

From: [REDACTED]
To: [REDACTED]
Subject: Re: Consultation on the West Berkshire Local Plan Review 2022-2039 Proposed Main Modifications
Date: 31 January 2025 16:32:19
Attachments: [REDACTED]

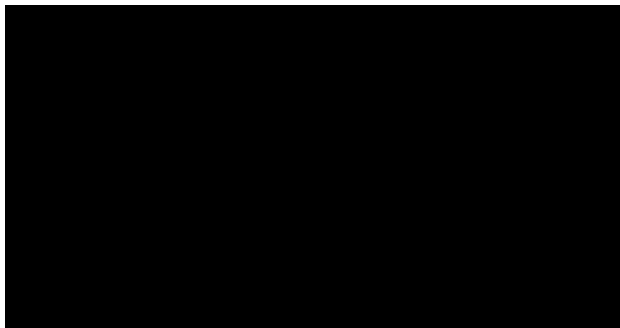
This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.

Dear Sir / Madam

Please see attached the updated version of the representations which I wish to be uploaded – please disregard the previous version

Andrew

Andrew Black



In 2025, ABC will be supporting Dose of Nature as its chosen Charity of the Year. The Charity works with people with mental health problems by encouraging them to connect with nature in order to improve their mental wellbeing.



From: Andrew Black [REDACTED]
Date: Friday, 31 January 2025 at 10:59
To: "planningpolicy@westberks.gov.uk" [REDACTED]

Subject: Consultation on the West Berkshire Local Plan Review 2022-2039 Proposed Main Modifications

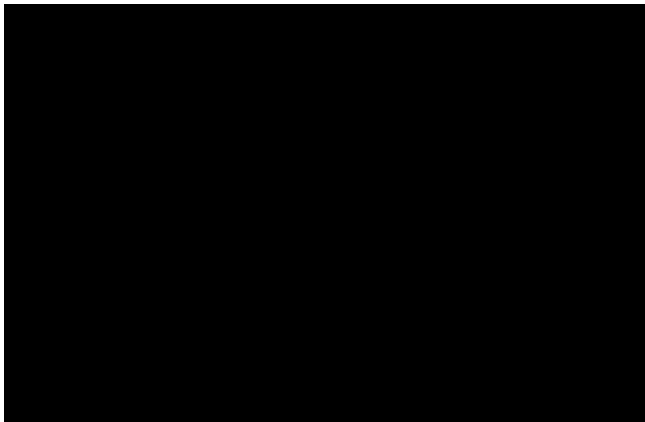
Dear Sir / Madam

Please find attached a representation for and separate representations on behalf of Bucklebury Parish Council for the consultation on the main modifications to the local plan.

I would be grateful if you could acknowledge receipt.

With thanks

Andrew Black



In 2025, ABC will be supporting Dose of Nature as its chosen Charity of the Year. The Charity works with people with mental health problems by encouraging them to connect with nature in order to improve their mental wellbeing.





**West Berkshire Local Plan Review 2022-2039 (LPR)
 Consultation on Proposed Main Modifications
 (6 December 2024 – 31 January 2025)**

Representation Form

Ref:
 (For official use only)

Please complete and return this form:	By email: [REDACTED]
	By post: Planning Policy, Development and Housing, Council Offices, Market Street, Newbury, RG14 5LD
Return by:	11:59pm on Friday 31 January 2025

Please read the **Guidance Note**, available on the Council’s website <https://www.westberks.gov.uk/lpr-proposed-main-modifications>, before making your representations.

This form has two parts:
 PART A – Your details
 PART B – Your representation(s)

Please complete a new form for each representation you wish to make.

<u>PART A: Your details</u>		
<i>Please note the following:</i>		
<ul style="list-style-type: none"> <i>We cannot register your representation without your details.</i> <i>Representations cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.</i> 		
	1. Your details	2. Agent’s details (if applicable)
Title	Mr	Mr
First Name*	Barry	Andrew
Last Name*	Dickens	Black
Job title <i>(where relevant)</i>	Chairman	Managing Partner
Organisation <i>(where relevant)</i>	Bucklebury Parish Council	Andrew Black Consulting
Address* <i>Please include postcode</i>	[REDACTED]	
Email address*	[REDACTED]	
Telephone number		
Consultee ID <i>(if known)</i>		

PART B – Your representation(s)

All comments made at previous stages of the LPR have been taken into account by the Inspector and there is no need to resubmit these. Publication of the proposed Main Modifications is a regulatory stage and any representations made should relate specifically to the legal compliance and soundness of the proposed Main Modifications and should not relate to parts of the Plan that are not proposed to be modified.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change.

Your name or organisation (and client if you are an agent):	Bucklebury Parish Council
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Proposed Main Modifications and Proposed Changes to the Policies Map

1. Please indicate whether your representation relates to the Schedule of Proposed Main Modifications or the Schedule of Proposed Changes to the Policies Map and provide the modification/change number you are commenting on below:

Document name	All Documents
Modification/Change reference number (MM / PMC)	In relation to SP17

2. Do you consider the Proposed Main Modification or Proposed Policy Map Change to be:
(please tick/mark 'X' one answer for a and one for b)

- a) **Legally compliant** Yes No
- b) **Sound** Yes No

Please refer to the guidance notes for a full explanation of 'legally compliant' and 'soundness'

If you consider the Proposed Main Modification or Proposed Policy Map Change not to be sound, please identify which test of soundness your representation relates to:
(please tick/mark 'X' all that apply)

Positively Prepared: The LPR should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements.	x
Justified: the LPR should be the most appropriate strategy, when considered against the reasonable alternatives	x
Effective: the LPR should be deliverable	x
Consistent with national policy: the LPR should enable the delivery of sustainable development in accordance with the policies of the NPPF	x

3. If you have answered ‘No’ to question 2a or 2b above, please provide details of why you consider the Proposed Main Modification or Proposed Policy Map Change is not legally compliant or is unsound, including any changes you consider necessary to make the Plan legally compliant or sound.

