

Part B – Your Representation

Please use a separate sheet for each representation

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

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

| | |
|---|--|
| Your name or organisation (and client if you are an agent): | Pippa Nisbet (Lichfields) on behalf of “the Partnership,” a Partnership comprising A2Dominion, Catesby Estates, Donnington New Homes and Ptarmigan Land. |
|---|--|

Please indicate which part of the Local Plan Review this representation relates to:

| | |
|--------------------|------------|
| Section/paragraph: | |
| Policy: | Policy SP1 |
| Appendix: | |
| Policies Map: | |
| Other: | |

1. Legally Compliant

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

Do you consider the Local Plan Review is legally compliant?

Yes

No

Please give reasons for your answer:

Please refer to our response on Policy SP17.

2. Soundness

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

Do you consider the Local Plan Review is sound?

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

Please tick all that apply:

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

Please give reasons for your answer:

Our representations are prepared in relation to the strategic promotion of land known as North East Thatcham ("NET") on behalf of "the Partnership" which comprises A2Dominion, Catesby Estates, Donnington New Homes and Ptarmigan Land who are jointly promoting the land ("the site") on behalf of its landowners. The Partnership has signed a collaboration agreement to ensure that the site at NET comes forward as a whole, thereby avoiding piecemeal development. The agreement should give the Council confidence that a comprehensive approach will be delivered and the Partnership remains fully committed to progress a planning application as soon as the site's allocation within the Local Plan is secured.

We support Policy SP1's vision and objectives which includes a strategy over the plan period to "optimise the density of development to make the best use of land whilst conserving and enhancing the distinctive character and identity of the built, historic and natural environment." This is in line with the objectives for delivery of the strategic site allocation identified at North East Thatcham (NET) (Policy SP17) where both the Partnership's own studies and the Council's background evidence have undertaken work to explore and demonstrate how the site at NET can best deliver the growth which Thatcham needs. The evidence indicates the site could accommodate development of up to 2,500 homes with a number of infrastructure improvements such as local centres, education, healthcare, sports provision and open space.

We also support the Spatial Strategy's development approach which is based on three spatial areas. This identifies Newbury and Thatcham as one of the spatial areas, and notes that development will be required to follow the district-wide settlement hierarchy set out in Policy SP3. The thrust of the strategy aims to promote sustainable communities taking account of the function and sustainability of settlements across the District and Policy SP3 identifies Thatcham as an 'urban area' - the urban areas being the prime focus for housing and economic development. Development potential is to be offered through a number of means but importantly includes "b. Strategic and non-strategic sites allocated for housing and economic development through other policies in the LPR or neighbourhood plans" within this. As stated above, the site at NET is included with the LPR as one of these strategic sites.

We support the recognition that, “Density on individual sites will vary according to their location and context, size of developable area and site specific issues such as shape and access.” We consider these are important determining factors to ensure that the right amount and type of development is brought forward and will usually be determined by further detailed technical work on sites being assessed through the detailed design stages.

We note that Allocations will be related to the role and function of settlements and the development opportunities identified through the HELAA and support this as a sustainable and viable approach to identifying suitable sites coming forward through the LPR.

We support the policy intention that states, “Thatcham will be a focus for regeneration, for new housing and for improved provision of services and facilities” and the identification of NET as “A new urban extension to the north east of the town” which “will provide a new residential neighbourhood with supporting facilities and green infrastructure in accordance with Policy SP17.” NET has been identified as the most appropriate site to deliver the strategic growth which Thatcham needs and is the only site which has been identified as suitable for delivering this through the LPR and its background evidence. In particular the Vision 2050 for West Berkshire clearly supports the idea of north of Thatcham as being the only direction of growth for the settlement in the long term.

3. Complies with the Duty to Co-operate

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

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

Yes

No

Please give reasons for your answer:

Please refer to our response on Policy SP17.

4. Proposed Changes

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

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

5. Independent Examination

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

Yes No

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

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

6. Notification of Progress of the Local Plan Review

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

Please tick all that apply:

Tick

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

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

| | | | |
|------------------|------------------|-------------|-----------------|
| Signature | PL Nisbet | Date | 02.03.22 |
|------------------|------------------|-------------|-----------------|

Your completed representations must be received by the Council by 4:30pm on Friday 3 March 2023.

