

Report to West Berkshire Council

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an Inspector appointed by the Secretary of State

Date: 8 April 2025

Planning and Compulsory Purchase Act 2004 (as amended)

Section 20

Report on the Examination of the West Berkshire Local Plan Review 2022-2039

The Plan was submitted for examination on 31 March 2023

The examination hearings were held between 8 May 2024 and 3 October 2024

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Abbreviations used in this report

2004 Act	The Planning & Compulsory Purchase Act 2004 (as amended)
2012 Regulations	The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)
AONB	North Wessex Downs Area of Outstanding Natural Beauty
AWE	Atomic Weapons Establishment
The Council	West Berkshire Council
DEPZ	Detailed Emergency Planning Zone
NPPF	National Planning Policy Framework
ONR	Office for Nuclear Regulation
OSEP	Off-Site Emergency Plan
The Plan	The West Berkshire Local Plan Review 2022-2039
PPG	Planning Practice Guidance
PPTS	Planning Policy For Traveller Sites
sqm	square metres

Evidence and Examination Documents

All of the Council's supporting evidence submitted with the Plan along with documents that I issued, requested or accepted during the examination were published on the examination website. Each document has its own individual reference number such as CD1, HOU6, INF5a, etc. Where appropriate, I refer to documents by their reference numbers in this report.

Non-Technical Summary

This report concludes that the West Berkshire Local Plan Review 2022-2039 provides an appropriate basis for the planning of the district, provided that a number of main modifications are made to it. West Berkshire Council has specifically requested that I recommend any main modifications necessary to enable the Plan to be adopted.

Following the hearings, the Council prepared schedules of the proposed main modifications and policies map changes, and updated the sustainability appraisal and habitats regulations assessment. The main modifications, policies map changes and updated sustainability appraisal and habitat regulations reports were subject to public consultation over an eight week period. In some cases I have amended the detailed wording of the modification and/or added consequential modifications where necessary. I have recommended their inclusion in the Plan after considering the sustainability appraisal and habitats regulations assessment and all the representations made in response to consultation on them.

The **main modifications** can be summarised as follows:

- **Plan period** modified to 2023 to 2041 (rather than 2022 to 2039).
- Inclusion of a **key diagram**.
- **Housing requirement** modified to a minimum 9,270 between 2023 and 2041 (average of 515 homes per year) rather than 8,721 to 9,146 between 2022 and 2039 (513 to 538 homes per year).
- **Housing supply** increased to 9,493 homes between 2023 and 2041 (rather than 9,057 between 2022 and 2039) and confirmation that the Plan identifies a supply of specific, deliverable sites for five years following the intended date of adoption.
- Policy SP17 **North East Thattham** modified to propose up to approximately **2,500 homes** (rather than 1,500) and to ensure the timely and coordinated provision of green, social and physical infrastructure and the achievement of sustainable development.
- Inclusion of four **additional housing allocations**: CA12 (225 homes) and CA17 (45 homes) at **Thattham**; TIL13 (138 homes) at **Tilehurst**; and PAN8 (25 homes) at **Pangbourne**.
- Changes to the **settlement boundaries** at Chieveley, Newbury, Pangbourne, Thattham and Tilehurst.
- **Employment land requirement** modified to a minimum of 57,531 sqm for offices and 98,196 sqm for industry and warehouses between 2023 and 2041 (rather than 50,861 sqm and 91,109 sqm between 2022 and 2039).
- Policy SP2 modified to protect the setting of the **North Wessex Downs AONB**.
- Policy SP4 modified to clarify the approach to managing development around the **Atomic Weapons Establishments** at Aldermaston and Burghfield
- Inclusion of an additional policy relating to **RAF Welford** and **Denison Barracks**.
- A number of other main modifications to ensure that the plan is positively prepared, justified, effective and consistent with national policy.

Introduction

1. This report contains my assessment of the West Berkshire Local Plan Review 2022-2039 ("the Plan") in terms of section 20(5) of the Planning and Compulsory Purchase Act 2004 (as amended) ("the 2004 Act"). It considers first whether the Plan's preparation has complied with the duty to co-operate. It then considers whether the Plan is compliant with other legal requirements and whether it is sound. The National Planning Policy Framework published in September 2021 ("NPPF") paragraph 35 makes it clear that in order to be sound, a local plan should be positively prepared, justified, effective and consistent with national policy.
2. Revised versions of the NPPF were published during the examination, in September and December 2023, December 2024 and February 2025. However, the transitional arrangements in those documents meant that I continued to examine the Plan in the context of NPPF 2021 as that remained the relevant previous version. All references to the NPPF in this report are to the 2021 version unless otherwise specified.
3. The starting point for the examination is the assumption that the Council submitted what it considered to be a sound and legally compliant plan. The West Berkshire Local Plan Review 2022-2039 submitted in March 2023¹ is the basis for my examination. It is the same document as was published in January 2023 for consultation under regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) ("the 2012 Regulations").
4. In the first few months of the examination, having considered the representations made under regulation 20 and my preliminary questions, the Council decided to carry out further work to inform consideration of whether certain aspects of the Plan were sound. Staff resource issues at the Council affected the time it took to complete that work and, later in the examination, to respond to my matters, issues and questions.
5. In May 2023, as a result of local government elections, the political administration of the Council changed. In December 2023, an Extraordinary Meeting of the Council was arranged to approve the withdrawal of the Plan under section 22 of the 2004 Act. However, prior to that meeting, the Secretary of State directed the Council not to take any step to withdraw the Plan from examination and, on conclusion of the examination, to publish my report and consider adopting the Plan including any modifications that I recommend².

¹ CD1.

² Letter from the Minister of State for Housing, Planning and Building Safety to Councillor Lee Dillon (19 December 2023).

6. Those circumstances led to considerable delay in the examination process and meant that I was unable to commence the hearing sessions until May 2024, more than a year after the Plan had been submitted.

Main Modifications

7. In accordance with section 20(7C) of the 2004 Act, the Council requested that I recommend any main modifications necessary to rectify matters that make the Plan not sound and/or not legally compliant, and thus incapable of being adopted³. This report explains why the recommended main modifications are necessary. The main modifications are referenced in bold in the report in the form **MM1**, **MM2** etc, and are set out in full in the Appendix.
8. Following the examination hearings, the Council prepared a schedule of proposed main modifications and changes to the policies map, and carried out further sustainability appraisal and habitats regulations assessment⁴. The main modifications schedule, policies map changes, and updated sustainability appraisal and habitat regulations assessment reports were subject to public consultation for eight weeks between 6 December 2024 and 31 January 2025. A total of around 730 representations from around 270 representors were received during that period.
9. I have taken account of the consultation responses in coming to my conclusions in this report and have made some amendments to the wording of the main modifications and added further modifications where these are necessary for consistency or clarity. Where appropriate I have highlighted these amendments in this report.
10. I considered whether any additional steps in the examination, such as further hearings, sustainability appraisal or public consultation, should be taken as a result of the responses to the main modifications consultation or changes I have made to the main modifications. I decided that none was necessary in the interests of fairness or to prevent prejudice to any party's interests. This is because the representations relate to matters that have been considered through the examination, and none of the changes I have made significantly alters the modified policies in the Plan other than by ensuring that they are clear and therefore effective.

Policies Map

11. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide

³ Letter from Executive Director dated 5 December 2024 [EXAM66].

⁴ EXAM62, EXAM63, EXAM64 and EXAM65.

a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the submission policies map is the Proposed Submission West Berkshire Local Plan Review 2022-2039 Policies Map⁵.

12. The policies map is not defined in statute as a development plan document and so I do not have the power to recommend main modifications to it. However, a number of the published main modifications to the Plan's policies require further corresponding changes to be made to the policies map. In addition, there are some instances where the geographic illustration of policies on the submission policies map is not justified and changes to the policies map are needed to ensure that the relevant policies are effective. These further changes to the policies map were published for consultation alongside the main modifications on 6 December 2024⁶. In this report I identify one amendment that is needed to those further changes in the light of the consultation responses⁷.
13. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted policies map to include all the changes proposed in the Proposed Submission West Berkshire Local Plan Review 2022-2039 Policies Map and the further changes published alongside the main modifications referred to above, incorporating the additional amendment identified in this report.

Context of the Plan

14. West Berkshire District is a unitary authority in south east England with a population of around 161,400. It is largely rural, and 74% of the area forms part of the North Wessex Downs Area of Outstanding Natural Beauty (AONB⁸). The two largest settlements are Newbury and Thatcham, whereas suburban areas of Reading extend into the east of the district (Calcot, Purley on Thames, and Tilehurst). Two Atomic Weapon Establishments (AWE), Aldermaston and Burghfield, are located in the District between Thatcham and Reading. There are good road connections to London, Reading, Oxford and Swindon, including the M4 and the A34, and the main railway line connects Newbury to the west of England and London.
15. When adopted, the Plan will replace the saved policies of the West Berkshire District Local Plan 1991-2006 (adopted 2002); the West Berkshire Core Strategy Development Plan Document 2006-2026 (adopted 2012); and the Housing Site Allocations Development Plan Document (adopted 2017). It will then form part of the statutory development plan for the district along with the

⁵ CD2.

⁶ Schedule of Changes to the Policies Map [EXAM63].

⁷ Amendment to the Thatcham settlement boundary in relation to modified allocation CA12.

⁸ In November 2023, AONBs were rebranded National Landscapes. However, for consistency with the submitted Plan, I continue to refer to the AONB.

West Berkshire Minerals and Waste Local Plan 2022-2037 (adopted 2022), the Stratfield Mortimer Neighbourhood Plan (made 2017), the Compton Neighbourhood Plan (made 2022), the Hermitage Neighbourhood Plan (made 2024), and the Cold Ash Neighbourhood Plan (made 2024), and any other neighbourhood plans subsequently made.

Public Sector Equality Duty

16. The Council's Equality Impact Assessment⁹ concluded that the Plan would have a positive impact on people with protected characteristics as defined in the Equality Act 2010¹⁰. I have had due regard to the aims expressed in section 149(1) of that Act in my consideration of several matters during the examination including meeting the housing needs of the elderly, people with disabilities, and Gypsies and Travellers; and the provision of improved, and safe access to, open space, recreation, health, education, leisure, community and faith facilities.

Assessment of Duty to Cooperate

17. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with the duty to cooperate imposed on it by section 33A. The Council's Duty to Cooperate Statement¹¹ provides information about its engagement with local planning authorities and prescribed bodies on strategic matters¹² during the preparation of the Plan.
18. The most significant strategic matters addressed during the preparation of the Plan were Reading's unmet housing need; meeting the accommodation needs of Gypsies and Travellers; a potential strategic site at Grazeley in the east of the district; the implications of AWE Aldermaston and AWE Burghfield; meeting the need for employment land; provision of health care facilities; impacts on the strategic road network; impacts on the AONB; and impacts on water quality of the River Lambourn, Kennet and Lambourn Floodplain, and Kennet Valley Alderwoods Special Areas of Conservation.
19. The mechanisms the Council used to address strategic matters with other local planning authorities and relevant prescribed bodies involved both officers and elected members. They included regular meetings of established partnership groups; specific meetings to discuss particular issues; workshops; exchanges of

⁹ CD10.

¹⁰ Age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

¹¹ CD11.

¹² A "strategic matter" is (a) sustainable development or use of land that has or would have a significant impact in at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas, and (b) sustainable development or use of land in a two-tier area if the development or use is a county matter or would have a significant impact on a county matter [section 33A(4) of the 2004 Act].

written and oral technical advice; development of joint methodologies; preparation of funding bids; preparation and use of shared evidence; memorandums of understanding; and statements of common ground. The evidence indicates that those mechanisms were effective in achieving active and ongoing constructive engagement where necessary, and no local planning authorities or other prescribed bodies claim that the Council failed to comply with the duty to cooperate¹³.

20. Thus, whilst I consider potential soundness issues associated with some of the strategic matters referred to above later in this report, I am satisfied that the Council complied with the duty to cooperate during the preparation of the Plan.

Assessment of Other Aspects of Legal Compliance

Local development scheme

21. The Plan was prepared in accordance with the Council's Local Development Scheme adopted in January 2023¹⁴, although the length of the examination means that it will be adopted at a later date than envisaged when submitted.

Public consultation

22. A number of concerns were raised in representations about the nature, timing and effectiveness of the public consultation carried out during the preparation of the Plan including in relation to the Council's website, lack of public meetings, and availability of documents. However, the Council's Consultation Statement¹⁵ demonstrates that, in preparing the Plan, it complied with its Statement of Community Involvement adopted in January 2020 as required by section 19(3) of the 2004 Act. Furthermore, whilst the Plan was submitted for examination within a month of the end of the regulation 19 consultation period, it is clear from the Consultation Statement that all of the representations were considered by the Council.

Sustainability appraisal

23. The Council carried out a sustainability appraisal of the Plan, prepared a report of the findings of the appraisal, and published the report along with the Plan and other submission documents under regulation 19¹⁶. A non-technical summary

¹³ Council response to SPQ3 [EXAM3 20 October 2023].

¹⁴ CD9.

¹⁵ CD4a to CD4c.

¹⁶ CD3a to CD3k.

was published in October 2023¹⁷. The appraisal was updated to assess the main modifications¹⁸.

24. The sustainability appraisal considered reasonable alternatives to the amount of housing development to be accommodated, including above local housing need; the spatial strategy (as discussed under main issue 1 below); site allocations¹⁹; and, where relevant, development management policies. Whilst a number of alternatives suggested by representors were not expressly appraised, I am satisfied that, in the context of the significant constraints that exist in the district (including the AONB, the two AWEs, and areas at risk of flooding), all reasonable alternatives were considered in a proportionate manner through the ongoing sustainability appraisal during the preparation and examination of the Plan.
25. It may be the case that when the Plan was published for consultation under regulation 19 in January 2023, the Council's notification letter and other publicity material did not explicitly invite comments on the sustainability appraisal report. However, the report was made available and referred to, along with other supporting documents, and comments were made about it in various representations. The evidence, including the Council's Consultation Statement²⁰, clearly indicates that those comments were considered by the Council. When the updated sustainability appraisal report was published on the Council's website for consultation alongside the proposed main modifications, consultees were explicitly invited to express their views about it.
26. Therefore, I am satisfied that the sustainability appraisal complied with the necessary legal requirements, and that it adopted a systematic approach based on proportionate, adequate evidence and was used by the Council to inform decisions about the content of the Plan, including which sites to allocate, having regard to reasonable alternatives. Where relevant, I return to the sustainability appraisal, including its assessment of the reasonable alternatives, in my assessment of soundness issues later in this report.

Habitat regulations assessment

27. A habitat regulations assessment was carried out during the preparation of the Plan and updated during the examination to consider the proposed main modifications²¹. The assessment finds that the Plan, in combination with other

¹⁷ CD3

¹⁸ EXAM64.

¹⁹ The sustainability appraisal was updated during the examination hearings to assess each of the allocations included in the Plan that are retained from previously adopted plans using the same methodology as that used to assess the new residential site allocation options [EXAM26C 20 May 2024].

²⁰ CD4a, and oral evidence at hearings on 8 May and 12 June 2024.

²¹ CD8 and EXAM65.

plans and projects, has the potential to have significant effects on the integrity of the River Lambourn, Kennet and Lambourn Floodplain, and Kennet Valley Alderwoods Special Areas of Conservation. However, the assessment concludes that those in-combination effects can be avoided through a combination of strategic and proposal-specific mitigation measures. The Plan includes policies aimed at ensuring that those mitigation measures are implemented. I consider whether they will be effective in that regard later in this report, and recommend main modifications accordingly.

Strategic priorities

28. The development plan, taken as a whole, includes policies to address the strategic priorities for the development and use of land in West Berkshire. These include policies in the Plan aimed at mitigating and adapting to climate change; achieving high quality, sustainable development; meeting housing needs; supporting economic growth; enhancing town centres; promoting cultural distinctiveness; conserving and enhancing the historic and natural environment and AONB; improving green infrastructure; promoting sustainable transport; and providing infrastructure to support development²².

Climate change

29. The development plan, taken as a whole, includes policies designed to secure that the development and use of land in West Berkshire contribute to the mitigation of, and adaptation to, climate change. These include strategic and development management policies in the Plan relating to the spatial strategy, flood risk, water quality and resources, green infrastructure, design quality, energy, air quality and transport.

Superseded policies

30. Appendix 7 in the Plan sets out a schedule of policies in the West Berkshire District Local Plan 1991-2006, the West Berkshire Core Strategy 2006-2026, and the Housing Site Allocations DPD 2006-2026 that will be superseded by policies in the Plan. However, Appendix 7 needs to be modified to clarify that a number of policies in the Housing Site Allocations DPD 2006-2026 that are not included in the Plan are superseded by policy SP12 [MM110]. This is necessary to ensure compliance with regulation 8 of the 2012 Regulations.

North Wessex Downs AONB

31. As required by section 245 of the Levelling-up and Regeneration Act 2023, in examining the Plan I have sought to further the purpose of conserving and

²² Plan paragraph 3.5.

enhancing the natural beauty of the North Wessex Downs AONB. In so doing, I have taken account of the Management Plan 2019-2024²³ and other relevant evidence when considering the effects of development both within and affecting the setting of the AONB. As a consequence, and to ensure consistency with national planning policy and relevant guidance²⁴, I recommend a number of main modifications to the Plan. These are set out under the relevant main issues of this report.

Other legal requirements

32. The Plan complies with all other relevant legal requirements, including in the 2004 Act (as amended) and the 2012 Regulations.

Assessment of Soundness

Main Issues

33. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings, I have identified 12 main issues upon which the soundness of the Plan depends. This report deals with these main issues. It does not respond to every point or issue raised by representors. Nor does it refer to every policy, policy criterion or allocation in the Plan.

Issue 1 – Are the amounts of housing, industrial and warehouse, and office development that the Plan identifies as being needed justified and consistent with national policy?

34. National policy expects strategic policies to look ahead over a minimum 15 year period from adoption and, as a minimum, provide for objectively assessed needs for housing and other uses, as well as needs that cannot be met within neighbouring areas, other than in a number of defined circumstances²⁵.

Plan period

35. The submitted Plan covers the period 2022 to 2039 and assesses the quantified need for housing, industrial and warehouse, and office development on that basis. However, the Plan will not be adopted until after 1 April 2025 meaning that, to be consistent with national policy, relevant strategic policies need to look ahead to 2041. Furthermore, to reflect the standard method for calculating local

²³ LAN10.

²⁴ In particular, NPPF 176 and 177 and Guidance for relevant authorities on seeking to further the purposes of protected landscapes (Defra 16 December 2024).

²⁵ NPPF 11 and 22.

housing need²⁶ and the latest comprehensive evidence relating to housing land supply, the base date of the Plan should be changed to 2023. I therefore recommend that the Plan be modified to cover the period from 1 April 2023 to 31 March 2041 [**MM18 and MM30**]. I deal with the implications of this for relevant parts of the Plan in subsequent sections of this report.

Housing development

36. Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. Local housing need should be calculated at the start of the plan-making process using the standard method and then be kept under review and revised where appropriate as the figure may change due to the inputs being variable.
37. Paragraph 6.2 of the Plan states that local housing need calculated using the standard method was 513 dwellings per year based on 2022 data. However, the figure was 515 dwellings per year at the time the Plan was submitted for examination in March 2023 based on the latest affordability data²⁷.
38. Policy SP12 states that provision will be made for 8,721 to 9,146 net additional homes per year between 2022 and 2039 (513 to 538 per year). A main modification is required to delete reference to a range, as that does not establish an unambiguous housing requirement figure for the district or serve any clear purpose. Furthermore, to be up to date, the minimum housing requirement should be based on local housing need calculated using the standard method at the time the Plan was submitted for examination (515 dwellings per year), and cover the modified plan period 2023 to 2041 ie a total of at least 9,270 dwellings. These changes ensure that policy SP12 is consistent with national policy and justified [**MM18**].
39. The Council considered a higher level of housing growth than the standard method figure during the preparation of the Plan. If achieved, such a scale of development would be likely to deliver more affordable housing on market-led schemes in accordance with policy SP19, thereby reducing the expected shortfall of around 3,500 affordable homes over the plan period²⁸. However, such an approach was rejected by the Council, primarily on the grounds of the environmental impacts and lack of suitable, available sites. Such a decision was reasonable, and it is not therefore necessary to modify the Plan to set a housing requirement above local housing need to deliver more affordable homes.

²⁶ NPPF 66 and PPG ID:2a-001-20190220.

²⁷ Council response to SPQ24 [EXAM3].

²⁸ Council response to PQ38 [EXAM2].

40. Paragraphs 6.5 and 6.6 in the Plan refer to Reading Borough Council having identified a shortfall of 230 dwellings in their current local plan period to 2036, and to this need being met in the West of Berkshire area. However, it is clear from evidence that became available during the examination that Reading Borough Council can now identify more than sufficient supply to meet their current local plan requirement²⁹. It is not necessary, therefore, to modify policy SP12 to increase the housing requirement above local housing need to make provision for unmet need in Reading. However, the reasoned justification needs to be modified to reflect the latest evidence relating to Reading's housing supply; this will ensure the Plan is justified and effective **[MM19]**. Housing needs in West Berkshire, Reading and other neighbouring authorities will need to be considered again in future reviews of the relevant local plans in the context of current NPPF; there is no need to modify the Plan further in that regard.

Industrial and warehouse development

41. Paragraph 7.8 in the Plan refers to a minimum requirement of 91,109 sqm of industrial floorspace or 23 hectares of land between 2022 and 2039. This is based on analysis of past trends, labour demand and supply, economic forecasts, the local property market and potential impacts of the COVID pandemic³⁰. As the requirement figure in the Plan reflects the highest growth scenario based on past trends, it represents a positive approach. However, the Plan needs to be modified so that the requirement applies to the modified plan period, and is set out in policy rather than only in the reasoned justification. Policy SP20 and the reasoned justification should, therefore, refer to a minimum requirement of 98,196 sqm for the period 2023 to 2041 **[MM30 and MM31]**. This will ensure that the Plan is justified, effective and consistent with national policy.
42. I deal later in this report with whether the Plan identifies sufficient land to ensure that the minimum requirement for additional industrial and warehouse floorspace can be met.

Office development

43. Paragraph 7.4 in the Plan refers to a need for a net increase in office floorspace of 50,816 sqm to 2039. This is based on the same evidence as the requirement for industrial and warehouse floorspace described above. For the same reasons, policy SP20 and reasoned justification need to be modified to refer to a minimum requirement of 57,531 sqm of additional office floorspace for the

²⁹ Council response to AP4 [EXAM26]

³⁰ Employment Land Review 2020 and Addendum 2022 [EMP3 and EMP4]

period 2023 to 2041 [MM30 and MM31]. Again, I consider the Plan's approach to the supply of office floorspace later in this report.

Conclusion

44. I therefore conclude that policies SP12 and SP20, and associated reasoned justification, need to be modified as described above to ensure that they are sound in terms of setting minimum requirements for the amount of housing, industrial and warehouse, and office development in the district.

Issue 2 – Does the Plan set out an appropriate spatial strategy for West Berkshire, taking into account reasonable alternatives?

45. Policy SP1 sets out a development strategy based on different approaches in three distinct spatial areas (Newbury and Thatcham; the Eastern Area; and the North Wessex Downs AONB) and the settlement hierarchy defined in policy SP3. There are a number of other policies in the Plan that also form key parts of the spatial strategy including SP2 (the AONB); SP4 (AWE Aldermaston and AWE Burghfield); and DM2 (separation of settlements around Newbury and Thatcham).
46. Before looking at each of those elements of the spatial strategy, I consider whether they were chosen having regard to consideration of reasonable alternatives in the context of the settlement pattern and other relevant characteristics of the district.

Settlement hierarchy

47. Policy SP3 defines a settlement hierarchy comprising three urban areas; six rural service centres; eight service villages; and a number of smaller settlements listed in Appendix 2 with settlement boundaries defined on the policies map. The hierarchy was defined based on a reassessment of that in the adopted Core Strategy to take account of each settlement's current roles, infrastructure and services.
48. Specifically, the assessment used a scoring system based on an audit of services and facilities including rail and bus services; convenience stores; post offices; schools; GPs and pharmacies; community centres; libraries; sport and recreation facilities; places of worship; public houses; and employment opportunities. However, it also inevitably necessitated judgements to be made, based on that consistent and systematic evidence base, about the role and character of each settlement and its relationship to others.

49. Whilst certain places could no doubt have been categorised differently for a variety of reasons, I am satisfied that the approach taken by the Council was based on adequate and proportionate evidence and reasonable in the context of relevant national policy and guidance relating to sustainable development, accessibility, community facilities and the vitality of rural communities.

Reasonable alternative spatial strategies

50. Two broad spatial strategy options were considered during the preparation of the Plan: retaining the approach in the adopted Core Strategy based on four spatial areas (Newbury/Thatcham; AONB; Eastern; and East Kennet Valley); and a revised spatial strategy based on three spatial areas (Newbury/Thatcham; AONB; and Eastern/East Kennet Valley combined), with an increased focus on Newbury and Thatcham.
51. As part of this, consideration was given to options for distributing housing development including: rolling forward the distribution from the adopted Core Strategy; increased focus on the Eastern Area (Grazeley); reduced focus on the AONB; continued focus on Newbury; and increased focus on Thatcham.
52. In the context of the settlement pattern in the district; the significant constraints to development including flood risk, the AWEs and the AONB; and the Council's strategic priorities, the Plan's spatial strategy is appropriate taking account of the reasonable alternatives. In particular, it strikes an appropriate balance between seeking to meet the identified need for development in the most accessible locations in and around the main settlements, particularly Newbury and Thatcham, and protecting the natural environment and landscape quality of the district, whilst also supporting rural communities.
53. I turn now to consider each of the elements of the spatial strategy set out in policies SP1 to SP4: Newbury and Thatcham; North Wessex Downs AONB; and the Eastern Area.

Newbury and Thatcham Area

54. Policy SP1 seeks to ensure that Newbury retains its key role as the administrative centre and major town centre, is a focus for housing and business development, and the main focus for office development. Thatcham is described as a focus for housing and business development, regeneration and improved services and facilities, whilst the villages surrounding Newbury and Thatcham are expected to retain their existing roles. The Plan proposes a large allocation on the edge of both Newbury and Thatcham, along with five other allocations in the area. The West Berkshire Strategic Vision 2050³¹ provides the

³¹ SET3a to SET3e (2022).

strategic context for this approach, and modifications are required to refer to this in order to ensure the Plan is justified and consistent with national policy³² [MM1, MM24 and MM26]. I consider whether each of the allocations in the Newbury and Thatcham area is sound later in this report, but the land supply identified in the submitted Plan has capacity for around 7,000 new homes proposed in this part of the district³³. For the reasons set out later in this report, I recommend modifications to increase the capacity of the North East Thatcham strategic site and include two additional allocations at Thatcham. This would further boost the supply in the Newbury and Thatcham area which is consistent with the objectives of policy SP1.