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

Please refer to separate representations
--

Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA)

4. Do you have any comments on the updated Sustainability Appraisal/Strategic Environmental Assessment Report – Proposed Main Modifications (November 2024)?
(Please be as precise as possible)

Page number	Various
Paragraph number	Various
Comments:	
Please refer to separate representations	

Habitats Regulations Assessment

5. Do you have any comments on the addendum to the Habitats Regulations Assessment of the Proposed Main Modifications (November 2024)?

(Please be as precise as possible)

Page number	Various
Paragraph number	Various
Comments:	
Please refer to separate representations	

Notification of Progress of the Local Plan Review

6. Do you wish to be notified of any of the following?

(please tick/mark 'X' all that apply)

<i>The publication of the report of the Inspector appointed to carry out the examination</i>	<i>x</i>
<i>The adoption of the Local Plan Review</i>	<i>x</i>

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

Signature	Andrew Black	Date	31.01.2025
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Your completed representations must be received by the Council by 11:59pm on Friday 31 January 2025.



West Berkshire Local Plan Review

Proposed Main Modifications Consultation

**Representations on behalf of Bucklebury Parish
Council**

January 2025

Project West Berkshire Local Plan

ABC Reference ABC0170/07

Issue Final

Author Andrew Black

Date January 2025

Disclaimer: This report has been prepared for the above-named client for the purpose agreed in Andrew Black Consulting's (ABC) terms of engagement. Whilst every effort has been made to ensure the accuracy and suitability of the information contained in this report, the results and recommendations presented should not be used as the basis of design, management or implementation of decisions unless the client has first discussed with ABC their suitability for these purposes and ABC has confirmed their suitability in writing to the client. ABC does not warrant, in any way whatsoever, the use of information contained in this report by parties other than the above-named client.

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1. Introduction and Executive Summary

- 1.1 These representations are made on behalf of Bucklebury Parish Council in response to the consultation on the Proposed Main Modifications to the West Berkshire Local Plan Review 2022-2039.
- 1.2 Andrew Black Consulting represented Bucklebury Parish Council (BPC) in the local plan hearing sessions throughout the summer of 2024.
- 1.3 These representations refer to regulation 18 and 19 submissions made during the consultation process for the Local Plan Review (LPR) and also the matters statements submitted in advance of the hearing sessions.
- 1.4 These representations respond to the following consultation documents:
- Schedule of Main Modifications to the West Berkshire Local Plan Review 2022-2039 (November 2024).
 - Schedule of Proposed Changes to the Policies Map
 - Updated Sustainability Appraisal / Strategic Environmental Assessment (SE/SEA) Report – Proposed Main Modifications (November 2024)
- 1.5 The main thrust of these representations is made against the tests of soundness as set out in paragraph 35 of the previous version of the National Planning Policy Framework which the plan was examined against. This states that plans are ‘sound’ if they are:
- Positively prepared*** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- Justified*** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- Effective*** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- Consistent with national policy*** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.
- 1.6 For the reasons set out within these representations, it is considered that the main modification proposed are unsound and fail against each of the tests as set out in paragraph 35 of the framework. The failings against the tests of soundness are set out in each of the subsequent sections of these representations.



2. Schedule of Proposed Main Modifications

- 2.1 The main area of concern for BPC is the main modifications in relation to the proposed allocation of development at North East Thatcham under policy SP17. The proposed modifications to this policy are set out in turn with submissions made against each element.

Main Modification MM25

'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 the provision of all infrastructure, services, open space and facilities will meet the needs of the development will and be delivered in a timely and co-ordinated way across the whole site 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.'

- 2.2 It is not considered that the proposed modifications to the rest of the policy provide a sound approach to the delivery of a comprehensive development. Far from providing more certainty on the delivery of infrastructure, the modifications to the wider policy bring about further ambiguity which is set out in subsequent sections of this statement.
- 2.3 BPC made consistent submissions throughout the examination process on the providence of the Thatcham Strategic Growth Study and its role in the allocation of the site in policy SP17 and its basis within this the wording of the policy. Its removal in the thrust of the policy is welcomed and reflects the submissions made on this basis, however it remains as an evidence base document which is referenced elsewhere in the policy. Further submissions are made on this within subsequent sections of this document.

Homes

The site is to be allocated for the phased delivery of approximately 1,500 up to approximately 2,500 dwellings, with the final number of dwellings to be determined by the adopted Masterplan Supplementary Planning Document (SPD) required by this policy. which will be completed within the period of the plan. 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 Policy 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.*

- 2.4 The increase of allocation on the site to 2,500 dwellings has consistently shown to be unsound by BPC. Further reasoning on the soundness of this approach is highlighted in subsequent



sections of these submissions by reference to the scoring within the Sustainability Appraisal addendum in relation to this increase.

- 2.5 Whilst the requirement of a Masterplan SPD is welcomed it is not considered that this would make the policy, or wider plan, sound.
- 2.6 WBC offered a zoom meeting with parish counsellors ONLY on 22nd January. This is 7 working days before the consultation ends and far too late to enable BPC to brief parishioners and for them to respond.
- 2.7 It is clear to BPC that WBC has acted to frustrate this consultation by making it very difficult for the public to meaningfully engage and be heard.
- 2.8 The requirement for the masterplan to be undertaken and adopted prior to an application being submitted is evidence in its own right that the allocation of the site for 1,500 dwellings, let alone 2,500, was made in haste at the very end of the plan making progress and lacked the justification and evidence base for this to be considered a sound approach.