Part B – Your Representation***Please use a separate sheet for each representation***

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

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

| | |
|---|--|
| Your name or organisation (and client if you are an agent): | Pippa Nisbet (Lichfields) on behalf of “the Partnership,” a Partnership comprising A2Dominion, Catesby Estates, Donnington New Homes and Ptarmigan Land. |
|---|--|

Please indicate which part of the Local Plan Review this representation relates to:

| | |
|--------------------|------|
| Section/paragraph: | |
| Policy: | SP12 |
| Appendix: | |
| Policies Map: | |
| Other: | |

1. Legally Compliant

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

Do you consider the Local Plan Review is legally compliant?

Yes

No

Please give reasons for your answer:

Please refer to our response on Policy SP17.

2. Soundness

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

Do you consider the Local Plan Review is sound?

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

Please tick all that apply:

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

Please give reasons for your answer:

Our representations are prepared in relation to the strategic promotion of land known as North East Thatcham ("NET") on behalf of "the Partnership" which comprises A2Dominion, Catesby Estates, Donnington New Homes and Ptarmigan Land who are jointly promoting the land ("the site") on behalf of its landowners. The Partnership has signed a collaboration agreement to ensure that the site at NET comes forward as a whole, thereby avoiding piecemeal development. The agreement should give the Council confidence that a comprehensive approach will be delivered and the Partnership remains fully committed to progress a planning application as soon as the site's allocation within the Local Plan is secured.

We support the plan's positive approach to increase housing delivery through the Plan Period and that new homes will be delivered in line with the Spatial Strategy and Settlement Hierarchy in addition to considering Policy DM1: Development in the Countryside. This will ensure that development comes forward on appropriately-allocated sites and for development of appropriate density.

We support that the target figure of 538 dwellings per annum does not constitute a ceiling or cap to development. The NPPF is clear at paragraph 60 that the objective is to boost the supply of housing and West Berkshire's Housing Background Paper (January 2023) states at paragraph 2.27, "It is considered that a number higher than the current LHN in West Berkshire should be planned for."

In addition to the NPPF objectives to boost housing supply, the Council notes that other reasons why a higher number should be planned for include:

"-The most recent objectively assessed need in the OAN Sensitivity Testing report of March 2018 was 600 dpa. Though the methodology has been superseded and it is no longer a recent study, it remains a consideration;

-The need for flexibility as the impact of annual changes to the LHN, as a result of the rolling forward of the time period covered by the household projections and the updating of the affordability ratio, is uncertain; and

-The need for flexibility to allow for phasing issues and for an element of non delivery of sites."

It is also worth noting that the Government’s Planning Practice Guidance (Housing and economic needs assessment), last updated 16 December 2020, states at paragraph: 015 Reference ID: 2a-015-20190220 that, “Where a strategic policy-making authority can show that an alternative approach identifies a need higher than using the standard method, and that it adequately reflects current and future demographic trends and market signals, the approach can be considered sound as it will have exceeded the minimum starting point.” This aligns with the NPPF focus on positively prepared plans, and clearly points to the basis for LPAs to go above the minimum starting point.

3. Complies with the Duty to Co-operate

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

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

Yes

No

Please give reasons for your answer:

Please refer to our response on Policy SP17.

4. Proposed Changes

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

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

5. Independent Examination

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

Yes

No

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

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

6. Notification of Progress of the Local Plan Review

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

Please tick all that apply:

Tick

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

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

| | | | |
|------------------|-----------|-------------|----------|
| Signature | PL Nisbet | Date | 02.03.22 |
|------------------|-----------|-------------|----------|

Your completed representations must be received by the Council by 4:30pm on Friday 3 March 2023.



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

Ref:

(For official use only)

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

This form has two parts:

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

PART A: Your Details

Please note the following:

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

| | Your details | Agent's details (if applicable) |
|---|---------------------|---|
| Title: | | Mrs |
| First Name:* | | Pippa |
| Last Name:* | | Nisbet |
| Job title (where relevant): | | Planning Director |
| Organisation (where relevant): | | Lichfields |
| Address* <i>Please include postcode:</i> | | The Minster Building, 21 Mincing Lane, London, EC3R 7AG |
| Email address:* | | ████████████████████ |
| Telephone number: | | ██████████ |

*Mandatory field

Part B – Your Representation***Please use a separate sheet for each representation***

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

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

| | |
|---|--|
| Your name or organisation (and client if you are an agent): | Pippa Nisbet (Lichfields) on behalf of “the Partnership,” a Partnership comprising A2Dominion, Catesby Estates, Donnington New Homes and Ptarmigan Land. |
|---|--|

Please indicate which part of the Local Plan Review this representation relates to:

| | |
|--------------------|------|
| Section/paragraph: | |
| Policy: | SP17 |
| Appendix: | |
| Policies Map: | |
| Other: | |

1. Legally Compliant

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

Do you consider the Local Plan Review is legally compliant?