55. In order to prevent the coalescence of Newbury and Thatcham and to maintain the separate identity of the distinct settlements around both towns, policy DM2 states that development which would detract from the open or rural character of five gaps between settlements (which are defined on the policies map³⁴) will not be permitted and states that development will only be allowed if two criteria are met. This restrictive approach is justified given that suitable land has been allocated for development in and on the edge of the two towns, and the important role that the remaining gaps, which are limited in extent, perform in preventing the merging of the named settlements, safeguarding their individual identities, maintaining a strong sense of place, and protecting the landscape character of the surrounding countryside. Whilst the designated gaps include some developed sites in use and disused brownfield land, including Newbury Leisure Park, this does not undermine their strategic purpose. Furthermore, development is not ruled out on such sites within the gaps provided that it meets the requirements of policy DM2 and other relevant policies in the Plan.
56. The large scale development at North East Thatcham proposed in policy SP17 (which I consider in detail under main issue 5) would reduce the gap between the town and the village of Upper Bucklebury. Modifications to the reasoned justification for policy SP17 explain that a revised settlement boundary to Thatcham will be defined in a review of the Plan when the extent of the built up area has been determined through the masterplanning and planning application processes and that consideration will then be given to whether a gap needs to be defined between the two settlements in line with policy DM2 through an update to the Plan [MM26]. That represents a justified approach that will be effective in helping to safeguard the separate identity of Upper Bucklebury and its landscape setting in the long term.

North Wessex Downs AONB

57. Policy SP1 states that there will be appropriate and sustainable growth in the AONB, which covers around 74% of the district. Policy SP2 refers to

³² NPPF 22.

³³ EXAM21.

³⁴ Newbury; Thatcham; Donnington; Enborne Row/Wash Water; Cold Ash; and Ashmore Green.

development supporting local communities and the rural economy in the AONB. The evidence indicates that small site windfalls are anticipated to deliver fewer than 450 homes in the whole of the AONB over the plan period³⁵ which the Council concluded would be insufficient to achieve the aims of the spatial strategy. Consideration was therefore given during the preparation of the Plan to identifying suitable and available sites that could be allocated for 10 or more dwellings on the edge of towns and villages in the AONB having regard to the settlement hierarchy and an assessment of the potential impact on landscape character.

58. A total of ten allocations in the AONB are included in the Plan which, collectively, have capacity for around 350 dwellings. These allocations, along with sites under construction or with planning permission, sites to be allocated in neighbourhood plans, and anticipated windfalls mean that a total of just over 1,000 homes are expected to be built in the AONB in the plan period³⁶. This would be consistent with the Plan's spatial strategy and with national policy aimed at maintaining and enhancing rural communities. Whilst I consider whether each of the allocations is sound later in the report, I am satisfied that at a strategic level there are exceptional circumstances to justify allocating sites for major development in the AONB based on the clear need for the development, the fact that the particular local needs could not be met outside the AONB, and the fact that landscape impacts have been appropriately assessed and can be effectively mitigated³⁷.
59. Overall, therefore, the spatial strategy relating to the AONB is justified and consistent with national policy. Whilst the Plan does not allocate sites at some rural service centres in the AONB this is because no suitable sites were identified having regard to the likely landscape impact or because sites are to be allocated in forthcoming neighbourhood plans. For the reasons set out later in this report, I recommend a modification to allocate an additional site for 25 dwellings at Pangbourne, one of the rural service centres in the AONB. Given my findings above, there is certainly no strategic reason why the Plan needs to be modified to include additional allocations in the AONB.
60. However, a modification is required to the reasoned justification to policy SP2 to clarify that exceptional circumstances have been demonstrated to justify the major development allocations in the AONB and therefore proposals that meet the requirements of the relevant allocation policy, along with other relevant policies, will be deemed to be in accordance with the development plan and consistent with national policy [**MM5**]. This will ensure that the Plan is justified,

³⁵ EXAM21.

³⁶ EXAM21.

³⁷ HOU6 chapter 5.

and provide an effective approach for preparing and determining planning applications in the future.

61. The Plan sets a requirement for the Hungerford and Lambourn neighbourhood plans to identify sites for 55 and 25 homes respectively. I consider whether that is justified later in this report. However, it is necessary to modify the reasoned justification to policy SP2 to clarify that if neighbourhood plans propose major development in the AONB to meet those requirements they would need to demonstrate exceptional circumstances [MM5]. This will ensure consistency with national policy and an effective approach for preparing neighbourhood plans in the future.
62. A modification is required to policy SP2 to clarify how proposals affecting the setting of the AONB will be assessed, including with regard to the interrelationship with the AONB and its landscape character and special qualities, and proposals being sensitively located and designed to avoid or minimise any adverse impacts on the AONB [MM4]. This will ensure consistency with national policy and provide an effective development management policy.
63. Policy SP2 and paragraphs 4.27 and 4.28 set out an approach to determining what constitutes major development in the AONB and how proposals for such development will be assessed. National policy is clear that whether a proposal is major development is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the AONB was designated. Whilst some of the detailed wording in the policy and reasoned justification differs somewhat from that in the NPPF, and further information is included, I am satisfied that there is no significant inconsistency with national policy and that decision makers will still have the role of determining whether any particular proposal does represent major development. Moreover, given that a large proportion of the district is within the AONB, and the fact that the Council receives a high number of planning applications each year for development within the designated area, the inclusion of such a policy in the Plan sets out a clear approach to provide an effective context for preparing and determining planning applications on a consistent basis.
64. As referred to earlier in this report, the Levelling Up and Regeneration Act 2023 amended the statutory duty relating to AONBs. In November 2023, AONBs were rebranded National Landscapes. Whilst the Council may wish to make minor, additional modifications to the Plan to reflect these changes, they do not affect the soundness of the Plan and therefore I am not recommending any main modifications as a consequence of them.

Eastern Area

65. Policy SP1 identifies Theale as the focus for additional housing in the Eastern Area. However, the policy is silent on the role of the Eastern Urban Area identified in the settlement hierarchy (which comprises Calcot, Purley on Thames and Tilehurst on the western edge of Reading). A main modification is therefore required to policy SP1 to define the Eastern Urban Area as a focus for housing development to ensure an effective and justified approach [MM3].
66. Much of the land in the Eastern Area is constrained by flood risk and restrictions around the two AWEs. Thus despite its location close to Reading, and the presence of rural service centres of Burghfield Common, Mortimer and Theale, the new allocations in the submitted Plan collectively only have capacity for around 100 dwellings contributing to a total of around 1,500 dwellings in the area taking account of commitments, windfalls and allocations in the made Stratfield Mortimer neighbourhood plan. No other sites were considered to be available and suitable in the Eastern Area when the Plan was submitted.
67. However, for reasons set out elsewhere in this report, modifications are required to increase the housing land supply identified in the Plan, taking account of evidence that became available during the examination that demonstrates that a number of omission sites are suitable for housing development. One of those sites (TIL13 Pincents Lane, Tilehurst) is in the Eastern Area, and its inclusion in the Plan would increase the supply in this part of the district which would assist in the delivery of the spatial strategy.

Settlement boundaries

68. The settlement boundaries defined in the Plan, along with the settlement hierarchy defined above, make a significant contribution to the definition and implementation of the spatial strategy. This is because policies SP1 and SP3 make clear that development within the boundaries of the settlements in the hierarchy will be supported, whereas all land outside settlement boundaries (including that within hamlets and isolated groups of dwellings) will be treated as open countryside where development will be more restricted.
69. The settlement boundaries were defined using a landscape-led approach and specific criteria to determine what land and buildings on the edges of the built up areas should be included or excluded³⁸. The intention was to define the existing built up area, and exclude land that more closely related to the wider countryside. Alternative approaches could have been taken, for example to draw the boundaries more loosely with the aim of facilitating small scale, edge of settlement windfall development, or development within the grounds of existing institutions that adjoin the main built up area. However, I am satisfied that the methodology used by the Council was reasonable in the context of the

³⁸The methodology used to carry out the settlement boundary review is summarised in Appendix 2 to the Plan and described more fully in SET9.

spatial strategy and based on adequate and proportionate evidence such that the resultant boundaries defined on the policies map are in the most part justified and will be effective in helping to deliver the Plan's strategic objectives in a manner that is consistent with national policy.

70. That said, there are a limited number of instances where changes need to be made to the settlement boundaries as defined on the policies map such that they are justified in the context of the methodology used and will be effective in implementing the spatial strategy and relevant policies. Those changes include land at Morphetts Lane, Chieveley; Sandford Park, Newbury; Pincents Lane retail park, Tilehurst; and Colthrop industrial estate, Thatcham.
71. The inclusion of the latter two commercial areas is consistent with the methodology which allowed consideration of employment and leisure uses located on the edge of settlements to take account of their scale, functionality and visual and physical relationship with the settlement. Colthrop industrial estate is outside the policy DM2 strategic gap, and the modified settlement boundary is contiguous with the designated employment area and allocation ESA1 meaning that any proposals for development within it would be subject to policies SP20, ESA1 and DM32.
72. Consequential changes to the settlement boundaries will also need to be made as a result of the four additional allocations that I recommend as main modifications later in this report. Having considered the representations made in response to the main modifications' consultation, I recommend that the settlement boundary to the north of modified allocation CA12 Henwick Park be changed to accurately reflect the 95 metre contour line and the extent of the landscape buffer.
73. For the reasons set out in paragraph 56 above and under main issue 5, the Thatcham settlement boundary needs to be changed to exclude the North East Thatcham allocation.
74. All of the changes to the settlement boundaries defined on the policies map were subject to consultation alongside the main modifications, other than the subsequent amendment I recommend in relation to CA12 Henwick Park.

Development outside settlement boundaries

75. Policies SP1 and SP3 make clear that all land outside the defined settlement boundaries (including that within hamlets and isolated groups of dwellings) will be treated as open countryside where development will be more restricted as set out in policies DM1 and DM35.

76. As a strategic approach this provides clarity and a reasonable degree of certainty about where different forms of development will and will not be permitted. Policy DM1 provides an overview of the types of residential development that may, exceptionally, be permitted outside settlement boundaries provided it is appropriately designed and located. More detailed policies for those types of development are then set out in subsequent DM policies which I deal with as necessary later in this report. However, for clarity and to be effective, policy DM1 needs to be modified to cross refer to the subsequent relevant policies, and an additional category relating to student or staff accommodation associated with existing educational and institutional sites in the countryside (policy DM38) needs to be added. The final paragraph of DM1 needs to be deleted as it summarises requirements set out more clearly in other parts of the Plan and introduces an ambiguous and unjustified requirement relating to cumulative impact. These changes [MM73] will ensure that policy DM1 is justified and effective.
77. I deal with policy DM35, which relates to economic development in the countryside, under main issue 11 later in this report.

AWE Aldermaston and AWE Burghfield

78. There are two AWEs at Aldermaston and Burghfield in the Eastern Area which are core to supporting national defence and security. Paragraph 4.38 sets out the key legislation that applies as a result of the quantities and types of hazardous material involved. Paragraphs 4.44 to 4.58 summarise the approaches relating to Detailed Emergency Planning Zones (DEPZ), Outer Consultation Zones and 12km Consultation Zones.
79. Policy SP4 aims to control development in the vicinity of the AWEs in the interests of public safety and to prevent external hazards to the two sites. It states that planning permission is likely to be refused for development in the DEPZ that could lead to an increase in residential or non-residential populations thus impacting on the Off-Site Emergency Plan (OSEP), especially when the Office for Nuclear Regulation (ONR) and/or Ministry of Defence (MoD) advise against or object to the development. Policy SP4 goes on to set out consultation arrangements for different types of development in the DEPZ, 5km Outer Consultation Zones and 12km Consultation Zones for the two AWEs. The zones are defined on the policies map and indicated on maps in Appendix 3.
80. It is not my role to examine the extent of the zones, or the OSEP and data about population, household size, numbers of existing homes or other matters that it is based on or will be used to help implement it. Nor is it my role to scrutinise the way in which the Council and other relevant bodies have assessed development proposals in the context of the AWEs in the past or speculate about how they

may do in the future. Rather, my concern is with the soundness of policy SP4, and in particular whether it will be effective in helping to ensure public safety and that the AWEs will not be adversely affected by the impact of other development in the area. In so doing, I assume that the relevant regulatory regimes will operate effectively³⁹.

81. In principle, the approach in policy SP4 is consistent with national policy which expects planning policies to recognise and support development required for operational defence and security purposes and ensure that operational sites are not affected adversely by the impact of other development proposed in the area. Local planning authorities should consult the appropriate bodies for development around major hazard sites⁴⁰.
82. However, to be effective and justified, policy SP4 needs to be modified [**MM8**] so that it is clear that development within the zones will be managed in the interests of public safety and to ensure that any proposed development does not adversely affect the defence related operation or capability of the AWEs, and to set out the circumstances when planning permission will be refused for development in the DEPZ or in the consultation zones. Having considered the responses to the consultation, I have amended the modification to clarify that the ONR and AWE / MoD will be consulted on all proposals which will lead to any increase in the residential or non-residential population of the DEPZ (including visitors and workers). This will ensure that those bodies will be able to assess the impact on the OSEP, including the cumulative impact of small scale developments. However, it is not justified to amend the modification to state that planning permission will be refused for all such developments prior to such assessment being undertaken in the context of the OSEP at the time.
83. The reasoned justification and Appendix 3 need to be modified accordingly [**MM9** and **MM108**], and to clarify that the extent of the DEPZ and consultation zones could change during the plan period. I have amended the modification to the reasoned justification to clarify that policy SP4 applies to all development proposals in the land use planning consultation zones, irrespective of whether they comply with other policies including SP1, SP3 and SP20.
84. The Plan could potentially have included a less restrictive approach to allow more development in and around settlements defined in the hierarchy in the Eastern Area in accordance with the spatial strategy where it could be shown on a case by case basis that public safety would not be compromised. Alternatively, it could have set out an even more restrictive approach, or have provided more detail about the circumstances in which development may be allowed or refused. However, I am satisfied that, subject to my recommended main modifications, the Plan sets out a justified and effective policy for

³⁹ NPPF 188.

⁴⁰ NPPF 45 and 97.

controlling development in the vicinity of the AWEs consistent with national policy. This is based on the Council's experience of dealing with planning applications and appeals in the relevant parts of the district over the last few years, and the expert advice from representatives of the ONR and the AWE / MoD.

85. The approach to controlling development around the AWEs set out in policy SP4 was applied during the preparation of the Plan, including in determining which sites are suitable for development. This had the effect of limiting the amount of development in the Eastern Area, as referred to above. There are two allocations within the DEPZ, RSA24 New Stocks Farm, Aldermaston (8 Traveller pitches) and RSA12 Pondhouse Farm, Burghfield (100 dwellings). Both of these have planning permission and were taken into account in the OSEP. In addition, there are two housing allocations and three employment allocations within the 5km Outer Consultation Zones: RSA8, RSA13, ESA4, ESA5 and ESA6. None of these developments would be contrary to policy SP4. The AWEs were, therefore, taken appropriately into account in determining the spatial strategy and identifying suitable sites for allocation.

Key diagram

86. National policy expects local plans to indicate broad locations for development on a key diagram. It is necessary, therefore, to modify the Plan to include a key diagram [MM2].

Conclusion

87. I conclude, therefore, that subject to the main modifications described above the Plan sets out an appropriate spatial strategy for West Berkshire, taking into account reasonable alternatives.

Issue 3 – Does the Plan contain appropriate strategic policies and set out an effective framework for the preparation of neighbourhood plans that is justified and consistent with national policy?

88. There are four made neighbourhood plans in the district, Stratfield Mortimer (2017), Compton (2022), Hermitage (2024), and Cold Ash (2024), along with seven other designated neighbourhood areas: Newbury; Thatcham; Burghfield; Tilehurst; Enborne; Hungerford and Lambourn.

Strategic policies

89. The Plan identifies 24 strategic policies: SP1 to SP24. Neighbourhood plans will be required to be in general conformity with those policies⁴¹. In many respects, they are consistent with the criteria set out in national policy and guidance relating to the purpose and nature of strategic and non-strategic policies including in terms of addressing the Council's strategic priorities for the development and use of land in West Berkshire⁴². However, for reasons set out elsewhere, modifications are required to the detailed content of some of those policies to ensure that they are sound, including in terms of providing a clear framework for neighbourhood plans.
90. Strategic policies SP13 to SP15 list sites allocated for residential development in different parts of the district, and SP21 lists sites allocated for employment development. Chapter 8 of the Plan is entitled "non-strategic site allocations", and contains policies for the sites listed in SP13 to SP15 and SP21. This approach means that the Plan contains unnecessary duplication and creates ambiguity about whether the allocations listed are subject to a strategic policy that a neighbourhood plan would need to be in general conformity with. This can be rectified by the deletion of policies SP13, SP14, SP15 and SP21 and the insertion of additional text and tables in chapter 8 to summarise the allocations in each spatial area to ensure the Plan is effective [**MM20 to MM22 and MM32, MM36, MM44, MM54 and MM67**]

Housing requirements for neighbourhood areas

91. Policies SP13, SP14 and SP15 in the submitted Plan include housing requirement figures of 55 and 25 dwellings for Hungerford and Lambourn respectively, with all other designated neighbourhood areas having a zero requirement. The figures take account of current commitments and any allocations in the Plan in those areas, along with the Council's assessment of potential opportunities for further development, in the context of the Plan's spatial strategy and settlement hierarchy. The figures also take account of the intentions of the relevant parish or town council in terms of the nature and purpose of the forthcoming neighbourhood plan, including whether it intends to make any allocations.
92. I consider under main issue 8 whether the assumption in the Plan that sites allocated in the Hungerford and Lambourn neighbourhood plans will collectively deliver 80 homes is justified. However, I am satisfied that the requirement figures for those areas, and the zero figures for other areas, are based on proportionate evidence and an approach that is consistent with national policy which expects housing requirements for designated neighbourhood areas to

⁴¹ NPPF footnote 18.

⁴² NPPF 17 to 23 and 28, and PPG ID-41-076-20190509

reflect the overall strategy for the pattern and scale of development and any allocations.

93. With the deletion of policies SP13, SP14 and SP15, the figures for neighbourhood areas need to be included in policy SP12 which deals with strategic matters relating to housing requirement and supply. Policy SP12 and its reasoned justification also need to be modified to state that the Council will supply a housing requirement figure for each neighbourhood area when a neighbourhood plan is being prepared or updated, and that sites allocated in the Plan do not count towards meeting the requirement for the neighbourhood area [MM18 and MM19]. These modifications will ensure that the Plan is effective and consistent with national policy.

Allocations in neighbourhood plans

94. Policy SP3, relating to the settlement hierarchy, needs to be modified to make clear that neighbourhood plans can allocate non-strategic sites (but not strategic sites) within and adjoining the settlement boundaries of the urban areas, rural service centres and service villages defined in the Plan. The reasoned justification also needs to be modified to explain that any allocations in neighbourhood plans that are within the settlement boundaries defined in the Plan would not count towards meeting the target figures in policy SP12 because to do so would not be consistent with the assumptions made about the district's overall housing land supply. The reasoned justification to policy SP20 needs to be modified to clarify that any employment allocations in neighbourhood plans would be additional to those in the Plan. These modifications [MM6, MM7 and MM31] will ensure consistency with national policy and an effective approach for the preparation of neighbourhood plans consistent with the Plan's spatial strategy.
95. For the reasons set out under main issue 2 above, the reasoned justification to policy SP2 needs to be modified to clarify that if neighbourhood plans include allocations that propose major development in the AONB they would need to demonstrate exceptional circumstances [MM5].

Appendix 6

96. Appendix 6 in the Plan is entitled "How policies are applied in a neighbourhood planning context". However, a modification is required to delete that Appendix as it is not consistent with relevant legislation and national policy and because the Council's website includes information about neighbourhood planning which is kept under review and updated as appropriate [MM109].

Conclusion

97. Subject to the main modifications that I refer to above, the Plan contains appropriate strategic policies and sets out an effective and justified framework for the preparation of neighbourhood plans.

Issue 4 – Were the sites allocated in the Plan selected on the basis of adequate and proportionate evidence, and is the Plan justified by viability evidence consistent with national policy?

98. During the preparation of the Plan it was clear to the Council that sites allocated in existing adopted plans and neighbourhood plans and/or with planning permission plus windfalls would not be sufficient to meet housing needs over the plan period. The Council therefore made a call for sites in winter 2016/17 and again in late 2018. This led to around 300 sites being promoted as potential allocations.
99. All sites were assessed in the Housing and Economic Land Availability Assessment in February and December 2020, and then again in January 2023, taking account of relevant available evidence, specialist advice and site visits. Potentially suitable sites were also subject to sustainability appraisal at regulation 18 and 19 stages. Some sites were deemed to not be suitable in accordance with the spatial strategy, for example, those at a settlement outside the hierarchy or in the countryside detached from any settlement boundary. Others were judged to not be suitable or developable for reasons such as poor access, flood risk or landscape impact. In parallel with the availability assessment and sustainability appraisals, other technical work was carried out to inform the preparation of the Plan and the choice of allocations. These included transport assessments, flood risk assessments, water cycle studies, and landscape sensitivity studies and character assessments.
100. Once the Council decided that the Plan was to allocate a large strategic site at Thatcham (the justification for which is considered under the next main issue), a number of smaller sites on the edge of the town were not considered necessary to allocate. That is a matter that I return to later when considering whether the housing land supply in the Plan is sufficient.

Strategic road network

101. Transport assessments were carried out in 2020 and 2021 along with further modelling in 2022. In response to representations by National Highways and Hampshire County Council, and ongoing discussions, further work was carried out in 2023 and 2024 and a statement of common ground agreed⁴³. Based on that, I am satisfied that the development proposed in the Plan will not have an

⁴³ EXAM25 (3 May 2024) and EXAM26 (17 May 2024).

unacceptable impact on highway safety or severe residual cumulative impacts on the strategic road network.

River Lambourn SAC nutrient neutrality

102. Several of the allocations in the Plan (as well as some other sites with planning permission assumed to deliver dwellings required to meet housing needs over the plan period) are within the hydrological catchment of the River Lambourn Special Area of Conservation which is vulnerable to changes in water quality from nutrients. In January 2024, legislation came into effect that means that wastewater treatment works are required to meet specified nutrient removal standards by 1 April 2030⁴⁴. The relevant treatment works in the River Lambourn catchment are expected to have the necessary upgrades by the end of 2025 meaning that an obstacle that has prevented many developments in the area over recent years will be removed.

103. Notwithstanding that, additional mitigations will be required to achieve nutrient neutrality and therefore the Council, in partnership with Natural England, has developed a strategy and guidance to identify appropriate mitigations which may be on or off site. Whilst there have been some delays in finalising aspects of the guidance, it is clear that considerable progress has been made in addressing the detailed technical issues such that planning applications will now be able to be determined. The selection of the allocations which require the development to demonstrate nutrient neutrality through a project level HRA and for mitigation to be in place and operational prior to any nutrient pollution being discharged is, therefore, justified, and the relevant policies should be effective meaning that there is a realistic prospect of those sites delivering the dwellings proposed in a timely manner.

Viability

104. A viability assessment was carried out during the preparation of the Plan⁴⁵. This was undertaken by an experienced, appropriately qualified consultancy in accordance with national planning policy guidance and industry good practice using proportionate, up to date evidence relating to the development values, costs (including those relating to policy requirements such as affordable homes, energy efficiency, and biodiversity net gain) and land values. Whilst it is possible that some costs may be higher than assumed, it is also possible that others could be lower and / or development values higher; this is reflected in some of the sensitivity tests included in the assessment.

⁴⁴ The Designation of Sensitive Catchment Areas Notice 2024.

⁴⁵ VIA1a to VIAf.

105. The whole plan viability assessment used a typology-based approach, reflecting the nature of the potential allocations, to consider the viability of residential development. In addition to that, a number of the allocations are subject to site specific viability assessments undertaken on behalf of the owners or promoters. Overall, the evidence indicates that the total cumulative cost of all relevant policies is unlikely to undermine the viability of the development that the Plan assumes will take place during the plan period.

Conclusion

106. I am satisfied, therefore, that the sites allocated in the Plan were selected on the basis of adequate and proportionate evidence, and that the Plan is justified by viability evidence consistent with national policy.

Issue 5 – Is policy SP17, relating to a strategic allocation at North East Thatcham, justified and consistent with national policy, and would it be effective in achieving sustainable development on the site?

Introduction

107. Policy SP17 proposes approximately 1,500 new homes during the plan period on a greenfield site of around 170 hectares on the north east edge of Thatcham. The southern boundary of the allocation is around one kilometre from the town centre and the railway station. To the south runs the A4 and Floral Way, and to the north lies the village of Upper Bucklebury within woodland on top of a hill that forms part of the North Wessex Downs AONB. Not far to the east and west of the site are the villages of Midgham and Cold Ash respectively.

108. The new homes, at least 40% of which would be affordable, would be accompanied by local shops; a GP surgery; a primary school; early years provision; land for secondary school provision; a community centre; formal and informal sports pitches; other green infrastructure including a community park; and transport infrastructure including walking and cycling routes and improvements to existing roads.

Principle and scale of residential development

109. For the reasons set out under main issue 2 above, I have already concluded that the Plan's spatial strategy, including focussing development on Thatcham, is appropriate and justified. A number of alternatives for development around the town were identified by the Council during the preparation of the Plan and

considered through the Thatcham Strategic Growth Study⁴⁶ and sustainability appraisal⁴⁷ including 1,500 and 2,500 dwellings at North East Thatcham; 800 dwellings at Colthorp; and 250 dwellings at Henwick. National policy advises that the supply of large numbers of new homes can often be best achieved through planning for larger scale developments including significant extensions to towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities⁴⁸. In principle, therefore, the proposal for a comprehensive, large scale development at North East Thatcham is consistent with national policy and justified, taking into account reasonable alternatives based on proportionate evidence.

110. However, the evidence indicates that the allocation has capacity for up to approximately 2,500 homes along with the physical, social and green infrastructure proposed in policy SP17⁴⁹. Restricting the scale of development to 1,500 homes would not therefore make efficient use of land and optimal use of the potential of the site as expected by national policy⁵⁰. Furthermore, a significant part of the justification for the allocation is that it would assist in the regeneration of the town, including through supporting local services and providing new social infrastructure. The viability evidence⁵¹ indicates that there is a reasonable prospect that a development including around 2,500 homes would be viable, whereas there are significant doubts that a development comprising around 1,500 homes could deliver all of the physical, social and green infrastructure proposed in policy SP17 whilst meeting all of the policy requirements in the Plan.
111. As submitted, therefore, policy SP17 is not effective, justified or consistent with national policy. This significant soundness deficiency can, however, be rectified by modifying policy SP17 to propose up to approximately 2,500 dwellings (rather than approximately 1,500 to be completed in the plan period) with an appropriate mix of types, tenures and sizes having regard to policy SP18 **[MM25]**.
112. Whilst, for the reasons set out later in this report, it is not expected that more than around 1,760 homes will be built on the site by 2041, the modification will provide a reasonable degree of certainty that the amount of residential development proposed on the site will be sufficient to help ensure the provision

⁴⁶ SIT2a to SIT2e.

