

West Berkshire Local Plan Review 2022 – 2039 (LPR) Examination

West Berkshire Council response to

IN18: Action Points AP15 – AP26

North East Thatcham strategic allocation

References below to the Council amending the proposed main modification to policy SP17 and reasoned justification relate to the wording set out in Appendix A to the Council's written statement for matter 4 [WS4/1]. A full track changes version of SP17 and reasoned justification, superseding that in WS4/1, should be produced as part of the response to this note.

Council Response

A full tracked changed version of the policy and supporting text is appended to this response (Annex A).

AP15. Council to amend the first paragraph in policy SP17 to:

- Delete reference to "residential-led".
- Include reference to the Council agreeing a masterplan. Consideration should be given to whether the timing of this agreement should be specified, for example in relation the submission, or determination, of any planning applications for development on the site. Consideration should also be given to whether the Council intends to adopt the agreed masterplan as a Supplementary Planning Document.

Council Response

The addition of "residential-led" was a proposed modification in the Council's Matter 4 Statement, the Council is content to no longer propose this as a modification to the policy.

The Council has included reference to agreeing the masterplan within the policy, prior to submission of a planning application. A new paragraph has been added to the policy relating to the masterplan and design code for the site, with an updated paragraph in the supporting text.

It is expected that development of the masterplan would take place through the Planning Performance Agreement (PPA) and at the pre-application stage, and the final masterplan would be agreed by the Council prior to submission of any planning application.

It is not intended to adopt the agreed masterplan as a Supplementary Planning Document (SPD). The Council considers that the policy provides sufficiently detailed requirements for development on the site and therefore an SPD is not required.

Ref	Page of submitted LPR	Policy / Paragraph of submitted LPR	Proposed Main Modification	Reason for modification
	63	Policy SP17	<p><i>Amend text at start of policy as follows:</i></p> <p>'Land as shown on the Policies Map is allocated for <u>the delivery of a comprehensive</u>, sustainable, low carbon, urban extension comprising of distinct neighbourhoods defined by their landscape, and connected and contributing to Thatcham, and woven through with natural habitats and links. The site will be masterplanned <u>Proposals must demonstrate how and delivered as a whole to achieve a comprehensive development</u> the provision of all infrastructure, services, open space and facilities will be <u>delivered in a timely and co-ordinated way alongside the phased delivery of residential development</u>. The Thatcham Strategic Growth Study provides guiding principles for the delivery of the site therefore proposals will demonstrate that these guiding principles have been positively responded to.'</p> <p><i>Add new text at end of policy as follows:</i></p> <p><u>'The site will be masterplanned, funded by the applicant and prepared in collaboration with the applicant, the Council, the community and other stakeholders, prior to the submission of a planning application. The masterplan will provide the framework to guide the development, and should be based on the evidence base underpinning the Local Plan and outcome of further technical work prepared in line with requirements of this policy. The masterplan will provide a guide as to the location and extent of built development, land uses, green infrastructure including the green buffer, key access arrangements, community and other infrastructure. Proposals must have regard to, and demonstrate how, they have been guided positively by the agreed masterplan.'</u></p>	<p>Clarification and additional information regarding the development of the masterplan in response to the Inspector's Action Point (AP15) contained within IN18</p>

			<u>A design code, prepared by the developer and agreed with the local planning authority, should be secured by a planning condition as part of any outline planning permission.'</u>	
	66	Para 6.63	<p><i>Amend the supporting text to the policy as follows:</i></p> <p>'Further detailed work will be required to develop a coherent masterplan to take the development forward. The Council will commission the masterplan, this which will be produced in collaboration with the applicant, the community and other stakeholders and funded by the developer as part of a Planning Performance Agreement (PPA). It will be based on existing evidence and information already produced to support the allocation of the site, including the Thatcham Strategic Growth Study. The policy makes clear that the masterplan will provide a guide as to the location and extent of built development, land uses, green infrastructure including the green buffer, key access arrangements, community and other infrastructure. The masterplan will be agreed, by the Council, prior to the submission of a planning application.</p> <p><u>The policy also makes clear that a design code will be developed alongside the planning application, secured by condition, and agreed with the Council prior to submission of the first reserved matters application.</u></p>	Clarification regarding the details relating to the timeframe for developing the masterplan in response to the Inspector's Action Point (AP15) contained within IN18

AP16. Council to amend the proposed modification to SP17 under the sub-heading “Homes” so that the second sentence reads “These dwellings will comprise an appropriate mix of housing types, tenures and sizes having regard to policy SP18” (or similar).

Council Response

The Council proposes to amend the policy as set out below.

Ref	Page of submitted LPR	Policy / Paragraph of submitted LPR	Proposed Main Modification	Reason for modification
	63	Policy SP17	<p><i>Amend text under ‘Homes’ heading of policy as follows:</i></p> <p>‘The site is to be allocated for <u>the phased delivery of</u> approximately 1,500 dwellings which will be completed within the period of the Plan. These dwellings will comprise <u>an appropriate mix of a-housing types, tenures and sizes having regard to mix which complies with the housing mix contained in Table 3 of policy SP18.</u> In addition at least:</p> <ul style="list-style-type: none"> • 40% of dwellings will be affordable housing <u>in accordance with SP19</u>; and • 3% of dwellings will be delivered via serviced custom/self-build plots.’ 	<p>Clarification as to the housing mix expected on the site in response to the Inspector’s Action Point (AP16) contained within IN18</p> <p>Reference to SP19 also added for clarity.</p>

AP17. Council to amend the proposed modification to SP17 under the sub-heading “Sustainability” to take account of any subsequent action points relating to policies SP5 and DM4.

Council Response

The Council proposes to amend the sustainability section of the policy to refer to policies SP5 and DM4. The bullet points are proposed to be deleted as they repeat details set out in the other policies of the plan and therefore, are not necessary to be included here.

Ref	Page of submitted LPR	Policy / Paragraph of submitted LPR	Proposed Main Modification	Reason for modification
	64	Policy SP17	<p><i>Amend text under ‘Sustainability’ heading of policy as follows:</i></p> <p>‘Development proposals for of the site will be supported by an Energy Statement or a detailed energy section with the Sustainability Statement Charter which will establish how policy requirements will be achieved. This will be informed by: An Energy Strategy which sets out measures to achieve a model low-zero carbon development (following the energy hierarchy) in accordance with Policies SP5 and DM4, including:</p> <ul style="list-style-type: none"> ● Net zero carbon (regulated and unregulated energy) emissions for dwellings; ● BREEAM ‘excellent’ non residential buildings; ● on-site renewable energy to assist in the delivery of a net zero carbon neutral development; and ● carbon off-setting.’ 	<p>Clarification around the Energy / sustainability requirements for the site in response to the Inspector’s Action Point (AP17) contained within IN18</p>

AP18. Council to consider whether the proposed modification to SP17 under the sub-heading “Flooding and Water Environment” needs to be amended to:

- Refer to waste water as well as water supply in the second bullet point.
- Include an additional clause requiring the existing flood defences and attenuation ponds on the site to be retained, protected and enhanced to ensure that flood risk downstream will not be increased as a result of the development.

Council Response

The Council proposes to add reference to waste water to the second bullet point and to add a clause requiring the existing flood defences and attenuation ponds on the site to be retained, protected and enhanced.

An additional paragraph is also proposed to be added to the supporting text to provide further information regarding flood risk and management on the site.

Ref	Page of submitted LPR	Policy / Paragraph of submitted LPR	Proposed Main Modification	Reason for modification
	64	Policy SP17	<p><i>Amend text under a new Flooding heading of policy as follows:</i></p> <p><u>‘Development proposals for the site will be supported by A an Integrated Water Supply and Drainage Strategy which will set out:</u></p> <ul style="list-style-type: none"> • Measures to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site; • <u>Details of the phasing of development to consider likely upgrades needed for the water supply and wastewater network infrastructure; and</u> • Surface water <u>drainage management approaches</u> that could deliver net gain for Thatcham town, including use of on-site sustainable drainage systems (SuDS); • <u>A Flood Risk Assessment, taking into account the Thatcham Surface Water Management Plan, which sets out adequate flood mitigation measures to ensure there is no detrimental impact on flood risk in Thatcham;</u> • <u>Flood alleviation measures</u> 	<p>Clarification regarding water supply and waste water and requirements for FRA and retention of existing flood attenuation measures in response to the Inspector’s Action Point (AP18) contained within IN18</p>

			<u>already present on the site need to be retained, protected and enhanced.'</u>	
66	New paragraph after 6.61	<p><i>Additional text in supporting text as follows:</i></p> <p><u>'Flood risk and surface water drainage is a key consideration for Thatcham, following extensive surface water flooding in the summer of 2007 as a result of high intensity rainfall overwhelming storm drains and culverted streams. The flood event was considered to be in the order of a 1 in 200 year event. Following the flooding various studies and strategies were developed to identify opportunities for reducing flood risk in the town. The Thatcham Surface Water Management Plan (2010) sets out a number of proposed measures to reduce flood risk in Thatcham, focusing on retaining runoff upstream of Thatcham to reduce peak flows through the existing urban area and drainage system. A number of flood attenuation ponds have been constructed on the North East Thatcham site, and these are to be retained and enhanced in addition to Sustainable Drainage Systems (SuDS) provided on the site. The Integrated Water Supply and Drainage Strategy involving localised and strategic flood management measures will be required, in line with the requirements of the West Berkshire Sustainable Drainage Systems SPD (2018).'</u></p>	Clarification as to the requirements relating to the water environment in response to the Inspector's Action Point (AP18) contained within IN18	

AP19. Council to amend the proposed modification to SP17 under the sub-heading “Heritage” to clarify the requirement relating to development on the North East Thatcham strategic site supporting an appropriate use of the listed buildings in the area, and to refer to development avoiding or minimising harm to their significance.

Council Response

The Council proposes to amend the second bullet point to clarify the requirements of the development relating to the listed buildings adjacent to the site.

Ref	Page of submitted LPR	Policy / Paragraph of submitted LPR	Proposed Main Modification	Reason for modification
	64	Policy SP17	<p><i>Amend text relating to Heritage element of policy as follows:</i></p> <p><u>‘Development proposals for the site will be supported by A a Historic Environment Strategy, in accordance with policy SP9 to demonstrate how the site’s historical development, archaeological remains and historic buildings and parkland will inform the scheme and help to create a sense of place. It should:</u></p> <ul style="list-style-type: none"> <i>• <u>Be informed by a proportionate heritage impact assessment, desk-based archaeological assessment and if needed, field evaluation; and</u></i> <i>• <u>Demonstrate ing how the impact of the development on their setting of the adjacent listed buildings has been considered and how they will be conserved and harm to their significance minimised()</u> ‘</i> 	<p>Clarification of policy wording. Change to 2nd bullet point in response to the Inspector’s Action Point (AP19) contained within IN18</p> <p>Reference to SP9 also added for clarification.</p>

AP20. Council to amend the proposed main modification to SP17 under the subheading “Community” as follows:

- First sentence to read “A range of community facilities will be provided on the site including...” (or similar).
- to clarify the requirement of the developer in terms of “early years provision”.
- To clarify the requirement for a health care facility, having regard to the wording suggested in the written statement from the ICB [WS4/3] (amend to clarify that the developer’s contribution would be proportionate to the additional needs associated with the future residents on the site rather than to meet the full build cost).
- Delete the final bullet points relating to “outdoor formal and informal sports pitches” and “open space and play areas” (and, if necessary, amended the proposed modification under the sub-heading “Green Infrastructure” relating to “provision of open space within the developable area” to clarify the types of public open space that would be required in accordance with policy DM40).

Council Response

The Council proposes to amend the first sentence to set out that the community facilities will be provided to serve the development.

The Council proposes a main modification to include Early Years provision to the same bullet point as primary school provision as the requirements are the same. A main modification is also proposed to the bullet point relating to secondary school provision to make clearer the requirements associated with a secondary school, and to add SEND provision to the bullet point. These modifications have been agreed with the Local Education Authority (LEA).

