



**West Berkshire Local Plan Review 2022-2039**  
**Proposed Submission Representation Form**

**Ref:**

*(For official use only)*

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

This form has two parts:

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

**PART A: Your Details**

*Please note the following:*

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cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.*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

	<b>Your details</b>	<b>Agent's details (if applicable)</b>
Title:	Mr	
First Name:*	Craig	
Last Name:*	Pettit	
Job title <i>(where relevant):</i>	Senior Planning Manager	
Organisation <i>(where relevant):</i>	Thakeham Homes	
Address* <i>Please include postcode:</i>	High Barn, Ashridgewood Business Park, Warren House Road, Wokingham, Berkshire, RG40 5BS	
Email address:*	[REDACTED]	
Telephone number:	01344 981810	

\*Mandatory field

## Part B – Your Representation

**Please use a separate sheet for each representation**

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

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

Your name or organisation (and client if you are an agent):	Craig Pettit, Thakeham Homes
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**Please indicate which part of the Local Plan Review this representation relates to:**

Section/paragraph:	
Policy:	
Appendix:	
Policies Map:	
Other:	See letter attached

### 1. Legally Compliant

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

**Do you consider the Local Plan Review is legally compliant?**

Yes

No

*Please give reasons for your answer:*

## 2. Soundness

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

### Do you consider the Local Plan Review is sound?

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

Please tick all that apply:

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

Please give reasons for your answer:

## 3. Complies with the Duty to Co-operate

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

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

Yes

No

Please give reasons for your answer:

#### 4. Proposed Changes

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

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

#### 5. Independent Examination

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

Yes

No

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

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

#### 6. Notification of Progress of the Local Plan Review


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

*Please tick all that apply:*

*Tick*

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

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

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



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Planning Policy Team  
West Berkshire Council  
Council Offices  
Market Street  
Newbury  
RG14 5LD

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

03 March 2023

Dear Sir / Madam,

### **West Berkshire Local Plan Review to 2039: Regulation 19 Consultation Representations on behalf of Thakeham Homes**

Thakeham Homes Limited ('Thakeham') is writing in response to the West Berkshire Council Local Plan Review Regulation 19 Consultation ("Reg 19 Local Plan"). Thakeham has interests across West Berkshire, including land at west of Wantage Road, Lambourn.

#### **Land at West of Wantage Road, Lambourn ("the Site")**

Please find enclosed a Vision Document for the Site at Lambourn, which should be read alongside our commentary herein. In summary, it is considered that a sensitive development of the Site could accommodate the following:

- Delivery of 10% Biodiversity Net Gain;
- Delivery of zero carbon homes in lifetime operation;
- Circa 27 new homes comprising a variety of accommodation to attract different households;
- Policy compliant provision of affordable housing, in tenure blind design;
- Scope for delivery of housing to meet the needs locally of those in the racing industry;
- New local facilities (allotments indicatively proposed);
- The provision of an open community recreation space;
- A focus on sustainable transport through the provision of a new access in addition to pedestrian links into the existing neighbouring development.

Alongside undertaking this review of the Reg 19 Local Plan, Thakeham has engaged with the ongoing preparation of the Lambourn Neighbourhood Development Plan (LNDP). In July 2022, the LNDP Steering Group issued a Call for Sites, having identified a need for further homes within Lambourn. Thakeham submitted the Site to be assessed and considered for allocation within the emerging LNDP on 31 August 2022.

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In January 2023, the LNDP Steering Group undertook a public consultation on the nine proposed housing sites that had come forward via the Call for Sites process, asking for feedback from the local community. Of those who responded, and who expressed a first-choice preference, 55% stated that the Site at Land West of Wantage Road was their preferred option, with the second-most preferred Site achieving just 16% of the responses. Thakeham therefore considers that the Site is generally well supported among the local community and represents the most sustainable and acceptable location for housing development in the Village.



## Preferred Sites

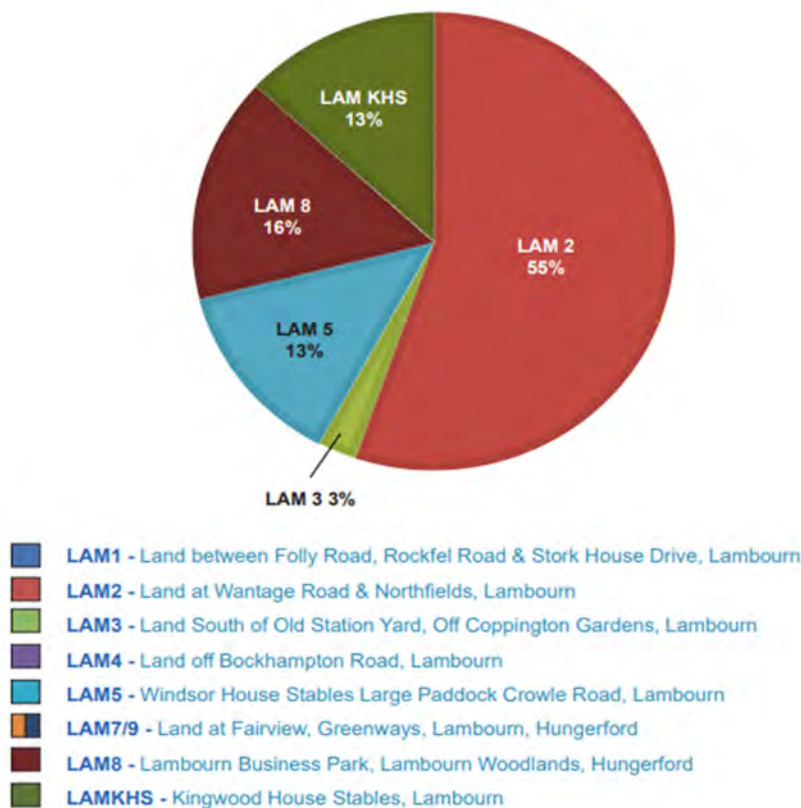


Fig1: Lambourn Neighbourhood Development Plan, Preferred Sites consultation 2023.  
Source: <https://lambourn-pc.gov.uk/Indp-public-consultation-on-development-sites-the-results/>

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Registered office address: Thakeham House, Summers Place, Stane Street, Billingshurst, West Sussex, RH14 9GN



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### **About Thakeham**

Thakeham is a zero carbon, infrastructure-led sustainable placemaker and is committed to creating new, extraordinary communities, where the highest attention to detail makes a positive difference.

Thakeham build for the future, for communities and for individuals. Our approach sets us apart from our competitors. We deliver our schemes with a focus on zero carbon sustainable development, looking ahead of current housing standards. From 2025, all Thakeham Homes will be carbon neutral in construction and zero carbon in lifetime use.

Each development is different and tailored to its locality, with careful consideration of the area's character, as well as the environment. As a sustainable placemaker first and foremost, Thakeham's commitment to improving existing communities means its schemes are design and infrastructure-led; engaging with education, highways, healthcare, utilities and other stakeholders from the start of a project. The delivery of homes facilitates the delivery of physical, social and green/blue infrastructure which benefits the wider surrounding area, as well as the new residents, and ensures that Thakeham create sustainable places to live and work.

The proposed Environment Bill sets out the Government's target of 10% Biodiversity Net Gain across development sites. This figure is already an internal requirement of all Thakeham developments, and we are seeking to take this further by achieving a 20% Net Gain across our development Sites from 2025 onwards.

We will engage local primary schools with our 'Eddie & Ellie's Wild Adventures' initiative to promote the importance of ecology and biodiversity, delivering National Curriculum linked activities and early career-based learning.

At every stage, our approach is one that ensures we leave a legacy behind that everyone can be proud of.

Thakeham design all homes to be beautiful and reflect the character of the area. The materials used across all developments are of the highest quality. Thakeham builds all developments tenure blind to ensure no drop off in quality.

As one of 12 members of the NHS Healthy New Towns network, Thakeham is a committed advocate of developing healthy places in line with the Healthy New Town principles. But over time, we have realised that these principles are just the starting blocks, and at Thakeham we are committed to delivering sustainable, zero carbon communities.