Yes

No

Please give reasons for your answer:

It is understood the Council has followed the Duty to Cooperate under Section 33A of the Planning and Compulsory Purchase Act 2004. The Local Plan Review (LPR) is being produced through close partnership working with West Berkshire Council’s neighbouring local authorities to ensure that cross-boundary planning issues are being taken into account and a Duty to Cooperate Statement accompanies the Draft LPR. The Council has prepared a Sustainability Appraisal and a range of background evidence has informed the LPR.

2. Soundness

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

Do you consider the Local Plan Review is sound?

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

Please tick all that apply:

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

Please give reasons for your answer:

Our representations are prepared in relation to the strategic promotion of land known as North East Thatcham ("NET") on behalf of "the Partnership" which comprises A2Dominion, Catesby Estates, Donnington New Homes and Ptarmigan Land who are jointly promoting the land ("the site") on behalf of its landowners. The Partnership has signed a collaboration agreement to ensure that the site at NET comes forward as a whole, thereby avoiding piecemeal development. The agreement should give the Council confidence that a comprehensive approach will be delivered and the Partnership remains fully committed to progressing a planning application as soon as the site's allocation within the Local Plan is secured.

We consider that the overarching approach of the Local Plan in selecting Thatcham for large-scale housing growth to address housing needs, and in focusing this expansion at NET via Policy SP17, is sound. However, there are some individual elements of the policy that require modification to be made sound and meets the tests of the NPPF.

The key policy considered in this representation is Policy SP17 (North East Thatcham Strategic Site Allocation) and we refer to Policies SP13 (Sites allocated for residential and mixed-use development in Newbury and Thatcham) and SP18 (Housing Type and Mix) as these have relevance to the NET strategic site.

We support Policy SP17's proposal to include the land at NET as a significant future allocation to deliver a residential led development.

Policy SP17 has been informed by a comprehensive Local Plan process and the evidential foundations exist to support a sound allocation if the Policy is modified in ways that we explain later in these representations.

The Scale of Development at NET

It is helpful to set out the evolution of the NET allocations in the emerging Local Plan to explain the basis for the specific modifications sought to make the plan sound.

In February to March 2018, West Berks Council began the process of bringing forward its Local Plan and consulted (Reg 18) on a Local Plan Scoping Report and assembling the evidence base to explore and then establish the basis for bringing forward the site at NET. In November 2018, a further Reg 18 consultation took place to explore the broad issues around scale of growth, settlement hierarchies and effectiveness of adopted policies.

Paragraph 11 a) of the NPPF is at the heart of plan-making, encouraging a presumption in favour of sustainable development. It states that, “*all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change and adapt to its effects.” (Lichfields emphasis).*

In this context, the evidence which underpins Policy SP17 has sought to achieve a sustainable pattern of development by identifying and meeting the development needs of the area and ensuring that future growth is aligned with infrastructure provision to enable that growth to occur and to help facilitate wider infrastructure improvements needed.

Part of the Local Plan evidence base included a study by David Lock Associates (DLA) - the Thatcham Strategic Growth Study (TSGS) - which included three parts – the past, present and future.

The broad thrust and approach of the TSGS work and its conclusions identified that Thatcham has a series of infrastructure deficits and has regeneration needs. It concluded that only growth of a strategic scale could support the service provision and regeneration that Thatcham requires. The study demonstrated the suitability and deliverability of the NET site as a driver for the regeneration of Thatcham.

The TSGS sets out that NET has the potential to accommodate up to 2,500 new homes, 40% of these being affordable. In addition, it showed illustratively how the site’s development could include provision for:

- a new strategic country park for the whole town, linking Thatcham to the plateau and AONB
- Approximately 50% of the site given over to green open space of different types
- Surface water management approaches that could deliver net gain for the town
- Biodiversity net gain through habitat restoration and linkages
- Two new primary schools (1x 3FE, 1x 2FE) with flexibility on locations and provision
- An 8FE secondary school serving all of Thatcham
- Dedicated sports fields and dual-use sporting facilities shared with the secondary school
- Local centres providing local retail, facilities and small-scale employment space
- New local facilities and an extension of area for Colthrop Industrial Estate
- Active travel improvements on routes between the site, town centre and railway station
- Potential for community spaces at key locations adjacent to the country park; and

- Public transport and active travel provision

The TSGS “*Concept Plan*” for the site (pages 60-65 within part 3, the Future document) provided a illustration for how one might conceive development of the site at that scale, whilst identifying a need for flexibilities and more technical work to inform a more precise form of masterplan at a later date (e.g. pupil requirements/school provision; specific flood attenuation design; impact of views on the skyline etc).