The Council proposes a main modification in relation to the health care facility. The wording has been agreed with the Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board (BOB ICB).

The Council wishes to retain the requirements for outdoor formal and informal sport pitches and areas, within this bullet point as it is anticipated that the provision of these will be for community use. A modification is proposed to include the wording “for community use” to make this clear. The bullet point related to Open Space has been deleted as this is covered by the Green Infrastructure section of the policy.

The supporting text has also been updated to include paragraphs specifically relating to the Education and Health care provision.

Ref	Page of submitted LPR	Policy / Paragraph of submitted LPR	Proposed Main Modification	Reason for modification
	63	Policy SP17	<p><i>Amend text under ‘Community’ heading of policy as follows:</i></p> <p><u>‘A range of community facilities will be provided to serve the development, including:</u></p>	Clarification of policy wording and further changes in response to the

			<ul style="list-style-type: none"> • Local centres providing local retail facilities and small-scale employment for community use (approximately 1,100sq.metres Class E and F2); • <u>Primary Healthcare provision and associated infrastructure, which is operationally and financially viable, the details of which should be agreed with 450sq.metres GP Surgery to be offered to the NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board (BOB-ICB) or other such appropriate body, taking into account the feasibility study carried out by the BOB-ICB. Further detailed feasibility work should be carried out at the applicants expense in collaboration with the BOB ICB and local stakeholders.</u> • Early years provision; • A 2.5FTE p Early years and primary school provision on site and sports infrastructure requirements of the school. L with land to be provided and build costs to be met by the applicant; • <u>Secondary school and SEND provision, including the provision of land and a financial contribution, land to meet the impact of the development.</u> The nature and cost of the <u>required provision mitigation</u> will be informed by a feasibility study, undertaken at the applicants expense and prepared in collaboration with the Council and local stakeholders; • A 1,200sqm e Community indoor facility to be used for sport and community uses with a variety of room sizes (currently use classes E and F); • Outdoor formal and informal sports pitches and areas for community use to meet the identified needs of the development; • Open space to meet the needs of the development in accordance with Policy DM41.' 	<p>Inspector's Action Point (AP20) contained within IN18.</p>
66	New paragraphs	<i>Additional text in supporting text as follows:</i>		Further clarity as to the

		after 6.61	<p><u>'New education provision, including early years, primary and secondary provision will be required to support the needs of the development. Early years and primary provision will be provided on site. The requirements for secondary and SEND provision will be determined following the completion of a feasibility study which will consider the best solution for secondary education requirements in Thatcham. It is expected that land will be required on the site, and financial contributions to support delivery the preferred solution.</u></p> <p><u>Primary healthcare facilities should be provided, with associated car parking and landscaping. The facilities should be operationally and financially viable and take into account the feasibility study commissioned by the NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board (BOB-ICB). The facility should provide room sizes that comply with the Department of Health Building Note 11-01 (or any successor documents). The provision and any contractual arrangement of the facility will need to be agreed as part of any planning application coming forward on the site. Where the onsite provision of a facility in accordance with this policy is not viable, the Council will expect other offsite mitigation measures, to ensure the primary healthcare provision can support the new population growth. The applicant should engage with the BOB-ICB at an early stage to discuss the details of any offsite provision. A further feasibility study, to identify office mitigation measures, would need to be carried out at the applicant's expense and any identified offsite mitigation measures will be funded by the applicant through developer contributions.'</u></p>	<p>requirements for education and primary health care provision in response to the Inspector's Action Point (AP20) contained within IN18</p>
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AP21. Council to amend the proposed modification to SP17 under the sub-heading “Green Infrastructure” to:

- Refer to “in accordance with policy SP10” in the first paragraph
- Clarify that the “green infrastructure buffer” would comprise an extensive area of multi-functional green infrastructure covering the higher land across the northern part of the allocation to create a strong defensible permanent boundary between the built development and adjoining countryside; protecting ancient woodland and other areas of ecological value and provide new opportunities for biodiversity; and provide opportunities for informal recreation (or similar).

See also AP20 above regarding the wording of the requirements relating to the provision of public open space.

Council Response

The Council proposes to amend the policy to refer to policy SP10 and DM40 in the first paragraph.

The Council proposes a modification to clarify the details of the Green Infrastructure buffer.

A new paragraph is also proposed to be added to the supporting text to set out more information about the Green Infrastructure on the site.

Ref	Page of submitted LPR	Policy / Paragraph of submitted LPR	Proposed Main Modification	Reason for modification
	63	Policy SP17	<p><i>Amend text under ‘Green Infrastructure heading of policy as follows:</i></p> <p>‘The site will provide a comprehensive network of green infrastructure and open space across the whole site <u>in accordance with SP10 and DM40 and landscape strategy</u> which will <u>respond positively to the take advantage of the sensitivities of the landscape, protect and enhance landscape and ecological biodiversity features of value within and around the site and make provision for biodiversity net gain.</u></p> <p>This network will comprise: <u>The provision will include:</u></p> <ul style="list-style-type: none"> • <u>Conservation of the areas of ancient woodland by providing appropriate buffers between the development and the ancient woodland.</u> • <u>Enhancements for biodiversity.</u> 	Clarification of policy wording in response to the Inspector’s Action Point (AP21) contained within IN18

			<ul style="list-style-type: none"> • <u>A band of green infrastructure/new community park across the higher land on the northern part of the allocation (as shown on the indicative map fig.X) to be retained outside the settlement boundary. This is to create a buffer between the built development of the allocation and the adjoining countryside and the villages of Upper Bucklebury and Cold Ash to the north. The precise nature of the band of GI to be informed by a Landscape and Visual Impact Assessment and the masterplanning process.</u> • A new community park linking Thatcham to the North Wessex Downs AONB; • <u>Green Infrastructure and open space within the developed parts of the site in addition to the community park.</u> • <u>Greenways which connect through the site to the park and facilitate connectivity to the wider landscape and the existing Public Rights of Way network. AONB, and include leisure routes accessible to all users.</u> • A comprehensive network of other accessible routes and connections within the development which provide walking and cycling links along desire lines; • <u>A Public Rights of Way Strategy to demonstrate how existing Public Rights of Way will be protected and enhanced and how new ones will be established, including bridleway links and safe crossing points.</u> • <u>Retention of existing, ained and provision of new, trees, hedgerows and other appropriate native planting, which contribute to biodiversity net gain;</u> • <u>Provision of allotments.</u> • <u>A Green Infrastructure</u> 	
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			<p><u>Strategy to show how the network of multifunctional green infrastructure will be delivered across the site.</u></p>	
	66	New paragraphs after 6.61	<p><i>Additional text in Supporting text as follows:</i></p> <p><u>'It is anticipated that approximately half of the site will be set aside as Green Infrastructure, to serve the new population at North East Thatcham and be retained in perpetuity. An area, across the north of the site, will provide a buffer between the new development and the existing community of Upper Bucklebury to the north and comprise an extensive area of multi-functional green space, which will protect ancient woodland and areas of ecological value while providing opportunities for informal recreation. In addition, green infrastructure will be provided within the areas of built development. Built development should respond to the findings of the LVIA and ensure an appropriate form of development taking into account the constraints of the site, including below ground infrastructure. Areas of isolated development should be avoided.</u></p> <p><u>The indicative GI buffer boundary takes into account the landscape work done to support the TSGS, and uses the 105m contour to the west and central portion of the site, with the 100m contour to the east. The gas pipeline across the north of the site is required to have designated standoff areas, and given its location to the north of the site development to the north of the pipeline is not considered appropriate. The final extent of the GI buffer will be determined through the LVIA, masterplan and other relevant background work carried out to support a planning application on the site.'</u></p>	Further clarity regarding the Green Infrastructure in response to the Inspector's Action Point (AP21) contained within IN18

AP22. Council to amend the “proposed new site plan” to

- Delete the developable area
- Amend the notation of the “Green Infrastructure Buffer” so that it is more diagrammatic with a less precise boundary and broadly covers the higher parts of the site and other areas adjoining ancient woodland.
- Amend the Legend to refer to “Indicative Green Infrastructure between built development and adjoining countryside” (or similar).
- Include the settlement boundary to the north of the A4 and Floral Way as currently defined in the adopted Core Strategy.
- Include the Colthrop Industrial Estate Designated Employment Area within the Thatcham settlement boundary.

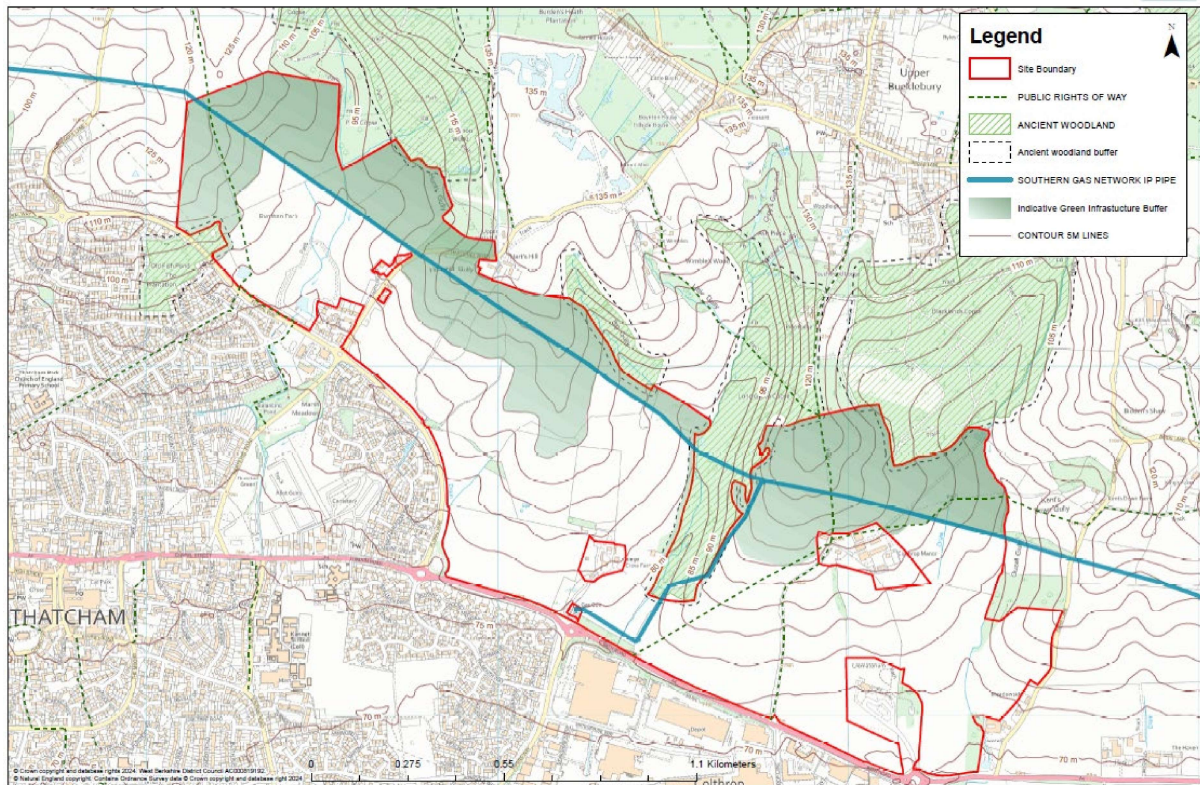
Council response

The Council has deleted the developable area and the Green Infrastructure buffer has been amended to be more illustrative/diagrammatic as to the location and scale of the band of Green Infrastructure. The legend of the map has been updated accordingly. Map included in Annex B.