⁴⁷ CD3a page 25.

⁴⁸ NPPF 73.

⁴⁹ In particular, the Thatcham Strategic Growth Study Stage 3 [SIT2c September 2020] and North East Thatcham Partnership's Development Statement [WS4/6 Appendix March 2024].

⁵⁰ NPPF September 2023 paragraph 125.

⁵¹ VIA1a, VIA1c and VIA1d(i) (Autumn 2022); North East Thatcham Partnership's Viability Note [WS4/6 Appendix 9 of the Development Statement, March 2024]; and Statement of Common Ground on Secondary School Provision [EXAM42 Annex D, June 2024].

of the social, green and physical infrastructure and a commercially viable bus service.

113. Furthermore, the modification will ensure that the Plan is flexible as there is nothing to prevent up to 2,500 homes being built on the site by 2041 if all relevant policy requirements are met. The modification will also have the significant benefit of increasing the number of homes proposed in the Plan which, for reasons set out later in this report, is necessary to help meet housing needs in accordance with national policy.
114. In addition to the above modification, significant changes are also necessary to various parts of policy SP17 and accompanying reasoned justification to ensure that it is effective in securing the delivery of all aspects of the proposal in a timely and comprehensive manner whilst meeting all relevant policies in the Plan and thereby achieving sustainable development on the site. These changes, and reasons for them, are described under the sub-headings below.

Masterplanning, design, and phasing

115. The first paragraph of policy SP17 needs to be modified to clarify that the site will be developed comprehensively with proposals demonstrating how infrastructure, services, open space and facilities will meet the needs of the development and be delivered in a timely and coordinated way across the whole site alongside the phased delivery of residential development.
116. Policy SP17 then needs further modification to include a new section relating to masterplanning and a design code. This will provide greater clarity about the proposed masterplanning process, and how this will inform the location and extent of development on the site, the actual number of homes that will be built, the phasing of development, and the coordinated delivery of infrastructure. This is essential, because as submitted policy SP17 requires a significant amount of further studies and other work to be carried out without being clear about how this is intended to relate to the masterplanning and planning application processes.
117. To facilitate meaningful engagement with the community and other stakeholders, and ensure that the masterplan effectively guides the development of the site, policy SP17 needs to be clear that the Council will lead and coordinate the process, in collaboration with the site promoters, relevant town and parish councils, the community and other stakeholders. Furthermore, due to the significance of the work to be carried out to inform the masterplan, and to ensure effective community engagement, the masterplan should be prepared and adopted as a supplementary planning document prior to the submission of a planning application. The reasoned justification should be modified to refer to the Council's intention to adopt the supplementary planning

document within 12 months of the adoption of the Plan as this will help to prevent undue delay to the commencement of development on the site.

118. Finally with regard to the masterplanning process, reference to the Thatcham Strategic Growth Study “guiding principles” needs be deleted from policy SP17, and the reasoned justification amended to explain that the Growth Study and the West Berkshire Strategic Vision 2050 include information that forms part of the justification for the Plan’s spatial strategy and the strategic allocations in Newbury and Thatcham, some of which will be relevant to the preparation of the masterplan.
119. This additional part of policy SP17 also needs to state that a design code should be prepared by the developer and agreed by the Council through a planning condition at the outline application stage.
120. Those modifications relating to masterplanning, design and phasing, along with the further detailed changes set out below, will ensure that the policy is effective in securing the delivery of all elements of the proposal and achieving high quality design [MM25].

Infrastructure

121. For the reasons set out above, modifying policy SP17 to propose up to 2,500 homes and set out clear requirements for masterplanning will help to ensure the delivery of the necessary social, green and physical infrastructure. National planning guidance recognises that where local plans propose large scale developments including significant extensions to towns, there may not be certainty and/or the funding secured for necessary strategic infrastructure at the time the plan is produced. Strategic policy-making authorities are therefore expected to demonstrate that there is a reasonable prospect that the proposals can be developed within the timescales envisaged following engagement with infrastructure providers⁵². In that context, I turn now to consider each of the different types of infrastructure referred to in policy SP17 along with a number of other issues that are relevant to the soundness of the proposal.

Transport infrastructure

122. The transport assessment carried out during the preparation of the Plan⁵³ is based on adequate, proportionate evidence and an appropriate methodology. It found that the North East Thatcham development could cause additional delays and congestion around key junctions along the A4 corridor, with through traffic

⁵² PPG ID: 61-059 and 060-20190315.

⁵³ INF3 Phase 1 Transport Assessment (December 2020) and INF4 Phase 2 Transport Assessment (July 2021).

diverting onto alternative routes including in Thatcham, Cold Ash and Upper Bucklebury. Transport evidence provided by representors, including Bucklebury Parish Council, Cold Ash Parish Council and Thatcham Town Council, also indicates the potential adverse impacts that the development could lead to on local roads, some of which are rural in nature and unsuitable for large amounts of traffic.

123. To address the identified impacts, the transport assessment sets out a package of measures to encourage a shift to sustainable modes along with improvements to highway capacity and key junctions on the A4 corridor and Floral Way. Subject to those measures, the evidence demonstrates that the proposal would not have an unacceptable impact on highway safety and that the residual cumulative impacts on the road network would not be severe. Whilst some additional traffic would be generated on the local road network, including through Upper Bucklebury and Cold Ash, it is clear that this would not be so great to mean that those national policy tests would be failed. The proposal would also lead to even longer queues at the Thatcham level crossing to the south of the town where the barriers are down for more than 50% of the day. However, whilst Network Rail advise that this may lead to further complaints, it would not result in safety issues.
124. A number of modifications are required to policy SP17 to ensure that it, along with other relevant policies in the Plan including SP23, SP24 and DM42, is effective in ensuring the timely delivery of the necessary transport mitigations. The modifications include clarifying that measures are needed to encourage use of sustainable transport modes and that development proposals will need to be supported by a transport assessment and travel plan in accordance with policy DM45. The requirements need to include provision of multiple access points, as well as a vehicular through route, as this will help to ensure that trips from the site are dissipated. For clarity, the indicative site map in the Plan should show potential access points as identified in the transport assessment, although these will need to be considered further through the masterplanning process.
125. Subject to those modifications [MM25], I am satisfied that policy SP17 will be consistent with national policy and effective in achieving safe and suitable access for all users and that significant impacts on capacity, congestion and highway safety can be cost effectively mitigated to an acceptable degree at an appropriate time.

Education infrastructure

126. Policy SP17 requires early years provision and a 2.5 form entry primary school to be provided on the site; these would be needed to accommodate future residents. The requirements are, therefore, justified although the references to a specific sized school and sports infrastructure provision need to be deleted for effectiveness as the number of classrooms and associated outdoor play space

for the primary school will be determined through the masterplanning process [MM25].

127. Existing secondary schools in the area are at capacity meaning that additional provision will be needed. However, the scale of the residential development proposed is not sufficient to require a new school of a size that would be operationally viable. Policy SP17 therefore requires the provision of land for a secondary school, the nature and cost of which would be informed by a feasibility study to be funded by the developer. In principle, this is a justified approach as the provision of a new secondary school on the site, potentially to replace the 1950s Kennet School as well as to serve future residents, would provide significant benefits to the wider community.
128. Whilst the development of 1,500 homes could provide the land and potentially make a financial contribution, the viability evidence shows that the contribution would be substantially greater with a development of up to 2,500 homes (having also taken account of requirements relating to other infrastructure) meaning that the identified funding gap would be significantly reduced. Other sources of funding would still be required, but this is not unusual and does not mean that there is not a reasonable prospect of the school being provided when needed as part of a proposal for up to 2,500 homes. To reflect the modified scale of residential development, and for effectiveness, policy SP17 needs to refer to special educational needs provision and to a financial contribution from the developer (in addition to the provision of land for the secondary school) [MM25].

Health care infrastructure

129. Policy SP17 requires the provision of a 450 sqm GP surgery on the site. Existing primary health care infrastructure in Thatcham has no spare capacity meaning that a new facility on the site is needed to serve future residents but would also have benefits for existing residents in the town. However, it is clear from the evidence from the NHS and existing GP practice that the requirement for a "450 sqm surgery" is unduly prescriptive and unjustified.
130. Policy SP17 therefore needs to be modified to clarify that what is required is a primary healthcare facility that is operationally and financially viable, the details of which will be determined through a feasibility study that will inform the masterplanning process [MM25]. Such a policy provides sufficient clarity about the required outcome and the process by which the details are to be finalised. The extent to which funding is required in addition to a proportionate contribution from the residential development will depend on various factors, including the size and nature of the health care facility. It is appropriate, therefore, for those and other details to be determined through the feasibility study, masterplan and planning application process.

Local retail, employment, community facilities and open space

131. Policy SP17 requires the provision of local centres providing retail facilities and small scale employment (approximately 1,100 sqm) along with a 1,200 sqm indoor community / sports centre, outdoor sports pitches and other open space. Such facilities will clearly be beneficial to future residents and help to achieve sustainable development as they will provide opportunities to meet day to day need locally by walking and cycling.
132. However, the specific floorspace requirements are not justified, and will be matters that can properly be determined through the masterplanning process. Modifications are also required to clarify that a range of community facilities should be provided, and that the local centres should include business uses as well as retail. The requirements for sports pitches and other open space need to be planned as integral parts of the overall green infrastructure to be provided on the site and therefore should be set out in that part of policy SP17 rather than under the heading "community". Those changes [MM25] are necessary for effectiveness.

Landscape and green infrastructure

133. The site is located on the lower northern slopes of the Kennet Valley, rising towards the wooded ridge which characterises the southern boundary of the North Wessex Downs AONB and Bucklebury Common. It comprises predominantly agricultural fields defined by mature hedgerows and trees along with areas of woodland. Three distinct landscape areas are found within the site. The north-western area is based around a bowl valley, with parkland characteristics. Further south-east, a series of enclosed valleys and undulating terrain create a more intimate character, which begins to open out towards the east but faces into a strongly wooded gully. Beyond this dividing woodland, the eastern end of the site opens out to create open and expansive views over large fields and towards the south and east⁵⁴.
134. The site and adjoining countryside are included in the woodland and heathland mosaic landscape character area designated on the policies map. The Council's landscape evidence concludes that the site could accommodate areas of new development in some parts, providing it has regard to the setting and form of existing settlement and the character and sensitivity of adjacent landscape character areas⁵⁵.
135. Policy SP17 requires the provision of a comprehensive green infrastructure network which takes account of the landscape features of value within and around the site informed by a landscape and visual impact assessment and a green infrastructure strategy. The site map in the Plan shows three separate

⁵⁴ SIT2c paragraph 2.80.

⁵⁵ LAN7e paragraph 1.7.

areas designated as country park/public open space connected by green links running along the northern boundary of the site.

136. The requirement for significant provision of green infrastructure is clearly justified as it is necessary to achieve sustainable development on the site and to safeguard the landscape character of the area including the natural beauty of the AONB, and biodiversity on and near the site including adjoining ancient woodland and local wildlife sites. However, policy SP17 and the site map need significant modification to ensure that the Plan is effective in those regards **[MM25]**.
137. The first paragraph of the relevant section of SP17 needs to refer to a comprehensive network of green infrastructure and public open space being provided across the site in accordance with policy SP10 which responds positively to the sensitivities of the landscape, protects and enhances landscape and biodiversity features and makes provision for biodiversity net gain. The policy then needs to refer to the particular types of green infrastructure and open space, with relevant requirements relating to each. These include conservation of the areas of ancient woodland by providing appropriate buffers, and a band of green infrastructure / community park across the higher land on the northern part of the allocation to create a buffer between the built development and the adjoining countryside and Upper Bucklebury, the precise nature of which is to be informed by a landscape and visual impact assessment and the masterplanning process having regard to the location of the site in the setting of the AONB. Other requirements that need to be included are public open space in the developed parts of the site in accordance with policy DM40; sports pitches and areas; allotments; and making connections to the wider landscape and public rights of way network. Finally, a green infrastructure strategy and public rights of way strategy are required **[MM25]**.
138. In addition to those requirements relating to green infrastructure provision, policy SP17 needs to be modified to make clear that the site lies in the setting of the AONB and will therefore need to be developed in accordance with policy SP2 with a landscape and visual impact assessment informing the final capacity, design and layout of the development through the masterplan process **[MM25]**. This will ensure that the development has regard to the interrelationships with the AONB and its landscape character and special qualities thereby avoiding or minimising any adverse impacts.

Biodiversity

139. The Thames Valley Ecological Research Centre conducted a desk-based ecology assessment of the site during the preparation of the Plan. There are no areas within the allocation that are internationally, nationally or locally designated for their biodiversity value. A priority habitat (grassland) is present

on the site, and much of the upper slopes are designated as a biodiversity opportunity area in the Plan. There are significant areas of ancient woodland adjoining the site that are designated as local wildlife sites, and evidence of protected and priority species nearby⁵⁶.

140. Policy SP17 requires an ecology strategy to set out how biodiversity net gain will be achieved; how priority habitats and ecological features will be protected and enhanced; the creation of new ecological features; and a site-wide management plan. This is justified and consistent with national policy, although the requirement for a strategy should refer to biodiversity and policy SP11 to ensure internal consistency and effectiveness [MM25].

141. In the context of the nature of the site and its surroundings I am satisfied that the ecology evidence is adequate and proportionate at plan-making stage, and that policy SP17 along with other relevant policies in the Plan will provide an effective framework to ensure that the ecology of the area is protected and biodiversity net gain achieved. The potential impacts on the ancient woodlands and watercourses, including Ouzel Gully on the site's eastern boundary, are matters that can be addressed in detail during the masterplanning and planning application processes, informed by the biodiversity, green infrastructure and public rights of way strategies required by SP17.

Historic environment

142. There are no designated heritage assets in the allocation, although there are three grade II listed buildings in "excluded pockets" within the wider allocation boundary: a barn at Colthrop Manor, and a barn and cart shed at Siege Cross Farm. Archaeological remains are likely to be present on the site⁵⁷.

143. Modifications are required to policy SP17 to clarify that an historic environment strategy in accordance with policy SP9 will need to demonstrate how the area's historical development, archaeological remains and historic buildings and parkland will inform the scheme and help to create a sense of place [MM25]. This will ensure that the policy is effective and consistent with national policy. It is not necessary to amend the modification to the reasoned justification to include additional detail as that can be set out in the masterplan supplementary planning document.

Flood risk and surface water

⁵⁶ SIT2b paragraphs 2.36 and 2.37 and SIT2c paragraphs 2.58 to 2.64.

⁵⁷ SIT2c paragraphs 2.65 to 2.71.

144. Whilst the site is at low risk of river flooding, there is risk of surface water flooding within the site and in Thatcham town⁵⁸. To be effective, policy SP17 needs to be modified to clarify that a flood risk assessment will be required in accordance with policy SP6 and that this should take into account the Thatcham Surface Water Management Plan to ensure that there is no detrimental impact on flood risk in Thatcham. For effectiveness, reference also needs to be made to the existing flood alleviation measures on the site to ensure that they are retained and protected, and to policy DM7 relating to water resources and wastewater [MM25].

Mineral resources

145. The requirement for a minerals resource assessment needs to clarify that any potentially valuable mineral resources on the site should be identified and considered for extraction to ensure consistency with national policy and the West Berkshire Minerals and Waste Local Plan [MM25].

Sustainability and energy

146. Most of the references to standards and strategies listed under the sub heading "Sustainability" need to be deleted as they are appropriately dealt with under other parts of policy SP17 (as modified) or in other policies in the Plan [MM25]. This will avoid repetition and/or internal inconsistency. However, to be effective, this part of policy SP17 does need to set out a clear requirement for an energy statement to support development proposals and to clarify that the construction and operations management plan will need to safeguard any below ground infrastructure as there are oil and gas pipelines crossing the site [MM25].

Housing trajectory for North East Thatcham

147. The site is being promoted, on behalf of the landowners, by a partnership of property, development and housebuilding companies. As set out earlier in this report, the proposed modification to clarify that the proposal is for up to approximately 2,500 dwellings will ensure that there is a reasonable prospect of it being viably developed. A significant amount of assessment work has been carried out both on behalf of the Council during the preparation of the Plan and by the development partnership.

148. Whilst policy SP17 requires significant further work to be carried out, this will build upon the extensive assessment work that has already been completed. The Council expects to adopt the masterplan supplementary planning document within a year of the Plan being adopted, and the development partnership intend to submit a planning application shortly after that. It is reasonable to assume

⁵⁸ SIT2c paragraphs 2.48 to 2.57.

that a planning application, and subsequent reserved matters, that are consistent with a recently adopted supplementary planning document could be approved more quickly than is the case for some large scale strategic sites. The modified housing trajectory in the Plan [MM111] assumes that the first 60 homes will be completed by 31 March 2031. Whilst this could be considered to be somewhat optimistic, on balance I am satisfied that there is a realistic prospect of that being achieved.

149. Market demand is strong in West Berkshire, and the allocation is a greenfield site. The proposal is likely to comprise a number of areas of residential development on different parts of the allocation with their own access points onto the existing road network. The partnership envisages there being around five different outlets operating at the same time once the development is underway. The Plan requires 40% of the homes to be affordable. For all those reasons it is not unrealistic to assume that 170 homes will be built each year from 2031 onward as set out in the Plan's revised trajectory, despite the requirement for residential development to be phased to ensure that the necessary infrastructure, including schools and primary health care, is delivered in a coordinated and timely way. Indeed, it is possible that delivery rates could be higher – the partnership suggests around 250 per year.
150. Overall, therefore, I am satisfied that there is a realistic prospect that 60 homes will be built on the site by 31 March 2031 and that there is a reasonable prospect that 1,760 will be completed by 31 March 2041.

Site map in the Plan and policies map

151. The site map in the Plan needs to be replaced with a simplified version that shows the allocation boundary and within that an "indicative green infrastructure buffer", rather than specifically designated areas of community park / public open space. This is because the actual extent of that buffer, and other areas of green infrastructure and open space, will be determined through the masterplanning process. It is appropriate for the indicative buffer to follow the 105 metre contour on the central and western part of the site and the 100 metre contour on the eastern part, along with position of the gas pipeline that will require standoff areas, as that reflects the landscape evidence used to inform the Thatcham Strategic Growth Study. This will be considered in more detail through the landscape and visual impact assessment required by policy SP17 to inform the masterplan.
152. The site map also needs to show the adjoining areas of ancient woodland as they are referred to in policy SP17. The "potential car park" needs to be deleted as that is not referred to in the policy and may not be appropriate; this needs to be considered through the masterplan process. Finally, indicative access points, based on the transport assessment, need to be shown on the map as

they are referred to in modified policy SP17, although the final access arrangements will also be determined through the masterplan process [MM25]. Those changes to the site map will ensure that policy SP17 can be effectively applied.

153. To reflect the modifications to policy SP17 and the site map, the policies map needs to be changed to remove the designations for a country park, green links and car park. The policies map would therefore simply define the red line boundary of the allocation. The policies map also needs to be changed to exclude the whole of the allocation from the Thatcham settlement boundary. This is because a revised settlement boundary will need to be defined in a review of the Plan when the extent of the built up area and extensive green infrastructure along the northern part of the allocation have been determined through the masterplanning and planning application processes. As explained under main issue 2 earlier in this report, consideration will then also be given to whether a strategic gap needs to be defined between Thatcham and Upper Bucklebury to safeguard the separate identity of the village and its landscape setting in the long term in accordance with policy DM2.

Reasoned justification to policy SP17

154. Significant changes are required to paragraphs 6.52 to 6.63 to reflect the main modification to policy SP17 and changes to the policies map, and thereby ensure that the proposal is appropriately justified in the Plan [MM26].

Conclusion

155. Policy SP17 and main modifications to it, the site map and the reasoned justification [MM25 and MM26] have been subject to many objections from local residents, town and parish councils, local councillors and others. They were discussed at hearing sessions on 21 and 22 May, 26 June and 1 October 2024. However, the proposal is an essential part of the Plan and will make a substantial contribution to meeting the significant need for new market and affordable homes in the district over the coming years. The main modifications that I describe above set out clear policy requirements and provide the Council with a range of mechanisms, including a masterplan supplementary planning document and design code, to ensure that the requirements can be met.
156. Therefore, subject to the main modifications described above, I am satisfied that policy SP17 relating to a strategic allocation at North East Thatcham, is justified and consistent with national policy, and will be effective in achieving sustainable development on the site.

Issue 6 – Is policy SP16, relating to a strategic allocation at Sandlesford Park, justified and would it be effective in achieving sustainable development on the site?

157. Policy SP16 allocates 134 hectares of land at Sandlesford Park on the southern edge of Newbury for around 1,500 dwellings, 40% of which would be affordable homes, along with a local retail centre, employment uses, a new primary school, an extension to an existing school, transport infrastructure and extensive areas of green infrastructure.
158. The allocation is well related to the existing built up area of Newbury, and in most respects the development requirements set out in policy SP16 along with the adopted supplementary planning document should be effective in achieving the sustainable development of the site. However, a number of changes need to be made to some of the detailed policy requirements and reasoned justification. These relate to mineral resource assessments; flood risk assessments; affordable housing; housing mix; renewable and low carbon energy; access to the A339 via Highwood Copse Way; the types of uses proposed in the local centre; and the development principles in the adopted supplementary planning document. A number of changes are required to the site allocation map to ensure it accurately reflects relevant planning applications and land ownerships (see below). These modifications [MM23 and MM24] will ensure that the policy is effective and justified.
159. The site was allocated in the Core Strategy adopted in 2012 and is subject to a supplementary planning document adopted in 2015. Despite that, development has not yet started on site. However, considerable progress has been made in the last three years or so to enable development to take place. The eastern part of the site had outline planning permission granted in 2022 for up to 1,000 homes. The western part of the site, which has an indicative capacity for 500 homes, was subject to an undetermined outline planning application in April 2023. Both parts of the allocation are controlled by housebuilders.
160. Development on the eastern part of the site is expected to start in 2026/7, with 450 homes being completed by 2031. Development on the western part is expected to start in 2028/9 with 150 homes completed by 2031. The trajectory shows all of the 1,500 homes being completed by 2038. Given the good progress being made with the planning applications and other preparatory work, the Council's assumptions about when the developments will start, which are more cautious than those of the developers, are reasonable. Furthermore, the assumed build out rates are reasonable given the market conditions and the fact that 40% of the homes will be affordable.
161. At the time of the examination hearings, the developers of both parts of the site indicated that the number of homes could be somewhat lower than assumed in

the Plan on the basis of recent site assessment work⁵⁹. However, negotiations were ongoing, and the Council remains confident that there is capacity for around 1,500 dwellings on the whole allocation, which includes an area of land not included in either of the planning applications⁶⁰. National policy expects optimal use to be made of the potential of sites⁶¹, and I am satisfied that there is a reasonable prospect that around 1,500 dwellings could be built on the allocation over the plan period meaning that it is not necessary for soundness to modify the Plan to include a lower indicative capacity.

Conclusion

162. Subject to the main modifications described above, policy SP16 is justified and should be effective in achieving sustainable development on the Sandford Park allocation.

Issue 7 – Are policies RSA1 to RSA23, relating to non-strategic housing allocations, justified and consistent with national policy, and would they be effective in achieving sustainable development on the sites?

163. Chapter 8 in the Plan contains policies RSA1 to RSA23 relating to non-strategic allocations for residential development which are set out in three sections, relating to the three spatial areas referred to in policy SP1. Each allocation policy sets out a number of dwellings along with “parameters” which the development will be expected to comply with, and is accompanied by a map showing the site boundary and other information relating to the proposed development. The allocations are also designated on the policies map.

164. For the reasons set out under issues 2 and 4 above, I am satisfied that the Plan's spatial strategy is justified and that the allocations were selected using an appropriate methodology. In general, therefore, each of the non-strategic residential allocations is justified. However, there are a number of potential soundness issues relating to some of the allocations that I address below. Before I look at those individual sites, there are two issues that relate to all or many of the allocations that I need to address.

Number of dwellings proposed

165. Firstly, each of the allocation policies refers to the number of dwellings that are assumed to be built on the site. The figures are based on a consistent approach making reasonable assumptions about developable area and density

⁵⁹ 800 on the eastern part rather than 1,000, and 360 on the western part rather than 500.

⁶⁰ Council response to AP77 [EXAM53.1] and oral evidence at hearing on 2 October 2024.

⁶¹ NPPF 125.

of development in the context of each site's location, character and setting in accordance with policy SP1 (as modified) and other relevant policies. Whilst it is possible that more dwellings may be capable of being accommodated on some of the sites, this is something that can be determined through the planning application process and it is not necessary for soundness to modify the Plan to include a higher figure for any of the sites.

166. However, a modification is required to the introduction to chapter 8 to clarify that the number of dwellings assumed on each site is approximate and that actual numbers will be determined during the planning application process through detailed design work in accordance with the development parameters and other relevant policies [MM35]. This is necessary to ensure the allocation policies are justified and effective. I consider the quantitative contribution that the allocations collectively make to the overall housing land supply identified in the Plan under matter 8.

Water supply, drainage and flood risk

167. Secondly, the development parameters referring to an integrated water supply and drainage strategy should be deleted because they relate to a matter that is addressed in more detail by policy DM7 and do not add any site-specific information. Where relevant for site specific reasons, policies should be modified to make clear that a flood risk assessment will be required, and to refer to designing for climate change and resilience in accordance with policy SP5. Those modifications [MM38 to MM41, MM46 to MM53, MM55, MM56 and MM58 to MM65] will ensure the relevant allocation policies are justified and effective. For the same reasons, the modification to policy RSA1 needs to be amended to include a requirement for a flood risk assessment (this was missed in error in the modification published for consultation) [MM37].

Allocation policies – site specific soundness issues

168. Modifications are required to policy RSA2 Bath Road, Speen to refer to the historic character of the area and the need for the design of the proposal to respond sensitively to the character, density and scale of existing development [MM38]. This will ensure the policy is effective in preserving or enhancing the historic environment.
169. For the same reason, policy RSA9 The Green, Theale needs to be modified to refer to the conservation of the listed milestone on the site and the archaeological assessment that has been carried out [MM49].
170. Policies RSA10 and RSA11 relate to two adjoining sites in Theale which together have an indicative capacity for 100 dwellings. The sites are suitably located and will make a valuable contribution to housing land supply in the

Eastern Area where suitable opportunities for residential development are limited due to the constraints referred to earlier. The policy requirements are justified and provide an effective framework for achieving sustainable development.