The HELAA was first published in February 2020 and has subsequently been updated in December 2020 and January 2023. The site was originally considered as four different parcels (THA6, THA8, THA10 and THA20). Following the forming of the Partnership and the subsequent collaboration agreement, these parcels were amalgamated to form one strategic site submission known as “THA20.” As part of the HELAA, a number of other sites were appraised in the Thatcham area but were eventually concluded as unsuitable. It was considered that due to the strategic scale of development required and because NET was concluded to be the best site to deliver this, no further allocations in Thatcham should take place within the Local Plan period. Whilst the NET site predominantly comprises agricultural fields at present, the majority of land within the district is agricultural (Grades 2 and 3) and the HELAA (Jan 2023) notes at paragraph 3.30 that “*no sites have been considered unsuitable because they contain the best and most versatile agricultural land.*” Given the large volume of agricultural land across the district, for delivery of strategic level development, it will be inevitable that some agricultural land must be released.

The Site Selection Background Paper pulls together the key conclusions arising from the local plan evidence base and determines which sites should be brought forward as allocations. Based on the TSGS and HELAA, the Paper importantly states that NET is suitable for “*residential led development with infrastructure.*” This assumes development up to 2,500 dwellings in line with the studies to date. It concludes that “*only growth of a strategic scale could support the service provision and regeneration that Thatcham requires.*” (Lichfields emphasis)

The emerging draft LPR (published December 2020 under Regulation 18) put forward Policy SP17 (North East Thatcham Strategic Site Allocation). Policy SP17 stated that “*the site as allocated on the map is allocated as a residential-led development comprising approximately 2,500 dwellings.*” As part of this, development of the site will be expected to deliver:

- At least 40% affordable housing
- A housing mix which complies with the housing mix contained in Table 4 of policy SP18 Housing type and mix
- At least 3% of dwellings to be delivered via serviced custom/ self-build plots
- On-site renewable energy to assist in the delivery of a carbon neutral development
- 2 new primary schools (1 x 3FE, 1 x 2FE) and the sports infrastructure requirements of those schools
- A new secondary school (8FE) and the sports infrastructure requirements of that school
- Surface water management approaches that could deliver net gain for Thatcham town
- Biodiversity net gain through habitat restoration and linkages
- A network of green infrastructure which will include a new strategic country park linking Thatcham to the plateau and the AONB
- Local centres providing retail facilities and small-scale employment space

- Active travel improvements on routes between the site, town centre and railways station
- Appropriate vehicular accesses and a through route
- Sustainable transport through routes

Representations were made on behalf of the Partnership (December 2020-Feb 2021) which endorsed the Council's inclusion of NET for development of a strategic scale, noting that the development will help regenerate Thatcham and contribute towards meeting its infrastructure requirements. The reps included an overview of the work undertaken by technical advisors and the underlying evidence.

The West Berkshire Interim Sustainability Appraisal Report (Dec 2020) identified that the Council's spatial strategy (outlined in Policy SP1) affirms a continued approach to focusing development in settlements in line with a District-wide settlement hierarchy. Thatcham, as part of the Newbury and Thatcham urban area, is noted as a sustainable location for development and it highlights that 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. This will enable long-term planning for Thatcham's future.

It anticipates delivery of at least 1,250 dwellings within the plan period and notes that there are a number of significant positive sustainability effects that developing the site would have, including maximising the provision of: affordable housing; custom and self-build plots; new green infrastructure and public open space, new community infrastructure; including primary and secondary schools; and improvements to the cycling and walking network to improve opportunities for sustainable travel.

The SA/ SEA Environmental Report (November 2022), Appendix 4 assesses two development quantum allocations for NET, looking at up to 2,500 homes and 1,500 homes. In the case of the "up to 2,500 home" allocation there are shown to be more positives than for the "1,500 home allocation." This is mainly in respect of two issues – housing and infrastructure; 2,500 homes will enable a significantly higher proportion of homes to meet local needs, in a sustainable location meaning fewer additional sites will be required across the district in due course to meet need than for 1,500 homes. Regarding infrastructure, up to 2,500 homes would allow for infrastructure necessary to support the development of the site to be provided within the development, close to where the new homes will be located. It would also support regeneration and improvement of other community facilities within Thatcham. In the 1,500 home allocation, the site would only allow for some of the infrastructure necessary to support the development of the site to be provided within the development and it is stated it may be unable to support some of the larger community infrastructure projects required to allow for greater support for Thatcham (e.g. education facilities).