The indicative GI buffer has been determined using the suggested maximum height of development as set out in the Thatcham Strategic Growth Study - 105m contour to the west, 100m contour to the east. The Council recognises that the growth study suggests that development could go up to the 110m contour in some places, however, to give a greater degree of flexibility the 105m contour has been used to define the GI buffer. A gas pipeline runs across the north of the site providing a constraint to development, and the Council believes that no development should take place north of the pipeline as this would result in isolated areas of development to the north of the site. A 15m buffer to the ancient woodland has also been used to define the indicative GI buffer in areas adjacent to the ancient woodland.

The plan has been discussed with colleagues in Development Management and it is considered that a shaded area identifying that the most northern part of the site is expected to be green infrastructure, rather than use of a vague line on a plan, provides the best starting point and less ambiguity when considering interpretation and application of the policy, while still recognising that the final GI buffer will be determined through the LVIA, masterplan and other relevant background work carried out to support any application coming forward on the site. The map below shows the constraints used to define the indicative GI buffer and a paragraph added to the supporting text of the policy.

North East Thatcham



The settlement boundary has been redrawn to exclude the proposed allocation at North East Thatcham, but to include the Designated Employment Area at Colthrop Industrial Estate as per AP11. Map included in Annex C.

Ref	Page of submitted LPR	Policy / Paragraph of submitted LPR	Proposed Main Modification	Reason for modification
	66	New paragraph after 6.61	<p><i>Additional text in supporting text as follows: (this text is the same as that identified under AP21)</i></p> <p><u>'It is anticipated that approximately half of the site will be set aside as Green Infrastructure, to serve the new population at North East Thatcham and be retained in perpetuity. An area, across the north of the site, will provide a buffer between the new development and the existing community of Upper Bucklebury to the north and comprise an extensive area of multi-functional green space, which will protect ancient woodland and areas of ecological value while providing opportunities for informal recreation. In addition, green</u></p>	Further clarity regarding the Green Infrastructure in response to the Inspector's Action Point (AP22) contained within IN18

			<p><u>infrastructure will be provided within the areas of built development. Built development should respond to the findings of the LVIA and ensure an appropriate form of development taking into account the constraints of the site, including below ground infrastructure. Areas of isolated development should be avoided.</u></p> <p><u>The indicative GI buffer boundary takes into account the landscape work done to support the TSGS, and uses the 105m contour to the west and central portion of the site, with the 100m contour to the east. The gas pipeline across the north of the site is required to have designated standoff areas, and given its location to the north of the site development to the north of the pipeline is not considered appropriate. The final extent of the GI buffer will be determined through the LVIA, masterplan and other relevant background work carried out to support a planning application on the site.'</u></p>	
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AP23. Council to prepare a main modification to the reasoned justification of SP17 to explain:

- the purpose of the “site plan”, including showing the allocation’s relationship with the town and surrounding rural areas.
- That the access points and green infrastructure are indicative, and that the layout and landscaping of the development across the whole allocation will be determined following the completion of the further work and masterplanning process required by policy SP17.
- That the Thatcham settlement boundary in the vicinity of the site remains as defined in the Core Strategy and will be revised through a future update to the Plan to reflect the extent of the built up area once that is known subsequent to the masterplanning and planning application processes required by policy SP17.
- That consideration will also be given in a future review of the Plan to designating a strategic gap between Thatcham and Upper Bucklebury having regard to policy DM2 once the revised Thatcham settlement boundary has been redefined.

Council Response

The Council proposes to amend the supporting text as requested in AP23.

Ref	Page of submitted LPR	Policy / Paragraph of submitted LPR	Proposed Main Modification	Reason for modification
	66	Policy SP17 New paragraph after 6.61	<p><i>Additional text as follows: (this is part of the same text identified in AP21 and AP22)</i></p> <p><u>‘The indicative GI buffer boundary takes into account the landscape work done to support the TSGS, and uses the 105m contour to the west and central portion of the site, with the 100m contour to the east. The gas pipeline across the north of the site is required to have designated standoff areas, and given its location to the north of the site development to the north of the pipeline is not considered appropriate. The final extent of the GI buffer will be determined through the LVIA, masterplan and other relevant background work carried out to support a planning application on the site.’</u></p>	Provide additional supporting text to the policy in response to the Inspector’s Action Point (AP23) contained within IN18

AP24. Council to delete paragraph 6.54 and insert the following (or similar): “The Thatcham Strategic Growth Study was carried out in 2019 to 2020 to understand how to plan for growth in Thatcham over the plan period. The West Berkshire Strategic Vision 2050 was prepared in 2022 to guide sustainable growth over the long term in the context of paragraph 22 of the updated NPPF published in 2021. Whilst the development proposed in policy SP17 is expected to be completed within the plan period, and some details in both of those documents are now out of date, they still include relevant information that forms part of the justification for the LPR’s spatial strategy and the strategic allocations in Newbury and Thatcham”.

Council Response

The Council proposes to delete paragraph 6.54 and replace it with the wording set out below.

The Council does not consider the Vision document or the TSGS to be wholly out of date. It is acknowledged that they are of their time, but many of the details included in them, relating to the allocation of the site, and the considerations that need to be made at planning application stage are still relevant.

Ref	Page of submitted LPR	Policy / Paragraph of submitted LPR	Proposed Main Modification	Reason for modification
	66	Para 6.54	<p><i>Amend text as follows:</i></p> <p><u>'6.54 In reviewing the vision for Thatcham as part of the LPR and to best understand how to plan for growth in Thatcham within the plan period, the Council commissioned masterplanning work (Thatcham Strategic Growth Study (TSGS) 2020). The Thatcham Strategic Growth Study was carried out in 2019 – 2020 to understand how to plan for growth in Thatcham over the plan period. The West Berkshire Strategic Vision 2050 was drafted in 2022 to guide sustainable growth over the long term in the context of paragraph 22 of the updated NPPF published in 2021. These documents include relevant information that form part of the justification for the LPR's spatial strategy and the strategic allocations in Newbury and Thatcham.'</u></p>	Clarification in response to the Inspector's Action Point (AP24) contained within IN18

AP25. Council to prepare a statement of common ground with the North East Thatcham Partnership and any relevant infrastructure providers to inform my consideration of whether there is a reasonable prospect of an operationally and economically viable secondary school being provided on the site at an appropriate time in relation to the development of (a) 1,500 homes and (b) 2,500 homes. This should include approximate figures for the following:

- Size of the school (forms of entry, square metres of floorspace and total hectares of land including playing fields etc).
- Proportion of the school's capacity that would be required to meet the needs of future residents on the site
- Overall cost.
- Proportion / amount of overall cost to be met by the developer.
- Proportion / amount of overall cost to be met by others along with potential sources of funding.

The statement should identify areas of agreement and disagreement between the relevant parties.

Council Response

The statement of common ground is appended to this Statement in Annex D.

The Council has reviewed all the information available relating to secondary school provision in the Thatcham area and considers that the feasibility study is the best way to determine the final secondary school provision required as a result of the development. The Council anticipates that the development can be adequately mitigated but considers that this is best explored through the feasibility study as set out in the policy.

While there is a requirement for additional secondary school provision as a result of the development, it may be that this could be delivered through a number of different solutions, including:

- a new school (size to be considered through the feasibility study),
- sixth form centre,
- remodelling of existing secondary school site, or
- provision of SEND.

Currently there is uncertainty as to future pupil numbers, and therefore, it is considered unrealistic to consider the only solution to education provision as a result of the development is to deliver a new secondary school on the site.

The Council considers that the provision and safeguarding of land for education, as set out in the policy, is required to allow for all options in the feasibility study to be fully considered and to allow the preferred solution to be brought forward.

AP26. Council to prepare a statement of common ground with the North East Thatcham Partnership setting out a realistic timetable for the future development of the site having regard to the evidence in “Start to Finish” [EXAM27]. This should assume all of the development proposed in SP176 is provided and include dates/timescales for the following:

- Marketing and disposal of land to housebuilders.
- Completion of various strategies and other work required by policy SP17.
- Preparation of a masterplan in collaboration with the community and other stakeholders.
- Council agreement to a masterplan.
- Council agreement to phasing arrangements.
- Submission of planning application(s).
- Approval of planning application(s).
- Completion of section 106 / other legal agreements.
- Discharge of pre-commencement conditions.
- Approval of reserved matters.
- “Opening up works” (on and off-site).
- First housing completions.
- Housing completions in subsequent years (having regard to the requirement for this to be phased and coordinated with the timely delivery of the infrastructure required by SP17).

The statement should identify areas of agreement and disagreement between the relevant parties.

Council Response

The statement of common ground is appended to this Statement in Annex E.

The Council considers that by commissioning the masterplan itself, funded by the developer, through a Planning Performance Agreement, this will allow for greater buy-in from the local community, as the masterplan will be developed independently of the developer for the site. Collaboration with the developer, the community and local stakeholders will be critical to developing a masterplan that will be agreed upon and can be used to guide the development proposals coming forward on the site. The masterplan will be agreed by the Council prior to submission of a planning application.

ANNEX A

PROPOSED MODIFICATIONS -

Policy SP17 North East Thatcham Strategic Site Allocation

Land as shown on the Policies Map is allocated for the delivery of a comprehensive, sustainable, low carbon, urban extension comprising of distinct neighbourhoods defined by their landscape, and connected and contributing to Thatcham, and woven through with natural habitats and links. The site will be masterplanned Proposals must demonstrate how and delivered as a whole to achieve a comprehensive development the provision of all infrastructure, services, open space and facilities will be delivered in a timely and co-ordinated way alongside the phased delivery of residential development. The Thatcham Strategic Growth Study provides guiding principles for the delivery of the site therefore proposals will demonstrate that these guiding principles have been positively responded to.

Homes

The site is ~~to be~~ allocated for the phased delivery of approximately 1,500 dwellings which will be completed within the period of the Pplan. These dwellings will comprise an appropriate mix of a housing types, tenures and sizes having regard to mix which complies with the housing mix contained in Table 3 of pPolicy SP18. In addition at least:

- 40% of dwellings will be affordable housing in accordance with SP19; and
- 3% of dwellings will be delivered via serviced custom/self-build plots.

Community

The site will provide A range of community facilities will be provided to serve the development, including:

- Local centres providing local retail facilities and small-scale employment including for community use ~~(approximately 1,100sq.metres Class E and F2)~~;
- Primary Healthcare provision and associated infrastructure, which is operationally and financially viable, the details of which should be agreed with 450sq.metres GP Surgery to be offered to the Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board (BOB-ICB) or other such appropriate body, taking into account the feasibility study carried out by BOB-ICB. Further detailed feasibility work should be carried out at the applicant's expense in collaboration with BOB ICB.
- ~~Early years provision;~~
- A 2.5FTE p Early years and Pprimary school provision on site and sports infrastructure requirements of the school. L with land to be provided and build costs to be met by the applicant;
- Secondary school and SEND provision, including the provision of land and a financial contribution, land to meet the impact of the development. The nature and cost of the required provision mitigation will be informed by a feasibility study, undertaken at the applicant's expense and prepared in collaboration with the Council and local stakeholders;

- A 1,200sqm e Community indoor facility to be used for sport and community uses with a variety of room sizes ~~(currently use classes E and F)~~;
- Outdoor formal and informal sports pitches and areas for community use ~~to meet the identified needs of the development~~;
- ~~Open space to meet the needs of the development in accordance with Policy DM41.~~

Green Infrastructure

The site will provide a comprehensive network of green infrastructure and open space across the whole site in accordance with SP10 and DM40 and landscape strategy which will respond positively to the take advantage of the sensitivities of the landscape, protect and enhance landscape and ecological biodiversity features of value within and around the site and make provision for biodiversity net gain.