171. Policy RSA12 Pondhouse Farm, Burghfield Common needs to be modified to refer to a protected species survey to ensure it is effective with regard to safeguarding biodiversity **[MM52]**.
172. A modification is required to policy RSA13 Bath Road, Woolhampton to delete references to an odour assessment and minerals extraction as they are not necessary or justified **[MM53]**.
173. Policy RSA14 Lynch Lane, Lambourn is an allocation carried forward from a previous plan that does not have planning permission. However, it is now under the control of a developer and pre application discussions have taken place meaning that there is a reasonable prospect of development taking place in the plan period. A modification is required to clarify the requirement relating to the layout of development in relation to the area within Flood Zone 2 and the River Lambourn SSSI/SAC **[MM55]**. This will ensure the policy is effective with regard to flood risk and biodiversity.
174. Policy RSA16 Southend Road, Bradfield Southend needs to be modified to ensure that the landscaping requirement is justified and effective **[MM58]**.
175. A number of changes are required to policy RSA17 Chieveley Glebe to ensure that it is effective and justified with regard to access arrangements; protecting the character and appearance of the area including with regard to the adjoining listed buildings, the Chieveley conservation area, and the frontage hedge; the provision of a burial ground within the site; and the provision of a footpath link to a nearby recreation ground. The site map needs to be modified accordingly. **[MM59]**.
176. A modification is required to policy RSA18 Pirbright Institute, Compton to ensure that it is effective with regard to flood risk and protecting the Compton conservation area **[MM60]**.
177. Policies RSA20, RSA21 and RSA22 propose a total of 59 dwellings on three adjoining sites in Hermitage. Modifications are required to each of the policies to clarify the requirements relating to the provision of an area of public open space which will serve future residents of all of the sites, and policy RSA22 needs to be amended to clarify the access arrangements including in relation to the other two sites. Changes are also required to policies RSA21 and RSA22 to ensure that they are effective with regard to specific heritage assets and protecting the character and appearance of the area. RSA22 also needs to be

amended to increase the capacity from 34 to 42 and to refer to a minerals resource assessment. Finally, the site maps for each allocation need to be modified to clarify the relationships between the three developments and accurately reflect land ownerships [MM62, MM63 and MM64]. Those modifications will ensure that the three policies are effective.

Conclusion

178. The modifications I have described above are necessary to ensure that policies RSA1 to RSA23, relating to non-strategic housing allocations, are justified, consistent with national policy, and effective in achieving sustainable development on the sites.

Issue 8 – Does the Plan identify a sufficient supply and mix of housing sites consistent with national policy to ensure that the identified need for new homes can be met?

Introduction

179. The submitted Plan identifies a total land supply with capacity for 9,137 dwellings between 2022 and 2039. However, for the reasons set out under main issue 1, I have already found that the Plan needs to be modified to cover a plan period 2023 to 2041 and include a requirement for a minimum of 9,270 dwellings to be delivered between those dates.

180. The housing supply identified in the submitted Plan would not, therefore, be sufficient to ensure that the modified minimum requirement could be met. However, that supply relates to the period 2022 to 2039 and is based on information relating to 1 April 2022, whereas comprehensive information relating to 1 April 2023 became available during the examination⁶². This information includes the planning status of all sites, other relevant evidence, and a trajectory summarising expected completion rates annually over the plan period. I am satisfied that it is consistent with national guidance relating to housing land availability⁶³ and represents up to date, proportionate and adequate evidence. To ensure that the Plan is effective and justified, and to reflect the modified plan period, it is necessary to take account of this updated evidence in deciding what modifications are required.

181. Further information has become available since 1 April 2023 which suggests that a limited number of the sites included in the updated trajectory may deliver more dwellings more quickly, whereas others may deliver fewer, more slowly or

⁶² EXAM12 (23 February 2024) and EXAM54 (19 August 2024).

⁶³ PPG ID:3 Housing and economic land availability assessment, and PPG ID:68 Housing supply and delivery.

not at all⁶⁴. However, this evidence is not comprehensive, and it is inevitable that circumstances will continue to change as time goes by. Using the information relating to 1 April 2023 as the main reference point therefore represents an appropriate approach. That said, I address some site specific issues arising from more recent information below (as I did under main issue 6 in relation to Sandlesford Park).

182. Whilst there can never be certainty when estimating how many homes will be built looking ahead over many years, judgements can be made as to whether there is a reasonable or realistic prospect based on evidence relating to the availability and suitability of sites, viability, ownership, developer intentions, planning status, site assessments, infrastructure and build rates as required by national planning policy and guidance⁶⁵. Having assessed the relevant evidence, I am satisfied that in most respects the Council's trajectory for each site based on information relating to 1 April 2023 is justified. Where necessary, I comment on specific elements of the supply in the following paragraphs.

Sites under construction or with planning permission

183. The updated trajectory indicates that a total of 2,180 dwellings⁶⁶ are expected to be completed on sites under construction or with permission. There are two sites that had permission on 1 April 2023 that more recent information indicates may not be developed at the time envisaged: Faraday Road / Kelvin Road (160 dwellings) and Bayer House (140 dwellings). However, whilst this may have implications for the supply in the five years following adoption (which I consider below), the owners of both sites intend to dispose of them for development and I am satisfied that there is a reasonable prospect of the numbers of dwellings being delivered by 2041.

Allocations in the Plan

184. I concluded under main issue 5 above that policy SP17 North East Thatcham needs to be modified to allow up to approximately 2,500 homes (rather than 1,500) and that there is a reasonable prospect that a total of 1,760 will be completed on that site by 2041. The inclusion of that figure in the modified trajectory is, therefore, justified.

185. I have also concluded, under main issues 6 and 7, that all of the other housing allocations in the Plan (ie those carried forward from previous adopted plans, most of which have planning permission, and the eight new non-strategic sites) are justified. For the reasons set out above, using the comprehensive

⁶⁴ The further information about housing land supply includes written statements in response to SQ7.13 to SQ7.21 (20 September 2024) and EXAM58 (27 September 2024).

⁶⁵ NPPF Annex 2 definitions of "deliverable" and "developable", and PPG ID:68.

⁶⁶ 451 (retained allocations under construction) + 1,729 (other commitments)

information for these sites relating to 1 April 2023 represents the most appropriate and reliable approach. Collectively, the allocations in the submitted Plan (SP16, SP17 and RSA1 to RSA23) have capacity for a total of 5,253 dwellings, 4,513 of which are expected to be built by 2041⁶⁷.

Sites to be allocated in Hungerford and Lambourn neighbourhood plans

186. The Plan assumes that 55 dwellings will be built on sites to be allocated in the Hungerford neighbourhood plan and 25 on sites to be allocated in the Lambourn neighbourhood plan. Work on both plans is progressing, and this includes the identification of more than sufficient land in both cases to accommodate the numbers proposed. The potential sites are relatively small, and assessed as being suitable and available by the Council. However, as the neighbourhood plan process is not within the control of the Council, it is necessary for effectiveness to modify the reasoned justification to policy SP12 to clarify that the Council will monitor progress and may identify opportunities to address any shortfall if the neighbourhood plans are not made within two years of the adoption of the Plan [MM19]. Subject to that, there is a realistic prospect that 55 dwellings will be built in Hungerford and Lambourn by 2031 as assumed in the trajectory.

Windfalls

187. In addition to the specific sites for residential development identified in the Plan, policy SP1 supports development and redevelopment within the settlement boundaries of the urban areas, rural service centres, service villages and smaller settlements listed in policy SP3 Table 1 and Appendix 2 Table 17. The Plan assumes a windfall allowance of 140 dwellings per year following adoption. This is based on the annual average delivery on unallocated sites of fewer than 10 dwellings. Whilst this assumption is based on long term trends and is higher than has been achieved in recent years, housing completions generally have fallen significantly since the pandemic. Furthermore, the Plan makes no allowance for windfalls on sites of 10 or more dwellings, whereas such developments made a significant contribution to supply between 2006 and 2023⁶⁸. I am therefore satisfied that a windfall allowance on 140 dwellings per year from 2026 onward is justified by compelling evidence and can be regarded as a reliable source of supply.

Overall supply for plan period

⁶⁷ This includes RSA6 Stonehams Farm which is allocated for a 64-bed care home (which equates to 36 dwellings); this is accounted for in the C2 Use Class Communal Accommodation in the trajectory.

⁶⁸ Council response to AP77 [EXAM53 19 August 2024] indicates that an average of 380 dwellings per year were built on small, medium and large windfall sites between 2006 and 2023.

188. The comprehensive information relating to 1 April 2023 indicates that a total of 9,060 dwellings will be delivered between 2023 and 2041. On that basis, there would be a shortfall of 210 dwellings against the modified minimum requirement for 9,270 dwellings between 2023 and 2041⁶⁹.

Additional potential allocations identified during the examination

189. During the examination, the Council advised that, based on further information that had become available since 1 April 2022 (the date on which the supply in the submitted Plan was based), four additional sites were now considered to be suitable and available⁷⁰. The sites, and draft policies for each set out in potential main modifications were discussed at hearing sessions in May, June and October 2024.

190. Together, those four sites have capacity for a total of around 433 dwellings meaning that, if the Plan were modified to include them, the overall supply for the plan period would be 9,493 which would exceed the minimum requirement by 223 dwellings. All four are being promoted for development, and are likely to be available in the short to medium term. Three are adjacent to urban areas identified in policy SP3 and the other is adjacent to a rural service centre meaning that they are all well located and consistent with the spatial strategy. The sustainability appraisal finds that development on each site would not lead to any significant adverse impacts provided suitable mitigation is provided⁷¹. In principle, therefore, I agree that they are all suitable for residential development. However, there are a number of potential soundness issues relating to each that I need to address.

CA12 land at Henwick Park, Bowling Green Road, Thatcham (approximately 225 dwellings)

191. CA12 land at Henwick Park is a greenfield site to the north of Bowling Green Road on the edge of Thatcham. It extends up the undeveloped western side of Cold Ash Hill towards the village of Cold Ash into part of the gap between the two settlements designated in accordance with policy DM2. However, the proposed site map shows the extent of the built development extending no further than the existing development on the opposite side of Cold Ash Hill and not encroaching into the designated gap. The site map also shows an extensive landscape buffer in the northern part of the proposed allocation. The proposed policy makes clear that there should be no development above the 95 metre

⁶⁹ 9,270 – 9,060 = 210.

⁷⁰ EXAM26 (17 May 2024); EXAM53.1 and EXAM53A (19 August 2024); and EXAM57 (26 September 2024).

⁷¹ EXAM53A and EXAM64.

contour and that the landscape buffer must be retained to maintain the open character between Thatcham and Cold Ash.

192. Furthermore, the proposed policy also requires the development to be informed by a landscape and visual impact assessment in accordance with policy SP7. Following the main modifications consultation, I have amended that part of the policy to also refer to policy DM2 and changed the proposed site map so that the landscape buffer accurately follows the 95 metre contour line. The effect of that change is to extend the buffer further down Cold Ash Hill thereby increasing the length of the undeveloped road frontage between the new homes and the southern extent of Cold Ash compared to that shown in the modifications' consultation. The Thatcham settlement boundary needs to be amended to exclude all of that landscape buffer. On that basis, whilst the development would clearly encroach into the countryside between Thatcham and Cold Ash, I am satisfied that a clear physical and visual separation of the two distinct settlements would be retained as the landscape buffer can be given legal protection by way of a planning obligation to ensure its permanence.
193. The proposal would not be inconsistent with policy CAP1 in the Cold Ash Neighbourhood Plan (2024) as that policy allows development outside the settlement boundaries defined in Figure 8 of that plan if it is on a site allocated in the West Berkshire Housing Site Allocations Development Plan or its successor.
194. The evidence indicates that transport impacts, flooding, biodiversity, social infrastructure provision and other site specific matters are all capable of being appropriately addressed at the planning application stage. The proposed allocation policy, along with other policies in the Plan, provide an effective framework for the preparation and determination of any subsequent planning application in most respects. However, following consultation on the main modifications, I have amended the requirement for a transport assessment in part (d) in the proposed policy to delete reference to "using the Council's VISSIM model" as that may not be appropriate or necessary, and such a specific requirement is not included in other allocation policies or referred to in policy SP23.
195. The site is available and in the control of a developer. A significant amount of preparatory work has been undertaken to support a planning application. I am satisfied that there is a realistic prospect of development starting in 2028/2029 and 150 homes being completed by 31 March 2031.
196. Whilst the site promoter's assessment is that the site has capacity for 236 homes I am not persuaded that it is necessary to amend the reference to 225 in the proposed modification as paragraph 8.2 in the Plan (as modified) makes

clear that the figure is approximate and that the actual number will be determined at the planning application stage.

197. CA17 land east of Regency Park Hotel, Bowling Green Road, Thatcham (approximately 45 dwellings)

198. This site lies between an existing hotel and the proposed allocation CA12 to the north of Bowling Green Road. The proposed site map shows a landscape buffer on the northern part of the allocation that would be consistent with that proposed on CA12. The development would be contained between the existing hotel and the new homes proposed on the land to the east, and would not encroach into the designated gap between Thatcham and Cold Ash. As with CA12, the evidence shows that all site specific matters are capable of being appropriately addressed at the planning application stage. The proposed allocation policy, along with other policies in the Plan, provides an effective framework for the preparation and determination of any subsequent planning application.

199. The site is available and in the control of a developer and I am satisfied that there is a realistic prospect of 45 homes being completed by 31 March 2031.

PAN8 land north of Pangbourne Hill, Pangbourne (approximately 25 dwellings)

200. PAN8 land north of Pangbourne Hill is on the western edge of Pangbourne in the AONB and has capacity for approximately 25 dwellings. This is based on a low density development (20 dwellings per hectare in accordance with policy SP1) with the elevated western part of the allocation being provided as a landscape buffer to ensure that the new homes are not visually prominent. Part (f) of the proposed policy makes this clear and requires the scheme to be informed by a detailed landscape and visual impact assessment. On that basis I am satisfied that around 25 homes, which would be contained by the landscaped buffer and existing housing to the east and south, could be designed to ensure that there is no harm to the natural beauty of the AONB beyond the developed area. To provide additional protection, and consistency with the approach taken on other allocations, it is necessary for the landscape buffer to be outside the modified settlement boundary.

201. Access to the site would be from an existing residential road, Sheffield Close. The development would generate some additional traffic on Pangbourne Hill and its junction with the A340. However, the scale of the development means that this would be limited, and the proposed policy requires mitigation measures to be provided based on a transport assessment. Subject to this, the proposed development would not be likely to have an unacceptable impact on highway safety or severe impact on the road network.

202. Pangbourne is a rural service centre and therefore an appropriate location for residential development in accordance with the Plan's spatial strategy. Whilst the site would make a modest contribution towards meeting the housing requirement, nonetheless it would significantly assist in meeting the shortfall in supply that I have identified given the shortage of suitable and available sites in the district. For the reasons set out above, the harm to the natural beauty of the AONB can be restricted to the immediate effect within the area proposed for low density development. On balance, therefore, I am satisfied that there are exceptional circumstances for this proposed major development in the AONB.
203. The evidence shows that other site specific matters are all capable of being appropriately addressed at the planning application stage. The proposed allocation policy, along with other policies in the Plan, will provide an effective framework for the preparation and determination of any subsequent planning application.
204. The site is available and in the control of a developer. A significant amount of preparatory work has been undertaken to support the submission of a planning application. I am satisfied that there is a realistic prospect of 25 homes being completed by 31 March 2031.

TIL13 land at Pincents Lane, Tilehurst (approximately 138 dwellings)

205. TIL13 is a greenfield site to the east of Pincents Lane on the southern edge of Tilehurst with the AONB immediately to the west. To the east of the proposed allocation is a recreation ground, and to the south a large retail and commercial area beyond which are the A4 and junction 12 of the M4. Pincents Lane connects to the roads in the commercial area to the south and via those to the A4. Pincents Lane to the north is narrow, winding and steep, unsuitable for use by motor vehicles. The allocation includes pockets of woodland, mature trees and hedgerows, and is crossed by a number of well used public rights of way and desire lines.
206. The proposed site map shows the eastern, higher part of the site as community parkland, the creation of which is a requirement of the proposed policy along with walking and cycling links between it and the adjoining recreation ground, residential areas and public rights of way. This would provide significant public benefits to the existing community as well as future residents of the site. The retention of the community park in perpetuity is a requirement of the proposed policy and can be secured through a planning obligation and the exclusion of that part of the proposed allocation from the settlement boundary.
207. Development would be within the setting of the AONB. Limiting the extent of the residential development to the lower, western part of the site with a design and layout that is informed by a detailed landscape and visual impact assessment

and which complies with policies SP2 and SP7 would prevent harm to the natural beauty of the AONB. The new homes would be contained by Pincents Lane to the west, the large commercial area to the south, and new community park and existing recreation ground to the east meaning that the development would not lead to the coalescence of Tilehurst, Calcot and Theale.

208. The proposed policy requires the main vehicular access to the development to be provided from the south with an additional emergency access. Whilst relevant sections of Pincents Lane are narrow, the highway authority advises that they are of sufficient width to provide safe access. All traffic from the site would have to go through the adjoining commercial area and the junction with the A4 which are extremely congested at certain times, particularly on weekend afternoons. Detailed transport modelling shows that the additional traffic generated by the development of this site would represent a small percentage of that using the nearby roads and busy junctions on the A4 and M4. Both the local highway authority and National Highways are satisfied that there would not be an unacceptable impact on highway safety or a severe impact in terms of congestion and capacity. Whilst the access arrangements would cause inconvenience for future residents at certain times, most trips to and from the site could reasonably be made at times when the congestion within the commercial area is more limited. On balance, therefore, I am satisfied that, the development can be provided with safe and suitable access for all users in accordance with national policy.
209. The site is not subject to any international, national or local designations relating to biodiversity. However, there are mature trees and hedgerows on the site which is used by a variety of wildlife, an ancient woodland and local wildlife site adjoin the eastern boundary, and there are priority habitats nearby. The proposed policy includes a requirement for a tree survey and an ecological impact assessment to inform any planning application and for appropriate avoidance and mitigation measures to be implemented.
210. It is clear from the many objections that have been made to planning applications to develop the site over the years, and the representations made by numerous local residents and their political representatives during the examination including in response to the proposed modifications, that there is significant community opposition to the proposal. However, the site represents a rare opportunity to provide a significant number of new homes on the edge of the Eastern Urban Area with good access to services and facilities in a highly constrained part of the district. The new homes will make a significant contribution to meeting the need for market and affordable housing, and the proposed policy will lead to the creation of a new community park with good walking and cycling links.
211. The evidence shows that all site specific matters (including education and health infrastructure provision; transport impacts; emergency access; landscape

impacts; biodiversity; heritage; surface water flooding; noise; air pollution; and water resources) are capable of being appropriately addressed at the planning application stage. The proposed allocation policy, along with other policies in the Plan, will provide an effective framework for the preparation and determination of any subsequent planning application.

212. The site is available and in the control of a developer. A significant amount of preparatory work has been undertaken to support the submission of a planning application. I am satisfied that there is a realistic prospect of at least 138 homes being completed by 31 March 2031.

213. Whilst the site promoter's assessment is that the site has capacity for 165 homes I am not persuaded that it is necessary to amend the figure of 138 in the proposed modification as paragraph 8.2 in the Plan (as modified) makes clear that figure is approximate and that the actual number will be determined at the planning application stage in the context of the relevant policy requirements.

Conclusion on additional potential allocations identified during the examination

214. I therefore conclude that all of the four potentially additional sites are suitable and available, and that their development would be consistent with the Plan's spatial strategy and make a significant contribution to boosting the housing land supply within a few years of the Plan being adopted. In order to increase the housing land supply for the plan period such that it should be sufficient to meet needs to 2041, and to boost the supply of deliverable sites for the five years following adoption (2026 to 2031), I recommend that the Plan be modified to include the four additional allocations.

215. Each additional allocation needs to be accompanied by a site specific policy, setting out the approximate number of dwellings proposed along with a site map and development requirements as included in the proposed modifications and discussed above [**MM42**, **MM43**, **MM45** and **MM57**]. This will ensure that the Plan is positively prepared, consistent with national policy and effective in identifying sufficient land to meet the need for new homes. The policies map will need to be amended accordingly.

Overall supply for the plan period including main modifications

216. Subject to my recommended main modifications, the overall supply for the plan period 2023 to 2041 has capacity for a total of approximately 9,493 dwellings. This compares to a minimum requirement for that period of 9,270 dwellings meaning that there is a modest flexibility allowance of 223. However, there is additional flexibility due to the fact that no allowance has been made for any medium or large windfall sites and because the North East Thatcham site has

capacity for a total of around 2,500 dwellings whereas 1,760 are assumed to be built by 2041. Furthermore, the promoters of several of the allocations without planning permission consider that those sites will be able to accommodate more dwellings than the indicative figure included in the Plan.

217. I am satisfied, therefore, that if Sandleford Park does end up delivering fewer than 1,500 homes, or if some of the commitments do not deliver as expected, there is sufficient flexibility to allow the identified need for the plan period to be met. Moreover, the Plan will need to be reviewed and updated many years before 2041 in the context of the revised NPPF published in February 2025. Adopting the Plan as soon as possible will ensure that 13 new allocations, with collective capacity for around 3,200 new homes that do not have permission, are confirmed in an adopted local plan which will provide much needed certainty over the period during which the review and update take place.
218. The reasoned justification to policy SP12, and the housing trajectory in Appendix 8, need to be modified to reflect the updated evidence relating to the housing land supply for the modified plan period 2023 to 2041 [MM19 and MM111]. This will ensure that the Plan is effective and justified.

Five year housing land requirement and supply

219. NPPF (2021) advises that local plans should identify a supply of specific, deliverable sites for years one to five of the plan period. Associated guidance clarifies that strategic policies should identify a five year housing land supply from the intended date of adoption of the plan⁷². That is also the case in the revised NPPF published in February 2025.
220. The Council intends to adopt the Plan in 2025/26 and therefore year 1 for the purposes of calculating five year supply following adoption starts on 1 April 2026. Based on the modified housing requirement of 515 dwellings per year, the five year requirement from that date, including a 5% buffer in accordance with the NPPF (September 2023), is 2,704 dwellings. The updated housing trajectory indicates that completions between 2023 and 2026 are expected to be significantly above the minimum requirement. However, as actual total completions in that period are not known, it is not appropriate to reduce the five year requirement from 1 April 2026 to take account of any over supply since 2023. This represents a positive approach.
221. National planning policy and guidance does not deal specifically with how to assess whether there will be a five year supply from a date a number of years after the date of the most recent comprehensive evidence about housing land supply. However, based on current evidence relating to the availability and

⁷² PPG ID:68-004 (July 2019).

suitability of sites, viability, ownership, developer intentions, planning status, site assessments, infrastructure and build rates, a judgement can be made about whether there is a realistic prospect of the assumed number of dwellings being built on the identified land supply between 1 April 2026 and 31 March 2031.

222. The latest trajectory, which takes account of all of my recommended modifications (including the additional allocations CA12, CA17, PAN8 and TIL13 referred to above) indicates that a total of 3,195 dwellings could be developed between 1 April 2026 and 31 March 2031 meaning that there would be a surplus of 491 dwellings against the five year requirement for that period. In other words, a deliverable supply for 5.9 years. Without the additional four allocations (total capacity 433 dwellings) the surplus would be marginal (58 dwellings).
223. The five year supply from 1 April 2026 includes 810 dwellings on all sites with full permission, or sites with outline permission for fewer than 10 dwellings on 1 April 2023; 1,605 dwellings on sites without planning permission, or sites with outline permission for more than 10 dwellings on 1 April 2023; 80 dwellings on sites to be allocated in Hungerford and Lambourn neighbourhood plans; and 700 windfalls.
224. There is no clear evidence to indicate that 810 dwellings will not be built between 2026 and 2031 on the sites with full permission, or on sites with outline permission for fewer than 10 dwellings. For the reasons set out above, the assumptions about windfalls and sites being allocated in the two neighbourhood plans are reasonable, and I am satisfied that there is a realistic prospect that the numbers of homes assumed will be delivered in the relevant period.
225. The Council and site promoters have provided relevant information, as referred to above, for all of the sites without permission or those with outline permission for more than 10 dwellings on 1 April 2023 assumed to be developed between 2026 and 2031. Those sites include the four additional allocations that I recommend be included in the Plan through main modifications. The information provided adequately addresses issues such as site availability, developer intentions, and progress towards obtaining permission and discharging conditions, as well as policy requirements such as nutrient neutrality and physical constraints. The Council's assumptions about the timing and rate of development are more cautious than those of the site promoters for some sites. I am therefore satisfied that there is clear evidence, that is proportionate, adequate and up-to-date, to demonstrate that there is a realistic prospect that a total of 1,605 homes will be completed on those sites in that period.
226. Overall, therefore, I conclude that, subject to the main modifications to site allocations referred to above, the Plan identifies a supply of specific, deliverable sites for five years following the intended date of adoption. The reasoned

justification to policy SP12 needs to be modified to reflect the updated evidence relating to the five year supply 2026 to 2031. Having considered the responses to the consultation, I have amended the proposed modification to paragraphs 6.25 to 6.27 and Table 3 to accurately set out the five year housing land supply from 1 April 2026 as described above. This will ensure that policy SP12 is appropriately justified, effective, and consistent with national planning policy [MM19].

Conclusion

227. Subject to the main modifications that I recommend above, the Plan identifies a sufficient supply and mix of housing sites consistent with national policy.

Issue 9 – Are the policies in the Plan relating to the design, type and mix of new housing, including affordable homes, justified and consistent with national policy and will they be effective in meeting the needs of different groups in the community?

Affordable housing

228. Policy SP19 sets out various requirements for the provision of affordable homes in market-led residential development schemes, including 30% on previously developed land and 40% on greenfield sites. These requirements are estimated by the Council to deliver a total of around 2,200 affordable homes over the plan period. This will make a significant contribution towards meeting the identified need for additional affordable homes which is around 330 per year or around 6,000 over the plan period. The viability assessment tested the effects of higher and lower levels of affordable housing, and the 30% and 40% requirements in the Plan strike a reasonable balance between maximising the delivery of much needed affordable homes and ensuring the viability of development is not compromised.

229. Modifications are, however, required to certain parts of policy SP19 to ensure it is justified and consistent with national policy. The requirement for affordable housing provision on sites of between five and nine dwellings needs to be changed so that it only applies to designated rural areas. The fourth paragraph needs to be modified to clarify that a review mechanism may be required if a lower level of affordable housing is proposed, as there will be some circumstances where this may not be necessary or justified. The fifth paragraph should refer to mixed and balanced communities in circumstances when off-site provision of affordable homes may be appropriate. The tenure split of affordable housing needs to be clarified to reflect the housing needs assessment and ensure that the needs of specific groups can be met. The requirement for affordable housing provision in specialist housing for older and disabled people needs to be clarified. Finally, the requirement for dwellings to

remain affordable in perpetuity needs to be clarified so that it applies to all forms of affordable home ownership. Associated changes are required to the reasoned justification. These modifications [MM28 and MM29] will ensure that policy SP19 is justified, effective and consistent with national policy.