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Our level of commitment to sustainability means that we are streets ahead of our competitors and aiming for a far higher level of impact. Thakeham has become the first housebuilder in the UK, and one of only five in the construction sector globally to have made commitments on the SME Climate Hub and be part of the United Nations' Race To Zero campaign. As part of this, we have committed to the SME Climate Commitment. Recognising that climate change poses a threat to the economy, nature and society-at-large, our company has pledged to take action immediately in order to halve our greenhouse gas emissions before 2030, achieve net zero emissions before 2050, and to disclose our progress on a yearly basis. Our sites will include the following sustainability improvements:

- All Thakeham homes will be carbon neutral in production and zero carbon in lifetime operation by 2025. This puts us well ahead of the pledges we have made as referred to above.
- On all Thakeham developments we follow industry best-practice by taking a 'fabric first approach', which looks at how design and materials can contribute to the energy performance of the completed building.
- We will also consider the potential for incorporating sustainable energy features, such as air-source or ground-source heat pumps, communal rainwater recycling, solar panels, battery storage, renewable energy tariffs, and highly efficient heating and hot water systems.
- Thakeham uses a UK-based factory which manufactures panels using timber from sustainable sources. The off-site panelised system improves efficiency, speed of construction, quality, and reduces carbon emissions.
- Our Sustainable Procurement Policy encourages the use of recycled materials, such as otherwise nonrecyclable waste plastics (One tonne of MacRebur tarmac mix contains the equivalent of 80,000 plastic bottles), as well as utilise products part of a circular economy.
- We ensure that our whole supply chain is as local as possible. We have gold membership with the Supply Chain Sustainability School.
- On site, we monitor and aim to minimise construction travel emissions, construction waste and energy consumption and are registered with the Considerate Constructors Scheme.

Our approach sets us apart from our competitors. We deliver our schemes with a focus on sustainable development, looking ahead of current housing standards.

### **Response to consultation**

Thakeham has reviewed the Reg 19 Local Plan and has chosen key policies relevant to its interests within the authority area, on which to provide specific comments. By way of general commentary Thakeham supports the approach taken by the Council in preparing its Local

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Plan and the early engagement that has taken place. Notwithstanding this, Thakeham is keen to ensure that each policy is appropriate, justified and evidenced, given the significance to future planning applications, and does have concerns in this regard.

For the avoidance of doubt, it is noted that the paragraph numbers within the 'Tracked Changes Version' of the Reg 19 Local Plan remain unchanged and do not therefore correspond with the most recent version. Any references within the commentary below are therefore based on the 'clean' version of the Reg 19 Local Plan.

These representations have been structured to follow the sections within the Reg 19 Local Plan for ease of reference.

Thakeham observed the Extraordinary Council Meeting on 02/03/22 where Members requested that the Reg 19 Consultation be abandoned, due a number of concerns. One such concern is the inconsistent approach to the HELAA, which Thakeham supports as set out in more detail below.

### Section 1: Introduction and Background

Paragraph 1.14 (Neighbourhood Planning) – Thakeham supports the proactive use of Neighbourhood Development Plans by local communities to influence development in their local areas, particularly where Neighbourhood Development Plans seek to allocate sites for development to assist meeting the housing need within the local authority area.

Paragraph 1.19 (Housing and Economic Land Availability Assessment (HELAA)) – This paragraph refers to the February 2020 HELAA that forms part of the evidence base of the Reg 19 Local Plan. It is evident that this HELAA assessment has since been updated in December 2020, and most recently in January 2023. Thakeham welcomes the approach to keeping the HELAA updated, however, it is noted the evidence base for the HELAA remains unchanged. Sites are therefore, for example, being assessed against the 2011 Landscape Sensitivity Assessment; a document which is now over twelve years old. The Reg 19 Local Plan proposes new allocations to help meet the housing requirement over the Plan period to 2039, however Thakeham considers the inclusion of new sites within the Reg 19 Local Plan should be based on sound and the most up to date evidence. This is particularly imperative in relation to landscape, given its ability to change over time. The Housing Background Paper (January 2023) confirms at paragraph 3.14 that 'the sites considered for allocation were identified through the HELAA'. Thakeham considers the evidence supporting the HELAA is out of date and therefore this is not a sound approach. New sites have been added to the HELAA and assessed, without the assessment of previously submitted sites having been revisited.

As an example, our Site is discounted within Stage 2b of the HELAA assessment, following the Landscape Sensitivity Assessment (2011) conclusion that development would result in Thakeham Homes Limited, High Barn, 5 Ashridgewood Business Park, Warren House Road, Wokingham, Berkshire, RG40 5BS

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harm to the AONB. Thakeham submitted detailed evidence to West Berkshire Council in December 2021, in the form of an updated Landscape Appraisal (September 2021), that demonstrated positive changes to the Site's context when compared to the Council's 2011 Landscape Sensitivity Assessment and concluded the Site could be developed without causing harm to the AONB. In addition, we confirmed to West Berkshire Council that Lambourn Parish Council has produced a Landscape Character Appraisal (November 2020), to inform the LNDP, which also confirms the Site is capable of sensitive development. This evidence does not appear to have been considered.

The Council confirms at paragraph 1.23 of the Reg 19 Local Plan that *'one of the key features of the plan-led system is that development plans should be based on up-to-date evidence'*. Thakeham supports this, however, maintains the position that the evidence supporting the HELAA is out of date. Thakeham has received no correspondence from the Council on the above, however would welcome the opportunity to discuss the matter further.

Paragraph 1.22 (Duty to Cooperate) notes the intention of the Council to continue the cross-boundary relationship with neighbouring authorities. Thakeham supports this approach and considers that it goes to the heart of successful strategic planning. It is noted however that the 'Duty to Cooperate Statement' at paragraph 5.7, whilst confirming that Reading's unmet need should be met within the West of Berkshire Area, also states that 'this agreement relates only to Reading's need as calculated by the Berkshire SHMA, not by any alternative calculations of need'. Thakeham suggests that this is re-written, as it appears to not include the Government's proposed method for calculating housing need and therefore cannot be considered a sound approach. It is also not clear how this unmet need will be delivered.

### Section 3: Shaping West Berkshire: Vision and Objectives

Paragraph 3.2 (Provision of Housing) – Thakeham agrees with the importance of delivering a range of housing, and agrees that they need to come forward in the most sustainable locations, which is why it is critical that the allocated sites set out in the Reg 19 Local Plan are available, suitable and achievable and therefore deliverable. This is even more important for the villages in the AONB where the presumption in favour of sustainable development does not apply, and therefore windfall applications are unlikely to come forward outside of the Development Plan. We are also supportive of newly proposed text that housing be made "carbon neutral", which falls in line with our own sustainability objectives to provide carbon neutral construction and net zero lifetime use homes from 2025.

Paragraph 3.5(2) (Strategic Objectives: Housing) – Following on from paragraph 3.2, Thakeham is supportive of providing the required level of market, affordable and specialist housing types in appropriate and sustainable locations, with all of our developments promising to provide policy compliant levels of affordable housing, with no viability assessments.

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### Section 4: Development Strategy: Our Place Based Approach

Paragraph 4.5 (Key Pieces of Evidence) – It should be emphasised that Thakeham is concerned with the HELAA stated as being a key piece of evidence in preparation of the Plan, as we consider sites have been assessed on out-of-date information, and while it is appreciated that the HELAA report was updated in January 2023, individual Site information does not seem to have been consistently updated.

Paragraph 4.15-4.16 (Lambourn's Role in the AONB) – Thakeham supports the Council's identification of Lambourn as a key service centre for surrounding rural area, as well as identifying its leading role within the horseracing industry across the country. It is therefore considered that growth to this village is sustainable, to ensure the village continues to thrive and also provide homes to support the specific local need of those within the horseracing industry.

Paragraph 4.17 (Existing Allocations in the AONB) – Thakeham is concerned that, despite being allocated in an adopted Plan in 2017, a number of the allocations in the AONB have not been delivered.

The West Berkshire Core Strategy (2012) ("the Core Strategy") sets out a housing requirement of 'at least' 10,500 net additional dwellings from 2006 to 2026. Whilst the Core Strategy allocates strategic development sites, the Housing Site Allocations DPD 2006-2026 ("HSA DPD") was prepared to allocate non-strategic sites to help meet the housing need across the Plan Period.

The Housing Delivery and Trajectory within Appendix 1 of the HSA DPD notes the expected delivery from the HSA DPD allocations across the Plan Period to be 1,650; thus confirming all of the HSA DPD allocations were expected to be delivered by 2026. It is also confirmed on page 107 of the HSA DPD that a new Local Plan will cover the period up to 2036 and will need to consider allocating new sites and to look again at the proposed housing distribution. The Council's latest Annual Monitoring Report (January 2023) confirmed that as of 31/03/22 1,539 dwellings had been permitted on the HSA DPD sites, however, completions totalled only 388 dwellings. With 3 years remaining in the Plan Period, it is unlikely that the delivery of the HSA DPD sites will accord with expectations.