Community

The site will provide a range of community facilities, including:

- *Local centres providing local retail facilities and small-scale ~~employment~~ business-use, 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 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;*
- *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~~ 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 to meet the identified needs of the development;~~
- ~~Open space to meet the needs of the development in accordance with Policy DM41.~~

- 2.9 The removal of a space requirement in relation to the local centre brings in further ambiguity to the policy and provides the local community with no assurance of what will be provided on the site. It also removes a requirement that will form the basis of the scope for the masterplan SPD.
- 2.10 It was clear during the examination hearings that the process undertaken to date by WBC in relation to the provision of healthcare on the site was severely flawed and there was no certainty on the form of provision that might come forward on the site or the viability of such a provision. The removal of the requirements in regard to size of the surgery reflects this lack of certainty. The inclusion of a requirement for further detailed feasibility work has been added by the council but this does not remedy the fundamental issues of soundness in the approach to what should be an infrastructure led development.
- 2.11 As with the healthcare provision, the secondary school and SEND provision is subject to the requirement of a further feasibility study.
- 2.12 In regard to both healthcare and school provision if a sound approach had been taken by WBC in advance of the submission of the plan, then the requirement for a further feasibility study would not be necessary.
- 2.13 In any event, no details of the timing for this feasibility work have been set out within the policy wording nor the supporting text and it is assumed that this would form part of the masterplan SPD process. The council should confirm this in any final proposed wording of the plan.
- 2.14 The removal of the minimum requirements in relation to the community indoor facility also bring about significant ambiguity and concern for the local community on the form the development will take and is considered a retrograde step in the soundness of the policy as a whole.

Green Infrastructure

The site will provide a comprehensive network of green infrastructure network and public open space across the whole site in accordance with policy SP10 which will respond positively to the ~~take advantage of the sensitivities of the landscape, protect and enhance landscape and 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 is to be informed by a Landscape and Visual Impact Assessment and the masterplanning process, having regard to the location of the site within the setting of the North Wessex Downs National Landscape (AONB);
- ~~A new community park linking Thatcham to the North Wessex Downs AONB;~~
- Green infrastructure and public open space within the developed parts of the site in addition to the community park, taking into account the requirements set out in DM40;
- Greenways which connect through the site to the park and facilitate connectivity to the wider landscape and the existing Public Rights of Way network; connection to the 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;~~
- Existing and new Public Rights of Way and 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;
- ~~Retained and new trees, hedgerows and other appropriate native planting which contribute to biodiversity net gain;~~
- Provision of allotments;
- Outdoor formal and informal sports pitches and areas; and
- A **Green Infrastructure Strategy** to show how the network of multifunctional green infrastructure will be delivered across the site to include a strategy for the protection of existing and provision of new trees, hedgerows and other appropriate native planting.

2.15 The approach taken by the council in relation to the provision of green infrastructure within policy SP17 was a source of significant concern for BPC in the lead up to the examination. Clearly the increase of the dwellings to be delivered on this site by order of 1,000 dwellings will put significant pressure on the amount of green infrastructure which could feasibly be delivered on the site and the overall form this will take. This would clearly be a vital part of the masterplan SPD process, but fundamental concerns remain around how the green



infrastructure will be delivered and maintained on site in a way which protects the existing communities around the site and provides a sustainable form of development.

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~~*
- *How adverse impacts on air quality will be minimised; and*
- *Promotion and encouragement of sustainable modes of travel, in accordance with policy DM45.*

2.16 The transport impacts of the proposed allocation were a key area of concern for BPC in advance of the hearing sessions and this has been exacerbated by the increase in dwellings to 2,500. For the reasons set out in the submissions made by BPC, the evidence base and assessments in relation to traffic impact are fundamentally flawed and remain so. Further submissions are made in relation to the scoring of the site in the revised SA regarding highway impact.

2.17 In terms of the modifications, the insertion of wording to include *multiple access points* gives significant cause for concern. The revised maps accompanying policy SP17 show an access point onto Harts Hill Road, this would give a direct route through the site into Upper Bucklebury Village and would actively encourage the directing of traffic through this route in order to avoid congestion on the A4 / Floral Way and would be used to get access to the M4.

2.18 The Main Mods to the LP takes an insular view on the impact of traffic concentrating on internal movement within the site and access points. The LP indulges in wishful thinking over sustainable transport modes for SP17. Its suggestion that residents will choose to cycle, walk or use infrequent bus services is illusory. Most residents will have no option but to use their cars to commute to work and for the school run if ,as seems probable, the secondary/SEND school will be off-site. Much increased traffic congestion on the A4 at peak times will see hundreds of additional car journeys going up Harts Hill Rd for the M4 J12 and J13 and A34. Yet



there are no planned road improvements to the roads surrounding the site. The LP fails to address improving highway capacity in the vicinity of the site with no road junction enhancements yet astonishingly the SA Appendix 5 says the SP17 development is likely to have a positive impact on road safety.

- 2.19 There is also a direct contradiction in the wording of the policy which requires adverse impacts to be minimised and the scoring in the SA which states that there are no such impacts.

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 Ppolicies 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.~~
- ~~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; and~~
 - ~~Surface water management approaches that could deliver net gain for Thatcham town, including use of on-site sustainable drainage systems (SuDS).~~
- ~~An Ecology Strategy which will set out:~~
 - ~~A Biodiversity Net Gain Strategy to show how 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 site wide management plan.~~
- ~~A Green Infrastructure Strategy which will show how a network of multifunctional green infrastructure will be delivered across the site.~~



- ~~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.~~
- ~~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.~~
- ~~A Landscape and Visual Impact Assessment (LVIA) in accordance with the Landscape Institute Guidelines for Landscape and Visual Impact Assessment 3rd edn. 2013. This will inform the final capacity, 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 Assessment (2021) of the site.~~
- ~~A Mineral Resource Assessment (MRA)~~
- ~~A Historic Environment Strategy to demonstrate how the listed buildings in the area will be conserved and how the impact of the development on their settings has been considered.~~
- A Construction and Operations Management Plan (COMP) to ~~shall~~ accompany any planning application on the site. The COMP shall safeguard ~~the any below ground infrastructure oil pipeline~~ on the site from operational works, including the provision of an appropriate buffer.