230. Policies DM16 and DM17 relate to First Homes exception sites and rural exception housing schemes respectively. These are consistent with national policy and will be effective in helping to meet the need for affordable homes.

Housing density

231. Policy SP1 sets out different requirements for the density of residential development in different parts of West Berkshire, including at least 70 dwellings per hectare in town centres, along main transport routes and close to transport nodes; at least 35 per hectare in urban areas; and at least 30 per hectare in other defined settlements. Modifications are required to clarify that in the AONB densities of 20 dwellings per hectare are appropriate, and that in all locations development should seek to make optimum use of land and achieve high quality design [MM3]. This will ensure the approach is justified having regard to the particular characteristics of different parts of the district, consistent with national policy.

Housing type and mix

232. Policy SP18 requires residential development to contribute to the delivery of an appropriate mix of dwelling tenures, types and sizes, reflecting the proportions set out in Table 3. Those figures are based on a reasonably up to date assessment and the policy also refers to taking account of more recent evidence. The approach is, therefore, justified and consistent with national policy aimed at ensuring the housing needs of different groups in the community can be met.
233. Policy SP18 also requires all dwellings to be accessible and adaptable in accordance with building regulation M4(2), and around 10% of new market homes to meet the wheelchair users standard M4(3). Those requirements are based on proportionate and reasonable estimates of need and were factored into the viability assessment of the Plan. They are, therefore, justified and consistent with national policy. However, a modification is required to clarify the approach to the provision of wheelchair accessible and adaptable homes in affordable housing schemes, to ensure consistency with national policy and effectiveness [MM27].

Internal space standards

234. The requirement in policy DM30 for all new dwellings to comply with the nationally described space standard is not justified by evidence of need as required by national policy. Modifications are, therefore, required to delete policy DM30 and associated reasoned justification, and the reference in paragraph 5.30 to all residential development complying with those standards [MM12 and MM90].

Public open space and private gardens

235. Policy DM40 requires all residential development of 10 or more dwellings to provide high quality public open space on-site, with reference to a standard of 3-4.3 ha per 1,000 population, or through a financial contribution for off-site provision in certain circumstances. This approach is consistent with national policy and justified.

236. Policy DM31 sets out requirements for the provision of private amenity space in residential developments. A modification is required to the policy and reasoned justification to clarify the requirement for flatted developments, including through the provision of balconies [MM91 and MM92]. This will ensure the policy is justified and effective.

Specialist housing

237. Paragraph 11.18 in the Plan refers to an identified need for around 1,710 units of specialist housing for older people between 2021 and 2039 (95 per year). Policy DM19 supports the provision of new, and the extension or alteration to existing, specialist housing subject to certain criteria being met. Modifications are required to the policy and reasoned justification to clarify the types of development (including sheltered accommodation, extra care housing and care homes) and the approach to affordable housing provision [MM86 and MM87]. This will ensure the policy is effective and consistent with national policy.

Conclusion

238. Subject to the main modifications referred to above, the policies in the Plan relating to the design, type and mix of new housing, including affordable homes, are justified and consistent with national policy and will be effective in meeting the needs of different groups in the community.

Issue 10 – Will the Plan be effective in ensuring that the need for additional accommodation for Gypsies and Travellers, and Travelling Showpeople, can be met?

239. National policy expects strategic policies, as a minimum, to provide for objectively assessed needs to be met including the housing needs for different

groups in the community⁷³. Planning Policy for Traveller Sites (PPTS)⁷⁴ expects local planning authorities to use a robust evidence base to establish accommodation needs of Gypsies and Travellers and local plans to identify specific deliverable sites for years 1 to 5, and specific, developable sites or broad locations for years 6 to 10 and where possible for years 11-15.

240. The Council commissioned a Gypsy and Traveller Accommodation Assessment (GTAA) which was carried out in 2019 and updated in 2021⁷⁵. This was undertaken by an experienced consultant based on established good practice. Further evidence relating to need was provided during the examination, including in connection with a planning application and by the GTAA consultant orally during the hearings. I am satisfied that the available evidence relating to Gypsy and Traveller accommodation needs is proportionate, up to date and adequate.

Gypsy and Traveller accommodation

241. At the time the Plan was prepared, there was one Council-operated Gypsy and Traveller site in the district, along with five private authorised sites and one occupied unauthorised site. Table 7 in the Plan identifies a net shortfall of 30 pitches between 2021 and 2038 compared to identified needs associated with the families on those existing sites⁷⁶. However, between 2021 and 2023, planning permissions were granted for a total of 10 net additional pitches on three of the existing sites.

242. One site is allocated in the Plan for additional Gypsy and Traveller accommodation: RSA24 New Stocks Farm, Paices Hill, Aldermaston. This was previously used to provide transit pitches, but planning permission was granted in September 2022 to create 8 permanent pitches. Whilst the site is within the Aldermaston DEPZ, its use was taken into account in the Off-Site Emergency Plan and there is no substantive evidence before me to indicate that the planning permission will not be implemented.

243. The 8 permanent pitches on RSA24 contribute to the 10 additional pitches identified between 2021 and 2023 referred to above. There remains, therefore, a residual requirement for 20 additional pitches between 2023 and 2038. There

⁷³ NPPF 11b and 62.

⁷⁴ The PPTS was updated in December 2023 and December 2024. Given the latest revision was published during the main modifications' consultation towards the end of the examination, for pragmatic reasons and having regard to PPTS paragraph 30, I have not considered the implications of the definition of "gypsies and travellers" as revised in December 2024. The Council will need to consider this during the preparation of the Gypsy and Traveller Site Allocation Development Plan Document that its local development scheme indicates will be adopted by 2027.

⁷⁵ HOU3a and HOU3b.

⁷⁶ PPTS December 2023 definition or "full cultural need" as referred to in the GTAA (HOU3b).

may also be a need for additional pitches between 2038 and 2041, but that has not been quantified.

244. Despite a call for sites during the preparation of the Plan and again in November 2023, only one potential site was suggested. Rather than further delay the preparation of the Plan in an attempt to identify more allocations, the Council's local development scheme includes a commitment to consider the matter again when the Plan is reviewed.
245. In the meantime, policy DM20 sets out a positive approach to considering extensions to the existing sites, and for the establishment of new sites located in or well related to settlements or in rural locations provided that they are appropriate in scale and not isolated. In September 2023, there were six planning applications proposing a total of 15 pitches pending consideration by the Council, all of which would be additional to the supply of pitches referred to above.
246. Thus, whilst the Plan does not identify sufficient specific sites to meet in full the identified need for additional Gypsy and Traveller accommodation to 2038 or for the modified plan period to 2041, I am satisfied that there is a reasonable prospect of those needs being met from sites that have planning permission or others that will come forward as windfalls in the context of policy DM20. Furthermore, if additional sites do need to be allocated, the Council is committed to undertaking the necessary work in the short to medium term.
247. A number of changes are required to the reasoned justification to policy DM20 so that it is up to date and clearly and accurately sets out the identified need, and supply of sites, for additional Gypsy and Traveller accommodation. This will ensure that the policy is justified and effective [MM88].

Travelling Showpeople's accommodation

248. There is one Travelling Showpeople's yard in the district, at Long Copse Farm, Enborne. This has been used as a circus headquarters for many years, although the number of authorised residential units has been limited to four and the storage of caravans, vehicles and equipment restricted to the eastern part of the site⁷⁷. A site that included that yard was allocated for 24 plots in the local plan adopted in 2017 based on a GTAA carried out in 2015 which had identified that scale of need associated with a circus business. Temporary permissions were granted in 2018 and 2020 to accommodate around 20 families, associated with a circus, who had been moved off an unauthorised site in London.

⁷⁷ Planning permission for dual use of a site (comprising the allocation and adjoining land) as an agricultural holding and circus headquarters, including a mobile home and three caravans for four months of the year, was granted on appeal in 2001 [EXAM36].

However, no permanent plots have been granted on the allocation other than the four permitted in 2001.

249. The 2019 GTAA and 2021 update indicate that a need for 24 plots still exists, such that the site is again allocated in the Plan as RSA25. A planning application was submitted in 2023 to use the allocated site for 24 Travelling Showpeople's plots on a permanent basis⁷⁸. Information provided with that application indicates that the plots are required for circus workers when not performing but also by some older family members and children associated with circus workers on a more permanent basis. Such use is consistent with the PPTS definition of Travelling Showpeople which is members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such), including such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily or permanently⁷⁹.

250. The existing authorised use of the site is not tied to any particular circus business or Travelling Showpeople use. Evidence provided by the GTAA consultant and the Showmen's Guild⁸⁰ indicates that there is a shortage of Travelling Showpeople's yards, and a shortage of opportunities to develop new yards, around England. Thus, even if the existing circus business were to vacate the site, it is likely that it would be suitable and appropriate for an alternative Travelling Showpeople's business.

251. The allocation allows for a significant increase in the physical area to be used as a Travelling Showpeople's yard compared to the area permitted for storage of caravans, vehicles and equipment under the 2001 permission. However, the size of the allocation is justified on the basis of the number of plots reasonably required for a Travelling Showpeople business based on the available evidence, taking into account guidance on plot design from the Showmen's Guild, and national policy which recognises the need for mixed-use yards to allow residential accommodation and space for storage of equipment⁸¹. Policies RSA25 and DM20 set out detailed requirements relating to layout, design, landscaping and access which should ensure that the proposed development does not have an unacceptable impact on the character or appearance of the area or on highway safety.

252. I am, therefore, satisfied that the allocation of RSA25 for a Travelling Showpeople's yard including 24 plots is justified and consistent with national policy. However, the reasoned justification to policy DM20 needs to be modified to explain the proposed use of the site [MM88], and RSA25 needs to be

⁷⁸ EXAM37.

⁷⁹ PPTS (December 2023) Annex 1 paragraph 3.

⁸⁰ FWS10/3 Annex 11.

⁸¹ PPTS (December 2023) paragraph 19.

modified to delete reference to flood zones 2 and 3 as the Environment Agency has confirmed that those zones do not cover the site [MM66]. Those modifications will ensure the two policies are justified and effective.

Conclusion

253. Subject to the main modifications described above, the Plan should be effective in ensuring that the need for additional accommodation for Gypsies and Travellers, and Travelling Showpeople, can be met.

Issue 11 – Are the policies in the Plan relating to economic development justified and consistent with national policy, and will they be effective in supporting economic growth?

Strategic approach to employment land

254. Policy SP20 supports industrial, storage and distribution, and office developments on allocated sites; designated employment areas; other existing employment land; other sites within settlement boundaries; and in the countryside provided that certain criteria are met. The policy also seeks to prevent the loss of existing employment uses outside designated employment areas other than in certain defined circumstances. This represents a positive approach, and is necessary given the identified net additional need for nearly 100,000 sqm of industrial and warehouse floorspace and nearly 60,000 sqm of office floorspace. However, for clarity and therefore effectiveness, the wording of SP20 needs to be modified to refer to the specific allocations ESA1 to ESA6 and designated employment areas listed in Appendix 4 to the Plan [MM30].

Designated employment areas

255. The 23 designated employment areas listed in Appendix 4 and defined on the policies map are the most significant established areas of industrial, warehouse and office uses identified through employment land reviews carried out in 2020 and 2022. I am satisfied, therefore, that they were selected for designation based on adequate and proportionate evidence.

256. However, the detailed boundary of the designated area of Young's Industrial Estate, Aldermaston needs to be amended to ensure consistency with the approach to development in the DEPZ set out in policy SP4. The boundary of the designated area of Membury Industrial Estate, Lambourn needs to be amended to reflect an extant planning permission and to include allocations ESA2 and ESA3. The reasoned justification to policy SP20 needs to be modified to update the information about the London Road Industrial Estate and Greenham Business Park designated areas. These changes to the policies

map and modification to the reasoned justification to SP20 **[MM31]** will ensure that the Plan is effective and justified.

257. Policy DM32 states that all designated employment areas are safeguarded for office, industry, and storage and distribution uses and sets out various criteria for considering development proposals. This is consistent with the strategic approach in policy SP20 set out above, and necessary given the identified need for net additional floorspace and the limited supply of suitable new employment land (see below). However, for effectiveness, a modification is required to the reasoned justification to DM32 to define industrial uses as those falling within use classes B2 and E(g)(iii) and storage or distribution as B8 **[MM93]**.

258. Whilst there are other existing clusters of employment uses, none are so significant that they necessitate modification to the Plan to include them in the Appendix 4 list of designated employment areas subject to policy DM32. This is particularly so non-designated sites are also protected from loss to alternative uses by policy SP20.

Sites allocated for industrial and warehouse development

259. Six sites are allocated for industrial and/or warehouse development. Each is designated on the policies map, and subject to a specific policy in chapter 8 of the Plan. The allocations were selected following the employment land reviews in 2020 and 2022, the Housing and Economic Land Availability Assessment, and sustainability appraisal. Four of the employment allocations propose major development in the AONB. However, each of the allocations represents an extension to an existing established employment site, and the landscape impacts have been assessed and will be adequately mitigated due to the extent of the allocation and by the development requirements set out in relevant policies in the Plan. For clarity and effectiveness, a modification is required to the reasoned justification to policy SP20 to define industrial uses as those falling within use classes B2 and E(g)(iii) and storage or distribution as B8 **[MM31]**.

260. Modifications are also required to the detailed wording of some of the employment allocation policies, to reflect up to date evidence and therefore ensure that they are justified and effective.

261. ESA1 needs to refer to recent planning permissions, including that granted to Thames Valley Police for a logistics hub and office development on the site **[MM68]**. If implemented, this would reduce the supply of land available for general industrial and warehouse development.

262. The amount of floorspace proposed in ESA2 needs to reflect an extant planning permission, and reference to an archaeological assessment needs to be added (and to ESA3) **[MM69 and MM70]**. Whilst some of the requirements in ESA2

may differ from the extant permission, they are nonetheless justified as they would be appropriate and necessary to the assessment of any further proposals relating to the site, including those in part (e) aimed at minimising the impact on the AONB.

263. Reference to a minerals safeguarding area in ESA4 needs to be deleted to ensure consistency with the adopted Minerals and Waste Local Plan which includes the site as part of a waste safeguarding area [MM71]. Finally, ESA5 needs to be modified to ensure that potential contamination on the site is appropriately addressed [MM72].
264. Subject to the above modifications, I am satisfied that the six employment allocations are based on proportionate, adequate and up to date evidence. Collectively, they have capacity for up to 60,000 sqm of industrial and warehouse development⁸² meaning that they will make a significant contribution towards meeting the need for nearly 100,000 sqm of additional floorspace. Whilst some of the designated employment areas also have capacity for additional floorspace, including London Road Industrial Estate later in the plan period, it is clear that there is a significant shortfall between the amount of employment land that the Plan identifies and the amount of land needed.
265. Various other sites, including land adjoining existing industrial estates, were considered for allocation in the Plan but excluded due to being in the DEPZ, at risk of flooding and/or due to the likely impact on the landscape or setting of the AONB. I am satisfied that there is proportionate and adequate evidence to support the Council's assessment of each of those sites, and that the constraints referred to represent strong reasons for preventing employment development in those locations.
266. The amount of new employment land proposed in the Plan is, therefore, justified despite it being insufficient in quantitative terms to meet the identified need for industrial and warehouse development over the plan period as there are strong reasons, based on relevant national policy⁸³, to restrict the overall scale and distribution of those forms of development at the present time. The identified industrial and warehouse land supply should be sufficient to meet needs for several years after adoption, and the Council is committed to considering this matter further in the forthcoming review.

Theale rail-road transfer site

267. Policy DM43 aims to ensure that a site at Theale defined on the policies map is reserved for industries which require a rail-road transfer facility and access to

⁸² If the Thames Valley Police develop allocation ESA1, this would be reduced to around 40,000 sqm.

⁸³ NPPF 11b and footnote 7 and NPPF 97b.

the highway network, and that the site is not redeveloped for other uses. Paragraph 12.100 states that the site is primarily an aggregates terminal which is safeguarded in the West Berkshire Minerals and Waste Local Plan 2022-2037. However, paragraph 12.101 seems to suggest that the site is also suitable for uses that require a rail-road transfer facility for consumer goods. To address this ambiguity, and to ensure consistency with the Minerals and Waste Local Plan, modifications are required to the policy and reasoned justification [MM103 and MM104]. These will ensure that the policy is justified and effective in ensuring a sustainable transport facility, that is unique in the district, is safeguarded for appropriate uses.

Office development

268. No sites are allocated in the Plan specifically for office development as none were assessed as being available, suitable and viable for development. The approach to office development in the Plan is to safeguard existing office space (policies SP20 and DM32); promote offices on redevelopment sites within and on the edge of town centres (policy SP22); and support office developments on relevant allocated sites, in designated employment areas, existing suitably located employment sites and suitable sites within settlement boundaries (policy SP20). Policy DM32 states that new office proposals within a designated employment area will not be required to satisfy the sequential test set out in national policy.
269. Given the lack of suitable and available sites to allocate, and the identified need for around 58,000 sqm of net additional office floorspace, this approach is justified and necessary to support the local economy. However, to ensure effectiveness, the reasoned justification to policies SP20 and DM32 needs to be modified to define "office development" as uses falling within sub sections E(g)(i) or E(g)(ii) of the Use Classes Order [MM31 and MM93].

Town centres and retail parks

270. Policy SP22 sets out a hierarchy of town centres based on the scale, character and role of each: major town centre: Newbury; town centres: Thatcham and Hungerford; and district centres: Lambourn, Pangbourne and Theale. The policy goes on to define various criteria for considering development proposals aimed at maintaining and enhancing the vitality and viability of each of the centres. This approach is consistent with national policy.
271. The town centre boundaries and primary shopping areas within each are defined on the policies map. They are based on the boundaries defined in the adopted core strategy revised to take account of changes in recent years, including new developments and changes of use. In general, I am satisfied that the boundaries defined are justified and will help to ensure that policy SP22 can be effectively implemented. However, the Newbury primary shopping area

needs to be amended on the policies map to exclude the east side of the Kennet Centre fronting Market Place as the majority of units along that frontage are no longer in retail use. Subject to this, the Plan provides a justified policy framework for considering the redevelopment of the centre for a mix of main town centre uses.

Economic development in the countryside

272. Policies DM35, DM36 and DM38 support proposals that contribute to sustaining a prosperous rural economy, farm diversification, and development on existing educational and institutional sites in the countryside, provided that various specified criteria are met. In most respects these policies are consistent with national planning policies supporting a prosperous rural economy. However, a number of changes to the detailed wording of policies DM35 and DM38 and associated reasoned justification are necessary to ensure they are justified and effective [**MM95**, **MM96**, **MM99** and **MM100**].

Equestrian development and the horseracing industry

273. Equestrian activities, and the North Wessex Downs horseracing industry in the Lambourn Valley in particular, are characteristic features of West Berkshire and play an important role in the rural economy. Policy DM37 includes three parts relating to domestic and commercial equestrian development; the horseracing industry; and Newbury Racecourse.

274. The second part of policy DM37 seeks to protect and allow the growth of the horseracing industry whilst conserving environmental quality and countryside character. In principle, this is justified and consistent with national policy relating to the natural environment, landscape character, particular economic sectors, and the rural economy. However, modifications are required to the policy and reasoned justification to ensure the Plan is effective in protecting existing horseracing establishments and facilities, both from changes of use and redevelopment to other uses but also from development nearby that could impact on the vitality and viability of the industry; supporting the development of related services, facilities and infrastructure; and allowing new residential development in the countryside where it is essential to the horseracing industry in accordance with policy DM23 [**MM97** and **MM98**].

275. A modification is also required to the first part of policy DM37 to ensure that it is effective by clarifying that it relates to all equestrian development, and by referring to the British Horseracing Authority standards, as well as other standards, relating to the adequate provision of land and facilities [**MM97**]. Following the modifications' consultation I have amended that part of the policy to refer to proposals having regard to those standards as it is not justified to require proposals to be in accordance with them as they do not form part of the statutory development plan.

Denison Barracks and RAF Welford

276. RAF Welford and Denison Barracks are important facilities that support national defence activities. Various policies in the Plan relating to development in the countryside would not be effective in either supporting development required for operational or associated reasons, or in ensuring that the sites are not affected adversely by the impact of other development proposed in the surrounding area.

277. It is necessary, therefore, to include an additional policy along with reasoned justification and site maps in the Plan relating to those two establishments. This would support development at RAF Welford and Denison Barracks where it directly sustains the functioning of the defence establishment, and prevent development in the surrounding area if it would adversely affect the defence related operation or capability of the site and/or the safety and wellbeing of those within the relevant statutory safeguarding zones [MM94]. The policies map will need to be amended to define the sites and safeguarding zones. This will ensure that the Plan is effective and consistent with national policy relating to defence establishments.

Conclusion

278. Subject to the main modifications referred to above, the policies in the Plan relating to economic development are justified and consistent with national policy, and will be effective in supporting economic growth.

Issue 12 – Are the other strategic and development management policies in the Plan justified, consistent with national policy and effective?

279. This issue considers the soundness of all of the Plan's policies not covered under the preceding main issues.

Climate change and sustainable construction (policies SP5 and DM4)

280. National planning policy expects the planning system to help shape places in ways that contribute to radical reductions in greenhouse gas emissions, including through the design of development. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards⁸⁴.

281. The Planning and Energy Act 2008 allows local planning authorities to set energy efficiency standards in their development plan policies that exceed the energy efficiency requirements of the building regulations. However, such

⁸⁴ NPPF 152 and 154b.

policies must not be inconsistent with relevant national policies and should use standards that are nationally endorsed.

282. The written ministerial statement on local energy efficiency standards published on 13 December 2023⁸⁵ advises that changes to energy efficiency building regulations are planned for 2025 meaning that homes built to that standard will be net zero ready and should need no significant work to ensure that they have zero carbon emissions as the grid continues to decarbonise. Compared to varied local standards, which can add cost and complexity, such nationally applied standards provide much-needed clarity and consistency for businesses to invest and prepare to build net zero ready homes. In that context, the Government does not expect local plans to set local energy efficiency standards that go beyond current or planned building regulations. Any planning policies that do propose higher energy efficiency standards should be rejected at examination if they do not have a well-reasoned and robustly costed rationale that ensures that:

- development remains viable, and the impact on housing supply and affordability is considered; and
- the additional requirement is expressed as a percentage uplift of a dwelling's Target Emission Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP).

283. West Berkshire has carbon emissions well above average levels for the South East and England, and the Council declared a climate emergency in 2019 with the stated aim of becoming carbon neutral by 2030⁸⁶. Fuel poverty levels are also relatively high in the district⁸⁷.

284. Mitigating and adapting to climate change and minimising demand for energy and other resources is one of the Plan's strategic objectives. Policy SP5 requires all development to contribute to West Berkshire becoming and staying carbon neutral by 2030 including by applying the energy hierarchy, achieving the highest viable levels of energy efficiency, generating and supplying renewable, low and zero carbon energy, and as a last resort carbon offsetting in accordance with policy DM4. Policy DM4 requires development to achieve net zero operational carbon emissions (regulated and unregulated energy) by implementing the energy hierarchy, meeting specified minimum standards of construction, and including onsite renewable, low and zero carbon energy technologies.

285. The minimum construction standards for residential development set out in policy DM4 part 1A require compliance with the carbon TER set by the Future Homes Standard once this is confirmed by central government, and in the meantime a 63% reduction in carbon emissions by on-site measures as

⁸⁵ Statement UIN HCWS123.

⁸⁶ Plan 10.12 and 10.13 and Table 5.

⁸⁷ Plan 10.15.

compared to the baseline emission rate set by Building Regulations Part L 2021 (SAP 10.2). Part 1A also sets a target expressed in terms of the Building Regulations Fabric Energy Efficiency metric (15kWh/m²/year). The latter is intended to ensure that fabric energy efficiency is achieved as a key step in meeting the TER target, which itself is expected to be achieved before the addition of onsite renewable, zero and low carbon energy technologies.

286. Policy DM4 part 1B sets construction standards for residential refurbishments and part 2 sets standards for non-residential development. These are expressed in terms of achieving BREEAM excellent, which is a nationally recognised and achievable standard.
287. The final part of policy DM4 states that if development cannot demonstrate that it is net zero carbon in relation to operational energy (regulated and unregulated) it will be required to address any residual carbon emissions by a cash in lieu contribution.
288. The Council has provided a significant amount of detailed evidence for policies SP5 and DM4, including from specialist consultants⁸⁸. This includes analysis of national policy and legislation; technical evidence relating to the emerging Future Homes Standard including through the national Future Homes Hub relating to technologies and standards; and the potential implications for building costs including in circumstances in which financial contributions are required for carbon offsetting. With regard to the latter, the increase in costs associated with meeting the requirements of policy DM4 is estimated to be around 5% based on national data adjusted to take account of local circumstances. These additional costs, which are not insignificant, were factored into the viability assessment of the Plan which I concluded earlier demonstrates that the cumulative impact of the policy requirements is unlikely to undermine the viability of development, having made reasonable assumptions about building costs and values, developer profits and benchmark land values.
289. The overall aim of policies SP5 and DM4 - development achieving net zero operational carbon emissions - is consistent with national planning policy. The overarching energy efficiency target in DM4 part 1A is expressed in terms of TER as required by the written ministerial statement, and the levels set are justified in the context of current and planned building regulations and the Council's detailed evidence. The policy relating to fabric energy efficiency is also expressed in terms of the building regulations metric. Thus, whilst that particular standard is not referred to in the written ministerial statement, I am satisfied that it is a practical and measurable approach that avoids adding complexity through the introduction of different metrics.
290. However, the approach in policy DM4 does go beyond current and planned building regulations in a number of respects including by stipulating that fabric energy efficiency should be the first step in achieving the TER target; requiring

⁸⁸ CC1 (December 2022) and EXAM39 (June 2024).

that target to be met before account is taken of on-site renewable, zero and low energy technologies; and by referring to both regulated and unregulated energy. Notwithstanding that, the Council's evidence demonstrates that the approach should be effective in ensuring that development achieves net zero operational carbon emissions without compromising the financial viability of development in West Berkshire.

291. Furthermore, whilst following the specified approach will reduce flexibility for developers, and at least in the short to medium term present some additional challenges in terms of detailed design, materials, technologies and construction skills, there is no substantive evidence to indicate that those cannot be overcome. The effect of the standards on the overall affordability of housing in West Berkshire, which is affected by various factors, is difficult to assess but there is no substantive evidence to indicate it is likely to be significant. Moreover, the climate emergency and fuel poverty mean that it is essential to achieve significant improvements in the standards of construction in the district. I am therefore satisfied that the approach of going beyond current, and potentially future, building regulations is justified in the particular circumstances of West Berkshire and the significant, persuasive evidence provided for the detailed requirements of policy DM4.