In summarising the effects, it concludes that the allocation of "up to 2,500 homes" will have a positive effect on all elements of sustainability. The scale of the development provides for community infrastructure to be delivered on site, resulting in a significantly positive impact on social sustainability. The "1,500 home" allocation would simply have a neutral impact on all elements of sustainability and the development may not be of a size to deliver the wider range of facilities to support Thatcham.

Following Reg 18, there was a slight delay to the Local Plan as a result of further work by the Council responding to the new NPPF paragraph 22. In parallel, the Partnership has been working to undertake its own masterplanning and feasibility work taking into account flood basin design, road and access design, topographical survey, tree survey and landscape constraints. The emerging conclusions of this work is that the site has a minimum estimated yield of around 2,275 dwellings, with a theoretical maximum of 2,670 alongside proposals for two primary schools and a secondary

school alongside other associated infrastructure.

Separately, two parties - Croudace Homes and Colthrop Village Consortium - have joined together to suggest an 'Alternative Housing Strategy'. This strategy claimed it could deliver Thatcham's housing needs for the Local Plan period on two smaller sites (totalling 1,175 homes), provide infrastructure, and reduce the impact of new development on Thatcham residents. The Council's position however remains the same and as outlined above is endorsed by the background evidence. This position is that growth of a strategic scale needs to occur in Thatcham and the focus to achieve this growth should be on one strategic site. The site assessed as being most suitable to deliver this is North East Thatcham. Other alternative sites for development in Thatcham have been discounted – through the evidence, including the HELAA - for a number of reasons such as flooding, but in any event none of these were also able to deliver the scale of growth that Thatcham needs.

Towards the end of 2022, the Council appears to have revisited its approach to the scale of the NET site. The change in direction has led to the wording of the policy in the Regulation 19 Submission West Berks Local Plan Review (WBLPR) allocating the site to “*approximately 1,500 homes*” in total, yet the Council's evidence to date does not support the reduced number; indeed, the evidence shows that significantly more homes could potentially be supported on the site. As mentioned, the SA shows this higher quantum to generate more positive outcomes but the November 2022 SA/SEA Environmental Report provides an update to state that up to 2,500 homes is no longer to be taken forward as the “*potential impact to local community is considered high, and politically a reduced number on the site is considered to be more acceptable.*”

Precisely how many homes would come forward on the site will need to be established through further detailed technical work, and Policy SP17 states this will be based on a range of factors including a masterplanning exercise and a Landscape and Visual Impact Assessment (LVIA). The policy states 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 Council's evidence base and the Partnership's work to date indicates that up to 2,500 homes could be delivered at NET, yet the ability to bring forward an increased number would now be limited by the current wording of the SP17 policy, contrary to its evidence base.

The Indicative Site Plan, which accompanies Policy SP17 appears to assume that no development should occur above the 110m contour line where it is speculated that views may be more open (guided by previous work set out within the TSGS). Importantly, the TSGS notes that the contour lines used “*should form a 'soft constraint' to development, with local conditions considered.*” The Partnership has commissioned The Richards Partnership to carry out an analysis to consider at what heights development could be introduced on the site in a way that would be acceptable in terms of landscape and visual impact. This work shows that development on the higher ground (e.g. above the 110m contour line) is possible on some parts of the site, whilst the introduction of green space in other areas will ensure that almost exactly half of the site can be left as landscape/green space. This shows that it would be premature to establish limits to the scale of homes or spatial extent of development before the technical work expected by Policy SP17 is prepared.

The Indicative Site Plan should be limited to a red line site plan that clearly shows the extent of the wider allocation but without imposing limits that are unevidenced and unjustified, and which preempt further masterplanning and technical work that can provide all the assurance required by the Council, that the potential of the site is achieved, whilst ensuring LVIA and other relevant matters are properly protected.

It is important that Policy SP17 therefore retains a degree of flexibility to meet the tests of soundness, making provision for more than 1,500 homes to be delivered subject to further detailed evidence (e.g.

Masterplanning, LVIA and viability work) in the future, and for it to support the appropriate scale of growth which Thatcham needs.