~~This network will comprise:~~

The provision will include:

- Conservation of the areas of ancient woodland by providing appropriate buffers between the development and the ancient woodland.
- Enhancements for biodiversity.
- A band of green infrastructure/new community park across the higher land on the northern part of the allocation (as shown on the indicative map fig.X) to be retained outside the settlement boundary. This is to create a buffer between the built development of the allocation and the adjoining countryside and the village of Upper Bucklebury to the north. The precise nature of the band of GI to be informed by a Landscape and Visual Impact Assessment and the masterplanning process.
- ~~A new community park linking Thatcham to the North Wessex Downs AONB;~~
- Green Infrastructure and open space within the developed parts of the site in addition to the community park.
- Greenways which connect through the site to the park and facilitate connectivity to the wider landscape and the existing Public Rights of Way network. AONB, and include leisure routes accessible to all users.
- ~~A comprehensive network of other accessible routes and connections within the development which provide walking and cycling links along desire lines;~~
- A **Public Rights of Way Strategy** to demonstrate how existing Public Rights of Way will be protected and enhanced and how new ones will be established, including bridleway links and safe crossing points.
- Retention of existing, ~~and~~ provision of new, trees, hedgerows and other appropriate native planting. which contribute to biodiversity net gain;
- Provision of allotments.
- A **Green Infrastructure Strategy** to show how the network of multifunctional green infrastructure will be delivered across the site.

Transport

Measures will be included to improve accessibility by, and encourage use of, ~~non-~~motorised-sustainable transport modes.

Development proposals for the site will be supported by A a **Transport Assessment, Strategy and Travel Plan** to will provide detail on how this will be achieved, including:

- Active travel Improvements on routes between the site, Thatcham town centre and the railway station;
- Multiple access points and A-a vehicular through route;
- Sustainable transport through routes;
- Mitigation of the development's impacts on the highways network with improvements to existing junctions where they are needed and delivery of new access points for all forms of movement and transport to the site at locations to be agreed with the planning authority; and
- An air quality management plan detailing How adverse impacts on air quality will be minimised.
- ~~A Public Rights of Way Strategy to demonstrate how existing Public Rights of Way will be protected and enhanced and how new ones will be established, including bridleway links and safe crossing points.~~
- Promotion and encouragement of sustainable modes of travel, in accordance with policy DM45.

Sustainability

Development proposals for of the site will be supported by an **Energy Statement** or a detailed energy section within the **Sustainability Statement** Charter which will establish how policy requirements will be achieved. This will be informed by: An **Energy Strategy** which sets out measures to achieve a model low carbon development (following the energy hierarchy) in accordance with Policies SP5 and DM4., including:

- ~~Net zero carbon (regulated and unregulated energy) emissions for dwellings;~~
- ~~BREEAM 'excellent' non residential buildings;~~
- ~~on-site renewable energy to assist in the delivery of a net zero carbon neutral development; and~~
- ~~carbon off-setting.~~
- A **Construction and Operations Management Plan (COMP)** to accompany any planning application on the site. The COMP shall safeguard the oil pipeline from operational works, including the provision of an appropriate buffer.

Flooding and Water Environment

Development proposals for the site will be supported by A an **Integrated Water Supply and Drainage Strategy** which will set out:

- measures to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site;

- details of the phasing of development to consider likely upgrades needed for the water supply and waste water network infrastructure; and
- surface water drainage management approaches that could deliver net gain for Thatcham town, including use of on-site sustainable drainage systems (SuDS);
- A Flood Risk Assessment, taking into account the Thatcham Surface Water Management Plan, which sets out adequate flood mitigation measures to ensure there is no detrimental impact on flood risk in Thatcham;
- Flood alleviation measures already present on the site and how they will need to be retained, protected and enhanced.

Biodiversity

Development proposals for the site will be supported by A an **Biodiversity Strategy** in accordance with SP11 which will set out:

- ~~A Biodiversity Net Gain Strategy to show h~~ How biodiversity net gain will be achieved including through habitat restoration and linkages;
- How priority habitats and ecological features will be protected and enhanced;
- The creation of new ecological features; and
- A a site-wide ecological biodiversity management plan.

Landscape

Development proposals for the site will be supported by A a **Landscape and Visual Impact Assessment (LVIA)** in accordance with the Landscape Institute Guidelines for Landscape and Visual Impact Assessment 3rd ed. 2013. This will inform the final capacity, masterplan for the development, design and layout of the site and requirements for green infrastructure and the provision of public open space. The LVIA will be informed by the Landscape Sensitivity and Capacity Assessment (2021) of the site and SP5.

Heritage

Development proposals for the site will be supported by A a **Historic Environment Strategy** in accordance with SP9 to demonstrate how the sites historical development, archaeological remains and historic buildings and parkland will inform the scheme and help to create a sense of place. The Historic Environment Strategy should:

- Be informed by a heritage impact assessment, desk-based archaeological assessment and if needed, field evaluation; and
- Demonstrate ing how the impact of the development on their setting of the adjacent listed buildings has been considered and how they will be conserved and harm to the significance minimised.(+)

Lighting

Development proposals for the site will be supported by A a **Lighting Strategy** which will include consideration of dark skies, particularly in relation to the nearby North Wessex Downs AONB, and measures to mitigate the impact on biodiversity.

Mineral Resources

Development proposals for the site will be supported by A a **Mineral Resource Assessment (MRA)** which identifies any potential viable mineral resources on the site and considers firstly prior extraction, and then incidental extraction as part of the development.

Masterplanning and Design Code

The site will be masterplanned, funded by the applicant and prepared in collaboration with the applicant, the Council, the community and other stakeholders, prior to the submission of a planning application. The Masterplan will provide the framework to guide the development, and should be based on the evidence base underpinning the Local Plan and outcome of further technical work prepared in line with requirements of this policy. The masterplan will provide a guide as to the location and extent of built development, land uses, green infrastructure including the green buffer, key access arrangements, community and other infrastructure. Proposals must have regard to, and demonstrate how, they have been guided positively by the agreed masterplan.

A design code, prepared by the developer and agreed with the local planning authority, should be secured by a planning condition as part of any outline planning permission.

Supporting text

6.52 Thatcham has experienced rapid population growth during the post-war period, expanding more than 5 times since 1951. This growth has been accompanied by infrastructure growth in transport, and a considerable expansion in the built-up area to match the population growth. However, in recent decades, the provision of social infrastructure has not kept pace with housing growth.

6.53 The vision for Thatcham contained in the Core Strategy DPD (2012) was that Thatcham town centre would be a focus for regeneration, enabling the town to fulfil its role within the District's Hierarchy of Centres by improving the retail offer and enhancing the streetscape. The provision of leisure and community facilities for all ages would be improved and encouraged within the town centre. The town would become more self-contained providing a range of job opportunities and encouraging residents to shop and socialise locally. Additionally, the Core Strategy concentrated housing expansion in Newbury.

6.54 ~~In reviewing the vision for Thatcham as part of the LPR and to best understand how to plan for growth in Thatcham within the plan period, the Council commissioned masterplanning work (Thatcham Strategic Growth Study (TSGS) 2020). The Thatcham Strategic Growth Study was carried out in 2019 – 2020 to understand how to plan for growth in Thatcham over the plan period. The West Berkshire Strategic Vision 2050 was drafted in 2022 to guide sustainable growth over the long term in the context of paragraph 22 of the updated NPPF published in 2021. These documents include relevant information that form part of the justification for the LPR’s spatial strategy and the strategic allocations in Newbury and Thatcham.~~

6.55 This evidence draws on other recent evidence produced to support the LPR such as the Landscape Character Assessment (LCA) (2019) and the Housing and Employment Land Availability Assessment (HELAA) (2020). The TSGS shows that Thatcham compares poorly to other similar centres in terms of overall service provision, including public services and commercial services. The town’s self-image is of a large village, rather than as a thriving market town.

6.56 In addition, it demonstrates that recent planning decisions support the approach that only growth of a strategic scale can support the service provision and regeneration that Thatcham requires.

6.57 The TSGS considers the sites promoted to the Council as part of the LPR and recommends that if strategic development were to occur in Thatcham, the most appropriate location to examine in more detail is the site promoted at North East Thatcham.

6.58 The western edge of the site is adjacent to the existing Thatcham settlement boundary along Floral Way and Bath Road (A4). The eastern end of the site is adjacent to Colthrop Industrial Estate, which is contiguous with Thatcham. ~~The new revised settlement boundary will be defined following the studies and work identified in the policy at the application stage.~~

6.59 Stage 3 of the TSGS examines the North East Thatcham site in detail and, using community objectives which emerged during a community stakeholder workshop, provides context for how development could come forward at the site.

6.60 The Council’s spatial strategy is outlined in Policy SP1 and affirms a continued approach to focusing development in settlements in line with a District-wide settlement hierarchy (contained in Policy SP3). Thatcham, as part of the Newbury and Thatcham urban area, is a sustainable location for development as confirmed in the Strategic Vision 2050. The TSGS shows the most sustainable way for development to come forward in the town and this policy draws on that evidence.

6.61 Hence, Thatcham is now a focus for regeneration, for new housing and for improved provision of services and facilities. A new urban extension to the north east of the town is allocated for development and will provide a new residential neighbourhood with supporting facilities and green infrastructure and enable long-term planning for Thatcham’s future. Delivery of approximately 1,500 dwellings is anticipated within the plan period.

x.xx The site plan (figure x) shows indicative locations for access points and for the band of green infrastructure buffer to the northern part of the site. The final layout, access, landscaping and green infrastructure will be determined following the completion of further work such as LVIA and the masterplanning process required by policy SP17.

x.xx It is anticipated that approximately half of the site will be set aside as Green Infrastructure, to serve the new population at North East Thatcham and be retained in perpetuity. An area, across the north of the site, will provide a buffer between the new development and the existing community of Upper Bucklebury to the north and comprise an extensive area of multi-functional green space, which will protect ancient woodland and areas of ecological value while providing opportunities for informal recreation. In addition, green infrastructure will be provided within the areas of built development. Built development should respond to the findings of the LVIA and ensure an appropriate form of development taking into account the constraints of the site, including below ground infrastructure. Areas of isolated development should be avoided.

x.xx The indicative GI buffer boundary takes into account the landscape work done to support the TSGS, and uses the 105m contour to the west and central portion of the site, with the 100m contour to the east. The gas pipeline across the north of the site is required to have designated standoff areas and given its location to the north of the site development to the north of the pipeline is not considered appropriate. The final extent of the GI buffer will be determined through the LVIA, masterplan and other relevant background work carried out to support a planning application on the site.

x.xx The Settlement Boundary for Thatcham, in an exception to the settlement boundary review criteria set out in Appendix 2, will be revised through a future Plan to reflect the extent of the built up area once that has been defined through the masterplanning and planning application processes required by policy SP17. Consideration of whether it is appropriate to designate a gap between Thatcham and Upper Bucklebury, in line with policy DM2, will be considered once the settlement boundary has been redrawn.

x.xx New education provision, including early years, primary and secondary provision will be required to support the needs of the development. Early years and primary provision will be provided on site. The requirements for secondary and SEND provision will be determined following the completion of a feasibility study which will consider the best solution for secondary education requirements in Thatcham. It is expected that land will be required on the site, and financial contributions to support delivery of the preferred solution.

x.xx Primary healthcare facilities should be provided, with associated car parking and landscaping. The facilities should be operationally and financially viable and take into account the feasibility study commissioned by the NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board (BOB-ICB). The facility should provide room sizes that comply with the Department of Health Building Note 11-01 (or any successor documents). The provision and any contractual arrangement of the facility will need to be agreed as part of any planning application

coming forward on the site. Where the onsite provision of a facility in accordance with this policy is not viable, the Council will expect other offsite mitigation measures, to ensure the primary healthcare provision can support the new population growth. The applicant should engage with the BOB-ICB at an early stage to discuss the details of any offsite provision. A further feasibility study, to identify office mitigation measures, would need to be carried out at the applicant's expense and any identified offsite mitigation measures will be funded by the applicant through developer contributions.

x.xx Flood risk and surface water drainage is a key consideration for Thatcham, following extensive surface water flooding in the summer of 2007 as a result of high intensity rainfall overwhelming storm drains and culverted streams. The flood event was considered to be in the order of a 1 in 200 year event. Following the flooding various studies and strategies were developed to identify opportunities for reducing flood risk in the town. The Thatcham Surface Water Management Plan (2010) sets out a number of proposed measures to reduce flood risk in Thatcham, focusing on retaining runoff upstream of Thatcham to reduce peak flows through the existing urban area and drainage system. A number of flood attenuation ponds have been constructed on the North East Thatcham site, and these are to be retained and enhanced in addition to Sustainable Drainage Systems (SuDS) provided on the site. The Integrated Water Supply and Drainage Strategy involving localised and strategic flood management measures will be required, in line with the requirements of the West Berkshire Sustainable Drainage Systems SPD (2018).