2.20 The removal of the wording in relation to energy requirements from the wording of the policy is not considered to be effective or justified and creates significant ambiguity around the actual form of development that will be created. It means that any planning application(s) can be brought forward with an Energy Statement which simply seeks to meet the minimum base level requirements and will lead to a form of development which provides a poor-quality form of development.

2.21 The requirement of the Construction and Operations Management Plan is considered vital given the known constraints of the site. The reference to *below ground infrastructure* reflects the known constraints in terms of oil and gas pipelines crossing the site. It is highly irregular that despite the known presence of these constraints that no further work has been undertaken on the feasibility of development over or near to them and what impact these elements will have on the overall capacity of the site. This is work which should have been done in advance of the allocation of the site for development and is considered to represent an unsound approach in its own right as a stand-alone issue.

Biodiversity

Development proposals for the site will be supported by a Biodiversity Strategy in accordance with policy SP11 which will set out:

- *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 site-wide biodiversity Management Plan.

2.22 As set out within the submissions from BPC throughout the local plan process, it is considered that the assessment of biodiversity harm resulting from the development of the SP17 has been fundamentally incorrectly assessed. Furthermore, it was demonstrated to the inspector that the survey work undertaken in relation to the biodiversity baseline on the site and the ecological impact of development of the site were not robust, reliable or up-to-date. It is therefore highly surprising that the council is continuing to rely on this evidence to justify development of the site.

2.23 The requirement for the development proposals to be supported by a biodiversity strategy will not remedy the issues of soundness already identified by BPC. In the event that allocation of the site is found to be sound then it is vital that the biodiversity strategy is carried out in advance of the submission of the application and is used to inform the Masterplanning process.

Landscape

The site lies in the setting of the North Wessex Downs National Landscape (AONB) and will be developed in accordance with policy SP2 and the Landscape Sensitivity and Capacity Assessment (2021) for the site.

Development proposals for the site will be supported by 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 Masterplan SPD which will determine the final capacity, 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.~~

2.24 As with other aspects of the impacts from the development of SP17, BPC has consistently set out significant concerns on the landscape impact of even a lower quantum of development on the site. The increase of the allocation to 2,500 dwellings significantly exacerbates these concerns.

2.25 Since the plan was submitted for examination the Levelling-Up and Regeneration Act 2023 was formally enacted. Section 245 (Protected Landscapes) of the Levelling-up and Regeneration Act 2023 (LURA) amends the duty on relevant authorities in respect of their functions which affect land in National Parks, National Landscapes, and the Norfolk and Suffolk Broads (collectively referred to as Protected Landscapes) in England.

2.26 Relevant authorities must now 'seek to further' the statutory purposes of Protected Landscapes. This replaces the previous duty on relevant authorities to 'have regard to' their statutory purposes at the plan making stage.



- 2.27 The duty also applies to functions undertaken outside of the designation boundary which affects land within the Protected Landscape.
- 2.28 Natural beauty, special qualities, and key characteristics can be highly dependent on the contribution provided by the setting of a Protected Landscape. Aspects such as tranquillity, dark skies, a sense of remoteness, wildness, cultural heritage or long views from and into the Protected Landscape may draw upon the landscape character and quality of the setting.
- 2.29 Functional connectivity is also important where there are flows or close interconnection between the Protected Landscape and its setting, for example:
- a shared water catchment and management of water resources
 - ecological connectivity where species are able to move across and between the designated and non-designated area
 - Rights of Way, Open Access Land and other recreational links joining the designated area to the wider countryside
- 2.30 Development and the management of land, water and estates located in the setting have the potential to adversely affect the natural beauty, special qualities, and key characteristics of a Protected Landscape.
- 2.31 Given the sensitivity of the location of the site in the setting of the North Wessex Downs AONB, as accepted by WBC, it is clear that the new duties under the LIURA apply to the allocation at SP17. It is clear on any reading of the policy, evidence base and proposed modifications that the council has failed its legal duty to properly consider the impacts of development within the setting of a National Landscape. The plan is unsound on this basis alone and cannot be remedied through modifications.
- 2.32 Regarding the requirement for a Landscape and Visual Impact Assessment (LVIA), this forms a fundamental aspect of any future application. The wording of the policy is clear that this will inform the Masterplan SPD and it is therefore clear that this must be an iterative and sequential process which further impacts on expected timescales for this work and the overall capacity of the site should the LVIA indicate that development of much lower quantum of homes would be required to ensure that the setting of the AONB is protected.

Heritage

Development proposals for the site will be supported by a Historic Environment Strategy in accordance with policy 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.

- 2.33 As with other aspects of the policy it is considered that heritage impacts from the development have not been adequately assessed by WBC in advance of the allocation of the site for development. Consideration of these proposals at application process is not



considered to be a sound approach and these are aspects which must be taken into account during the Masterplanning process. The wording of the policy should be amended to reflect this requirement.

Lighting

Development proposals for the site will be supported by 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.

- 2.34 The potential for impact from development in terms of light pollution is considered to be significant. The increase in number of units proposed under policy SP17 will significantly increase such impact. It is considered that this process must be undertaken alongside the LVIA process and should inform the masterplan SPD rather than being left to the application process. The wording of the policy should be amended to reflect this requirement.

Mineral Resources

Development proposals for the site will be supported by 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.

- 2.35 No comments.

Masterplanning and Design Code

The site will be masterplanned and a Supplementary Planning Document (SPD) prepared by the Council. The SPD will be funded by the applicant and prepared in collaboration with the applicant, relevant town and parish councils, the community and other stakeholders. The SPD will be adopted by the Council prior to the submission of a planning application. The Masterplan SPD 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 SPD will determine the location and extent of built development, land uses, green infrastructure including the extent of 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 adopted Masterplan SPD.

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.'