Detailed analysis of these sites and the reason for lack of delivery needs to be understood, and if appropriate the allocations deleted or supported by new, available and deliverable Sites. Again, it is considered this is even more important for settlements within the AONB, where windfall applications are unlikely to come forward. For example, Thakeham is concerned that of the 26 sites allocated within the HSA DPD in 2017, HSA 6 and specifically HSA 19 which is located in Lambourn, have not advanced a planning application. Notwithstanding this, Thakeham is not aware that the achievability and deliverability of these sites has been

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reassessed, however the Council proposes the sites to be 'carried forward' into the Local Plan Update. This would effectively grant an allocation on these sites for a total period of 22 years (2017-2039), when there is evidence that suggests these sites might not be deliverable. Thakeham does not consider this to be a sound approach to allocating land for development.

Paragraph 4.17 also emphasises the role of neighbourhood planning, stating that: "*additional development for the period beyond 2026 will therefore be limited and will come in part through allocations within the NDPs.*" Whilst Thakeham is wholly supportive of neighbourhood plans and their ability to drive community-led growth, it is also our understanding that they can be slow to come forward. Therefore, in Settlements within the AONB, where existing allocations are proving slow to deliver, Thakeham would advocate the Reg 19 Local Plan considering additional supporting sites to ensure growth is not stunted by undeliverable allocations.

Policy SP1 (Spatial Strategy) – Thakeham supports the Council's approach to the AONB and agrees that any development in this area needs to be sensitively designed to respect its special landscape qualities.

Policy SP2 (North Wessex Downs AONB) – The approach to development within the AONB is broadly supported, however a true assessment of a development site within the AONB cannot be undertaken without robust and up to date evidence; something that Thakeham considers is currently lacking, as highlighted. Moreover, in locations where there is a specific need to support a local industry, such as the village of Lambourn and the racing industry, the Reg 19 Local Plan must make sure that the right amount of development is coming forward to support this. The proposed Reg 19 Local Plan allocations total 65 homes, when added to the further 25 homes to come forward through the neighbourhood plan process, it would reveal a 3% increase on the number of households (3,750), according to 2011 Census data (2021 Census data on specific settlements currently unavailable). Thakeham suggests that given the delay to the delivery of the allocations to date and the fact that these are being carried forward into the Reg 19 Local Plan, the future needs of Lambourn and the thriving racing industry are being misrepresented.

Policy SP3 (Settlement Hierarchy) – Whilst the Council's approach to growth in Rural Service Centres is appropriate and proportionate, detailed scrutiny of the existing allocations is necessary in order to ensure some housing is delivered in these locations. Relying on infill, rural exception schemes and windfall sites will have a detrimental impact on the vitality of these communities – particularly those constrained by AONB.

The Council's view on the role and function of villages such as Lambourn, is confirmed by Table 1 which states that Rural Service Centres are: "*settlements with a good range of key services and opportunities for employment, community and education. They service a wide catchment area and contain reasonable accessibility and regular public transport provided to a number of destinations*".

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According to the statistics provided within Live Tables by the Department for Levelling up, Housing and Communities, as of 1 April 2021, West Berkshire had a total housing stock of 69,438 units. The 9,146 planned for across the plan period represents a 13% increase across West Berkshire as a whole. Comparably, it would therefore appear inconsistent that a Rural Service Centre such as Lambourn should only be given provision for a 3% increase in its housing stock.

### Section 5 – Our Environment and Surroundings

Policy SP5 (Responding to Climate Change) – Thakeham supports the need to respond to climate change and we have set out our own targets in this regard that exceed Government objectives, as highlighted above. However, Thakeham does not support the creation of bespoke policies and suggests the most effective way of achieving the national ambition to be net zero by 2050, alongside delivering the homes required to meet the needs of the country, is through the application of building regulations and the Future Homes Standard, and any opportunities for developers to exceed this. Creating bespoke policies which may require different building techniques is likely to only restrict the delivery of homes, therefore Thakeham does not support parts C and D of Policy SP5.

Policy SP11 (Biodiversity and Geodiversity) – Thakeham is supportive of the Council's requirement for all proposals to demonstrate a minimum of 10% biodiversity net gain, within the development at the first instance, or via off setting where not viable. This is in line with Thakeham's own internal commitment to achieving a 10% biodiversity net gain across all of our developments, which will increase to 20% from 2025.

### Section 6 – Delivering Housing

Policy SP12 (Approach to Housing Delivery) – Thakeham is concerned that the housing target figures, including the dwellings per annum (DPA) figure have dropped since the previous Plan consultation. Previously, 8,840 to 9,775 net additional dwellings were provided for over the Plan period, which equated to approximately 575 dpa. This has now reduced to 8,721 to 9,146 additional homes over the plan period, or approximately 513 to 538 dpa. This is of concern particularly when existing housing allocations are appearing slow to build-out, and villages such as Lambourn are also considered to be allocated less housing than is required.

Indeed, it is also noted that the Council suggest (paragraph 6.9) 513 dpa is a minimum and 538 dpa represents a 5% increase to support the Government's objective of significantly boosting the supply of homes. Whilst it is appreciated that the 538 dpa figure is stated as not constituting a '*ceiling or cap to development*', Thakeham does not consider a range to be consistent with the NPPF. The current approach does not appear to be planning positively for existing residents. The purpose of housing delivery is to ensure there is sufficient housing

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being delivered to meet the needs of West Berkshire inhabitants. In the previous Local Plan period, West Berkshire has delivered 8,288 houses between 2006 and 2022 (2022 AMR). However, only 1,902 of these were affordable, or 23%. This exacerbates the affordability of housing, with the current ratio more than double the national affordability. In order to support more people to buy their own homes, there needs to be a higher provision of housing, which can in turn deliver higher percentages of affordable housing.

Paragraph 6.12 and 6.13 (Retained Allocations) – It is of concern to note that despite the fact that the Core Strategy and Site Allocations DPD were adopted in 2011 and 2017 respectively, that there are still 2,652 outstanding units, which represents over 50% of the total homes allocated. This brings into doubt the deliverability of these allocations and further work would be undertaken to ensure that there is realistic chance of them coming forward. If there is any doubt, then they should not be considered ‘available’, and alternative Sites need to be included.

As commented above, an example is Land adjoining Lynch Lane, Lambourn, where the last three AMRs make no comment on its status, just that ‘*at the current time no planning application has been received*’. If no update is forthcoming from the landowner or agent, then it cannot be considered to be ‘available’ and should be replaced by an alternative site (or supported by a reserve site). This lack of delivery is of particular concern where the allocation is the only significant housing site for a whole village, particularly one such as Lambourn identified as a Rural Service Centre.

Paragraph 6.21 (Future Supply) – Thakeham is concerned that the Council no longer intends to provide allocations that exceed the housing shortfall, with paragraph 6.21 confirming that 1,809 dwellings ‘*need to be found*’. However, paragraph 6.22 confirms that proposed allocations will provide for just 1,720 dwellings, and paragraph 6.23 states that only 80 dwellings are now expected to be delivered from emerging Neighbourhood Plans (down from 315 in the previous consultation draft). This equates to 1,800 dwellings through new Local Plan allocations, and expected Neighbourhood Plan allocations. This leaves 9 dwellings unaccounted for, with no flexibility given for phasing issues or non-delivery as alluded to by paragraph 6.21. Whilst this does not take into account windfall sites, Thakeham does not consider relying on delivery of windfall sites to make up the remainder of housing need and provide a suitable buffer to be a sensible approach, particularly in a local authority that is heavily constrained by the AONB. To this end we note that the Council has concluded that at least 1,958 homes will come forward on windfall sites – around 20% of the overall supply. Thakeham suggests that in order to ensure that housing needs are met and not left to change, the Council should seek to allocate more smaller sites, as advocated by paragraph 69 of the NPPF.

Policy SP15 (Sites allocated for residential development in North Wessex Downs AONB) – Thakeham is supportive of this policy, encouraging neighbourhood plans being prepared in Thakeham Homes Limited, High Barn, 5 Ashridgewood Business Park, Warren House Road, Wokingham, Berkshire, RG40 5BS

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Lambourn and Hungerford to allocate housing. However, we would re-emphasise the point about making sure that each allocation is deliverable.