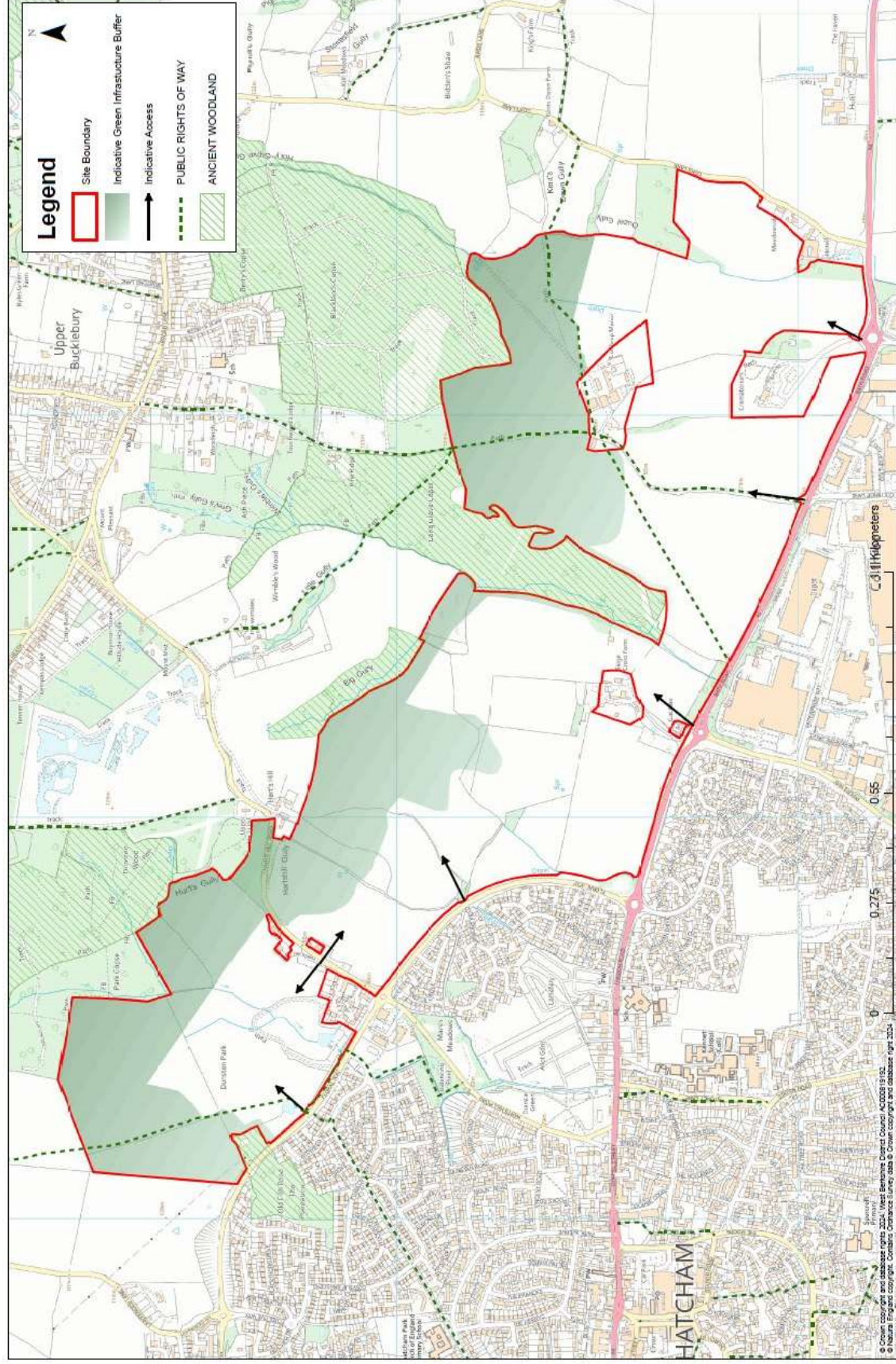
6.62 British Geological Survey data identifies that the site is underlain in part by construction aggregate mineral deposits. Therefore, a Minerals Resource Assessment will be carried out to determine the possibility of prior extraction of the mineral in accordance with the West Berkshire Minerals and Waste Local Plan 2020-2037.

~~6.63 Further detailed work will be required to develop a coherent masterplan to take the development forward.~~ The Council will commission the masterplan, this which will be produced in collaboration with the applicant, the community and other stakeholders and funded by the developer as part of a Planning Performance Agreement. It will be based on existing evidence and information already produced to support the allocation of the site, including the Thatcham Strategic Growth Study. The masterplan will provide a guide as to the location and extent of built development, land uses green infrastructure including the green buffer, key access arrangements, community and other infrastructure. The Masterplan will be agreed, by the Council, prior submission of a planning application.

A Design Code will be developed alongside the planning application, secured by condition, and agreed with the Council prior to submission of the first reserved matters application.

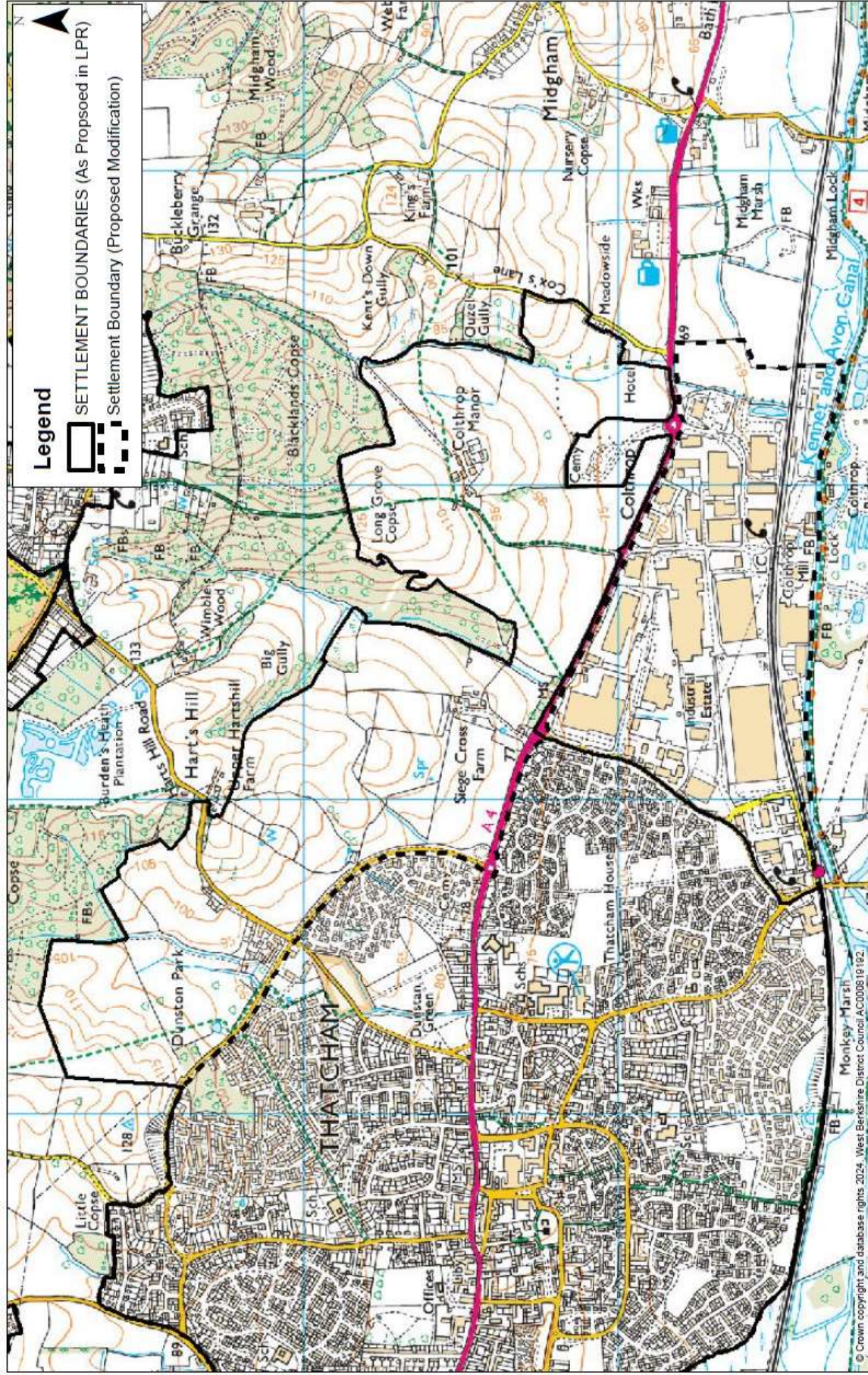
ANNEX B

Proposed Modification to North East Thatcham Indicative Site Map



ANNEX C

Proposed Modification to Thatcham Settlement Boundary



Date: 19th June 2024

AP25 response – SoCG on Secondary School Provision

AP25. Council to prepare a statement of common ground with the North East Thatcham Partnership and any relevant infrastructure providers to inform my consideration of whether there is a reasonable prospect of an operationally and economically viable secondary school being provided on the site at an appropriate time in relation to the development of (a) 1,500 homes and (b) 2,500 homes. This should include approximate figures for the following:

- **Size of the school (forms of entry, square metres of floorspace and total hectares of land including playing fields etc).**
- **Proportion of the school's capacity that would be required to meet the needs of future residents on the site.**
- **Overall cost.**
- **Proportion / amount of overall cost to be met by the developer.**
- **Proportion / amount of overall cost to be met by others along with potential sources of funding.**
- **The statement should identify areas of agreement and disagreement between the relevant parties.**

- 1.1 This document provides a Statement of Common Ground between the Council and the North East Thatcham Partnership (NETP) to set out the prospects of agreeing a suitable and sufficient mitigation solution for secondary school provision delivery of an operationally and economically viable secondary school being provided on the site at an appropriate time in relation to a development of either 1,500 homes or 2,500 homes.

Background

- 1.2 Policy SP17 (with proposed modifications as now suggested by the Council) would require the development at North East Thatcham to provide, amongst other things:
- “Secondary school and SEND provision, including the provision of land and a financial contribution. The nature and cost of the required provision will be informed by a feasibility study, undertaken at the applicant's expense and prepared in collaboration with the Council and local stakeholders;”*
- 1.3 Provision is required to meet the needs of the development to mitigate the impact of the development on secondary and SEND education provision in Thatcham.

- 1.4 Thatcham is served by two secondary schools, Kennet School and Trinity School, both of which have sixth form provision. Additional sixth form provision is also available at Newbury College.
- 1.5 The North East Thatcham site sits within the catchment area of Kennet School, part of the Equinox Learning Trust. The school has a capacity of approximately 1,900 and an admission number of 300. It occupies a site of 8.4ha. Francis Baily primary school and Kennet leisure centre occupy land adjacent to the school. The Kennet school fills to the Planned Admission Number (PAN) of 300 each year.
- 1.6 Whilst the focus of this note is on secondary provision, it is noted that the development site should also make suitable provision for early years and primary education as set out in Policy SP17.