Our objections to the policy therefore focus on the reference to “*approximately 1,500 homes*” not being sound. We draw this conclusion because that specific aspect of the policy is:

- 1) Not positively prepared: The West Berkshire Strategic Vision 2050 (produced by the Council in response to the introduction of Para 22 of the NPPF) provides the basis for looking at growth over the long term. It shows that any expansion of Thatcham – within and beyond the plan period - must logically be directed to the north of the town. It is therefore not appropriate to limit the scale of growth at NET to an arbitrary figure of approximately 1,500 if the site has a realistic prospect of accommodating more than this. Meeting OAN for the plan period is a minimum requirement of the plan, and if there are opportunities to do more than this, they should be actively taken.
- 2) Justified by evidence: as explained above, the evidence base relied on by the Council for NET finds that the site can potentially accommodate up to 2,500 homes and there is no evidence supporting imposing a lower cap on the quantum of development; indeed, the SA – which tested both 1,500 and 2,500 homes on the site - shows the higher quantum of development to generate more positive outcomes.
- 3) Not effective: a larger scale of development on the site can support more infrastructure and the Council’s evidence does not demonstrate that capping the capacity of the site at 1,500 is aligned to the level of infrastructure.
- 4) Not consistent with national policy: Among the aspects of concern, we would flag four references:
 - a. NPPF para 124 states that “*Planning policies and decisions should support development that makes efficient use of land*” taking into account a range of factors. None of these have been identified with evidence by the Council in justifying limiting the capacity of the site to approximately 1,500 when previous work has indicated a capacity of up to 2,500. Policy SP17 requires in any event to establish the true capacity of the site based on a masterplan and LVIA work. Further, it is clearly relevant to para 124, that the density for the site should take account of future improvement of infrastructure and services and in this regard, it is clearly relevant to the provision of social and community infrastructure, including educational facilities such as a secondary school. The IDP notes the benefits of secondary school provision and the scale of the development at NET should be set through the masterplan under Policy SP17 that in due course takes education provision into account; the evidence does not currently support the idea of limiting the capacity of the site to 1,500.
 - b. Paragraph 16 of the NPPF states that, “*Plans should: d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.*” It is inconsistent for Policy SP17 to limit the capacity of the site to approximately 1,500 dwellings when the evidence suggests the site could potentially accommodate more and when the policy itself says that the capacity of the site should be determined with reference to further technical work that has not yet been completed. If that further work showed that the site could, in fact, accommodate more than 1,500 homes (perhaps closer to the number estimated in the Council’s own evidence base), then this should be supported.
 - c. Paragraph 22 of the NPPF (July 2021) states, “*Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.*” The findings of the 2050 Vision work – prepared by the Council in response to that NPPF requirement –

demonstrate that there are limited long term options available to West Berkshire for growth of Thatcham. It would be contrary to national policy to set a density for the whole site that is artificially and unjustifiably low and would prevent it from fulfilling a role to meet long term needs, absent evidence to show that approximately 1,500 sets the threshold for an acceptable scale of development. Of note, the Council's Housing Background Paper (Jan 2023) projects a trajectory of 150 dwellings/ annum from 2029-2039 for NET.

- d. Paragraph 73 of the Framework refers to the opportunity for large scale developments and the requirement – in identifying suitable locations like NET for these forms of development – to ensure their size and location will support a sustainable community with sufficient access to services and employment opportunities within the development itself. This points to the need – through the evidence – to justify specifically the allocation's proposed scale of housing capacity within the site, which the Council has not done. By contrast, a policy that identified a capacity of up to 2,500 (as proposed in the Reg 18 Plan) would have done so via the existing evidence base, notably the TSGS).

Taken together, the solution to the problems identified is to change the wording of the policy so that rather than referring to “*approximately 1,500 homes*” it instead refers to “*a minimum of 1,500 homes*”. A consequential change would also be required to Policy SP13 which refers to “*approximately 1,500 homes at NET*”.

Housing Mix

The approach of Policy SP17 to housing mix also requires adjustment to be sound because it provides no flexibility to vary the mix of homes that can be provided on NET from that identified in Table 3 of Policy SP18.

We support the approach of Policy SP18 (Housing Type and Mix) itself, which refers to Table 3 in setting the SHMA's recommended mix of housing to be applied to planning applications on different housing sites. Of note, point b. allows for schemes to have some flexibility for variation from the prescribed strategic level mix in Table 3. Point b. states that in determining any variation from the mix, the Council will have regard to “*the appropriate mix for the site's size and location*”.

However, Policy SP17 – which cross refers to the mix in Table 3 of SP18 - does not provide the equivalent flexibility to NET. This flexibility must be afforded to NET within Policy SP17 in order to secure its future delivery and be consistent with Policy SP18. Whilst having a policy that sets a strategic level mix is in line with the NPPF and may be appropriate for the District and as a starting point for setting a mix in individual schemes, there needs to be the ability to set an appropriate NET-specific mix to respond to wider considerations such as market need and viability as well as site planning and design issues across the whole site and within individual phases. As it stands, this part of the policy as drafted would not be effective or consistent with national policy and required modification.