Replace the indicative site map with the updated indicative site map shown in Annex C below. Consequential changes to the Policies Map as shown in the Schedule of Proposed Changes to the Policies Map (PMC7)

- 2.36 As set out throughout this response, the Masterplanning process is considered to be a vital process in order to establish the true capacity of the site. However, for the reasons set out, the fact that this has been added to the requirements of the policy reinforces the concerns



raised on the fundamental issues of soundness and lack of evidence base underpinning the allocation and its addition as a main modification does not remedy the objections raised on this basis.

- 2.37 The principle of collaboration with parish councils, the community and other stakeholders is welcomed but with no scope or framework for these discussions there is little in the way of comfort offered to those parties on how the Masterplanning process will be undertaken and what the outcomes will be if fundamental concerns about the process or outputs be raised.
- 2.38 The council has consistently failed to consult with local groups as part of the local plan. A further example of this was the invitations by the council on 15 January to parish councils to provide an overview of the Main Modifications consultation to a meeting on 22 January which would be less than 10 days before the end of this current consultation. On this basis there is little comfort that the council will seek to constructively engage with parish councils during the preparation of the masterplan.
- 2.39 As set out the indicative site map in Annex C of the main modifications document shows access points from Harts Hill Road. This is not considered necessary or justified and would further exacerbate the significant highway impacts as highlighted in the submissions made by BPC throughout the examination process. There is no requirement to show indicative access points in the plan attached to policy SP17 until further work on this matter has been undertaken. The plan also shows an indicative green infrastructure buffer which cannot be confirmed until the Masterplanning process has been undertaken. It is also clear that no buffer has been made around the area of ancient woodland which extends into the site, nor does it include any buffer around the heritage assets on the site.

Main Modification 26

- 2.40 Several amendments are proposed to the wording of policy SP17. Submissions are made only in reference to paragraphs where amendments are proposed by the council.

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.

- 2.41 BPC has consistently raised concerns about the reference to Thatcham Strategic Growth Study (TSGS) within the policy and supporting text of policy SP17. These remain a fundamental issue of soundness in the opinion of BPC and the council has consistently failed to provide any response or defence to the concerns raised throughout the examination process. For the reasons set out it is not considered that the TSGS provides a reliable starting point for the allocation of this site or any subsequent Masterplanning process. Any reference to the TSGS



should be removed from the final wording of the policy SP17 and in the evidence base of the plan.

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 location and extent of built development, access, landscaping and green infrastructure will be determined following the completion of further work such as LVIA and the Masterplan SPD required by policy SP17.

- 2.42 As set out the indicative site map in Annex C of the main modifications document shows access points from Harts Hill Road. This is not considered necessary or justified and would further exacerbate the significant highway impacts as highlighted in the submissions made by BPC throughout the examination process. There is no requirement to show indicative access points in the plan attached to policy SP17 until further work on this matter has been undertaken.

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, taking into account the site's location within the setting of the North Wessex Downs National Landscape (AONB). 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 and the green infrastructure buffer 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.

- 2.43 The suggestion that half of the site will be set aside for green infrastructure is not reflected in the indicative map set out within the policy nor is it considered that this would be possible with an increase in the suggested capacity of the site 2,500.

- 2.44 There is also significant concern on how this area will be managed and maintained into perpetuity. No reference is made to the management responsibilities for the significant area of green infrastructure and this should be brought into the wording of the policy in order to demonstrate that the entire allocation is deliverable.

x.xx The area of green infrastructure shown on the indicative map takes into account the landscape work undertaken 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 green infrastructure buffer will be informed by the LVIA, and other relevant background work carried out to support the Masterplan SPD.

- 2.45 As set out the area of green infrastructure on the indicative map is not considered to be accurate nor reflective of the true constraints of the site. The wording proposed by the council accepts that the final area of green infrastructure will be informed by the LVIA. On this basis,



and until such work has been carried out, it is not considered to be justified for the extent of such green infrastructure to be illustrated in the wording of the policy.

x.xx The settlement boundary for Thatcham, is an exception to the settlement boundary review criteria set out in Appendix 2, and 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.

- 2.46 This is not considered to be a sound approach. As proposed, the settlement boundary is drawn around the entire site and would therefore mean that any area of green infrastructure remains in the settlement boundary. The settlement boundary cannot be altered by the masterplanning process and therefore the consideration of designation of a gap between Thatcham and Upper Bucklebury could only be controlled as part of the next plan review. This provides no certainty for the residents of Upper Bucklebury and the requirement for a gap should be made clear as a central part of the wording of policy SP17 and not left to an ambiguous and undeliverable promise within the supporting text of the policy.

x.xx The site will deliver a number of community benefits, both for the new residents of the site and for existing residents of Thatcham. The community infrastructure required to support the development is set out in the policy, the specific details, including the location, size, phasing and funding arrangements will be determined through the planning application stage. There may be opportunities for community infrastructure to be provided off site, or for improvements to existing services or facilities to be made as a result of the development.

- 2.47 As set out within these submissions, the proposed amendments introduce considerable ambiguity on the type, amount and location of the community benefits which will be provided as a result of the development. The suggestion that such infrastructure can be provided off-site is not considered to be justified and would lead to significant impacts for the wider community and the new residents of any future community.

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.

- 2.48 As set out within these submissions, no further information is provided on the form of the feasibility study nor the timing of such an exercise. Without further details of this process, significant ambiguity remains in place on deliverability of this required infrastructure provision.

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 other 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.

- 2.49 As with the community infrastructure, the suggestion that such infrastructure can be provided off-site is not considered to be justified and would lead to significant impacts for the wider community and the new residents of any future community.

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. An 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).

- 2.50 The increased risk from flooding is of significant concern to local residents. The provision of SuDS should be considered as part of the Masterplan SPD process and the wording of the supporting text should be updated in order to reflect this requirement.

x.xx Below ground infrastructure is present on the site. The design and layout of the site will need to take their presence into account and appropriate stand offs will be required to ensure there is no impact on operational requirements.