Policy RSA14 (Land Adjoining Lynch Lane, Lambourn. Site ref. HSA19) – Thakeham notes that this site was allocated in the 2017 Site Allocations Plan where the policy states “*This site is expected to delivery early and to contribute immediately to the supply of land needed to demonstrate a five year housing land supply*”. Despite this, the site has not commenced, and successive Annual Monitoring Reports fail to give any justification. As stated elsewhere in these representations, the Council should not just allow these allocations to roll forward unless there is a reasonable prospect of them being delivered, or at least supporting them with additional allocations should they continue to prove undeliverable, with sites that are demonstrably available, suitable and deliverable, such as the Site at Wantage Road, Lambourn.

### Section 10 – Development Management Policies: Our Environment and Surroundings

Policy DM4 (Building Sustainable Homes and Businesses) – Thakeham has a number of concerns with this Policy and its supporting text. Firstly, operational carbon emissions are usually defined through regulated energy consumption, as unregulated energy consumption is impossible to accurately predict, and its verification post-occupation is not something the Council are going to be able to administer, and neither is the housebuilding industry ready to conduct this monitoring.

Thakeham supports the requirement for on-site renewables, however only in the form of regulated energy only, which takes into consideration the trajectory of the decarbonisation of the national grid to play its part in the transition of every home’s electricity use to be Net Zero. However, by including unregulated energy, we believe that the cost and embodied carbon impact will affect viability for all developers.

Thakeham supports the Future Homes Standard approach to Net Zero Ready, and have already committed that from 2025, every Thakeham home we complete will be Net Zero carbon in operational emissions, as defined by regulated energy consumption using the SAP calculator. Thakeham considers that the Council should follow this approach, and therefore not take into consideration unregulated energy when defining carbon emissions.

Moreover, the higher level of energy standards sought by draft Policy DM4, in our view, go beyond national policy and the Government’s future intentions. Thakeham would therefore welcome the Council’s thoughts as to whether it considers draft Policy DM4 satisfies the tests of soundness, as drafted.

Thakeham Homes Limited, High Barn, 5 Ashridgewood Business Park, Warren House Road, Wokingham, Berkshire, RG40 5BS

[www.thakeham.com](http://www.thakeham.com)



# THAKEHAM

## HOMES

### **Summary**

Thakeham supports the creation of the Reg 19 Local Plan and looks forward to engaging further. Currently however we have concerns in relation to the wording of the policies, their evidence base and therefore on the overall soundness of the Reg 19 Local Plan as drafted. Whilst the Council's evidence underpinning certain policies is strong, in others it is notably weak.

Thakeham submits Land at West of Wantage Road as suitable, available and achievable, and considers it can make a valuable contribution to the local area and the housing needs of Lambourn, and West Berkshire as a whole. We therefore request that due consideration is given to the allocation of this Site within the Reg 19 Local Plan.

We trust that these representations will be useful, and we would be grateful for confirmation of receipt. Please do not hesitate to contact me if you have any queries or require any further information.

Yours faithfully

Craig Pettit  
**Senior Planning Manager**





# LAND AT WANTAGE ROAD LAMBOURN

VISION DOCUMENT  
AUGUST 2022



THAKEHAM

*Community creators with a focus on zero carbon, infrastructure-led placemaking*



CARBON NEUTRAL  
IN PRODUCTION, WITH  
INSETTING AND  
OFFSETTING OF  
CARBON EMISSIONS  
FROM 2025



ZERO CARBON HOMES  
WITH RENEWABLE  
TECHNOLOGY  
FROM 2025



ELECTRIC CAR  
CHARGING  
POINTS  
FOR ALL HOMES

ALLOTMENTS TO  
CREATE AN ENGAGED  
AND SUSTAINABLE  
COMMUNITY



WATER MANAGEMENT  
TECHNOLOGIES  
SUCH AS  
GREY WATER  
HARVESTING



WORK WITH  
REGISTERED  
PROVIDERS



EARLY DELIVERY OF  
INFRASTRUCTURE



QUALITY AT THE  
HEART  
OF OUR DESIGN AND  
DELIVERY



ALWAYS PROVIDE  
POLICY COMPLIANT  
AND TENURE BLIND  
AFFORDABLE HOMES

FLIPPING THE  
TRANSPORT  
HIERARCHY TO  
PUT PEDESTRIANS  
AND CYCLISTS FIRST



# OUR VISION

Thakeham's vision is to create an amazing place to live. A place that is an asset to its surroundings and the local community. Three key principles support this vision:



Commitment to 10% biodiversity net gain



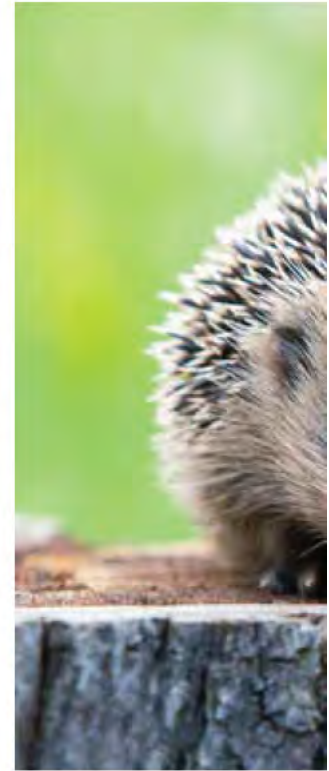
Delivering zero carbon homes



Creating pedestrian and cycle priority, encouraging sustainable movement

# DELIVERABLES

- c. 29 new homes comprising a variety of accommodation to attract different households, of which 40% will be affordable, in accordance with policy
- A mix of house types and sizes including apartments
- A new softer edge to the village when viewed from Wantage Road
- New public open space serving the wider Lambourn community
- Community allotments
- A biodiversity net gain of at least 10%





# SUSTAINABLE TRANSPORT

Thakeham's approach to sustainable transport starts with the principle of reducing the need to travel. Getting around will be easy with safe, off-road pedestrian and cycling friendly routes making them a more attractive option over the car.

Residents who want to make working from home a relaxing experience will have the option of a garden office as part of the purchase process of their house, allowing their home the flexibility to suit changing lifestyles.

Electric vehicle charging is provided as standard on every Thakeham home.

## STRATEGICALLY LOCATED AND WELL CONNECTED

The 'green corridors' centred through the Site, helps to strengthen the green network within and around the Site. This corridor contributes to creating a well connected community with ample green spaces. These green corridors will also support the ecology and biodiversity of the area.



This development will prioritise walking and cycling over car travel.





*"Surrey Wildlife Trust is pleased to be working with Thakeham to help its developments support nature's recovery and make it a core part of the life of its new communities."*

—Sarah Jane Chimbwandira, CEO of Surrey Wildlife Trust



# OPEN SPACE & BIODIVERSITY

At Thakeham, we want to see a world where seeing a hedgehog is an everyday experience. The proposal will provide a benefit to nature alongside a significant amount of usable open space for the community and existing residents. Biodiversity-focused landscaping will form a key part of the proposal, and will be seeking to provide a net gain for biodiversity of more than 20% as well as increasing people's connection to nature.

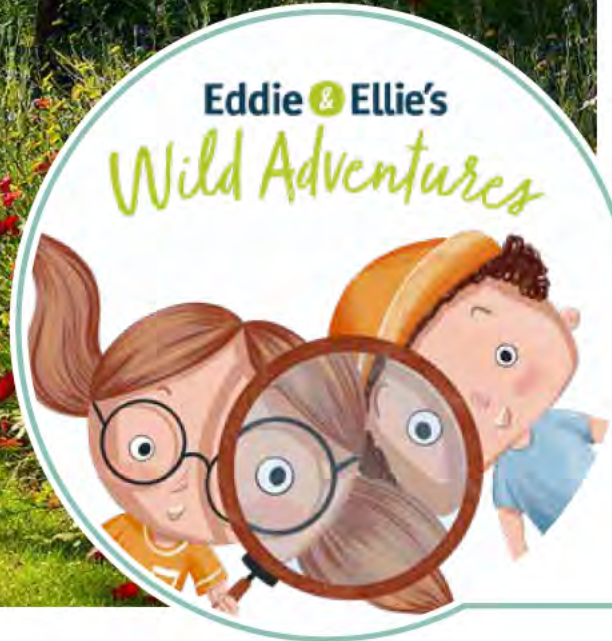
## COMMITTED TO NATURE RECOVERY

Nature Recovery is important to Thakeham and we are working to halt biodiversity loss, provide resilient habitats and educate young people about wildlife. Thakeham works closely with charities such as the Wildlife Trusts, to increase people's awareness and understanding of the natural world and deepening their relationship with it.