Areas of Agreement

Additional demand for secondary school places

- 1.7 The proposed development will create additional demand for school places in Thatcham.
- 1.8 Although the general need for secondary school provision at NET has been established by the evidence base, the specific nature has not been confirmed. This will be informed by the feasibility study, to be undertaken at the applicant's expense, as set out in policy SP17.
- 1.9 The Thatcham Growth Study Stage 3 (TGS3) was undertaken in 2020. At the time the study estimated that a development of 2,500 homes would generate a requirement for 397 pupils and an equivalent of 3.5 forms of entry, with need being met by a secondary school of 6-8 forms of entry (TGS3 Figure 73). The study did not consider the impact of 1,500 homes or the detailed options for mitigating 2,500 homes in alternative ways.
- 1.10 The TGS3 summarised secondary education issues at paras 4.84 – 4.87 identifying the following:
- 1 The need for secondary school provision relates to need from the development but also to accommodate current Thatcham pupils who are schooled in Newbury due to lack of capacity in Thatcham and who will be displaced by growth in Newbury.
 - 2 The Concept Plan showed land to be safeguarded for an 8FE school, with the NET development funding around half the cost.
 - 3 Three scenarios were identified: a) a new secondary school; b) a second Kennet school campus, potentially for a sixth form centre and/or specialist facilities to free up space at the main school; or c) a relocated Kennet School to be expanded up to 14FE.
 - 4 The secondary school to function as an 'education hub', including shared access to sports facilities, some community space and other potential community-facing facilities."

- 1.11 The TGS Concept Plan showed a secondary school site for up to eight forms of entry that it described (para 4.62) as: “*sized to be within the upper quartile of acceptable school sizes outlined by the Department for Education in their most recent technical note (2019).*” The land area was quantified at 8 hectares (page 103 of TGS3). A cost of £26.4m was identified. It assumed 50% of the cost of the secondary school is to be met by the developer (para 5.7).
- 1.12 Recognising there is not a fixed secondary school proposal, Policy SP17 provides for the nature and cost of the required provision mitigation to be informed by a feasibility study, undertaken at the applicant’s expense and prepared in collaboration with the Council and local stakeholders. The estimates above are therefore evidence-based working assumptions, but, ahead of the feasibility study, they are preliminary.

Feasibility Study

- 1.13 The feasibility study will be required to analyse options in detail and to identify the most appropriate type of provision to meet the needs of the existing and new communities.
- 1.14 The feasibility study will involve stakeholders such as the Local Education Authority and local schools, as well as professionals that can add their expertise – including curriculum and design experts, as well as those familiar with DfE Building Bulletins and design guidance.
- 1.15 The feasibility study will need to consider all reasonable options to mitigate the impact and should take into account demography, projections, the situation in the local area and funding, as well as curriculum requirements and DfE guidance. A new school is not the only potential option for mitigating the impact of the development.
- 1.16 The feasibility study provides an opportunity for each of the options identified in the TGS3, and any new/alternative options to be considered in some detail in the context of the landscape at that time and with the input of stakeholders.
- 1.17 The study should seek to build a consensus between all stakeholders and provide a robust evidence base for the mitigation needed and financial contribution via planning obligation.

Requirements for additional SEND education provision

- 1.18 The council has identified that the district has followed the national picture of rapidly increasing numbers of pupils requiring specialist SEND provision. It is predicted that over the next five years numbers will rise further, to around 8% of the school population in the district.
- 1.19 The council has confirmed that existing provision is at capacity, and it is anticipated that provision may be required for SEND pupils. This might be a further option for accommodation within the secondary school land set aside within the development, alongside the secondary school provision or through alternative options. The feasibility study will consider and test the options for the type, size, and cost of provision, taking into account the potential approach to secondary provision. The pupil generation estimates for the secondary school have been considered using pupil yield factors

provided by WBC Education for mixed housing. These figures should be considered indicative as they may be updated or amended in the future.

Updated analysis

1.20 The TSGS3 used a figure of 0.16 per dwelling. Current pupil yield estimates are 0.13 per dwellings for secondary and 0.03 per dwellings for sixth form for mixed housing. The number of children expected would be further refined as more information is provided on the type of housing and anticipated timing of the development.

1.21 The number of pupils generated by the development at 1,500 and 2,500 are set out in Table 1 below.

Table 1: Pupil numbers

	1500	2500
Estimated No. Pupils	240	400

1.22 This represents up to two forms of entry.

1.23 Table 2 contains the minimum and maximum area size calculation according to the Building Bulletin 103 for different sizes of school.

Table 2 Building Size Calculations -

Size of School	Total Buildings Area (m ²)	
	Max	Min
8FE Secondary School	12,575	11,060
7FE Secondary School	11,196	9,835
6FE Secondary School	9,856	8,645

1.24 The NETP site is capable of providing sufficient land to accommodate a secondary school of the size indicated. A site of 9ha (larger than that indicated by TSGS3 has been considered by the NETP in its work, but this could increase if necessary.

1.25 The TSGS3 estimated the build costs for a secondary school at £26.4m. It is likely that the build cost will have increased since 2020 due to inflation.

1.26 The National School Delivery Cost Benchmarking Report Version 18 was published in November 2023 and included projects up to 2022. It is noted that none of the projects included for secondary provision included brand new school places, and the figure of £2,960 per sqm is taken from the previous study in 2021. It would be necessary to account for more recent inflation costs. Table 2 provides an illustration of uplifts these costs but can only be considered an early indication due to the unknowns at this stage.

Table 2 - Cost per sqm - National School Delivery Cost Benchmarking (NSDCB)

£ 2,960

	NSDCB sqm rate * Total buildings area	NSDCB figure +10% (inflation)	NSDCB figure +20% (inflation)
8FE (Max)	£ 37,222,000	£ 40,944,200	£ 44,666,400
8FE (Min)	£ 32,737,600	£ 36,011,360	£ 39,285,120
7FE (Max)	£ 33,140,160	£ 36,454,176	£ 39,768,192
7FE (Min)	£ 29,111,600	£ 32,022,760	£ 34,933,920
6FE (Max)	£ 29,174,500	£ 32,091,950	£ 35,009,400
6FE (Min)	£ 25,589,200	£ 28,148,120	£ 30,707,040

- 1.27 The feasibility study will calculate costs. It will be costed by a quantity surveyor as part of the study process, will reflect both the costs of building in this area and the nature of the mitigation agreed, and will be independently tested by consultants working on behalf of the Council.
- 1.28 For calculating financial contributions, DfE guidance¹ recommends basing assumed costs of mainstream school places on the relevant average costs published in the DfE school places scorecard². For West Berkshire, the relevant figure is £31,749 per pupil generated.
- 1.29 The DfE Scorecard figures represent costs uplifted for inflation to Q1 2023 and is based on an all-England average. The cost per place does not distinguish between main school and sixth form places, the latter being more specialist in nature and usually more expensive to provide; the figures may therefore not apply for all types of secondary school accommodation in 2024.
- 1.30 The feasibility study will determine the nature of the required mitigation and it may be appropriate, for example, for the applicant to pay an amount – greater than the DfE scorecard figures – for a higher proportion of the total cost towards core spaces of a new build, such as hall, library, offices, study spaces or catering facilities (sized accordingly) to reflect that these may be required even if the pupil numbers from the proposed development would not fill a full-sized new school. Any planning obligation will be required to meet the CIL Regulation 122 and NPPF tests (para 57).

Sources of Funding

- 1.31 Detailed funding options would be considered as part of the feasibility study to aid the determination of which option would be most appropriate to take forward to ensure adequate secondary and any necessary SEND education provision. Other sources of funding, if available, could include Basic Need Capital Allocations which are funded by DfE for additional places required as a result of demographic growth. The amount of basic need funding is calculated by DfE based on an estimate of school capacity vs

¹ DfE (2023) Securing developer contributions for education (https://assets.publishing.service.gov.uk/media/64d0f70d7a5708001314485f/Securing_Developer_Contributions_for_Education.pdf)

² <https://www.gov.uk/government/collections/school-places-scorecards>

pupil number forecasts across a planning area for several years ahead, depending on need. Not all LA areas will secure this funding at all or for every year it may be available. In addition, the Council may also utilise amounts it has secured via s.106 contributions and Community Infrastructure Levy (CIL) from other developments, or government grants but this will need to align with Council priorities and available funding at that time. Were the option selected for an existing school – such as Kennet – to relocate some or all of its operations to NET, it might also be in a position to draw down DfE capital funding.

Areas of Uncommon Ground

Position of the Council

- 1.32 The Council's position is that it is anticipated the development can be adequately mitigated but this is best explored through the feasibility study as set out on the proposed policy SP17.

Position of the NETP

- 1.33 The NETP position is that at 2,500 homes, the development can be adequately mitigated based on any reasonable option that might arise from the feasibility study, including necessary contribution towards a secondary school.
- 1.34 At 1,500 homes, the Partnership considers it is a reasonable possibility that the required mitigation might not be capable of being delivered, if the costs of secondary provision required to be funded by the development are materially greater than considered by the viability evidence underpinning the Local Plan.
- 1.35 This conclusion is based, inter alia, on the following considerations:
- 1 The Council's Whole Plan Viability Assessment tests the viability of NET at 1,500 and 2,500 homes.
 - 2 VIA1b presents the assumptions in Table D (2,500 homes) and Table E (1,500 home). For secondary education it tests the following infrastructure costs:
 - a At 2,500 it assumes £26.4m. This is (inaccurately) presented as 50% of the total cost of the school taken from the TSGS3, but is in fact 100% of that amount.
 - b At 1,500 it assumes £15.84m presented as 60% pro-rated from the total figure from Table D.
 - 3 Viability considerations would indicate that, if the feasibility study did conclude that a secondary school was the necessary mitigation required at the maximum cost in Table 2:
 - a the £15.8m tested in viability terms for 1,500 homes would be 35% of the maximum cost identified;
 - b the £26.4m tested in viability terms for 2,500 would be 59% of the maximum cost.

- 4 Paragraphs 4.54 – 4.56 of the Development Statement (Appendix to the NETP Matter 4 Written statement) reviews the Council's Whole Plan Viability Assessment and concludes that a scheme of 1,500 only has a surplus of £4.724m based on a total infrastructure cost of £60.2m whereas at 2,500 homes, the scheme could shoulder an addition £80.9m of infrastructure cost (at £141.2m). This demonstrates headroom to cater for potential additional costs that might arise to mitigate the development, including those associated with secondary education.

Signatures:

1.36



Clare Lawrence – Executive Director – Place

West Berkshire Council



Matthew Spry - Lichfields

o.b.o. NET Partnership

Date: 21st June 2024

Response to AP26 – Statement of Common Ground

1.0 Introduction

1.1 This Statement of Common Ground (SoCG) has been substantially prepared by the North East Thatcham Partnership (NETP) and then shared with the Council for input. The Partnership provides a timetable for the future development of North East Thatcham having regard to the evidence in “Start to Finish 3” and in each section of this SOCG provides a summary on the areas of agreement and disagreement between the parties for the various stages within the scenarios. A specific requirement from AP26 is how long it will take to reach ‘Council agreement to a masterplan’, under three scenarios:

- 1 Council adopts the masterplan as Supplementary Planning Document (SPD) prior to submission of a planning application;
- 2 Council agrees the masterplan as informal guidance prior to the submission of a planning application; and
- 3 Council agrees the masterplan during the planning application process.

Note

The Inspector states at footnote 6 of the document ‘IN18: Action Points from week two hearing sessions’ that for the avoidance of doubt, the above scenarios should consider delivery of approximately 1,500 homes. In this context, the inclusion of trajectories prepared by NETP should not be interpreted as implying agreement by NETP that 1,500 dwellings is an appropriate scale of development on the site, taking account of the evidence. The NETP position remains that 1,500 is not justified or consistent with national policy. The Council disagrees.