- 2.51 BPC is acutely aware of the constraints relating to the oil and gas pipelines which cross the site and has consistently raised these throughout its submissions to the local plan process. Despite this, the council has failed to undertake any further work regarding these constraints, or the operational requirements as referenced. Given the significant constraint to development that these assets represent it is not considered appropriate for this to be a matter which is controlled at application stage. The actual impact of these constraints must form part of the



masterplanning process for the site and the wording of the supporting text updated to reflect this requirement.

6.63 Further detailed work will be required to develop a coherent masterplan to take the development forward. The Council will lead the development of a Masterplan SPD, this which will be produced in collaboration with the applicant, relevant town and parish councils, the community and other stakeholders and funded by the developer as part of a Planning Performance Agreement (PPA). It will be based on existing, and updated, evidence and information already produced to support the allocation of the site, including the Thatcham Strategic Growth Study. The Masterplan SPD will determine the location and extent of built development, land uses and green infrastructure including the extent of the green buffer, key access arrangements, community and other infrastructure. The Masterplan SPD will be adopted by the Council prior to submission of a planning application. It is the Council's intention that the Masterplan SPD will be adopted within 12 months of adoption of the LPR., prior to the submission of a planning application.

x.xx 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.'

- 2.52 As set out, the references to the TSGS in the supporting text is not considered to be justified or effective and should be removed from the wording of policy SP17.
- 2.53 The supporting text also sets out that it is the intention for the SPD to be adopted within a 12-month process from adoption of the Local Plan however there is no indication of what will happen should the process take longer than a year or if significant objections from the local community, council, third parties or consultees remain after a year.



3. Sustainability Appraisal / Strategic Environmental Assessment – Proposed Main Modifications

- 3.1 The Council has published an update to the Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) alongside the Main Modifications.
- 3.2 BPC set out significant concerns in relation to the SA in previous submissions as part of the local plan process and these remain valid. A table is appended to these representations which updates the position in relation to the SA objectives in response to the amendments made under the proposed main modifications. Particular concern is raised in regards to how scoring against key impacts on matters such as landscape and biodiversity and why the council has not changed the scoring on these matters despite the significant increase in housing from the land at North East Thatcham.
- 3.3 In terms of the masterplan SPD as proposed, BPC made representations during the examination process on the requirement for a sustainability appraisal to support this. The planning practice guidance sets out the following in this regard:

Supplementary planning documents do not require a sustainability appraisal but may in exceptional circumstances require a strategic environmental assessment if they are likely to have significant environmental effects that have not already have been assessed during the preparation of the relevant strategic policies.

A strategic environmental assessment is unlikely to be required where a supplementary planning document deals only with a small area at a local level (see regulation 5(6) of the Environmental Assessment of Plans and Programmes Regulations 2004), unless it is considered that there are likely to be significant environmental effects.

Before deciding whether significant environment effects are likely, the local planning authority will need to take into account the criteria specified in schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004 and consult the consultation bodies.

Paragraph: 008 Reference ID: 11-008-20140306

Revision date: 06 03 2014

- 3.4 Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004 as referred to in the planning practice guidance states that characteristics of the effects and of the area likely to be affected should have regard to (with emphasis added):
- a) *the probability, duration, frequency and reversibility of the effects;*
 - b) *the cumulative nature of the effects;*
 - c) *the transboundary nature of the effects;*
 - d) *the risks to human health or the environment (for example, due to accidents);*



- e) *the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);*
- f) *the value and vulnerability of the area likely to be affected due to—*
 - (i) *special natural characteristics or cultural heritage;*
 - (ii) *exceeded environmental quality standards or limit values; or*
 - (iii) *intensive land-use; and*
- g) *the effects on areas or landscapes which have a recognised national, Community or international protection status.***

3.5 Given the location of the site in the setting of the North Wessex Downs National Landscape (AONB) and for the reasons set out it is considered that the masterplan area would have characteristics which require an Environmental Impact Assessment (EIA) to be undertaken. As set out within these representations, the impact of the development of 2,500 dwellings on the site was not adequately assessed during the preparation of the local plan. Therefore the Planning Practice Guidance is clear that an SA is required in order to assess the significant effects of such a scale of development on the sensitive receptors in the local area.

3.6 In relation to policy SP17, the Main Modifications SA states that it is not necessary to reappraise the proposed increase in dwellings in the allocation of the site from 1,500 to 2,500 as this was undertaken at regulation 19 stage. BPC made detailed representations on the SA as part of its response to the regulation 19 consultation and these therefore remain relevant in the consideration of the modifications.

3.7 In relation to the quantum of development the regulation 19 version of the SA set out the following in terms of a development of 2,500 homes:

This option was originally to be taken forward and was included in the Reg 18 consultation. Despite providing a considerable number of new homes and community infrastructure to support these homes and the wider Thatcham community the potential impact the local community is considered too high, and politically a reduced number on the site is considered to be more acceptable. Therefore, this option will no longer be taken forward.

3.8 This has now been updated within the main modifications SA to state:

At Reg18 the site was included as a proposed allocation for approximately 2500 dwellings. Significant concerns were raised by the community over the quantum of development on the site, which led to the number of dwellings being reduced at Reg 19. However, during the Examination the Inspector directed the Council to modify the policy to deliver 2,500 dwellings on the site. It is recognised that not all of these dwellings will be delivered within the plan period, with approximately 1760 dwellings being delivered to 2041.