  
 Varied habitats help to achieve 10% biodiversity net gain on site.

  
 Educate future generations through the 'Eddie and Ellie' programme.





HALTING BIODIVERSITY LOSS



PROVIDING RESILIENT HABITATS



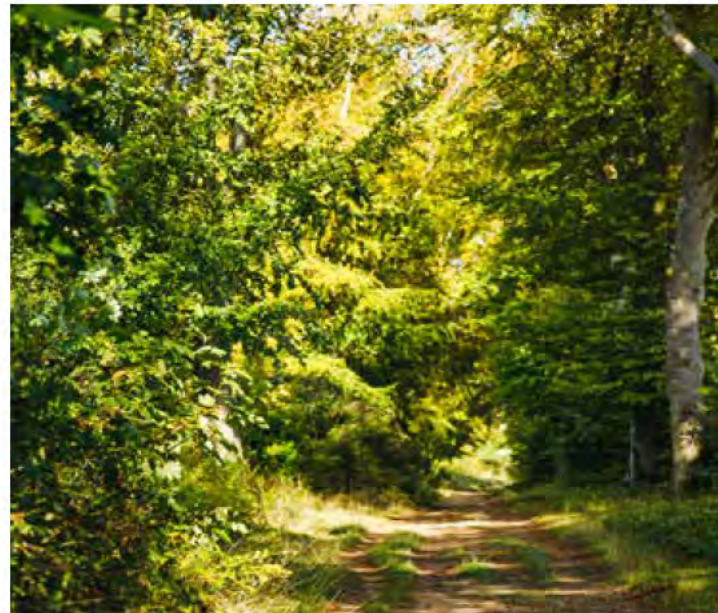
EDUCATING YOUNG PEOPLE ABOUT WILDLIFE



NATURE RECOVERY



Hedgehog Highways through fence boundaries to help the species roam and



At Thakeham, we focus on building future generations via our school engagement programmes, including our industry leading holistic ecology programme 'Eddie & Ellie's Wild Adventures' for primary age pupils. It's a fully Thakeham funded programme of workshops, site visits and a school trip to a Wildlife Trust facility that follows a development's journey from planning to site completion.

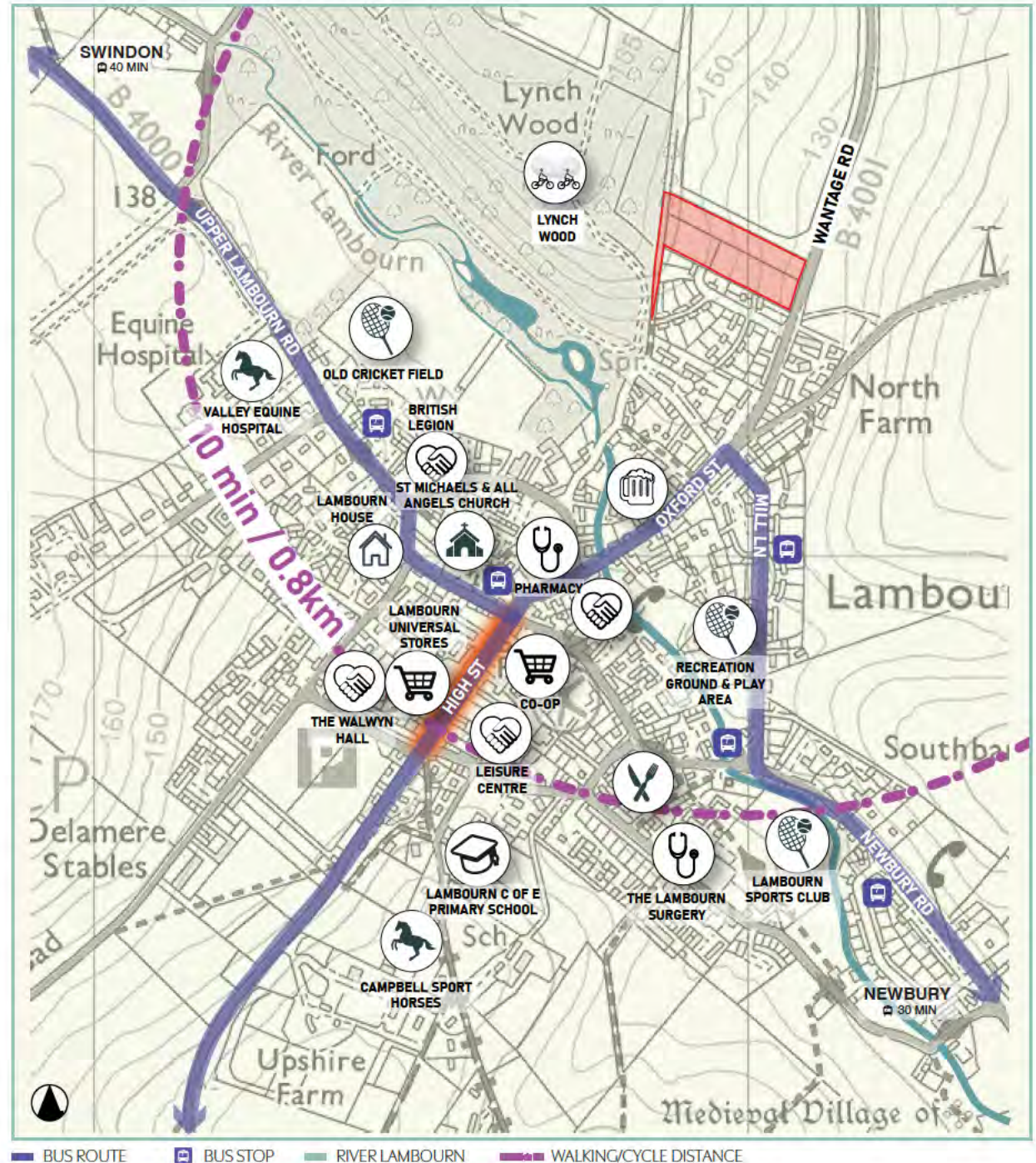


# THE SITE

The Site is located on the northern edge of Lambourn, and totals 1.9 ha.

The Site is within an Area of Natural Beauty (AONB). The Site is currently a series of pastoral fields, with established hedges and supporting trees that line the northern and eastern boundary. Sporadic trees and hedgerows are located within the Site and border its northern and eastern edge providing views into the site from certain points. Bordering the sites western egde is *Lynch Wood*, a deciduous woodland used by local residents for recreational uses such as dog walking and exercise. Along the western edge the Site slopes down, east towards Wantage Road.

The Site is accessed from Wantage Road, the principal access road to Lambourn town centre from the north. Local amenities and public transport connections to Swindon and Newbury are provided.





# LOCAL TOWNSCAPE

The Site is located close to many local amenities in Lambourn within easy walking/cycling distance. *Lynch Wood*, is a good quality public green with trails for walking and other recreational uses. Lambourn town centre has a range of facilities (shops, cafes and civic use buildings). The addition of a green space within the Site would strengthen the green infrastructure network within Lambourn. Development within the Site, along Wantage Road is a well-suited location to connections to the town centre. The introduction of dedicated safe pedestrian and cycle routes within the Site would encourage walkability and strengthen key links.