In simple terms, in order to be sound, the flexibility afforded to any site in the District by SP18 should similarly apply to NET in Policy SP17.

We have suggested amended wording below to Policy SP17.

The scale of Community Uses on the site

Whilst the overall approach to provision of community facilities is supported, it is premature to specify the quantum of some of the provision ahead of the capacity of the site being determined through the masterplanning and LVIA exercise specified in the Policy. For example, if the masterplan and LVIA shows that the site capacity is increased from the 1,500 homes identified as a minimum (to reflect the efficient use of land), this might change the quantum of retail facilities, or number of schools, or community indoor facilities. The current scales of provision are not justified with reference to the evidence base for the NET allocation, and in any event given the scale of residential development on the site (and thus the need of the population for the scale of these facilities) is not yet fixed.

The policy is therefore not justified, effective or consistent with national policy.

We have suggested changes to the policy accordingly, referring to the facilities being what is necessary to meet the needs of the development.

The new community park and the AONB

We support the concept of a new community park, but we are concerned at the reference in the policy to it *“linking Thatcham to the North Wessex Downs AONB”*. This is because the boundary of the AONB and the NET allocation are not contiguous, so it is not clear how this objective could be delivered within the site allocation. This aspect of the policy would thus not be directly achievable; nor therefore – if one accepts a direct link is not possible – would the policy expectation meet the NPPF (para 16) requirement of being *“unambiguous in terms of how a decision maker would react to development proposals”* that did not provide that direct connection. This reference should therefore be removed, so the requirement is limited to provision of a community park. The objective of ensuring the connections through the site support access to the AONB from Thatcham is in any event secured by the second bullet point listed under the policies ‘Green Infrastructure’ heading which requires: *“Greenways which connect through the site to the park, facilitate connection to the AONB, and include leisure routes accessible to all users”*

3. Complies with the Duty to Co-operate

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

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

Yes

No

Please give reasons for your answer:

A Duty to Cooperate Statement (January 2023) has been prepared to support the proposed submission (Regulation 19) version of the LPR. In producing the LPR the council has identified that it has engaged with a wide range of duty to co-operate partners. The council have collaborated to identify the relevant strategic matters which they need to address in their plans. They have undertaken and maintained effective and on-going joint working between strategic policy-making authorities and relevant bodies. In particular, joint working has helped to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.

4. Proposed Changes

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

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

We suggest the following changes (in bold text) to Policy SP17 are required to make the Local Plan sound. This is in line with the reasons set out in section 2 above.

Policy SP17

North East Thatcham Strategic Site Allocation

Land as shown on the Policies Map is allocated for a 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 and delivered as a whole to achieve a comprehensive development. The provision of all infrastructure, services, open space and facilities will be **proportionate to what is necessary to meet the needs of the development**, timely and co-ordinated. The Thatcham Strategic Growth Study provides guiding principles for the delivery of the site – **proposals will therefore demonstrate that these guiding principles have been positively responded to.**

Homes

The site is to be allocated for **approximately 1,500 dwellings which will be completed within the period of the plan. a residential led development of a minimum of 1,500 dwellings up to 2,500 dwellings.** These dwellings will comprise of a housing mix which complies with the housing mix **requirements** contained in ~~Table 3 of~~ Policy SP18. In addition at least:

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

Community

The site will provide:

- Local centres **to meet the needs of the development**, providing local retail facilities and small-scale employment for community use (Class E, ~~and F2 and Sui Generis~~);
- ~~450 sqm~~ GP Surgery **to meet the needs of the development and to be offered to the Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board or other such appropriate body;**
- Early years provision;
- ~~A 2.5 FE~~ Primary school **provision** on site and sports infrastructure requirements of the school **to meet the needs of the development. The land is to be provided and build costs to be met by the applicant;**
- Secondary provision - Land to meet the impact of the development. The nature and cost of the 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 1,200 sqm~~ community indoor facility to be used for sport and community uses with a variety of room sizes (currently use classes E and F) **to meet the identified need of the development;**

- Outdoor formal and informal sports pitches and areas to meet the identified need of the development;
- Open space to meet the needs of the development in accordance with Policy DM40+;

Green Infrastructure

The site will provide a comprehensive green infrastructure network which will take advantage of the landscape features of value within and around the site. This network will comprise:

- A new community park ~~linking Thatcham to the North Wessex Downs AONB~~;
- Greenways which connect through the site to the park, facilitate 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
- Retained and new trees, hedgerows and other appropriate native planting which contribute to biodiversity net gain.

Transport

Measures will be included to improve accessibility by, and encourage use of, non-motorised transport modes. A Transport Strategy 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;
- 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.