2.0 Start to Finish 3

2.1 Start to Finish 3 (STF3) was published by Lichfields on 21 March 2024. It does not provide specific evidence to inform consideration of how long it might take to agree a masterplan or SPD with the Council. The overall ‘lead-in time’ as defined in the research covers stages associated with securing a local plan allocation, going through the ‘planning approval period’ and ‘planning to delivery period’, and ending when the first dwelling is completed. It does not include information for all the site examples on what happened prior to the ‘planning approval period’. Importantly, the STF3 ‘planning to delivery’ average figures reflect only the time from the start of the planning approval period (i.e. validation date of the

first planning application on the site, usually an outline application) up to the first housing completion.

- 2.2 Therefore, the average lead in times in STF3 could be influenced by a whole range of scenarios. They could include schemes where an outline application was submitted after adoption of a local plan allocating the site and with no need to produce an agreed masterplan or SPD. Examples could also include sites where speculative outline applications were submitted prior to an Examination in Public (EIP) on the basis of an emerging application, which were then held in abeyance for years after a protracted local plan process. Applications which go to appeal can also take exponentially longer to pass through the 'planning approval period' and therefore experience a longer 'planning to delivery period' as a result. STF3 gives examples of how long this process can take, but not precisely how long individual components of it can take on a site-by-site basis, because the data is not readily available to do so.
- 2.3 In this context, the timescales associated with the production and delivery of eight SPD's and masterplans has been considered by the NETP to inform realistic assumptions for NET. This is provided to the Inspector in the supporting 'AP26 Technical Note' and includes sources for all the dates referenced.
- Matters in agreement: The limitations of the use of STF3 to provide evidence on how long it takes to produce and adopt an SPD or masterplan for strategic residential development and on in providing like for like examples of lead-in times.
 - Matters in disagreement: The Council has not verified the eight examples provided by Lichfields on behalf of the NETP in the supporting AP26 Technical Note and therefore is not in a position to explicitly accept them, albeit nor does it dispute them. The Council has not provided any of its own examples for timescales associated with the production and adoption of SPD's or masterplans.

3.0 Scenario assumptions

Assumptions relevant to all scenarios¹

- 3.1 **Inspector's Main Modifications:** No work will commence on progressing the site towards a planning application until there is a steer from the Inspector through preliminary findings or Main Modifications as to the scale of the allocation (either 1,500 or 2,500, or alternative) that is sound. For the purposes of this SoCG this is expected to be in Q3 2024.
- 3.2 **Updates to NETPs working assumptions:** All masterplanning work and evidence produced by the NET Partnership for the site to date is based on 2,500 homes. Reducing this to 1,500 would mean revisiting all working assumptions. No work on preparation of a single outline planning application, masterplan or SPD for the whole site can logically commence until this process is completed. This is expected to take 3-6 months. It is not expected this would be agreed until at least Q4 2024.

¹ Quartiles used relate to the calendar year. Q1 = Jan to March, Q2 April to June, Q3 July to September and Q4 October to December

- 3.3 **Masterplan or SPD preparation:** It is assumed that in all scenarios, the masterplanning work required would be led by (and paid for) by the Partnership, working and engaging with the Council and other stakeholders. Who leads the masterplanning work is a matter of disagreement between the parties and is articulated in more detail at the end of this section.
- 3.4 The legal requirements involved in an SPD (Option 1) and the formal approval required in Options 2 and 3 would be matters for the Council and its own internal processes, with associated political dependencies. This means an SPD (Option 1) would be a slower process than a developer-led masterplan approved by the Council (Option 2) which in turn would be slower than preparing and approving the masterplan as part of the application (Option 3). For the purposes of these scenarios, the Council would approve the SPD/masterplan.
- 3.5 **Infrastructure:** The evidence base confirms the site can be accessed and opened up without requirement for major upfront infrastructure – such as access roads or bridges – and is not dependent on third party landowners or utility/infrastructure providers.
- 3.6 **Build-out rates:** The previous trajectory for housing delivery on site was based on a very conservative assumption of 160 dpa (and was based on a simple assumption that each promoter would have one outlet). This is just above the national mean average (150 dpa) for sites of 2,000+ dwellings as per STF3 and is the mean figure from the second edition of the same research. However, there are several site-specific factors, as evidenced in STF3, which means the site could deliver above the national mean average including being a greenfield site, delivering a greater proportion of affordable housing, and the ability to host a number of outlets operating simultaneously.
- 3.7 In the context of the Inspector's questions with specific reference to SFT3, further consideration has been given to how the site would practically deliver. On this basis a fifth outlet is incorporated into the projection and this is agreed by NETP and the Council. Of the four promoters of NET, two are not housebuilders (Catesby Estates and Ptarmigan) and having considered the matter, it is considered reasonable that three outlets could be delivering in respect of their share of the site rather than the previously assumed two. Assuming there might be some depreciation in the annual output per outlet if the number of outlets increased from four to five, we have applied a 5% reduction, assuming 38 dpa per outlet. This means in a year where all five outlets were operational, annual build rates could reach 190 dpa. This is around the upper quartile build rate figure in the STF3 research for 2,000+ dwelling schemes of 188 dpa.
- 3.8 This is a conservative estimate. STF3 states at Table 5.2 that sites delivering with five outlets on average deliver 286 dpa, or 57.2 dwellings per outlet. In the neighbouring Wokingham, in the years where SDLs had five outlets operating, they delivered around 50 dpa each, or 250 dwellings a year².
- Matters in agreement: Timescales for the inspector's main modifications and updates to NETPs working assumptions. That an SPD would be a slower process than a

² See WS4/6 – Delivery Statement Appendix 3. South of the M4 and Arborfield Garrison examples

masterplan, which would be slower if agreement was needed prior to submission of an application rather than during. There are no infrastructure, landowner or utility impediments to delivering the site. That five outlets could be supported on the site reaching a maximum of 190 dpa when all five are operational.

- **Matters in disagreement:** The Council has indicated it would prefer the masterplan to be commissioned by a third party, procured by them and paid for by the NETP. The NETP does not agree that this proposed arrangement is necessary or would be effective and is likely to give rise to timescales for procurement and then potential disagreement over output and extend the time it would take to produce the masterplan itself. It is entirely common practice for the developer to take the lead in preparing the masterplan, whilst ultimately giving the Council control by way of requiring its approval.

The NETP considers the production of an SPD and masterplan for approval prior to an application for NET must be considered in the context of the stance from the leadership of the Council that led to it proposing to withdraw the local plan prior to intervention by the Secretary of State. This is different to the circumstances for some of the examples in the AP26 Technical Note, notably Long Marston Airfield SPD which had local and national government backing (as a designated Garden Community), and financing.

The Partnership considers the quickest nine-month timescales for production of an SPD would not be realistic in the context of a NET SPD. Furthermore, it is not uncommon for these processes to be legally challenged by third parties. On that basis it is concluded that it would take at least c.15 months (rounding the 14 months figure so it is associated with a quarter of a year) as the quickest and, as an upper range, three years to produce an SPD for NET.

4.0 The scenarios

4.1 For each of the three options, the timescales for each stage (low and high estimate) are informed by the examples set out in the supporting AP26 Technical Note. As the content of the Technical Note is a matter of disagreement with the Council, where the Council disagrees with the timescales associated with a particular stage of the option this is set out to assist the Inspector at the end of each option.

Option 1 - Council adopts the masterplan as SPD prior to submission of a planning application

Table 1 NETP timetable for the production and adoption of an SPD through to completion of the first house on site

Stage	Low estimate (date)	High estimate (date)	Assumptions
1 Revisiting the NET Partnership working assumptions on the scale of development on site.	Q4 2024	Q1 2025	Assume this will take 3-6 months

Stage		Low estimate (date)	High estimate (date)	Assumptions
2	Completion of various strategies and other work required by policy SP17 (Production of an updated evidence base to reflect 1,500 homes not 2,500.)	Ongoing	Ongoing	To be commenced from agreement of the revised NET Partnership working assumptions on the scale of development on site up to submission of the outline application (Q1 2027 or Q2 2029)
3	Whether an SEA is required?	Q1 2025	Q2 2025	<p>Assumptions based on the quickest an SPD could be produced being 15 months and the longest three years. This is informed by examples set out in the supporting AP26 Technical Note produced by Lichfields on behalf of the NETP.</p> <p>An SPD would be a council document. Although produced collaboratively (with technical work led by the Partnership) key stages would need to be led by the council, including consideration of SEA, public consultation and consideration by elected Members. To agree an SPD in West Berkshire the document would need to go to Full Council and go through various meetings. This would take at least two months.</p>
	Drafting of the SPD document including preparation of a masterplan in collaboration with the community and other stakeholders	Q2 2025 to Q1 2026	Q3 2025 to Q1 2027	
	Consultation of the draft SPD	Q1 2026	Q4 2027	
	Adoption of the SPD	Q2 2026	Q2 2028	
4	Pre-app (incl. consultation)	Q2 2026 to Q4 2026	Q2 2028 to Q4 2028	Assumed 6-month period.
5	Submission of outline planning application	Q4 2026	Q4 2028	
6	Determination of outline planning application	Q4 2027	Q4 2029	Assumed to take c.12 months
7	Council agreement to phasing arrangements	Ongoing	Ongoing	Agreed through determination of the application, including drafting the S106 and agreeing conditions
8	Completion of section 106 / other legal agreements.	Q1 2028 to Q3 2028	Q1 2030 to Q3 2030	Assume 6 months
9	Marketing and disposal of land to housebuilders	Q4 2028 – Q4 2029	Q4 2030 – Q3 2031	Only applicable to Ptarmigan Land and Catesby Estates (2/4 parcels). A lag of 12 months relative to the parcels being progressed by Donnington New Homes and A2Dominion is assumed.

Stage	Low estimate (date)	High estimate (date)	Assumptions	
10	Submission of first Reserved Matters	Q1 2029	Q1 2031	Donnington New Homes and A2Dominon parcels – assume 6 months after the S106 is signed
11	Determination of first Reserved Matters	Q3 2029	Q3 2031	Assume 6 months
12	Discharge of pre-commencement conditions.	Q3 2029 to Q3 2030	Q3 2031 to Q3 2032	Assume 12 months from decision on reserved matters
13	“Opening up works” (on and off-site).	Q3 2030 to Q3 2031	Q3 2032 to Q3 2033	Assume 12 months from discharge of pre-commencement conditions
14	First housing completed	Q3 2031	Q3 2033	

- Stages in agreement: 1, 2, 3, 4, 5. The length of time for stages 7, 8, 9, 10, 11, 12, 13 and 14 is not in disagreement, but when they occur will be impacted by the Council's disagreement over the length of time taken for stage 6.
- Stages in disagreement: 6, the Council considers this stage (determination of outline planning application) can be undertaken faster on the basis of the SPD process being undertaken. The Council's view is that key milestones can be agreed with the applicant regarding length of time for pre application, planning application, approval of conditions details to be considered and determined. The timescales for these aspects could therefore be reduced if negotiated appropriately through a PPA. The NETP considers timescales in a PPA are not binding and would not mean the stages of engaging and determining an application could not slip.
- Implications to timescales through disagreement: The Council considers the impact upon timescales would need to be confirmed through discussion between developer and Council. It is the NETPs view that, as set out in the supporting AP26 Technical Note, of the four SPD examples where applications were determined after adoption of an SPD, we consider, assuming 21 months from submission of an outline application to signing the S106 is a reasonable estimate which falls within the range identified³.

4.2 The below sets out housing completions in subsequent years (having regard to the requirements for this to be phased and coordinated with the timely delivery of the infrastructure required by SP17).

³ Only four examples submitted and determined applications after adoption of an SPD. Sandleford Park took 80 months, two applications at Arborfield Garrison took 6 months and 27 months respectively and South of the M4 took 12 months but was a small scheme relative to NET.