*Goodies Cafe with active frontage*

*Lambourn Universal Stores (Hardware)*

*Library*

*Valentins's Tavern Wine Bar*

*Lambourn Co-op & Post-Office*

*Barbers & Hair Salon*



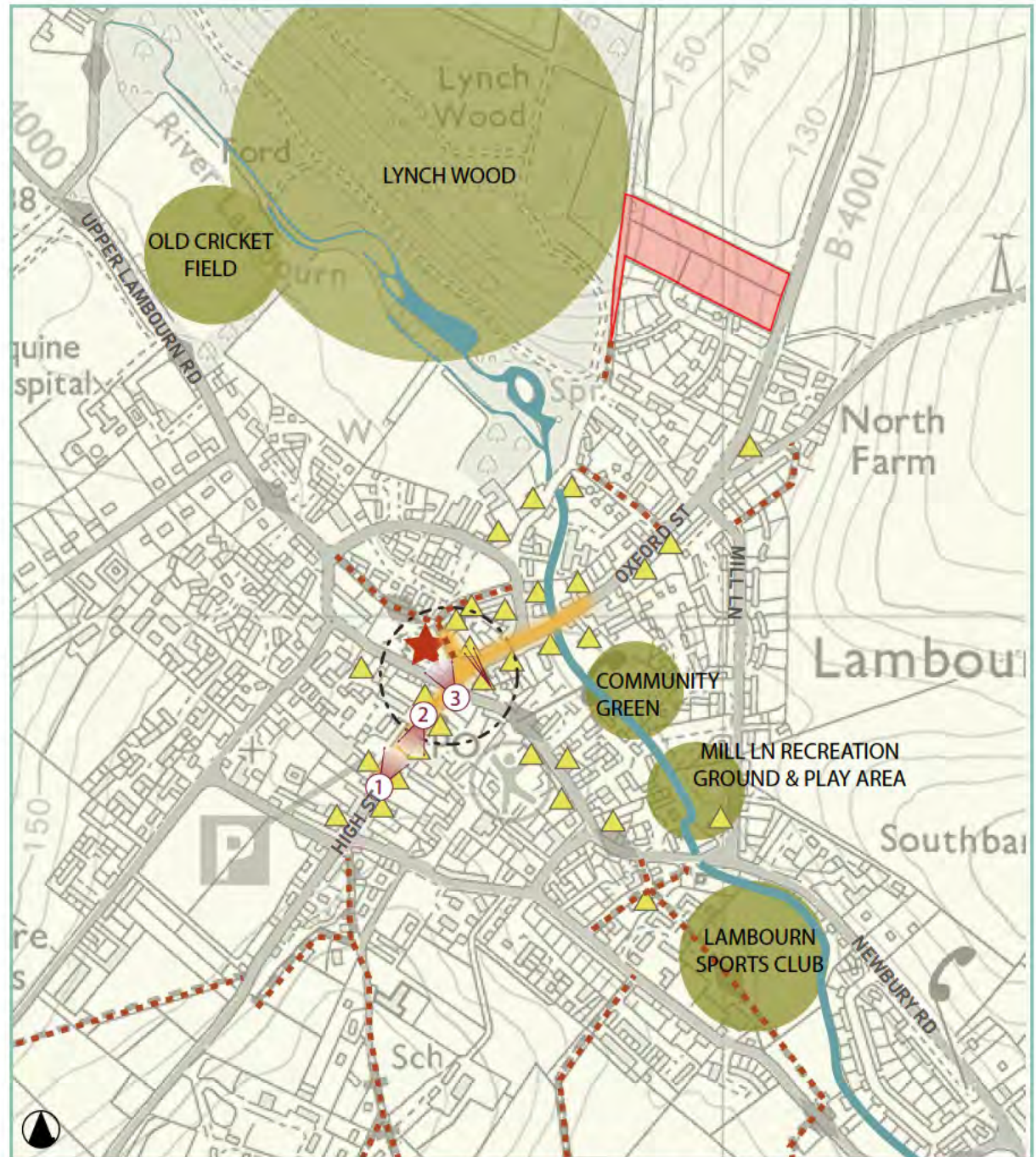
1. Lambourn High Street

2. Lambourn High Street

*Landmark with Architectural/ Historical Significance*



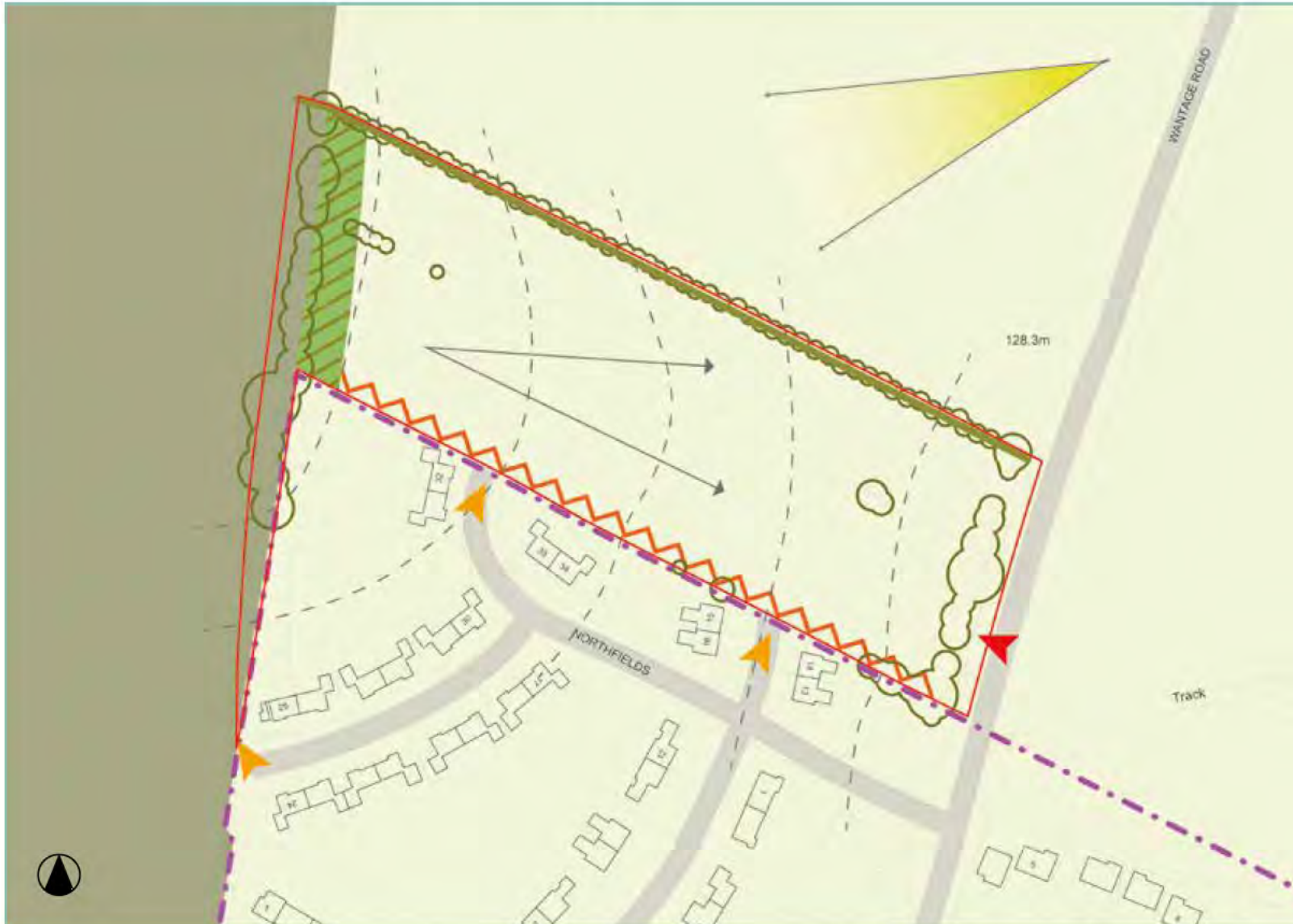
3. St Michael's & All Angel's Church



PRoW LISTED BUILDING SIGNIFICANT GREEN SPACE LANDMARK NODE RIVER LAMBOURN

# CONSTRAINTS AND OPPORTUNITIES

Following an assessment of the Site's constraints and opportunities, the Site is confirmed to be available, suitable and achievable.