Sustainability

Development of the site will be supported by a Sustainability 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.

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.

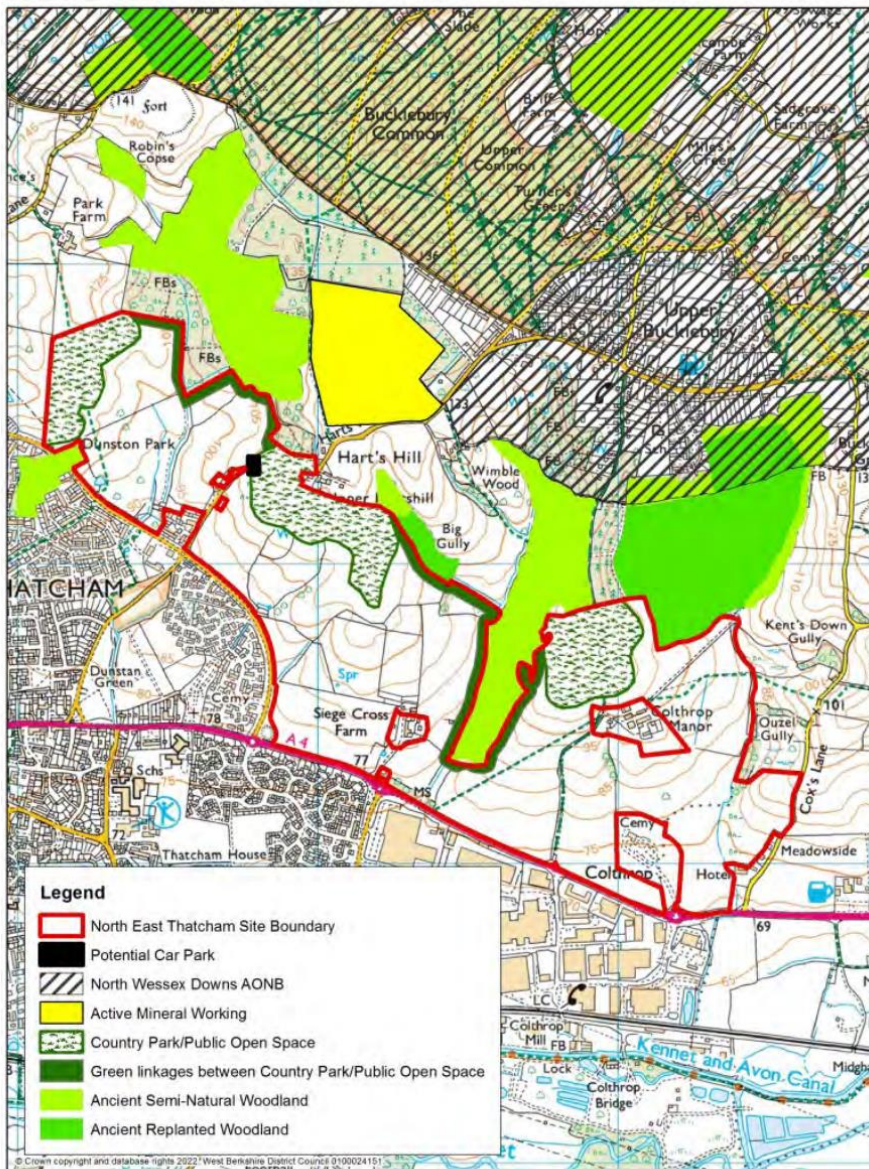
- A Landscape and Visual Impact Assessment (LVIA) in accordance with the Landscape Institute Guidelines for Landscape and Visual Impact Assessment 3rd ed. 2013. This will inform the final capacity, development, design and layout of the site and requirements for green infrastructure and the provision 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) shall accompany any planning application on the site. The COMP shall safeguard the oil pipeline from operational works, including the provision of an appropriate buffer.

North East Thatcham



Above – Plan to be amended to show site boundary only

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).

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. 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.

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 or development framework to take the development forward, which will be produced in collaboration with the community and other stakeholders.

5. Independent Examination

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

Yes

No

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

Participation is essential to enable further clarification and justification of the points made above. The reps made concern a large strategic allocation and further evidence will be required to be presented to fully make our case at EiP.

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

6. Notification of Progress of the Local Plan Review

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

Please tick all that apply:

Tick

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

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

| | | | |
|------------------|------------------|-------------|-----------------|
| Signature | PL Nisbet | Date | 02.03.23 |
|------------------|------------------|-------------|-----------------|

Your completed representations must be received by the Council by 4:30pm on Friday 3 March 2023.