Table 2 NETP low estimate delivery in the plan period

	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	Totals
Outlet 1	29	38	38	38	38	38	38	38	38	38	371
Outlet 2	29	38	38	38	38	38	38	38	38	38	371
Outlet 3, 4 and 5		86	114	114	114	114	114	94			750
Total	58	162	190	190	190	190	190	170	76	76	1,492

Table 3 NETP high estimate delivery in the plan period

	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	Totals
Outlet 1	29	38	38	38	38	38	38	38	295
Outlet 2	29	38	38	38	38	38	38	38	295
Outlet 3, 4 and 5		86	114	114	114	114	114	94	750
Total	58	162	190	190	190	190	190	170	1,340

- Implications to total build out in the plan period through disagreement: The Council considers the impact upon timescales (when delivery would commence) to a shorter time period at Stage 6 would need to be confirmed through discussion between developer and Council. Based on the AP26 Technical Note, the NETP consider Q3 2031 to Q3 2033 is a reasonable date for completion of the first dwelling.

Option 2 - Council agrees the masterplan as informal guidance prior to the submission of a planning application

Table 4 NETP timetable for the production and agreement of a masterplan for the site through to the completion of the first house on site

Stage	Low estimate (date)	High estimate (date)	Assumptions
1	Q4 2024	Q1 2025	Assume this will take 3-6 months

Stage	Low estimate (date)	High estimate (date)	Assumptions	
2	Completion of various strategies and other work required by policy SP17 (Production of an updated evidence base to reflect 1,500 homes not 2,500)	Ongoing	Ongoing	To be commenced agreement of the revised NET Partnership working assumptions on the scale of development on site up until submission of the outline application (Q3 2026 to Q4 2027)
3	Council agreement to masterplan	Q1 2025 to Q4 2025	Q2 2025 to Q4 2026	Assumed production of and agreement to a masterplan would take 9 to 18 months based on production by the NETP. This is in line with the West Eynsham masterplan, which was a developer led masterplan, example included in the AP26 Technical Note. On this basis the NETP consider nine months is the minimum amount of time it would take to agree a masterplan produced by the developer.
4	Pre-app	Q4 2025 to Q2 2026	Q4 2026 to Q2 2027	Assumed 6-month period.
5	Submission of outline planning application	Q2 2026	Q2 2027	
6	Determination of outline planning application	Q2 2027	Q2 2028	Assumed to take c.12 months
7	Council agreement to phasing arrangements	Ongoing	Ongoing	Agreed through determination of the application, including drafting the S106 and agreeing conditions
8	Completion of section 106 / other legal agreements.	Q3 2027 to Q1 2028	Q3 2028 to Q1 2029	Assume 6 months
9	Marketing and disposal of land to housebuilders	Q2 2028 – Q1 2029	Q2 2029 – Q1 2030	Only applicable to Ptarmigan Land and Catesby Estates (2/4 parcels). A lag of C.12 months relative to the parcels being progressed by Donnington New Homes and A2Dominion is assumed.
10	Submission of first Reserved Matters	Q3 2028	Q3 2029	Donnington New Homes and A2Dominion parcels – assume 6 months after the S106 is signed
11	Determination of first Reserved Matters	Q1 2029	Q1 2030	Assume 6 months
12	Discharge of pre-commencement conditions.	Q1 2029 to Q1 2030	Q1 2030 to Q1 2031	Assume 12 months from decision on reserved matters
13	“Opening up works” (on and off-site).	Q1 2030 to Q1 2031	Q1 2031 to Q1 2032	Assume 12 months from discharge of pre-commencement conditions
14	First housing completed	Q1 2031	Q1 2032	

- Stages in agreement: 1, 2, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13 and 14.

- **Stages in disagreement:** 3, the Council has indicated it would prefer the masterplan to be commissioned by a third party, procured by them and paid for by the Partnership. The Council considers that there are a range of procurement options, some of which may be quicker than others and therefore it would not add significant timescales. The Partnership does not agree that this proposed arrangement would be effective and is likely to give rise to timescales for procurement and then disagreement over output due to parallel masterplanning processes (by the Council and prospective applicant), and extent of time it would take to produce the masterplan itself. This has implications for how long it would take to complete stage 3.
- **Implications to timescales through disagreement:** The Council considers the assumed production period above of 9-18 months would continue to be applicable. NETP considers no masterplan would be completed in less than 12-21 months (3 months more than the currently assumed 9-18 months) if produced by a third party.

4.3 The below sets out housing completions in subsequent years (having regard to the requirements for this to be phased and coordinated with the timely delivery of the infrastructure required by SP17).

Table 5 NETP low estimate delivery in the plan period

	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	Totals
Outlet 1	10	38	38	38	38	38	38	38	38	38	23	375
Outlet 2	10	38	38	38	38	38	38	38	38	38	23	375
Outlet 3, 4 and 5		29	114	114	114	114	114	114	37			750
Total	20	105	190	190	190	190	190	190	113	76	46	1,500

Table 6 NETP high estimate delivery in the plan period

	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	Totals
Outlet 1	10	38	38	38	38	38	38	38	38	38	352
Outlet 2	10	38	38	38	38	38	38	38	38	38	352
Outlet 3, 4 and 5		29	114	114	114	114	114	114	37		750
Total	20	105	190	190	190	190	190	190	113	76	1,454

- **Implications to total build out in the plan period through disagreement:** The Council considers that there would be no change to when delivery would commence. NETP

considers third party production of the masterplan would extend the timescale for the first housing completion by three months to Q2 2031 to Q2 2032.

Option 3 - Council agrees the masterplan during the planning application process

Table 7 NETP timetable for the agreement of a masterplan for the site during the determination of an application through to the completion of the first house on site

Stage	Low estimate (date)	High estimate (date)	Assumptions	
1	Revisiting the NET Partnership working assumptions on the scale of development on site.	Q4 2024	Q1 2025	Assume this will take 3-6 months
2	Completion of various strategies and other work required by policy SP17 (Production of an updated evidence base to reflect 1,500 homes not 2,500)	Ongoing	Ongoing	To be commenced from agreement of the revised NET Partnership working assumptions on the scale of development on site up until submission of the outline application (Q4 2025 to Q2 2026)
3	Pre-app	Q1 2025 to Q3 2025	Q2 2025 to Q4 2025	Assumed 6-month period.
4	Submission of outline planning application	Q3 2025	Q4 2025	
5	Determination of outline planning application, as part of which 'Council agrees to a masterplan'	Q3 2026	Q4 2026	Assumed to take c.12 months
6	Council agreement to phasing arrangements	Ongoing	Ongoing	Agreed through determination of the application, including drafting the S106 and agreeing conditions
7	Completion of section 106 / other legal agreements.	Q4 2026 to Q2 2027	Q1 2027 to Q3 2027	Assume 6 months
8	Marketing and disposal of land to housebuilders	Q3 2027 – Q2 2028	Q4 2027 – Q3 2028	Only applicable to Ptarmigan Land and Catesby Estates (2/4 parcels). A lag of C.12 months relative to the parcels being progressed by Donnington New Homes and A2Dominion is assumed.
9	Submission of first Reserved Matters	Q4 2027	Q1 2028	Donnington New Homes and A2Dominion parcels – assume 6 months after the S106 is signed
10	Determination of first Reserved Matters	Q2 2028	Q3 2028	Assume 6 months

Stage		Low estimate (date)	High estimate (date)	Assumptions
11	Discharge of pre-commencement conditions.	Q2 2028 to Q2 2029	Q3 2028 to Q3 2029	Assume 12 months from decision on reserved matters
12	“Opening up works” (on and off-site).	Q2 2029 to Q2 2030	Q3 2029 to Q3 2030	Assume 12 months from discharge of pre-commencement conditions
13	First housing completed	Q2 2030	Q3 2030	

- Stages in agreement: 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12 and 13
- Stages in disagreement: N/A

4.4 The below sets out housing completions in subsequent years (having regard to the requirements for this to be phased and coordinated with the timely delivery of the infrastructure required by SP17).

Table 8 NETP low estimate delivery in the plan period

	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	Totals
Outlet 1	38	38	38	38	38	38	38	38	38	33		375
Outlet 2	38	38	38	38	38	38	38	38	38	33		375
Outlet 3, 4 and 5		114	114	114	114	114	114	66				750
Total	76	190	190	190	190	190	190	142	76	66		1,500

Table 9 NETP high estimate delivery in the plan period

	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	Totals
Outlet 1	19	38	38	38	38	38	38	38	38	38	14	375
Outlet 2	19	38	38	38	38	38	38	38	38	38	14	375
Outlet 3, 4 and 5		57	114	114	114	114	114	114	9			750
Total	38	133	190	190	190	190	190	190	85	76	28	1,500

5.0 Summary

- 5.1 Based on the preceding analysis, the headline outputs from the three options – all based on 1,500 homes and with a range to reflect uncertainty over time for revising working assumptions for a significantly smaller scheme and agreeing the masterplan under Options 1 and 2 – are as follows:

Table 10 Summary Outputs

	Option 1 (SPD)	Option 2 (Informal Masterplan)	Option 3 (Masterplan within application)
SPD or masterplan adopted / approved	Q2 2026 - Q2 2028	Q4 2025 – Q4 2026	Q3 2026 – Q4 2026 (when application determined)
Outline application submitted	Q4 2026 - Q4 2028	Q2 2026 - Q2 2027	Q3 2025 – Q4 2025
Outline Permission granted and legal agreements completed	Q3 2028 – Q3 2030	Q1 2028 - Q1 2029	Q2 2027 – Q3 2027
Determination of first Reserved Matters	Q3 2029 – Q3 2031	Q1 2029 - Q1 2030	Q2 2028 - Q3 2028
First housing completed	Q3 2031 – Q3 2033	Q1 2031 – Q1 2032	Q2 2030 – Q3 2030
Homes built within plan period	1,339 – 1,491	1,454 – 1,500	1,500

- Matters in agreement:** The Council considers that the planning to delivery period assumed by the NETP for NET is 2 years, which is longer than the average 1.6 years in the STF3. It is therefore the Council's view that timescales could be reduced by at least 6 months. The NETP accepts that the average planning to delivery period for sites of 1,500+ homes is 1.6 years (or 1 year and 7.2 months) in STF3. Whilst the NETP consider 2 year is a reasonable estimate for NET, a range of 1 year and 9 months (rounded up due to the need to consider delivery in quartiles) and 2 years is agreed to be reasonable. This would have very little impact on the options modelled as it means delivery of the first unit would come forward three months (or one quarter) faster. For option 1 delivery in the plan period would be 1,358 to 1,500 an under option 2 1,472 to 1,500.
- Matters in disagreement:** The Council's view is that in all scenarios, the determination period for pre-application discussions and planning applications could be reduced on the basis there is the opportunity/possibility for the Council to take a positive approach. Milestones would be agreed through a Planning Performance Agreement. The NETP considers that the planning approval period in STF3 covers the period from validation of the first application to detailed approval (normally a RMA). The variance in all three Options above relates to the time prior to submission of a planning application (in terms of revising the Partnerships working assumptions for a smaller scheme at 1,500 [were that to be found sound] and approving the masterplan as a discrete exercise). However, the approval period from submission of the application is a constant at two years and nine months. This is at the quicker end of the spectrum of the examples

analysed in STF3 where the lower quartile for schemes of 100+ units extends from 2.6 – 4.1 years (for 2,000 unit projects). However, it should be remembered that a lower quartile figure means that 25% of all schemes analysed can take less time than this benchmark, and in this regard, for the 93 sampled schemes (for which STF3 had planning approval data) over 1,500 units, there are 17 schemes with approval periods quicker than is being assumed for NET, a good number of them being below two years.

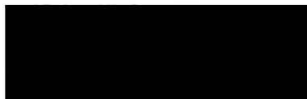
It is the Partnership's position that for context to the above, were the allocation to be confirmed via Main Modifications at 2,500 homes, there would be no need to revisit working assumptions and evidence underpinning the work done to date which would automatically cut 3-6 months from the above timescales and – under Option 3 – see homes completed on site by Q2 2030. The Council disagrees.

Signed:



Clare Lawrence, Executive Director - Place

West Berkshire Council



Matthew Spry, Senior Director

Lichfields