292. Overall, therefore, the approach set out in policies SP5 and DM4 is justified and consistent with national policy and should be effective in helping to mitigate climate change and tackle fuel poverty. However, policy DM4 needs to be modified to replace the single fabric energy efficiency target for residential development with specific targets, still expressed in the building regulations SAP metric, relevant to different types of dwelling. This will ensure the policy is effective and justified in terms of viability based on recent research⁸⁹. Detailed wording changes also need to be made, for effectiveness, to parts 1B, 2 and 3 of DM4 to clarify the requirements relating to residential refurbishments and non-residential development [MM75]. The reasoned justification needs to be modified accordingly, and to refer to a supplementary planning document which is being prepared by the Council to provide further guidance [MM76].

Flood risk, water resources, water quality and waste water (policies SP6, DM6 and DM7)

293. A number of changes to the detailed wording of parts of policy SP6 and associated reasoned justification are necessary to ensure effectiveness and consistency with national policy on development and flood risk, including in relation to the sequential and exception tests and by adding reference to cumulative impacts and to surface water flooding in the Newbury and Thatcham area [MM10 and MM11].

⁸⁹ EXAM39.

294. The reasoned justification to policy DM6 needs to be modified to refer to recent legislation relating to water quality and nutrient pollution relevant to the River Lambourn including the Levelling Up and Regeneration Act 2023 and the Designation of Sensitive Catchment Areas Notice 2024 [MM77]. This will ensure that the policy is effective and justified.
295. The requirement in policy DM7 for all new dwellings to meet the optional building regulations requirement of 110 litres/person/day is justified, subject to a change to the detailed wording, because the Thames Water region is under serious stress. However, a number of changes to other parts of the policy and reasoned justification are required, including deletion of the references to development being “water neutral” and clarification of the approach to the provision of water supply and wastewater treatment infrastructure capacity to serve development including through the reference to phasing where necessary. This modification [MM78], and associated modification to the reasoned justification [MM79], will ensure that policy DM7 is justified and consistent with national policy. Consequential modifications are required to the RSA policies to delete references to water and waste water infrastructure in order to avoid duplication and inconsistency; these are listed under main issue 7.

Landscape (policy SP8), green infrastructure (policy SP10), biodiversity (policy SP11), and trees, woodland and hedgerows (policy DM15)

296. Policy SP8 supports development which conserves and enhances the diversity and local distinctiveness of the landscape character of the district and requires planning applications to be accompanied by an appropriate landscape assessment that is proportionate to the scale and nature of the proposal. This policy is consistent with national policy and no modification is required.
297. Policy SP10 aims to protect and enhance local and strategic green infrastructure across the district. A modification is required to the detailed wording of part (o) relating to buffer zones along watercourses, to ensure effectiveness [MM15].
298. Policy SP11 sets out various requirements aimed at ensuring that development conserves and enhances biodiversity and includes specific references to internationally designated sites, nationally designated sites, irreplaceable habitats, and sites of local importance. In most respects this is consistent with national policy. However, modifications are required to the sections on biodiversity net gain, to avoid duplication with statutory requirements and inconsistency with national policy, and to clarify part (d) relating to buffer zones. This will ensure the policy is justified and effective [MM16]. Consequential modifications are required to the reasoned justification [MM17].

299. Policy DM15 aims to conserve and enhance trees, woodlands and hedgerows. Modifications are needed to the third paragraph and associated reasoned justification to ensure the requirement relating to Tree Preservation Orders is clear and consistent with national policy [**MM84** and **MM85**].

Historic environment (policies SP9 and DM9 to DM14)

300. Policy SP9 aims to set out a positive strategy for the conservation and enjoyment of the historic environment along with development management policies relating to different types of heritage asset. Further detailed development management policies are set out in policies DM9 to DM14 relating to conservation areas, listed buildings, non-designated heritage assets, registered parks and gardens, registered battlefields and assets of archaeological importance. The intention of these policies is to be consistent with national policy and provide additional detail to ensure an effective approach to decision making in the specific context of West Berkshire.
301. In principle, the approach is justified. However, modifications are required to various parts of some of the policies to ensure consistency with national policy and effectiveness. Policy SP9 and reasoned justification need to be modified to clarify the actions that will be taken to deliver a positive strategy for the conservation and enjoyment of the historic environment; to ensure an appropriate approach to decision making in relation to designated and non-designated heritage assets; and to delete reference to “enabling development” [**MM13** and **MM14**]. Some changes to policy DM9, DM10 and DM11, and associated reasoned justification, are also required to ensure an effective approach to decision making for development affecting conservation areas, listed buildings and non-designated heritage assets that is consistent with national policy [**MM80** to **MM83**].

Residential development in the countryside (policy DM1 and DM23 to DM27)

302. Policy DM1 states that, exceptionally, residential development outside settlement boundaries will be permitted and sets out a number of criteria that would need to be met. Policies DM23 to DM27 each set out criteria to consider whether specific types of residential development will be supported in the countryside: housing for rural workers; conversion of existing buildings to dwellings; replacement of existing dwellings; extensions of residential curtilages; and sub division of existing dwellings.
303. In most respects these policies are consistent with national policy and will be effective for the purposes of preparing and determining planning applications relating to such types of development which is particularly important in a rural district such as West Berkshire. However, modifications are required to the detailed wording of parts of DM1 and DM27 to ensure that they are justified and effective [**MM73** and **MM89**].

Health and wellbeing (policy DM3)

304. Policy DM3 needs to be modified to clarify how development proposals are expected to contribute to supporting healthy lifestyles and providing new health facilities where appropriate for effectiveness. The requirement for proportionate health impact assessments to support certain types of development also needs to be clarified to be consistent with national policy [MM74].

Infrastructure requirements and delivery (policy SP24)

305. Policy SP24 relates to existing, improved and new physical, social and green infrastructure. To ensure effectiveness and consistency with national policy, a modification is required to clarify that development will be required to ensure the timely and coordinated delivery of necessary infrastructure, having regard to the latest version of the Council's Infrastructure Delivery Plan, through proportionate financial contributions and/or on-site provision, and that where necessary the phasing of development will be linked to infrastructure provision [MM34].

Transport impacts and infrastructure (policies SP23, DM42, DM44 and DM45)

306. Policies SP23, DM42, DM44 and DM45 relate to the assessment and mitigation of impacts on the transport network, providing and improving transport infrastructure, and facilitating sustainable travel. In most respects, these are justified and consistent with national policy aimed at promoting sustainable transport. However, policy DM42 needs to be reworded to clarify that development will, where necessary, be required to make a proportionate contribution to the provision of, or improvement to, transport infrastructure before setting out the list of projects [MM102]. Policies DM44 and DM45 and associated reasoned justification need to be modified so that appropriate weight is given to Council guidance relating to highway design and parking standards, and to clarify the requirement for monitoring the implementation of travel plans [MM105 to MM107]. This will ensure those policies are justified and effective.

Digital infrastructure (policy DM41)

307. Policy DM41 relates to the provision of digital infrastructure, including fibre to the premises and telecommunications. However, parts of the policy either duplicate or are inconsistent with national policy and, following changes to the building regulations, parts of the policy represent unnecessary duplication. Parts (a) to (d) should, therefore be deleted [MM101].

Conclusion

308. The modifications described above are necessary to ensure that the development management policies in the Plan referred to under this issue are justified, consistent with national policy and effective.

Overall Conclusion and Recommendation

309. The Plan has a number of deficiencies in respect of soundness and/or legal compliance for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explained in the main issues set out above.
310. The Council has requested that I recommend main modifications to make the Plan sound and/or legally compliant and capable of adoption. I conclude that the duty to cooperate has been met and that with the recommended main modifications set out in the Appendix the West Berkshire Local Plan Review 2022-2039 satisfies the requirements referred to in Section 20(5)(a) of the 2004 Act and is sound.

William Fieldhouse

Inspector

This report is accompanied by an Appendix containing the main modifications.

West Berkshire Local Plan Review (LPR) 2022-2039
Schedule of Main Modifications (MM)

This schedule contains all of the Main Modifications to the submitted [West Berkshire Local Plan Review 2022 – 2039 \(LPR\)](#) which are necessary in order to make the Plan sound.

The Main Modifications below are expressed in the form of ~~strike through~~ for deletions and underlining for additions of text.

Please note that the page numbers and paragraph numbering below refer to the [Proposed Submission LPR dated 20 January 2023](#), as submitted.

Ref	Page of submitted LPR	Policy/ Paragraph of submitted LPR	Main Modification
MM1	14	Paragraph 4.11	<p><i>Insert additional text to the end of paragraph 4.11 as follows:</i></p> <p><u>'Future growth for Newbury and Thatcham has been set in the context of a long-term Vision developed for both towns, ensuring growth is sustainable in the longer term.'</u></p>
MM2	15	Paragraph 4.17	<p><i>Insert key diagram after paragraph 4.17 as set out in Annex A below</i></p>
MM3	16 - 17	Policy SP1	<p><i>Amendments to the following settlement boundaries as referenced in fourth paragraph:</i></p> <ul style="list-style-type: none"> • <i>Chieveley – to ensure consistency with the Settlement Boundary Review Criteria (as shown in the Schedule of Changes to the Policies Map (PMC1))</i> • <i>Newbury – to reflect amendment to allocated site boundary of Sandleford Park (as shown in the Schedule of Changes to the Policies Map (PMC2))</i> • <i>Pangbourne - to reflect new site allocation at Land north of Pangbourne Hill (as shown in the Schedule of Changes to the Policies Map (PMC3))</i>

Ref	Page of submitted LPR	Policy/ Paragraph of submitted LPR	Main Modification
			<ul style="list-style-type: none"> • <i>Thatcham – to reflect modifications to policy SP17, the inclusion of Colthrop Industrial Estate and the new site allocations at Henwick Park and Land east of Regency Park Hotel (as shown in the Schedule of Changes to the Policies Map (PMC4))</i> • <i>Tilehurst – to reflect new site allocation at Pincents Lane and the inclusion of the Pincents Lane Retail Park. (as shown in the Schedule of Changes to the Policies Map (PMC5))</i> <p><i>Amend sixth paragraph of the policy as follows:</i></p> <p><i>'In making optimum use of land and achieving high quality design Ddensity on individual sites will vary according to their location and context, size of developable area and site specific issues such as shape and access:</i></p> <ul style="list-style-type: none"> • <i>Within Newbury, Thatcham, Tilehurst, Purley on Thames, and Calcot, developments are expected to secure a net density of at least 35 dwellings per hectare with densities of at least 70 dwellings per hectare in town centres and for flatted developments along main transport routes and close to transport nodes.</i> • <i>Within other defined settlements developments are expected to secure a net density of at least 30 dwellings per hectare with higher densities achievable in the centres of Hungerford, Pangbourne and Theale.</i> • <i>Developments on the edge of defined settlements are generally expected to secure a net density of 30 dwellings per hectare outside of the AONB, and 20 dwellings per hectare within the AONB.</i> • <i>However, lower density developments will be appropriate in certain areas of the District that are particularly sensitive to the impact of intensification and redevelopment. This may be because of the prevailing character of the area, the sensitive nature of the surrounding countryside or built form, and/or the relative remoteness from public transport.'</i>

Ref	Page of submitted LPR	Policy/ Paragraph of submitted LPR	Main Modification
			<p><i>Amend the policy under 'Eastern Area' sub-heading as follows:</i></p> <p>'Eastern Area</p> <p><u>The Eastern Urban Area will continue to be a focus for housing development through existing commitments, allocated sites and regeneration and change in the existing built up area.</u></p> <p>The individual identities of the separate settlements within this area will be maintained and the high quality landscape and environmental assets in this part of West Berkshire will be conserved and enhanced.</p> <p>Theale will be a focus for additional housing through existing commitments and <u>allocated sites</u> new allocations.</p> <p>The area will continue to be important for business development with the retention of DEAs.'</p>
MM4	19	Policy SP2	<p><i>Amend the policy by adding a new second paragraph as follows:</i></p> <p><u>'Development in the setting of the AONB will be required to have regard to the interrelationship with the AONB and its landscape character and special qualities. Proposals will be required to be sensitively located and designed to avoid or minimise any adverse impacts on the AONB.'</u></p>
MM5	19 - 20	Supporting text to policy SP2	<p><i>Amend the supporting text after paragraph 4.24 as follows:</i></p> <p><u>'The setting of the North Wessex Downs National Landscape (AONB) and the protected landscape of the AONB itself add value to each other as the landscape and landforms link visually and functionally. The policy recognises this important interrelationship and seeks to ensure that development in its setting does not cause significant harm to the AONB by being poorly located or designed. This is especially the case where long views from or to the AONB are identified as important, or where the</u></p>

Ref	Page of submitted LPR	Policy/ Paragraph of submitted LPR	Main Modification
			<p><u>landscape character of land within and adjoining the AONB is complementary.</u></p> <p><i>Insert two new paragraphs after paragraph 4.28 as follows:</i></p> <p><u>'As part of the development of the LPR the Council has demonstrated the exceptional circumstances which justify allocating the sites identified in the LPR within the AONB. Therefore, proposals that meet the requirements of the relevant site allocation policy, along with other relevant policies, will be deemed to be in accordance with the development plan and consistent with national policy.</u></p> <p><u>The exceptional circumstances necessary to justify the allocation of any sites for major development within NDPs will be expected to be demonstrated through individual neighbourhood plans. Proposals that meet the requirements of the relevant site allocation policy in the neighbourhood plan, along with other relevant policies in the development plan, will be deemed to be in accordance with the development plan and consistent with national policy.'</u></p>
MM6	21 - 22	Policy SP3	<p><i>Amend the policy as follows:</i></p> <p>'Urban Areas: b) Strategic and non-strategic sites allocated for housing and economic development through other policies in the LPR <u>and/or</u> neighbourhood plans.</p> <p>Rural Service Centres: f) Non-strategic sites allocated for housing and economic development through other policies in the LPR <u>and/or</u> neighbourhood plans</p> <p>Service Villages: i) Non-strategic sites allocated for housing and economic development through other policies in the LPR <u>and/or</u> neighbourhood plans'.</p> <p><i>Insert new paragraph at the end of the policy as follows:</i></p>

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			<p><u>'Neighbourhood plans can allocate non-strategic sites for development. These must be located either within and/or adjoining the settlement boundaries of Urban Areas, Rural Service Centres and Service Villages. Strategic site allocations cannot be made within neighbourhood plans.'</u></p>
MM7	22	Supporting text to policy SP3	<p><i>Amend the supporting text by adding a new paragraph after paragraph 4.34 as follows:</i></p> <p><u>'Any non-strategic residential allocations within neighbourhood plans that are situated within defined settlement boundaries will not count towards meeting the housing requirement figure in policy SP12. This is because there is a presumption in favour of development within defined settlement boundaries and to do so would be inconsistent with the assumptions made in the LPR about the District's overall housing land supply.'</u></p>
MM8	23	Policy SP4	<p><i>Amend policy SP4 as follows:</i></p> <p>'Atomic Weapons Establishment (AWE) Aldermaston and Atomic Weapons Establishment (AWE) Burghfield</p> <p><u>Within the Office for Nuclear Regulation (ONR) land use planning consultation zones surrounding AWE Aldermaston and AWE Burghfield development will be managed in in the interests of public safety, and to ensure that any proposed developments do not adversely affect the defence related operation or capability of the AWE sites. pose an external hazard to the AWE sites, any new development of a type more particularly described in the table below¹ located in the Detailed Emergency Planning Zone (DEPZ)² of AWE Aldermaston and AWE Burghfield is likely to be refused planning permission by the Council, especially when the Office for Nuclear Regulation (ONR) and/or Ministry of Defence (MoD) have advised against that development and/or object.</u></p>

¹ This table reflects the ONR's consultation criteria as at 2022 – please note that these may change over time and the Policy SP4 reflects the Council's intention to follow the latest ONR guidance from time to time.

² Detailed Emergency Planning Zone (DEPZ) as defined by REPPiR and as detailed on the Council's website.

Ref	Page of submitted LPR	Policy/ Paragraph of submitted LPR	Main Modification												
			<p><u>Development proposals within the land use planning consultation zones that pose an unacceptable risk to the operation of the AWE Off-Site Emergency Plan (OSEP) and/or adversely affect the defence related operation or capability of the AWE sites will be refused planning permission.</u></p> <p><u>In determining applications, the ONR and AWE/MOD will be consulted on development proposals applications for new development in the Detailed Emergency Planning Zone (DEPZ)³, Outer Consultation Zone (OCZ)⁴ and any other 12km consultation zone as detailed on ONR website which meets the ONR consultation criteria as detailed on the ONR website⁵ described in the table below (as may be amended by the ONR from time to time). The ONR and AWE/MOD will be consulted on any proposal that is likely to lead to any increase in the residential or non-residential population (including visitors and workers) of the DEPZ. Development within the DEPZ is likely to be refused planning permission where the ONR, as regulator of the nuclear licensed sites, advise against the proposed development.</u></p> <p><u>For development proposals in the DEPZ and OCZ for each of AWE's, consideration will be given as to how the proposed development would impact on the AWE Off-Site Emergency Plan and supporting documents.</u></p> <p>Development within the Land Use Planning Consultation Zones: Office for Nuclear Regulation</p> <table border="1" data-bbox="651 1090 2038 1204"> <thead> <tr> <th colspan="2" data-bbox="651 1090 1272 1129">AWE Aldermaston (AWE A)</th> <th colspan="2" data-bbox="1272 1090 2038 1129">AWE Burghfield (AWE B)</th> </tr> <tr> <th data-bbox="651 1129 840 1169">Zone</th> <th data-bbox="840 1129 1272 1169">Development Type</th> <th data-bbox="1272 1129 1460 1169"></th> <th data-bbox="1460 1129 2038 1169"></th> </tr> </thead> <tbody> <tr> <td data-bbox="651 1169 840 1204">DEPZ</td> <td data-bbox="840 1169 1272 1204">Any new development, re-use or re-classification of an existing development that</td> <td data-bbox="1272 1169 1460 1204"></td> <td data-bbox="1460 1169 2038 1204"></td> </tr> </tbody> </table>	AWE Aldermaston (AWE A)		AWE Burghfield (AWE B)		Zone	Development Type			DEPZ	Any new development, re-use or re-classification of an existing development that		
AWE Aldermaston (AWE A)		AWE Burghfield (AWE B)													
Zone	Development Type														
DEPZ	Any new development, re-use or re-classification of an existing development that														

³ Current and future Detailed Emergency Planning Zone (DEPZ) as defined by REPIR and as detailed on the Council's website. The extent of the DEPZs (at January 2023) shown in Appendix 3 and the Policies Map could change before the Local Plan is updated or superseded. Policy SP4 will be applied to the latest version of the DEPZ.

⁴ Outer Consultation Zone (OCZ) and 12km zones as defined on by ONR website along with relevant distances and centre points. The OCZ and 12km zones are depicted in Appendix 3 and on the Policies Map.

⁵ <https://www.onr.org.uk/our-work/what-we-regulate/other-regulationslegislations/land-use-planning/>

Ref	Page of submitted LPR	Policy/ Paragraph of submitted LPR	Main Modification						
			<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 20%;"></td> <td>could lead to an increase in residential or non-residential populations thus impacting on the off-site emergency plan. Any new development, re-use or re-classification of an existing development that could pose an external hazard to the site.</td> </tr> <tr> <td>OCZ</td> <td>Any new residential development of 200 dwellings or greater. Any re-use or re-classification of an existing development that will lead to a material increase in the size of an existing development (greater than 500 persons). Any new non-residential development that could introduce vulnerable groups to the OCZ. Any new development re-use or re-classification of an existing development that could pose an external hazard to the site.</td> </tr> <tr> <td>12km zone</td> <td>A circular zone of 12km radius around all nuclear sites, for certain types of significant development due to the potential for such developments to pose an external hazard to sites.</td> </tr> </table> <p>ONR's website provides non-exhaustive examples of the types of developments that could pose an external hazard to a nuclear licensed site and the examples of the type of developments ONR would expect to be consulted on.</p> <p>The maps set out in Appendix 3 provide the mapping information, as at March 2020 in relation to the DEPZs, OCZs (5km) and the 12km consultation zones for each AWE site as per the ONR consultation criteria.⁶</p>		could lead to an increase in residential or non-residential populations thus impacting on the off-site emergency plan. Any new development, re-use or re-classification of an existing development that could pose an external hazard to the site.	OCZ	Any new residential development of 200 dwellings or greater. Any re-use or re-classification of an existing development that will lead to a material increase in the size of an existing development (greater than 500 persons). Any new non-residential development that could introduce vulnerable groups to the OCZ. Any new development re-use or re-classification of an existing development that could pose an external hazard to the site.	12km zone	A circular zone of 12km radius around all nuclear sites, for certain types of significant development due to the potential for such developments to pose an external hazard to sites.
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12km zone	A circular zone of 12km radius around all nuclear sites, for certain types of significant development due to the potential for such developments to pose an external hazard to sites.								
MM9	23-25	Supporting text to policy	<i>Amend supporting text to policy SP4 as follows:</i>						

⁶ It should be noted that the ONR 12km land use planning area should not be confused with the REPPiR Outer Planning Zones (OPZ) for the AWE sites. OPZs are for emergency planning use only. In 2022 they were AWE Aldermaston 15km and AWE Burghfield 12km.

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		SP4	<p>4.36 There are two nuclear licensed sites located in West Berkshire, the Atomic Weapons Establishment in Aldermaston (AWE A) and in Burghfield (AWE B). These are operated by AWE plc on behalf of the Ministry of Defence and regulated by the Office of Nuclear Regulation (ONR) (as well as other regulators).</p> <p>4.37 Both AWE sites are core<u>critical</u> to sustaining the UK government's nuclear deterrent and support national defence and security.</p> <p>4.38 There are hazards associated with the authorised use of these sites including conventional chemicals, explosives and radiation sources. As a result of the quantities and types of material involved, the sites are also regulated under the following key legislation:</p> <ul style="list-style-type: none"> a. The Radiation (Emergency Preparedness and Public Information) Regulations 2019 (REPPPIR)⁷. Both sites fall within the scope of REPPPIR legislation. The regulator for these sites is the ONR. b. Control of Major Accident Hazards Regulations 2015 (COMAH)⁸. Under these regulations AWE A is a Lower Tier COMAH site. The joint regulators for this site are the ONR and the Environment Agency (EA). AWE B does not fall under the COMAH regulations at the present time (2022). c. Explosive Regulations 2014⁹. Both AWE A and AWE B sites have explosives on site and AWE plc holds an explosives licence for both sites. The regulator is the ONR. d. Environmental Permitting (England and Wales) Regulations 2016 (EPR). Both sites generate and dispose of radioactive wastes. The regulator is the EA. <p>4.39 The NPPF <u>outlines that states at paragraph 45:</u> "Local planning authorities should consult the appropriate bodies when considering applications for the siting of, or changes to, major hazard sites, installations or pipelines, or for development around them."</p>

⁷ Radiation - Radiation (Emergency Preparedness and Public Information) Regulations 2019 (REPPPIR)

⁸ COMAH Guidance

⁹ Explosives Regulations 2014 -L150

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			<p>4.40 Furthermore, the NPPF at paragraph 95 states: <u>requires planning policy to</u></p> <p><i>“Planning policies and decisions should promote public safety and take into account wider security and defence requirements. It requires that operational defence sites are not affected adversely by the impact of other development proposed in the area, and that existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. by:</i></p> <p><i>i. anticipating and addressing possible malicious threats and natural hazards, especially in locations where large numbers of people are expected to congregate. Policies for relevant areas (such as town centre and regeneration frameworks), and the layout and design of developments, should be informed by the most up-to-date information available from the police and other agencies about the nature of potential threats and their implications. This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security; and</i></p> <p><i>ii. recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.”</i></p> <p>4.41 Paragraph 97(b) (ensuring that operational defence and security sites are not adversely affected by the impact of other development in the area) is complemented by paragraph 187 of the NPPF which provides, amongst other things, that <i>“planning policies and decisions should ensure that new development can be integrated effectively with existing businesses...”</i> and that existing businesses <i>“should not have unreasonable restrictions placed on them as a result of development permitted after they were established”.</i></p> <p>4.42 These national policies should be read alongside other relevant policies relating to economic development within the LPR.</p>

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			<p>4.43 The NPPF defines major hazard sites, installations and pipelines as: <i>'Sites and infrastructure, including licensed explosive sites and nuclear installations, around which Health and Safety Executive (HSE) (and Office for Nuclear Regulation) consultation distances to mitigate the consequences to public safety of major accidents may apply.'</i></p> <p>4.44 The preface to the guidance accompanying REPPiR 2019 states: "The provisions in REPPiR have been developed with consideration of provisions in the Control of Major Hazards Regulations 2015 (COMAH) [10] and the Pipelines Safety Regulations 1996 [11] to maximise emergency preparedness consistency between Regulations for major hazards sectors."</p> <p>4.45 Nuclear installations which are regulated by REPPiR present a potential major hazard as a result of the quantities of radioactive materials on the site.</p> <p>4.46 Under the REPPiR <u>19</u> legislation a <u>Detailed Emergency Planning Zone (DEPZ)</u> must be determined by the local authority where the relevant nuclear site is situated. For the AWE sites this is West Berkshire District Council. <u>This process was undertaken in 2019 and reviewed in 2023. Under legislation formal reviews of the DEPZ are required to be undertaken at least every three years or as a result of a material change in work with ionizing radiation. As such, the extent of the DEPZs shown in Appendix 3 and on the Policies Map could change before the Local Plan is updated or superseded. Policy SP4 will be applied to the latest version of the DEPZ.</u></p> <p>4.47 The DEPZ determination process, including the data behind the information provided in the Consequence Report prepared and issued by AWE, in 2019, was subject to an unsuccessful Judicial Review brought against the Council.</p> <p>4.48 The DEPZ for the AWE sites is the geographic area that in respect of which the AWE Off-Site Emergency Plan (OSEP) covers. The AWE OSEP must set out protective actions which would be implemented without delay to mitigate the likely consequences of a radiation emergency, must have detailed plans in place and the Council, along with the other agencies involved in the AWE OSEP Off-Site Emergency Plan, must be able to respond effectively. The regulators therefore require assurances</p>