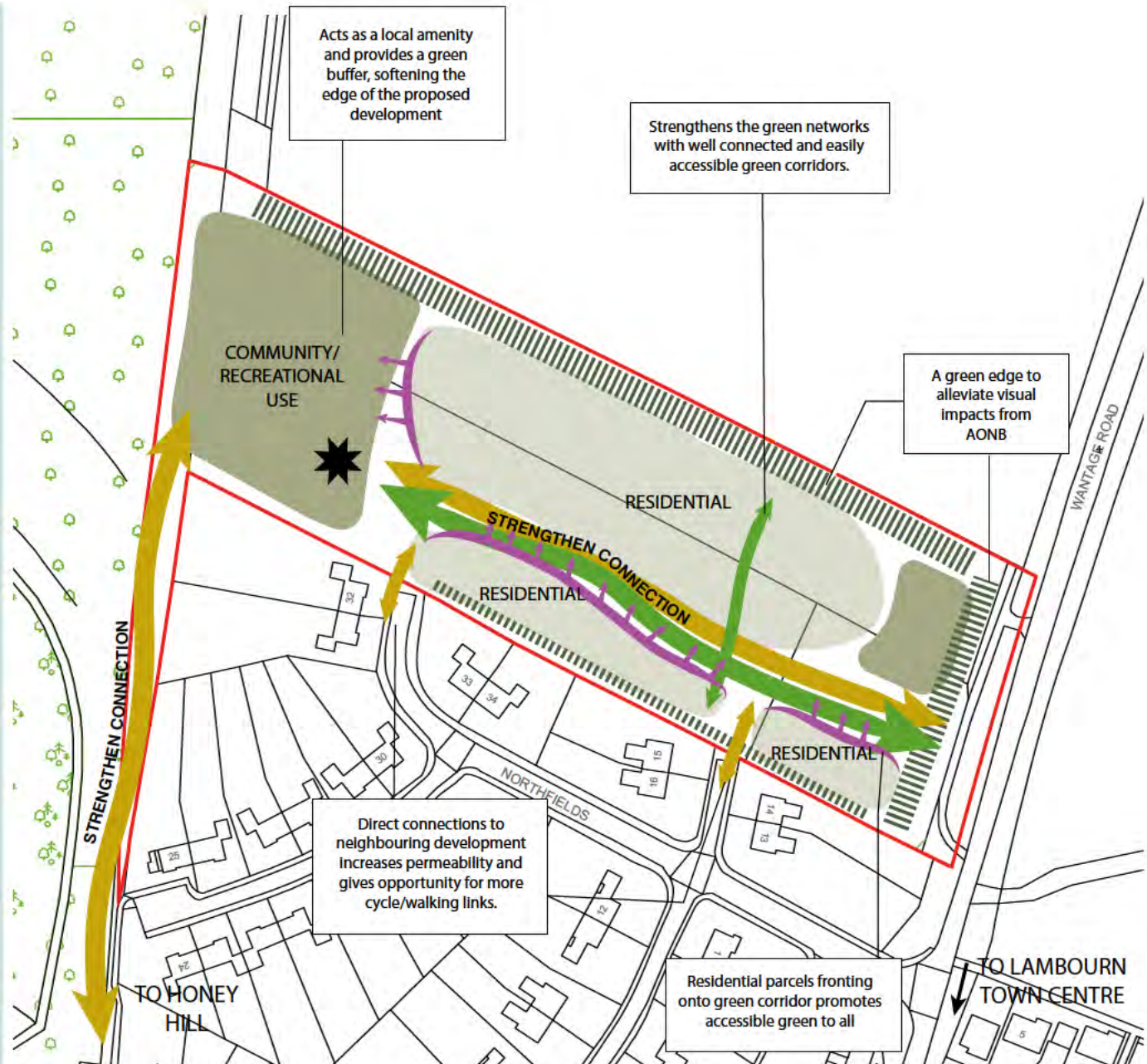


## Key

- Site Boundary
- AONB
- Priority Habitat - Deciduous Woodland
- Woodland Buffer - 15m
- Existing Trees
- Hedgerow
- 5m Site Contour
- Groundwater Flow Direction
- Sensitive Boundary
- Settlement Boundary
- Potential Visual Impact
- Potential Primary Access
- Potential Pedestrian/Cycle Access
- Road Network

# INDICATIVE APPROACH

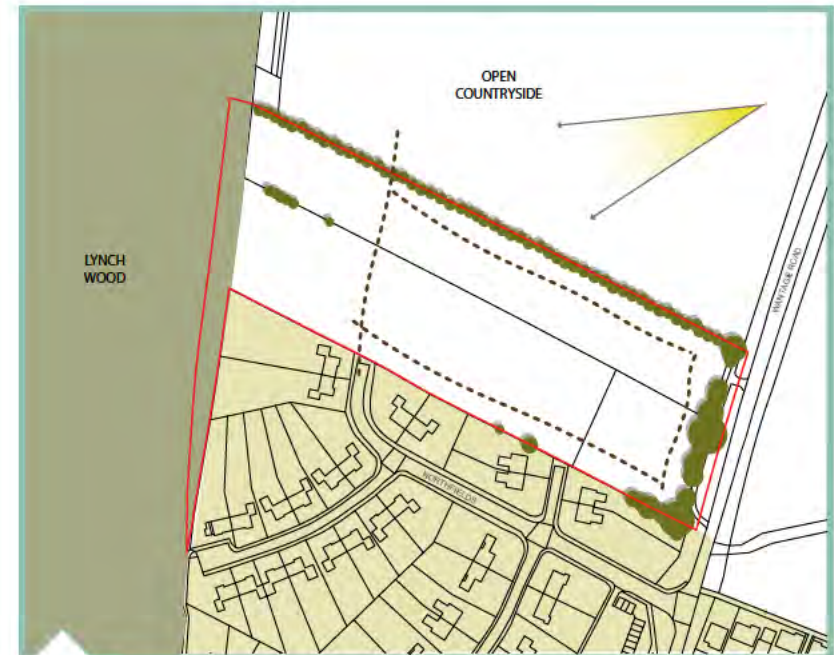
- Create new sustainable transport links, including dedicated pedestrian/cycle routes linking the Site and surrounding Lambourn settlement
- Increase site permeability with the addition of an access road and pedestrian/cycle routes into the Site
- Provide access to new open green space, providing choice and variety to existing and new residents
- Landscape-led design will take inspiration from existing features such as mature trees and hedgerows. This includes creating a definitive vegetative boundary along the northern and eastern edge, increasing biodiversity habitats
- Public open space and green infrastructure corridors to contribute towards biodiversity net gain
- A mix of house types ranging from apartments, to family homes, allowing families to remain within the community and have access to a mix of housing product that can meet needs at various life stages
- Community allotments and a play area provided on Site for new and existing nearby residents



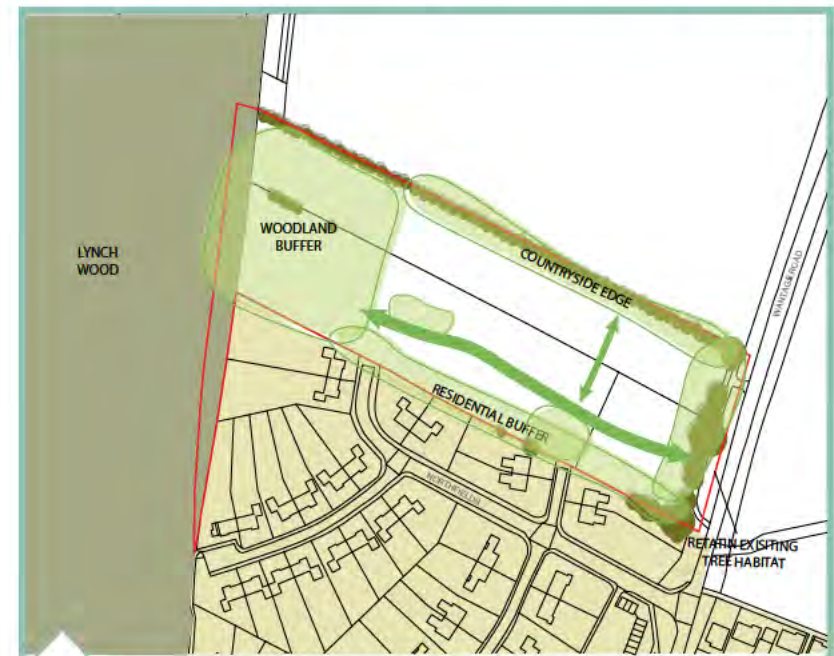
# CONCEPT MASTERPLAN

At the heart of the design process are the core Thakeham values of placemaking and community. These, alongside a review of the constraints and opportunities, have informed the concept masterplan.

- 1 Community Allotments (4 full plots or 8 half plots according to the *South West Counties Allotment Association* standard) for the residents of the new development and wider Lambourn community.
- 2 Pocket parks will be provided with equipped play, strengthening the green network as an amenity for new and existing residents.
- 3 Apartment building provides an anchor at the site gateway and lies at the lowest part of the site.
- 4 A tree-lined spine street as green link to connect the key amenities within the Site.
- 5 Site access from Wantage Road, providing a suitable and safe vehicular access connecting to the existing settlement.
- 6 Pedestrian and cycle connection to Honey Hill with potential for connections to adjacent woodland.
- 7 Provision of a separate pedestrian and cycle connection to Northfields.
- 8 Community car park for allotments, open space and leisure routes.
- 9 New woodland planting / buffering will promote biodiversity and connected habitats, whilst providing exercise and leisure routes. This provides a soft green edge to countryside and AONB.
- 10 An attenuation feature designed to mitigate flood risk, contribute to B and provide natural play and open space.