- 3.9 The council wording states that the increase in dwellings is directly linked to the request from the inspector but makes no attempt to address the reasons as previously set out on the potential impacts on the local community.
- 3.10 The regulation 19 consultation response from BPC set out that in **all instances** it was considered that the approach taken to the assessment and scoring of the site against the SA Objectives is severely flawed. BPC prepared its own analysis against the SA Objectives, and this was included with the reps at appendix 2.
- 3.11 Furthermore, as set out in other sections of these representations, the council states within the wording of policy SP17 that mitigation will be required in respect of matters such as air quality, highways, and heritage yet within the scoring of the SA for main modifications it is said that there will be no impact in regard to these matters. This is considered to directly contradict the assessment of the council within the wording of the policy itself.
- 3.12 It is noted that the detailed assessment of policy SP17 in the main modifications SA remains unchanged. It is clear from the revised wording of SP17 that the impact of the development in many aspects is to be assessed through further studies and the Masterplanning process. This includes, but is not limited to, landscape impact, historic environment, flooding, highways and provision of infrastructure. However, despite this the council has maintained its assessment of the allocation on such policy objectives as having a positive outcome. The scoring against all policy objectives is maintained and identical to that scored against the previous assessment of the site for 1,500 homes. It is inconceivable that an increase in over 1,000 dwellings from the previous allocations would amount to no change in effects against policy objectives and the SA for the main modifications is considered to be fatally flawed in its approach in this regard.



4. Conclusions

- 4.1 These representations demonstrate that the main modifications proposed to the plan have compounded the concerns raised by BPC throughout the local plan process on the significant failings with the soundness of the plan.
- 4.2 The main modifications proposed would continue to mean that LPR is **not positively prepared** and would not achieve the goal of sustainable development for WBC.
- 4.3 The main modifications proposed by the council are **not justified**. Many of the grounds for assessment of impacts and benefits lack credibility and are not based on available evidence. The concerns raised by BPC at regulation 19 stage and in matters statements remain and have not been remotely addressed by the modifications proposed.
- 4.4 The main modifications proposed are **not effective**. There was previous no evidence that the development of 1,500 homes at North East Thatcham would be deliverable and the increase to 2,500 provides no resolution to the fundamental issues of deliverability and viability.
- 4.5 The main modifications proposed are **not consistent with national policy**. In many instances the increase in dwellings to 2,500 at North East Thatcham under policy SP17 would directly conflict with national policy, particularly in relation to landscape character and impact upon the AONB.



West Berkshire Local Plan Review

Proposed Main Modifications Consultation

Appendix 1 – Sustainability Appraisal Comparison Table

January 2025



APPENDIX 1
SP17 – North East Thatcham – Sustainability Appraisal Extract
Main Modifications Consultation

SA Objective 1: To enable provision of housing to meet identified need in sustainable locations

SA Sub Objective	Effects of Policy on SA Objective Submission Version	Revised Policy on SA Objective – Main Modifications	Main Modifications Text	Bucklebury Parish Assessment of Effect – Reg 19	Bucklebury Parish Assessment of Effect – Main Modifications	Bucklebury Parish Comment – Main Modifications
1(a) To maximise the provision of affordable housing to meet identified need	++	++	None	+	+	Whilst AH delivery important it must be in right location. No evidence of mix to meet all sectors. No evidence that 2,500 homes can be accommodated on site
1(b):To enable provision of housing to meet all sectors of the community, including those with specialist requirements	++	++	None	+	+	No evidence of accommodating self build or specialist housing on the site.



SA Objective 2: To improve health, safety and wellbeing and reduce inequalities

SA Sub Objective	Effects of Policy on SA Objective Submission Version	Revised Policy on SA Objective – Main Modifications	Main Modifications Text	Bucklebury Parish Assessment of Effect – Reg 19	Bucklebury Parish Assessment of Effect – Main Modifications	Bucklebury Parish Comment – Main Modifications
2(a) To support health active lifestyles	++	++	None	?	?	No evidence on viability or delivery of sports facilities. Location will not give rise to sustainable travel. Main Modifications suggest this could be provided off-site which would not give rise to a significantly positive outcome as predicted.
2(b) To reduce levels and fear of crime and anti-social behaviour	+	+	None	?	?	No evidence to support this conclusion
2(c):To enable the protection and enhancement of high quality multi-functional GI across the District	++	++	None	?	?	The Green Infrastructure SPD that the Council promised in the Core Strategy Policy CS18 (2012) ¹ was never delivered ² . Thus, there is no GI evidence base to inform the draft LPR so no proper assessment can have been made in relation to sustainability.

¹ https://www.westberks.gov.uk/media/36372/Core-Strategy-CS18-Green-Infrastructure/pdf/Core_Strategy_-_CS18_-_Green_Infrastructure.pdf?m=63804796423160000

² <https://www.westberks.gov.uk/article/41087/Supplementary-Planning-Documents-SPD-and-Guidance-SPG>



SA Objective 3: To improve accessibility to community infrastructure

SA Sub Objective	Effects of Policy on SA Objective Submission Version	Revised Policy on SA Objective – Main Modifications	Main Modifications Text	Bucklebury Parish Assessment of Effect – Reg 19	Bucklebury Parish Assessment of Effect – Main Modifications	Bucklebury Parish Comment – Main Modifications
3(a): To improve access to education, health and other services	++	++	None	?	?	Further ambiguity created at examination on deliverability of education and healthcare facilities and no firm evidence to support the conclusion that it would have a significantly positive effect until such work is carried out.
3(b): To support the development of access to IT facilities including Broadband particularly in rural locations	?	?	None	?	?	No evidence of this provided in advance of the examination and still no evidence relating to this provided.



SA Objective 4: To promote and maximise opportunities for all forms of safe and sustainable travel

SA Sub Objective	Effects of Policy on SA Objective Submission Version	Revised Policy on SA Objective – Main Modifications	Main Modifications Text	Bucklebury Parish Assessment of Effect – Reg 19	Bucklebury Parish Assessment of Effect – Main Modifications	Bucklebury Parish Comment – Main Modifications
4(a): To reduce accidents and improve safety	+	+	None	?	--	Evidence relating to highway movements and safety remains seriously flawed. Introduction of access point onto Harts Hill would add to serious concerns around highway safety and impact.
4(b): To increase opportunities for walking, cycling and use of public transport	++	++	None	?	?	Lack of any coherent strategy within wording of policy to support conclusion that development would bring about increase in walking, cycling or use of public transport.