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			<p>that the AWE Off-Site Emergency Plan <u>OSEP</u>, owned by the Council, is adequate and can be implemented effectively in order to protect the public.</p> <p>4.49 The OCZ and 12km land use planning consultation zones for the AWE sites are determined by the ONR and extends from a geographical centre point on each AWE sites. <u>During the plan period there may be changes to the REPPiR legislation and/or in the inputs to the ONR's process which may result in consequential changes to the land use planning consultation zones or consultation criteria, which in turn could result in changes to ONRs advice on particular proposals. These will be kept under review and policy SP4 will be applied to the latest version of the ONR Guidance/Zones.</u></p> <p>4.50 The DEPZs and OCZs for the AWE sites cross over into the following neighbouring councils: Basingstoke and Deane Borough Council, Reading Borough Council, and Wokingham Borough Council (see further below).</p> <p>4.51 In respect of both AWE sites, the ONR <u>and AWE/MOD is will be consulted on any planning applications for new development within the DEPZ, the OCZ and the 12km zone (and any other consultation zone determined by the ONR from time to time) which meet the consultation criteria as set out within the policy on the ONR website¹⁰. These d Developments within these zones may have an adverse impact on pose an unacceptable risk to the viability and operability of the AWE OSEP Off-Site Emergency Plan and/or pose an external hazard to, adversely affect the defence related operation or capability of the nuclear licensed sites, and advice will be provided to the Local Planning Authority accordingly.</u></p> <p>4.52 The ONR provides advice to the local planning authorities on planning applications for developments around the AWE nuclear licensed sites. This advice seeks to limit the radiological public health consequences to members of the public in the event of a radiation emergency and to ensure that the developments do not pose an external hazard to the sites.</p>

¹⁰ <https://www.onr.org.uk/our-work/what-we-regulate/other-regulationslegislations/land-use-planning/>

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			<p>4.53 Given the potential cumulative effects of any population increase surrounding the AWE sites, it will be necessary to monitor committed and future approved but not built development in partnership with neighbouring councils. The councils will monitor planning completions and commitments as part of the Annual Monitoring Report and send this information directly to the Emergency Planning Services in each council and the ONR for them to make informed judgements when assessing future development proposals.</p> <p>4.54 The ONR's decision making process is detailed on its website.¹¹ The ONR will normally advise against a particular development should they not receive adequate assurance from the owner of the Off-Site Emergency Plan that the development can be accommodated within <u>the AWE OSEP that Plan</u>. As a result, the ONR will consider feedback provided by West Berkshire District Council Emergency Planning Service, as the <u>Plan AWE OSEP</u> owner under REPPIR. This feedback is often based on wider consultation with the AWE Off-Site Planning Group (a group of responding local, regional and national agencies). Should it be considered by the responding agencies that there would be an unacceptable risk to the AWE OSEP, Off-Site Emergency Plan (the Plan) would be adversely affected with no viable and sustainable mitigation options available, such that the OSEP Plan would not be able to accommodate the development and therefore protect public health, then as the policy makes clear that planning permission will be refused. normally West Berkshire District Council Emergency Planning Service would submit advice against the development to the local planning authority and inform the ONR. Consideration will be given taking into account the Guidance currently under development.</p> <p><u>Policy SP4 applies to all development proposals in the land use planning consultation zones, irrespective of whether they comply with other policies including SP1, SP3 and SP20. Applicants considering development proposals within the land use planning consultation zones are strongly encouraged to enter into discussions with the Council at an early stage to establish if there are likely to be any implications on the OSEP as a result of the proposals.</u></p> <p><u>The land use planning consultation zones for the AWE sites cross over into the following neighbouring</u></p>

¹¹ <https://www.onr.org.uk/land-use-planning.htm>

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			<p><u>councils: Basingstoke and Deane Borough Council, Reading Borough Council, and Wokingham Borough Council. The Council will monitor committed and future development proposals in partnership with neighbouring councils, those agencies with duties under REPPiR, and the ONR to understand the impact on the OSEP and the operation of AWE.</u></p> <p>4.55 The ONR will provide advice for developments that potentially pose an external hazard to the AWE sites.</p> <p>4.56 Policy SP4 reflects the Council's intention to normally follow the ONR's advice in the ONR's consultation zones.</p> <p>4.57 During the plan period there may be changes in the inputs to the ONR's process which may result in consequential changes to the consultation zones or criteria. These will be kept under review.</p> <p>4.58 During the plan period there may also be changes to the DEPZ as a result of the requirement under REPPiR legislation to undertake formal reviews of the DEPZ at least on a 3 yearly basis or because of a material change in work with ionizing radiation. This may result in the DEPZ for either AWE site remaining the same, extending or reducing in size and geography over time. These will be kept under review.'</p>
MM10	28-30	Policy SP6	<p><i>Amend second sentence of first paragraph of the policy as follows:</i></p> <p>'...Within Flood Zones 2 and 3 (and also on sites of 1 hectare or more in size, and in other circumstances as set out in the NPPF)...'</p> <p><i>Amend third sentence of first paragraph as follows:</i></p> <p>'Development within areas of flood risk from any source of flooding, including areas with a history of fluvial, groundwater or surface water flooding, <u>or from areas suffering sewer flooding from overwhelmed sewers....'</u></p>

Ref	Page of submitted LPR	Policy/ Paragraph of submitted LPR	Main Modification
			<p><i>Amend sixth paragraph as follows:</i></p> <p>'In applying the Sequential Test, where development has to be located in flood risk areas, it should be demonstrated that <u>If the sequential test shows that it is not possible for an alternative site to be used and therefore development has to be located in a flood risk area, it should be demonstrated that:</u></p> <p><i>Criterion d):</i> 'The development will be safe <u>for its lifetime</u> and not increase flood risk elsewhere.' ...</p> <p><i>Amend eighth paragraph as follows:</i></p> <p>'Where an Exception Test is required, in accordance with national policy and guidance, this should demonstrate how flood risk would be managed on site, including that the sustainability benefits of the site outweigh the flood risk and that the development will be safe for its lifetime, taking into account the vulnerability of its users and that it will not increase flood risk elsewhere. In addition to the sequential test, the exception test must be applied in certain situations according to national policy. This includes <u>highly vulnerable development in Flood Zone 2, essential infrastructure in Flood Zone 3a or 3b, and more vulnerable development in flood zone 3a. The exception test should demonstrate how flood risk would be managed on site so that the development is safe taking into account the vulnerability of its users, and that it will not increase flood risk elsewhere. The exception test will also need to show that the sustainability benefits of the development to the community outweigh the flood risk.'</u></p> <p><i>Amend criterion p) as follows:</i></p> <p>'Natural flood management measures can be implemented <u>where possible</u>.'</p> <p><i>Insert new text after paragraph 12 of the policy as follows:</i></p> <p><u>'A Cumulative Impact Assessment (CIA) forms an addendum to the Level 1 SFRA, and it identifies those river catchments where the level of flood risk and development pressures mean they could be affected by cumulative impacts. Where the latest Cumulative Impact Assessment identifies high</u></p>

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			<p><u>sensitivity to cumulative impacts, all development proposals must be accompanied by a Surface Water Drainage Strategy.</u></p> <p><i>Insert new text after paragraph 13 of the policy as follows:</i></p> <p><u>'In 2018 the Environment Agency identified Newbury and Thatcham as a nationally significant Flood Risk Area. In line with the recommendations of the Cumulative Impacts Assessment (CIA), a Surface Water Drainage Strategy will be required for all developments in Newbury and Thatcham regardless of their size.'</u></p>
MM11	30 - 32	Supporting text to policy SP6	<p><i>Amend paragraph 5.17 as follows:</i></p> <p><u>'The sequential approach should be taken when determining the layout of a development site, meaning the most vulnerable development should be sited in the areas of lowest flood risk within the site. to the layout of a development site can reduce the risk of flooding from all sources and not increase flood risk overall, both off and on site. This approach also ensures that that the most vulnerable development is located within the areas of lowest risk of flooding'</u></p> <p><i>Insert new text at the end of paragraph 5.24 as follows:</i></p> <p><u>The Environment Agency's guidance 'Approach to Groundwater Protection' (https://assets.publishing.service.gov.uk/media/5ab38864e5274a3dc898e29b/Environment-Agency-approach-to-groundwater-protection.pdf) should be referred to for developments which may impact groundwater.</u></p> <p><i>Insert new text after paragraph 5.24 as follows:</i></p> <p><u>'Cumulative Impacts</u></p> <p><u>Under the NPPF, strategic policies and their supporting SFRA's are required to consider cumulative</u></p>

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			<p><u>impacts in, or affecting, local areas susceptible to flooding, rather than just to or from individual development sites. Cumulative impacts are defined as the effects of past, present, and future activities on the environment.</u></p> <p><u>A Cumulative Impacts Assessment was prepared as an addendum to the Level 1 SFRA, and this identifies several river catchments where the level of flood risk and development pressures mean they could be affected by cumulative impacts. It sets out measures to manage the risk, and these have been incorporated within the policy.</u></p> <p><u>Newbury and Thatcham Flood Risk Area</u></p> <p><u>Within the 2018 Environment Agency Preliminary Flood Risk Assessment for England, the Newbury and Thatcham area has been designated as a nationally significant Flood Risk Area for surface water flood risk.</u></p> <p><u>Development proposals within the Newbury and Thatcham Flood Risk Area, as shown within the Thames River Basin District Flood Risk Management Plan 2021 to 2027¹², will require a Surface Water Drainage Strategy.'</u></p> <p><i>Insert new text into paragraph 5.27 as follows:</i></p> <p><u>'5.27 It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.'</u></p>
MM12	34	Supporting text to policy	<i>Amend paragraph 5.30 h) as follows:</i>

¹² Thames River Basin District Flood Risk Management Plan 2021 to 2027 (page 214): <https://assets.publishing.service.gov.uk/media/6380a45d8fa8f56ea9d462d8/Thames-FRMP-2021-2027.pdf>

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		SP7	'h. Homes and buildings – New development should be designed to be functional, healthy and sustainable, and all residential development should comply with the nationally described space standards, as set out in the Technical Housing Standards (2015) or as superseded, in line with Policy DM30. New development ...'
MM13	37-38	Policy SP9	<p><i>Amend first paragraph of the policy as follows:</i></p> <p>Positive action will be taken to ensure that opportunities for the conservation and enjoyment of the historic environment are maximised. <u>For example, this will include, but not be limited to:</u></p> <ul style="list-style-type: none"> • <u>producing conservation area appraisals and management plans;</u> • <u>maintaining a local list of non- designated heritage assets; and</u> • <u>maintaining a list of local heritage assets which are at risk, but which do not meet the criteria for inclusion on the national Heritage at Risk Register.</u> <p>The historic character, sense of place, environmental quality and local distinctiveness of West Berkshire will also be sustained and enhanced through new development, <u>including promoting heritage-led regeneration where appropriate and delivering public benefits from the District's archaeological resources.</u> Development.....</p> <p><i>Amend second paragraph as follows:</i></p> <p>Development that has an impact upon a heritage asset, whether designated or non-designated, will be expected to maximise opportunities to preserve, enhance, or better reveal the asset's significance, <u>including the contribution to that significance made by and/or its setting,</u> and make a positive contribution to local character and distinctiveness through high standards of design in accordance with Policy SP7.</p> <p><i>Amend third paragraph as follows:</i></p>

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			<p><u>Weight will be given to the conservation of the District's heritage assets in a manner according to their importance. Any harm to the significance of a designated or non-designated heritage asset must be justified. All proposals affecting</u></p> <p><i>Amend fourth paragraph as follows:</i></p> <p>Weight will be given to the conservation of the District's heritage assets in a manner according to their importance. Any harm to the significance of a designated or non-designated heritage asset must be justified. Proposals will be weighed against the public benefits of the proposal: whether it has been demonstrated that all reasonable efforts have been made to sustain the existing use, find new uses, or mitigate the extent of the harm to the significance of the asset; and whether the works proposed are the minimum required to secure the long term use of the asset.</p> <p><i>Amend fifth paragraph as follows:</i></p> <p>Development which would lead to substantial harm to, or loss of, the significance of a designated heritage asset, <u>including the contribution to that significance made by</u> or its setting will not be permitted, unless – ...</p> <p>j. No viable use of the asset can be found in the medium term through appropriate marketing that will enable its conservation; <u>and</u></p> <p>k. Conservation by grant funding or some other form of <u>not for profit</u>, charitable or public ownership is demonstrably not possible, and</p> <p><i>Amend sixth paragraph as follows:</i></p> <p>Development which would lead to less than substantial harm to the significance of a designated heritage asset, <u>including the contribution to that significance made by</u> or its setting will not be permitted, unless this harm is outweighed by <u>be weighed against</u> the public benefits of the proposal, including, where appropriate, securing its optimum viable use.</p>

Ref	Page of submitted LPR	Policy/ Paragraph of submitted LPR	Main Modification
			<p><i>Delete eighth paragraph as follows:</i></p> <p>Development proposals for enabling development which would otherwise conflict with other policies in the Local Plan but which would secure the future conservation of a heritage asset will be permitted where:</p> <ul style="list-style-type: none"> i. the proposals will not materially harm the heritage value of the asset or its setting; ii. it can be demonstrated that alternative solutions have failed; iii. the proposed development is the minimum necessary to protect the significance of the heritage asset; iv. it meets the tests and criteria set out in Historic England guidance GPA4: Enabling Development and Heritage Assets; v. it is subject to a legal agreement to secure the restoration of the asset prior to completion of the enabling development; and vi. it enables public appreciation of the saved heritage asset.'
MM14	38 - 41	Supporting text to policy SP9	<p><i>Amend paragraph 5.45 as follows:</i></p> <p>5.45 'The policy gives great weight to conserving the significance of heritage assets and their settings in a manner according to their importance. Heritage assets include any valued component of the historic environment, be it a building, monument, site, place, area or landscape, identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage assets include designated heritage assets and assets identified as by the Council, 'non-designated' heritage assets.</p> <p><i>Amend first sentence of paragraph 5.54 as follows:</i></p> <p>5.54 Development proposals likely to affect the significance of a designated or non-designated heritage</p>

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			<p>asset, <u>including the contribution to that significance made by</u> or its setting, are required to demonstrate a thorough understanding of context, the significance of the asset and any potential impacts on that significance through the preparation of a proportionate heritage statement.</p> <p><i>Delete paragraph 5.57 as follows:</i></p> <p>5.57 The long-term conservation of a small minority of heritage assets can sometimes present particular problems. Enabling development is a planning mechanism which, in extreme cases, permits a departure from planning policies in order to enable the conservation of a relevant heritage asset in cases where the future of that asset would not otherwise be secured. Where planning applications propose enabling development, the Council will use the detailed and rigorous tests set out by Historic England in order to determine whether planning permission would be appropriate.</p> <p><i>Move paragraph 10.81 from the supporting text of policy DM9 to add to the supporting text of policy SP9 instead as follows:</i></p> <p><u>'The Council has a statutory duty to pay special attention to the desirability of preserving or enhancing the character and appearance of the District's 53 Conservation Areas. As part of this duty and as part of its strategy to maximise opportunities for the conservation and enjoyment of the historic environment the Council is undertaking a phased programme of Conservation Area Appraisals (CAAs), in partnership with the West Berkshire Heritage Forum. As well as helping to define what is special about a particular Conservation Area, the project will provide local communities with an understanding of how and why Conservation Area status is appraised, designated, and applied in future development and conservation management decisions. This will help communities better engage with the management of change in their area, allowing them to more effectively champion the significance and values of local heritage. The project has involved the setting up of a Conservation Area Working Group, which has developed a 'Toolkit', which contains a variety of guidance, list of resources, and an appraisal report template, to assist parish councils and volunteers in undertaking a Conservation Area Appraisal and Management Plan.'</u></p>

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MM15	42	Policy SP10	<p><i>Amend criterion o as follows:</i></p> <p>'Provide <u>undeveloped</u> buffer <u>zones</u> strips of vegetation along the banks of water courses <u>in accordance with policy SP6.</u>'</p>
MM16	45 - 46	Policy SP11	<p><i>Amend the policy as follows:</i></p> <p>'Development proposals will be required to demonstrate how they conserve and enhance biodiversity and/or geodiversity including their long-term future management and <u>where required</u>, deliver a minimum 10% Biodiversity Net Gains....</p> <p><i>Amend criterion d as follows:</i></p> <p>'d. Provides or retains appropriate <u>at least 10m</u> buffer zones between development proposals and designated sites.....'</p> <p>Biodiversity Net Gain All proposals should demonstrate a minimum biodiversity net gain of 10% via a Biodiversity Net Gain Plan using the most up to date biodiversity accounting metric developed by Natural England and provide details of the long-term maintenance and management of the net gain. This should be delivered on site in the first instance, or through biodiversity off setting where appropriate. Major developments in particular must include measures to deliver biodiversity gains through opportunities to:</p> <ul style="list-style-type: none"> u. Restore and enhance existing features on site; v. Create additional habitats and ecological networks on site which help support the District's wider ecological network; and w. The linking of existing habitats within West Berkshire to create links between ecological networks and where possible, with adjoining features.
MM17	49	Supporting text to policy	<p><i>Amend paragraph 5.86 of supporting text as follows:</i></p>

Ref	Page of submitted LPR	Policy/ Paragraph of submitted LPR	Main Modification
		SP11	<p>5.86 'Paragraph 174 of the NPPF highlights the need to provide net gains for biodiversity by establishing coherent ecological networks that are more resilient to current and future pressures. The Council will deliver Biodiversity Net Gain in line with the latest national guidance and the Environment Act 2021. Biodiversity Net Gain (BNG) can be defined as "Development that leaves the environment in a measurably better state than beforehand" (DEFRA, 2018). In England, BNG is mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). BNG is part of the mitigation hierarchy and applicants for planning permission will be required to demonstrate that they have made all reasonable efforts to avoid losses of significant habitats and to mitigate any significant effects on biodiversity before demonstrating how the legally required BNG will be delivered. BNG will be achieved through a combination of retaining important features of the site and by making on site and off-site biodiversity enhancements to ensure an overall measurable minimum 10% net biodiversity gain is achieved, which contributes to restoring and enhancing the wider ecological networks and biodiversity of the District. To achieve net gain, a development must have a higher biodiversity unit score after development than before development (except where exemptions apply). The most up to date Natural England statutory Biodiversity Metric should be used to allow the assessment of assess biodiversity impact losses of a planning proposal given development, and where necessary appropriate the size of contribution required to offset the ecological impact of biodiversity loss from that development and deliver the additional 10% minimum net gain. The Council will deliver Biodiversity Net Gain in line with the latest national guidance and the Environment Act 2021. Applicants will need to submit a Biodiversity Gain Plan (including the completed Metric calculator) to demonstrate how the required net gain is to be delivered and to enable the local planning authority to discharge the statutory condition. Development cannot commence until the Biodiversity Net Gain plan has been approved and the condition discharged.</p> <p><u>The Environment Act 2021 requires that any on-site or off-site biodiversity net gain must be secured for a minimum of 30 years. Applicants will therefore need to demonstrate how the proposed BNG will be delivered and managed over that period of time. The Council will require periodic monitoring to assess whether the required BNG is being delivered and will seek appropriate remedial measures where monitoring demonstrates that it is not satisfactorily delivering and maintaining the required target condition. To secure the delivery of significant on-site and off-site BNG over the 30 years period, a legal</u></p>

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			<p><u>agreement between the applicants/landowners and the local planning authority will be required. Where applicants propose to use off-site credits to deliver the required net gain in whole or in part, they will need to demonstrate that these credits are from a site registered to provide such credits.'</u></p>
MM18	51	Policy SP12	<p><i>Amend the policy as follows:</i></p> <p>'Approach to Housing Delivery</p> <p>Provision will be made for <u>at least 9,270-8,721 to 9,146</u> net additional homes in West Berkshire for the period 1 April <u>2023</u>2022 to 31 March <u>2041</u>2039; <u>513 to 538</u> an average housing requirement of 515 dwellings per annum. The target figure of 538 dwellings per annum does not constitute a ceiling or cap to development.</p> <p>New homes will be located in accordance with Policy SP1: Spatial Strategy, Policy SP3: Settlement hierarchy and Policy DM1: Development in the Countryside.</p> <p>There should be no net losses from the existing stock of homes in West Berkshire. Existing homes should be retained in residential use (or replaced at least in equal numbers, normally on the proposed site), unless there is a reasoned justification in the form of a benefit to the wider community for a change of use. Developments should utilise opportunities to make better use of the existing housing stock.</p> <p><u>To meet the housing requirement, the following sources will ensure a continuous supply of land for housing across the Plan period:</u></p> <ul style="list-style-type: none"> • <u>sites allocated within the Local Plan and made neighbourhood plans;</u> • <u>existing planning commitments on unallocated sites;</u> • <u>existing planning commitments for communal accommodation (Use Class C2); and</u> • <u>a windfall allowance.</u>

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			<p><u>Sites to be allocated in Neighbourhood Plans</u></p> <p><u>The Council will supply a housing requirement figure to those qualifying bodies either preparing or updating a neighbourhood plan that intends to include residential allocations.</u></p> <p><u>For those plans currently in preparation, it will be necessary to identify sites to meet the following levels of development:</u></p> <ul style="list-style-type: none"> • <u>Hungerford: approximately 55 dwellings</u> • <u>Lambourn: approximately 25 dwellings.</u> <p><u>Sites allocated within this LPR cannot be counted towards the housing requirement supplied to qualifying bodies.'</u></p>
MM19	51 - 54	Supporting text to policy SP12	<p><i>Amend supporting text as follows:</i></p> <p>'Housing need and the housing requirement</p> <p>6.1 The NPPF states that <i>"to determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach.... Any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for"</i>.</p> <p>6.2 Details of the standard method for calculating the local housing need figure (LHN) are set out in the Housing and Economic Needs Assessment section of the Planning Practice Guidance (PPG). Using the 2014-based household projections, and an uplift based on the ratio of house prices to workplace-based earnings <u>published by the Office for National Statistics on 22 March 2023</u>, the LHN <u>for the District</u> is <u>513515</u> dwellings per annum using a baseline of <u>20222023</u>.</p>

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			<p>6.3 The LHN is not necessarily the same as the housing requirement, and the PPG outlines circumstances where it may be appropriate to plan for a higher number. These include, but are not limited to, situations where increases in housing need are likely to exceed past trends. This can include unmet needs from adjoining authorities, strategic infrastructure requirements that are likely to drive an increase in the local housing needs, and growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate extra growth.</p> <p>6.4 Although the NPPF no longer refers to 'Housing Market Areas' (HMAs), the PPG provides a definition of a housing market area which refers to the importance of key functional linkages between places where people live and work. The Berkshire (including South Bucks) Strategic Housing Market Assessment (SHMA, February 2016) found that West Berkshire has a strong functional relationship with Wokingham Borough, Reading Borough and Bracknell Forest. As a result, there has been much collaborative working between these authorities on housing matters and associated infrastructure.</p> <p>6.5 Reading Borough Council has The Reading Borough Local Plan (adopted 2019) identified a shortfall of 230 dwellings that is <u>was</u> anticipated to arise in the latter part of their Local Plan the plan period. The Reading Local Plan considers the period through to 2036. 6.6 The local authorities which make up the Western Berkshire HMA have agreed a Statement of Common Ground for the purposes of local plan-making. This continues to recognises Reading's unmet need set out in the <u>adopted Reading Borough Local Plan</u> and the principle that the need should be met within the West of Berkshire area. This agreement relates only to Reading's need as calculated by the SHMA, not by any alternative calculations of need.</p> <p>6.7 Reading has identified that a five yearly review is required by 2024 and that will need to consider how to deal with the housing needs generated by the standard methodology. Though the principle of meeting any unmet need within the Western Berkshire Housing Market Area (HMA) is accepted, the distribution of that unmet need within the HMA has not been agreed and will be subject to further review, through the plan-making process, before the need arises. Reading Borough Council now expects to deliver enough homes over the remainder of its adopted Local Plan period (to 2036) to more than meet its own adopted housing requirement including its previously identified unmet need. Reading</p>

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			<p><u>Borough Council therefore does not expect the West Berkshire LPR to make specific provision for the unmet need as outlined in the adopted Reading Borough Local Plan.</u></p> <p>6.8 No shortfall has been identified from other adjacent authorities or any of the other authorities within the Western Berkshire HMA.</p> <p>6.9 In order to support the government's objective of significantly boosting the supply of homes, which is set out in the NPPF, Policy SP12 expresses the housing requirement as a range, with a minimum requirement of 513 dwellings per annum meeting the 2022 LHN. The upper end of the range allows for approximately 5% additional homes (rounded to 538) on top of the 2022 LHN.</p> <p>6.10 The allocation of sites in the LPR aims to meet delivery of a higher number of homes in order to both boost supply and have some built-in flexibility. The upper end of the range is a target but should not be considered a maximum amount. It is not intended to be a cap on development that would otherwise be acceptable.</p> <p>Meeting the housing requirement</p> <p>6.11 Several sources will ensure a continuous supply of land for housing across the plan period. These include:</p> <ul style="list-style-type: none"> • retained allocations in the Local Plan and Stratfield Mortimer Neighbourhood Development Plan (NDP); • allocations in the Local Plan which are not being retained in the LPR due to development being under construction; • <u>sites allocated within the Local Plan and made neighbourhood plans;</u> • existing planning commitments on unallocated sites; • existing planning commitments for communal accommodation (Use Class C2); <u>and</u> • <u>a windfall allowance.</u> • windfall sites: sites not specifically identified in the development plan but that will come forward

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			<p>through the development management process in accordance with policies set out in the Local Plan and through the use of permitted development rights;</p> <ul style="list-style-type: none"> • new sites allocated in the LPR; and • new sites to be allocated in neighbourhood plans. <p><u>Sites allocated within the Local Plan and neighbourhood plans</u></p> <p><i>Retained Local Plan and Stratfield Mortimer NDP allocations:</i></p> <p>6.12 The plan period of the LPR (2023 - 2041<u>2022-2039</u>) overlaps with the previous plan period (2006 – 2026) and account therefore needs to be taken of sites that have already been allocated in the <u>adopted</u> Core Strategy, the <u>adopted</u> HSA DPD and the <u>made</u> Stratfield Mortimer NDP. The relevant policy criteria <u>for the retained Local Plan allocations included in Chapter 8 still apply to these sites to cover events such as revised schemes being submitted or a planning permission lapsing. However, for the purposes of calculating the housing supply, if a site has planning, then the number of dwellings permitted has been taken into account.</u></p> <p><u>This element of the supply consists of allocations with and without planning permission at 31 March 2023. Where a site has an extant permission, the number of dwellings permitted has been used for the purposes of calculating the housing supply. For those sites without permission at 31 March 2023, the number allocated within the policy has been used.</u></p> <p>6.13 2,652units were outstanding at 31 March 2022.</p> <p>6.14 Allocated sites that are retained are listed in Policies SP13-15.</p> <p><i>Allocations in the Local Plan which are not being retained:</i></p> <p>6.15 Several sites that are allocated within the Core Strategy and HSA DPD are not being retained in the LPR and this is because development is at an advanced stage of construction. At 31 March 2022<u>2023</u>, there were 7214<u>51</u> units outstanding on these sites.</p>