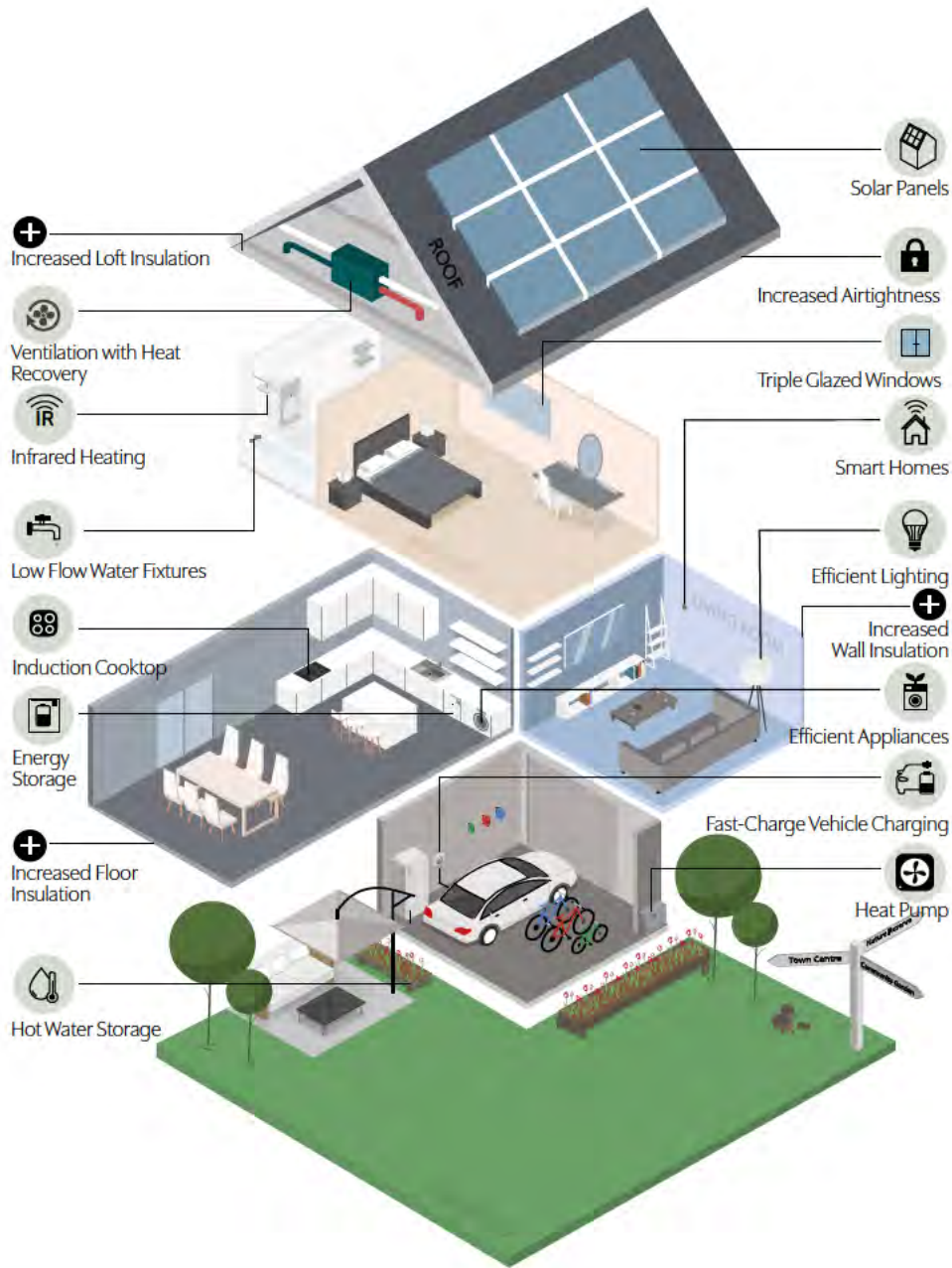


■ PRIORITY HABITAT    ↗ VISUAL IMPACT    ■ EXISTING SETTLEMENT    ● EXISTING TREES



○ GREEN SPACE    → GREEN LINKS    ● EXISTING TREES





Zero Carbon Homes

# NET ZERO BY 2025

We believe we have a responsibility as community creators, to understand that climate change is the most important issue facing us and future generations. That's why Thakeham has made a public declaration to become Net Zero by 2025, including our whole impact across our homes, the production, and our business emissions. We are also supporting the industry in the charge towards Net Zero as part of the Future Homes Hub.

## ZERO CARBON HOMES

*Every home will be zero carbon in lifetime operation.*

Our fabric first approach is what makes our homes intuitive enough for anyone to live a more sustainable life. Through exceeding Passivhaus' Space Heating Standard, we limit heat losses whilst allowing a careful mix of natural and controlled ventilation. Renewable energy backs up our designs to ensure homes are easy to operate and residents are more energy resilient.

## CARBON NEUTRAL BUSINESS

*Thakeham has hit it's goal to be a carbon neutral business, five years early.*

Thakeham was the first UK housebuilder to sign the SME Climate Commitment, joining us to the UN's Race To Zero campaign. Our carbon emissions are verified and we have been awarded our Carbon Neutral certification by Planet Mark, committing us to emissions reductions each year.



## CARBON NEUTRAL PRODUCTION

Every home will be carbon neutral in production.

Thakeham encourages the use of recycled materials, such as otherwise non-recyclable waste plastics and products part of a circular economy, as well as ensuring our whole supply chain is as local as possible; supported by our Gold accreditation with the Supply Chain Sustainability School.

We pioneer new processes, materials and methods throughout the business, including techniques such as Modern Methods of Construction (MMC) to help us understand the Whole Life Carbon of our homes. We are committed to reducing and offsetting the embodied carbon of the materials and construction processes under our control.



Solar Panel Detailing in Ockford Ridge Development by Thakeham in Godalming

# COMMUNITY & LEGACY

At Thakeham, community is at the heart of everything we do and drives our approach to social value. Delivering social value is an intrinsic part of Thakeham's culture, it is in the 'Thakeham Family' DNA and woven throughout our business activities. Our approach enhances our established business practices to maximise the wellbeing benefits that our developments can offer those who build them, those who live in them and the communities around them now and in the future.

We are passionate about having a positive impact on people's wellbeing, constantly striving to deliver against our four key focus areas:

- Building Local Communities via excellent placemaking that creates interconnected communities that challenge issues of loneliness and promote healthy living, and via our long term charity partnerships
- Building Future Generations via our school engagement programmes, including our industry leading holistic ecology programme 'Eddie & Ellie's Wild Adventures' for primary age pupils, and providing inspiring careers support to secondary age pupils through our Cornerstone Employer status with The Careers Enterprise Company
- Building a Stronger Industry with our support of small and medium size enterprises and upskilling for local workers, supporting apprenticeships, and actively contributing to the diversification and upskilling of the construction sector
- Building Sustainable places by tackling issues of climate change, biodiversity loss and societal disconnects via our ambitious Sustainability Strategy

As a pioneer member of Social Value UK, the professional body for social value and impact management, we understand our impact on the wellbeing of all our stakeholders and will develop a cohesive social value delivery plan for Burnham that addresses their needs.

**SOCIAL VALUE UK**  
Pioneer



One key area of our social value approach is our partnership the Plunkett Foundation, a national charity which supports community trust businesses.

The Plunkett Foundation defines community trust businesses as enterprises that are owned and run democratically by members of the community, on behalf of the community. They come in many forms, including shops, pubs, woodlands and anything that lends itself to community ownership. In addition to developing and safeguarding valuable assets and services, community trusts address a range of issues including isolation, loneliness, wellbeing, work and training. At Burnham we will work with the community and Plunkett to define and deliver a thriving community space.



Thakeham sponsor at local community *Goodwood Festival of Speed*



Thakeham sponsor at local community *Horsham Rugby Club*







# THAKEHAM

OUR PARTNERSHIPS SUPPORTING ZERO CARBON PLACEMAKING



PlanetMark



www.plunkett.co.uk



For further information, contact: [info@thakeham.com](mailto:info@thakeham.com)

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