SA Objective 5: Ensure that the character and distinctiveness of the natural, built and historic environment is conserved and enhanced

SA Sub Objective	Effects of Policy on SA Objective Submission Version	Revised Policy on SA Objective – Main Modifications	Main Modifications Text	Bucklebury Parish Assessment of Effect – Reg 19	Bucklebury Parish Assessment of Effect – Main Modifications	Bucklebury Parish Comment – Main Modifications
5(a): To conserve and enhance the biodiversity and geodiversity of West Berkshire	++	++	None	-	--	Previous concerns raised on significant errors and lack of up to date reports in evidence base on biodiversity. No justification for previous scoring against 1,500 dwellings and inconceivable that an increase to 2,500 dwellings would not have a significant impact against the SA objective.
5(b): To conserve and enhance the character of the landscape	+	+	None	-	--	Significant concerns raised in comments against SA scoring at regulation 19 stages. No justification that an increase to 2,500 dwellings would not lead to significant impact on setting of AONB.
5(c): To protect or, conserve and enhance the built and historic environment to include sustaining the significant interest of heritage assets	+	+	None	-	--	No evidence of any consideration to listed buildings within site or mitigation required. No justification that an increase to 2,500 dwellings would not lead to significant impact on heritage assets within red line boundary.



SA Objective 6: To protect and improve air, water and soil quality, and minimise noise levels throughout West Berkshire

SA Sub Objective	Effects of Policy on SA Objective	Revised Policy on SA Objective – Main Modifications	Main Modifications Text	Bucklebury Parish Assessment of Effect – Reg 19	Bucklebury Parish Assessment of Effect – Main Modifications	Bucklebury Parish Comment – Main Modifications
6(a): To reduce air pollution	0	0	None	--	--	Additional highway movements from increase to 2,500 dwelling movements will have significant impact
6(b): To manage noise levels	0	0	None	--	--	Additional highway movements from increase to 2,500 dwelling movements will have significant impact
6(c): To maintain and improve soil quality	0	0	None	-	-	No further evidence to suggest that soil quality would be maintained or improved
6(d): To maintain and improve water quality	0	+	The modified policy is unlikely to impact on water quality. Requires consideration of waste water	-	-	No justification for suggestion that there would be a beneficial impact on water quality despite modifications to policy.



SA Objective 7: To promote and improve the efficiency of land use

SA Sub Objective	Effects of Policy on SA Objective	Revised Policy on SA Objective – Main Modifications	Main Modifications Text	Bucklebury Parish Assessment of Effect – Reg 19	Bucklebury Parish Assessment of Effect – Main Modifications	Bucklebury Parish Comment – Main Modifications
7(a): To maximise the use of previously developed land and buildings where appropriate	-	-	None	-	-	No PDL on site. Reasonable alternatives not properly considered.
7(b): To apply sustainable densities of land use appropriate to location and setting	+	+	None	?	--	No evidence that increase in density is appropriate for setting of the AONB and other characteristics of site



SA Objective 8: To reduce consumption and waste resources and manage their use efficiently

SA Sub Objective	Effects of Policy on SA Objective	Revised Policy on SA Objective – Main Modifications	Main Modifications Text	Bucklebury Parish Assessment of Effect – Reg 19	Bucklebury Parish Assessment of Effect – Main Modifications	Bucklebury Parish Comment – Main Modifications
8(a): To reduce energy use and promote the development and use of sustainable /renewable energy technologies, generation and storage	++	++	n/a	?	?	Requirements relating to energy have been removed from policy so conclusion cannot be reached.
8(b): To reduce waste generation and disposal in line with the waste hierarchy and reuse of materials	0	0	n/a	-	-	Additional waste requirements from increase to 2,500 homes – no mention of mitigation
8(c): To reduce water consumption and promote reuse	+	+	n/a	-	--	No evidence of additional infrastructure required for water in relation to increase to 2,500 homes
8(d): To reduce the consumption of minerals and promote reuse of secondary materials	+	+	n/a	?	?	No evidence to reach this conclusion



SA Objective 9: To reduce emissions contributing to climate change and ensure adaption measures are in place to respond to climate change

SA Sub Objective	Effects of Policy on SA Objective	Revised Policy on SA Objective – Main Modifications	Main Modifications Text	Bucklebury Parish Assessment of Effect – Reg 19	Bucklebury Parish Assessment of Effect – Main Modifications	Bucklebury Parish Comment – Main Modifications
9(a): To reduce West Berkshire’s contribution to greenhouse gas emissions	+	+	None	?	?	No evidence presented on how units would come forward at lower carbon than agreed building regs. Wording relating to energy requirements now removed.
9(b): To sustainably manage flood risk to people, property and the environment	?/+	+	A modification to the policy requires the existing flood attenuation ponds to be retained, protected and enhanced.	?	?	No evidence presented on how flood risk or surface water would be managed. Suggested modifications do not provide justification for scoring.



SA Objective 10: To support a strong, diverse and sustainable economic base which meets identified needs

SA Sub Objective	Effects of Policy on SA Objective	Revised Policy on SA Objective – Main Modifications	Main Modifications Text	Bucklebury Parish Assessment of Effect – Reg 19	Bucklebury Parish Assessment of Effect – Main Modifications	Bucklebury Parish Comment – Main Modifications
10(a): To encourage a range of employment opportunities that meet the needs of the District	+	+	none	?	?	No evidence of delivery of retail or small scale employments for larger number of dwellings
10(b): To support key sectors and utilise employment land effectively and efficiently	0	0	none	0	0	Agreed
10(c): To support the viability and vitality of town and village centres	++	++	none	?	?	Unclear how allocation of this site would have any positive impact on vitality of Thatcham even with increase in dwellings to 2,500