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			<p><i>New sites allocated in the LPR: (moved up from below and amended as follows:)</i></p> <p>6.22 The Council's overall approach to identifying land for allocation is set out in Policy SP1 and in Policy SP3. Assessment of the availability, suitability and viability of individual sites has taken place through the Housing and Economic Land Availability Assessment (HELAA) and further technical and sustainability assessments have been undertaken. Sites proposed for allocation are detailed in Policies <u>SP13—15SP16 and SP17</u>, as well as policies RSA1 to RSA27, and these include provide additional housing supply on newly allocated sites of some 4,720 <u>2,400</u> homes. This includes the strategic allocation at North East Thatcham for <u>up to approximately 2,500 homes</u>, with approximately 4,500 <u>1,760</u> homes <u>expected to be delivered</u> within the plan period.</p> <p><i>Sites to be allocated in Neighbourhood Plans: (moved up from below and amended as follows:)</i></p> <p><u>The NPPF requires that within the housing requirement for the whole District, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations.</u></p> <p><u>Should any qualifying body decide to prepare a neighbourhood plan that includes residential allocations or update a made neighbourhood plan to include residential allocations, then the Council will supply a housing requirement figure.</u></p> <p><u>In meeting this requirement, the policy clarifies that sites allocated within this LPR cannot be counted towards meeting the figure supplied to a qualifying body. In addition, policy SP3 also makes clear that any NDP allocations within defined settlement boundaries will not count towards meeting the housing requirement figure in policy SP12 either. This is because there is a presumption in favour of development within defined settlement boundaries and to do so would be inconsistent with the assumptions made in the LPR about the District's overall housing land supply.</u></p> <p>6.23 A number of neighbourhood plans are in preparation <u>within the District</u>. Whilst it is not compulsory for neighbourhood plans to include allocations <u>which will allocate further sites for housing development</u>, it is proposed that <u>approximately</u> a further 80 dwellings will be allocated by local communities through <u>their NDPs the neighbourhood plans for Hungerford and Lambourn</u>. The figures for individual</p>

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			<p>neighbourhood areas are set out in Policies SP13 – 15. <u>The delivery of these neighbourhood plans will be monitored by the Council to ensure the housing requirement is met. The Council reserves the right to identify opportunities to address any shortfall if the Hungerford and Lambourn neighbourhood plans are not made within two years of the adoption of the LPR.</u></p> <p><i>Existing planning commitments on unallocated sites</i></p> <p>6.16 Existing permissions for housing on nonunallocated sites will also contribute to supply. Over 4,958-1,729 units on windfall sites, those not specifically identified in the development plan, already had permission or prior approval for permitted development at 31 March 2022-2023. <u>31 March 2023 is the date when the annual monitoring of development progress takes place.</u></p> <p><i>Existing planning commitments for communal accommodation (Use Class C2)</i></p> <p>6.17 The housing supply and delivery section of the PPG requires local planning authorities "to count housing provided for older people, including residential institutions in Use Class C2, as part of their housing land supply. This contribution is based on the amount of accommodation released in the housing market." The Housing Delivery Test Measurement Rulebook gives the ratio for communal accommodation based on the national average number of adults in all households as 1.8 based on the 2011 Census. For example, a 90 bed care home would equate to 50 net dwellings ($90 \div 1.8 = 50$).</p> <p>6.18 <u>At 31 March 2022-2023, there are were</u> existing permissions for residential institutions in Use Class C2 which equate to 57-91 units.</p> <p><u>Windfall allowance</u></p> <p>6.19 The NPPF states that local planning authorities should support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes (Para.68). Policies within the LPR identify the most sustainable settlements and direct development to the built up areas within settlement boundaries. The Council also</p>

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			<p>publishes and maintains a register of brownfield sites that are available and potentially suitable for residential development across the District.</p> <p>6.20 The Council has assessed the contribution likely to be made from windfall sites based on past trends. It is clear that windfall sites have consistently played an important role in the housing supply of the District: approximately 74%<u>72%</u> of completions in the period 2006 - 2022-2023 were on unallocated, windfall sites. The windfall allowance, of 140 dwellings per annum is, in comparison, relatively modest <u>and will add flexibility to the supply over the plan period</u>. It has been based on the average annual delivery on small sites of less than 10 units over the existing plan period 2006 – 2022 <u>2023</u>. The calculated allowance set out in Table 2 takes account of existing small permissions that are already included in the supply by deducting these from the allowance of 140 dpa over the period 2022 2023 to 2039-2041. Any future windfall sites of 10 units or more are not included in the calculations <u>of future supply, which introduces flexibility to the figures.</u> of which introduces flexibility and means that any allocations of medium or large sites within settlement boundaries will not result in any double-counting.</p> <p>Housing supply at March 2022 <u>1 April 2023 to 31 March 2041</u></p> <p>Table 2 shows the <u>supply position at 31 March 2022</u> over the plan period. 31 March 2022 is the date when the annual monitoring of development progress takes place. As aforementioned, for the purposes of calculating the housing supply, if a site has planning permission, then the number of dwellings permitted, or already built, has been taken into account in the table.</p> <p>Table 2 Housing Supply at 31 March 2022-1 <u>April 2023 to 31 March 2041</u></p> <table border="1" data-bbox="651 1200 1809 1407"> <thead> <tr> <th data-bbox="651 1200 1547 1353">Supply category</th> <th data-bbox="1547 1200 1809 1353">Net Units Outstanding No. of net dwellings</th> </tr> </thead> <tbody> <tr> <td colspan="2" data-bbox="651 1353 1809 1407"><u>Sites allocated within the Local Plan and made neighbourhood plans</u></td> </tr> </tbody> </table>	Supply category	Net Units Outstanding No. of net dwellings	<u>Sites allocated within the Local Plan and made neighbourhood plans</u>	
Supply category	Net Units Outstanding No. of net dwellings						
<u>Sites allocated within the Local Plan and made neighbourhood plans</u>							

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			<i>Retained Local Plan and Stratfield Mortimer NDP allocations:</i>	
			• Core Strategy: Sandleford Park Strategic Site	1,580 <u>1,500</u>
			• <u>Housing Site Allocations</u> DPD Sites:	990
			• <u>Sites with extant permissions</u>	<u>887</u>
			• <u>Sites without extant permissions</u>	<u>110</u>
			• Stratfield Mortimer NDP Site	82 <u>58</u>
			<i>Local Plan allocations not being retained (due to site being at an advanced stage of construction)</i>	
			• Core Strategy: Newbury Racecourse	465 <u>398</u>
			• <u>Housing Site Allocations</u> DPD Sites	256 <u>53</u>
			<i>New allocations within the LPR</i>	<u>2,421</u>
			<i>Sites to be allocated in Neighbourhood Development Plans</i>	
			• <u>Hungerford</u>	<u>55</u>
			• <u>Lambourn</u>	<u>25</u>
			<i>Subtotal of sites allocated within the Local Plan and neighbourhood plans</i>	<u>5,507</u>
			Existing planning commitments on unallocated sites	1,958 <u>1,729</u>
			Existing planning commitments for C2 Use Class communal accommodation	57 <u>91</u>
			Windfall allowance to 2039 <u>2041</u>	1,949 <u>2,166</u>
			TOTAL <u>housing supply</u>	7,337 <u>9,493</u>

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			<p>Future Supply</p> <p>6.21 In order to meet the target of 538 new dwellings per annum over the plan period, sites for a further 1,809 dwellings need to be found (requirement of 9,146 minus supply of 7,337). There also needs to be some built in flexibility to allow for phasing issues and for an element of non-delivery. The expression of the requirement as a range and the use of a relatively modest windfall allowance both add to the flexibility required to ensure that targets can be met.</p> <p>New sites allocated in the LPR</p> <p>6.22 The Council's overall approach to identifying land for allocation is set out in Policy SP1 and in Policy SP3. Assessment of the availability, suitability and viability of individual sites has taken place through the Housing and Economic Land Availability Assessment (HELAA) and further technical and sustainability assessments have been undertaken. Sites proposed for allocation are detailed in Policies SP13 – 15 and provide additional housing supply on newly allocated sites of some 1,720 homes. This includes the strategic allocation at North East Thatcham for approximately 1,500 homes within the plan period.</p> <p>Sites to be allocated in Neighbourhood Plans</p> <p>6.23 A number of neighbourhood plans are in preparation which will allocate further sites for housing development. It is proposed that a further 80 dwellings will be allocated by local communities through their NDPs. The figures for individual neighbourhood areas are set out in Policies SP13 – 15.</p> <p>Housing Trajectory</p> <p>6.24 The NPPF requires local planning authorities to illustrate the expected rate of housing delivery over the plan period through a housing trajectory. In preparing the trajectory the Council engages with landowners and developers and gives consideration to likely lead in times, start dates and build rates on different types of site. The housing trajectory showing the projected timeline for the delivery of</p>

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			<p>housing developments across the plan period in relation to the annual average requirement is included in Appendix 8. The trajectory will be updated annually and reported in the Annual Authority Monitoring Report (AMR).</p> <p>Five Year Housing Land Supply</p> <p>6.25 National policy now requires local plans In order to comply with the NPPF, the submitted plan must be able to demonstrate that the housing trajectory includes a sufficient supply of deliverable sites for the first five years <u>period post-adoption</u> to meet the housing requirement plus the appropriate buffer to ensure a flexible and robust supply. The assessment must then be reviewed on an annual basis.</p> <p>6.26 The latest assessment of the five-year supply for the post adoption period beginning 1 April 2026 to 31 March 2031 is set out in the housing trajectory in Appendix 8, and demonstrates a supply of 5.9 years. The calculation is outlined in the table below. was published in November 2022 and demonstrates a supply of 6.4 years for the five-year period beginning 1 April 2022. This supply forms the early part of the supply set out in the housing trajectory.</p> <p><u>Table 3: 5 year housing land supply 1 April 2026 to 31 March 2031</u></p> <table border="1" data-bbox="651 1018 1697 1315"> <tbody> <tr> <td data-bbox="651 1018 1473 1203"><u>Requirement including a 5% buffer (A)</u></td> <td data-bbox="1473 1018 1697 1203">2,704</td> </tr> <tr> <td data-bbox="651 1203 1473 1235"></td> <td data-bbox="1473 1203 1697 1235">$\frac{(515 * 5 * 1.05)}{1.05}$</td> </tr> <tr> <td data-bbox="651 1235 1473 1315"><u>Total deliverable housing land supply (B)</u></td> <td data-bbox="1473 1235 1697 1315">3,195</td> </tr> </tbody> </table>	<u>Requirement including a 5% buffer (A)</u>	2,704		$\frac{(515 * 5 * 1.05)}{1.05}$	<u>Total deliverable housing land supply (B)</u>	3,195
<u>Requirement including a 5% buffer (A)</u>	2,704								
	$\frac{(515 * 5 * 1.05)}{1.05}$								
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			<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 60%; padding: 5px;"><u>Total deliverable housing supply in years (B / A *5)</u></td> <td style="width: 40%; padding: 5px;"><u>5.9 years</u></td> </tr> </table> <p>6.27 The ability to demonstrate a five year land supply of land for housing is important in the decision making process. If the supply falls below the required amount, the presumption in favour of sustainable development applies and the plan-led approach advocated in the NPPF is compromised. The allocation of additional sites in this LPR aims to ensure that a five year supply can continue to be demonstrated when the position is reviewed each year and is maintained throughout the plan period.</p>		<u>Total deliverable housing supply in years (B / A *5)</u>	<u>5.9 years</u>
<u>Total deliverable housing supply in years (B / A *5)</u>	<u>5.9 years</u>					
MM20	55	Policy SP13	<i>Delete the policy and supporting text. Remove references to this policy throughout LPR.</i>			
MM21	57	Policy SP14	<i>Delete the policy and supporting text. Remove references to this policy throughout LPR.</i>			
MM22	59	Policy SP15	<i>Delete the policy and supporting text. Remove references to this policy throughout LPR.</i>			
MM23	60 - 61	Policy SP16	<p><i>Amend second and third paragraph of the policy as follows:</i></p> <p>'A Mineral Resource Assessment (MRA) will be required to be provided for <u>each development phase of the site.</u></p> <p>A detailed flood risk assessment with hydraulic modelling will be required for the whole site. <u>Detailed flood risk assessments accompanied by hydraulic modelling will be required for each development phase of the site.</u></p> <p><i>Amend sixth paragraph as follows:</i></p> <p>'Development of the site will be expected to deliver:</p>			

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			<ul style="list-style-type: none"> • <u>At least 40% affordable housing, in accordance with Policy SP19;</u> • <u>An appropriate mix of housing types, tenures and sizes having regard to policy SP18 and the Sandleford Park SPD, and therefore an emphasis on family homes;</u> • <u>A housing mix which complies with the housing mix contained in table 4 of Policy SP18, and therefore an emphasis on homes with at least 3 bedrooms;</u> • <u>On-site renewable energy generation from renewable, low carbon and/or zero carbon energy sources to assist in the delivery of a carbon neutral development, in accordance with Policies SP5 and DM4 and having regard to the Sandleford Park SPD;</u> • <u>Four primary all vehicle accesses:</u> <ul style="list-style-type: none"> ○ Two off Monks Lane; ○ One through to Andover Road via Warren Road; and ○ One onto the A339, <u>via Highwood Copse Way;</u> • <u>Provision for retail facilities in the form of a local centre and business employment; Provision of a local centre to include retail facilities, community facilities and employment space</u> <p><i>Update map to amend the site boundary of the allocated site as set out in Annex B below. Consequential changes to the Policies Map as shown in the Schedule of Changes to the Policies Map (PMC6)</i></p>
MM24	62	Supporting text to policy SP16	<p><i>Amend paragraph 6.41 as follows:</i></p> <p><u>'In reviewing the vision for Newbury as part of the LPR, the town will remain a focus for development the Council prepared the West Berkshire Strategic Vision 2050, which offers a clear spatial steer as to where growth in Newbury and Thatcham might go over the longer-term period up to 2050. Newbury will retain remain a focus for development whilst retaining its traditional market town heritage and</u></p> <p><i>Insert additional text to the end of paragraph 6.42 as follows:</i></p> <p><u>'..... Newbury, as part of the Newbury and Thatcham urban area, is a sustainable location for</u></p>

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			<p><u>development as confirmed in the Strategic Vision 2050.'</u></p> <p><i>Amend paragraph 6.49 as follows:</i></p> <p>'In addition, the importance of the SPD is highlighted such that the Council will be supportive of proposals which have regard, and positively respond, to it as it provides a framework for the future development of the site. <u>This includes having regard to the Development Principles listed in Section F.'</u></p>
MM25	63 - 65	Policy SP17	<p><i>Amend the policy as follows:</i></p> <p><u>'Land as shown on the Policies Map is allocated for the delivery of a comprehensive, sustainable, low carbon, urban extension comprising of distinct neighbourhoods defined by their landscape, and connected and contributing to Thatcham, and woven through with natural habitats and links. The site will be masterplanned. Proposals must demonstrate how and delivered as a whole to achieve a comprehensive development. The provision of all infrastructure, services, open space and facilities will 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.'</u></p> <p>Homes</p> <p>The site is to be allocated for <u>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.</u> These dwellings will comprise <u>an appropriate mix of a housing types, tenures and sizes having regard to mix which complies with the housing mix contained in Table 3 of pPolicy SP18.</u> In addition at least:</p> <ul style="list-style-type: none"> • 40% of dwellings will be affordable housing <u>in accordance with SP19;</u> and • 3% of dwellings will be delivered via serviced custom/self-build plots.

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			<p>Community</p> <p>The site will provide a range of community facilities, including:</p> <ul style="list-style-type: none"> • Local centres providing local retail facilities and small-scale <u>employment business-use, including for community use (approximately 1,100sq.metres Class E and F2);</u> • <u>Primary Healthcare provision and associated infrastructure, which is operationally and financially viable, the details of which should be agreed with 450sq.metres GP Surgery to be offered to the 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;</u> • Early years provision; • A 2.5FTE p <u>Early years and Pprimary school provision on site and sports infrastructure requirements of the school. L with land to be provided and build costs to be met by the applicant;</u> • <u>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;</u> • A 1,200sqm e <u>Community indoor facility to be used for sport and community uses with a variety of room sizes (currently use classes E and F);</u> • 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. <p>Green Infrastructure</p> <p>The site will provide a comprehensive <u>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.</u></p>

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			<p>This network will comprise: <u>The provision will include:</u></p> <ul style="list-style-type: none"> • <u>Conservation of the areas of ancient woodland by providing appropriate buffers between the development and the ancient woodland;</u> • <u>Enhancements for biodiversity;</u> • <u>A band of green infrastructure/new community park across the higher land on the northern part of the allocation (as shown on the indicative map fig.X) to be retained outside the settlement boundary. This is to create a buffer between the built development of the allocation and the adjoining countryside and the 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);</u> • A new community park linking Thatcham to the North Wessex Downs AONB; • <u>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;</u> • <u>Greenways which connect through the site to the park and facilitate connectivity to the wider landscape and the existing Public Rights of Way network; connection to the AONB, and include leisure routes accessible to all users.</u> • A comprehensive network of other accessible routes and connections within the development which provide walking and cycling links along desire lines; • <u>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;</u> • Retained and new trees, hedgerows and other appropriate native planting which contribute to biodiversity net gain; • <u>Provision of allotments;</u> • <u>Outdoor formal and informal sports pitches and areas; and</u> • <u>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</u>

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			<p><u>and provision of new trees, hedgerows and other appropriate native planting.</u></p> <p>Transport Measures will be included to improve accessibility by, and encourage use of, non-motorised <u>sustainable</u> transport modes.</p> <p><u>Development proposals for the site will be supported by A a Transport Assessment Strategy and Travel Plan to</u> will provide detail on how this will be achieved, including:</p> <ul style="list-style-type: none"> • Active travel Improvements on routes between the site, Thatcham town centre and the railway station; • <u>Multiple access points and A</u>-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; <u>and</u> • <u>Promotion and encouragement of sustainable modes of travel, in accordance with policy DM45.</u> <p>Sustainability Development proposals of <u>for</u> the site will be supported by an <u>Energy Statement or a detailed energy section within the Sustainability Statement Charter</u> which will establish how policy requirements will be achieved. This will be informed by:</p> <ul style="list-style-type: none"> • An Energy Strategy which sets out measures to achieve a model low carbon development (following the energy hierarchy) in accordance with Ppolicies SP5 and DM4.4, 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:

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			<ul style="list-style-type: none"> ○ Measures to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site; 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: <ul style="list-style-type: none"> ○ 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 <u>any below ground infrastructure oil pipeline on the site</u> from operational works, including the provision of an appropriate buffer. <p>Flooding and Water Environment</p>

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			<ul style="list-style-type: none"> • <u>Development proposals for the site will be supported by a Flood Risk Assessment, in accordance with policy SP6, which will take into account the Thatcham Surface Water Management Plan and set out: Adequate flood mitigation measures to ensure there is no detrimental impact on flood risk in Thatcham;</u> • <u>Surface water drainage management approaches that could deliver net gain for Thatcham town, including use of on-site sustainable drainage systems (SuDS); and</u> • <u>Flood alleviation measures already present on the site and how they will be retained, protected and enhanced.</u> <p><u>Development proposals also need to consider water resources and waste water in accordance with policy DM7.</u></p> <p><u>Biodiversity</u> <u>Development proposals for the site will be supported by a Biodiversity Strategy in accordance with policy SP11 which will set out:</u></p> <ul style="list-style-type: none"> • <u>How biodiversity net gain will be achieved including through habitat restoration and linkages;</u> • <u>How priority habitats and ecological features will be protected and enhanced;</u> • <u>The creation of new ecological features; and</u> • <u>A site-wide biodiversity Management Plan.</u> <p><u>Landscape</u> <u>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.</u></p> <p><u>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</u></p>

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			<p><u>space</u>. The LVIA will be informed by the <u>Landscape Sensitivity and Capacity Assessment (2021)</u> of the site.</p> <p><u>Heritage</u> <u>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.</u></p> <p><u>Lighting</u> <u>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.</u></p> <p><u>Mineral Resources</u> <u>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.</u></p> <p><u>Masterplanning and Design Code</u> <u>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.</u></p>

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			<p><u>A design code, prepared by the developer and agreed with the local planning authority, should be secured by a planning condition as part of any outline planning permission.'</u></p> <p><i>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 Changes to the Policies Map (PMC7)</i></p>
MM26	66	Supporting text to policy SP17	<p><i>Amend the supporting text to policy SP17 as follows:</i></p> <p>'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.</p> <p>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.</p> <p><u>6.54 In reviewing the vision for Thatcham as part of the LPR and to best understand how to plan for growth in Thatcham within the plan period, the Council commissioned masterplanning work (Thatcham Strategic Growth Study (TSGS) 2020). The Thatcham Strategic Growth Study was carried out in 2019 – 2020 to understand how to plan for growth in Thatcham over the plan period. The West Berkshire Strategic Vision 2050 was drafted in 2022 to guide sustainable growth over the long term in the context of paragraph 22 of the updated NPPF published in 2021. These documents include relevant information that form part of the justification for the LPR's spatial strategy and the strategic allocations in Newbury and Thatcham.</u></p>

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			<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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 <u>as confirmed in the Strategic Vision 2050</u>. The TSGS shows the most sustainable way for development to come forward in the town and this policy draws on that evidence.</p> <p>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</p>

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			<p>and will provide a new residential neighbourhood with supporting facilities and green infrastructure and enable long-term planning for Thatcham's future. Delivery of <u>up to approximately 1,500 2,500 dwellings is anticipated within the plan period, with the final capacity informed through the LVIA and masterplanning process.</u></p> <p><u>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.</u></p> <p><u>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.</u></p> <p><u>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.</u></p> <p><u>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</u></p>

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			<p><u>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.</u></p> <p><u>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.</u></p> <p><u>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.</u></p> <p><u>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</u></p>

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			<p><u>the applicant through developer contributions.</u></p> <p><u>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).</u></p> <p><u>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.</u></p> <p>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.</p> <p>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</p>

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			<p><u>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.</u></p> <p><u>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.'</u></p>
MM27	67	Policy SP18	<p><i>Amend fourth paragraph of the policy as follows:</i></p> <p><u>'All dwellings should be delivered as accessible and adaptable dwellings in accordance with Building Regulations M4(2). Around 10% of the new market housing and a maximum of 5 units of the affordable sector should also meet the wheelchair accessible standard M4(3) wheelchair user dwellings. unless evidence clearly demonstrates that this would make the scheme unviable. The Council will also support proposals for affordable wheelchair adaptable and accessible homes where evidenced by need. Affordable wheelchair adaptable and accessible homes will be negotiated on a site by site basis. The Council will take account of site-specific factors, evidence of site suitability and/or whether it would render development unviable in determining whether these requirements should apply.'</u></p>
MM28	70	Policy SP19	<p><i>Amend criterion b in second paragraph of the policy as follows:</i></p> <p><u>'b. In areas designated as rural under Section 157(1) of the Housing Act 1985 On development sites of between five and nine dwelling, 20% provision.'</u></p> <p><i>Amend fourth paragraph of the policy as follows:</i></p> <p><u>'If a lower provision of affordable housing is sought in exceptional circumstances, a review mechanism will may be required to ensure that if viability improves during the lifetime of the development project, additional affordable housing, up to the levels specified in this policy, is provided.'</u></p>

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			<p><i>Amend fifth paragraph of the policy as follows:</i></p> <p>'In exceptional circumstances where site specific issues inhibit the provision of on-site affordable housing, or where provision can be better met on an alternative site in the district, off-site contributions may be accepted as an alternative, <u>where it would result in mixed and balanced communities.</u>'</p> <p><i>Amend sixth paragraph of the policy as follows:</i></p> <p>'In determining residential applications the Council will assess the site size, suitability and type of units to be delivered. The Council will seek a tenure split of 25% First Homes and then 70% social rented and 5% shared ownership <u>30% affordable home ownership</u>. The priority '</p> <p><i>Amend the ninth paragraph of the policy as follows:</i></p> <p>'In relation to extra care housing, it is recognised that provision of affordable housing may be particularly difficult to achieve. In such circumstances, the policy will be implemented on a case-by-case basis, and the individual viability assessment will be used to demonstrate an appropriate affordable housing contribution. <u>In relation to specialist housing for older and disabled people it is recognised that the provision of affordable housing may be particularly difficult to achieve. Proposals will therefore be considered having regard to whether it falls within Class C2 or Class C3 depending on the level of care and scale of communal facilities provided. In such circumstances the policy will be implemented on a case-by-case basis, and the individual viability assessment will be used to demonstrate an appropriate affordable housing contribution.</u></p> <p><i>Amend final paragraph of the policy as follows:</i></p> <p>'The Council will expect <u>First Homes and other forms of affordable home ownership dwellings</u> to remain affordable in perpetuity so as to meet the needs of both current and future occupiers. It is expected</p>

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MM29	70 - 71	Supporting text to policy SP19	<p><i>Amend paragraph 6.75 as follows:</i></p> <p>'6.75 The NPPF and the Planning Practice Guidance (PPG) states that affordable housing should only be sought from major development of 10 or more dwellings or on housing sites of 0.5 ha or more across the district, <u>other than in designated rural areas</u>. In designated rural areas local planning authorities may instead choose to set their own lower threshold in plans and seek affordable housing contributions from developments above that threshold. Designated rural areas applies to rural areas described under <u>section 157(1) of the Housing Act 1985</u>, which includes National Parks and Areas of Outstanding Natural Beauty. As Approximately <u>about</u> 74% of West Berkshire is within an AONB. and <u>Most of the remaining parishes are designated rural areas. It is considered justified and reasonable for the Council to secure 20% affordable housing on sites of 5 or more between five and nine dwellings in the parishes designated as rural and this is reflected in policy SP19. In the following parishes that are not designated as rural areas the level of affordable housing required will only apply to sites of 10 dwellings or more as set out in the Policy:</u></p> <ul style="list-style-type: none"> • <u>Burghfield</u> • <u>Greenham</u> • <u>Holybrook</u> • <u>Newbury</u> • <u>Speen</u> • <u>Thatcham</u> • <u>Theale</u> • <u>Tilehurst</u> <p><i>Amend second sentence of paragraph 6.80 as follows:</i></p> <p>'A study of economic viability has been carried out on behalf of the Council which sets out the evidence for affordable housing thresholds <u>and this was updated through the Whole Plan Viability Assessment 2022.</u>'</p>

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			<p><i>Amend paragraph 6.85 as follows:</i></p> <p>'As a starting point, the Council seeks a tenure split of affordable housing on each development site of 25% First Homes, 70% social rented and <u>30% affordable home ownership</u>5% affordable/shared ownership. The Housing Need Assessment concludes that the core requirement is for social rented housing. There is, however, still a significant proportion of existing and newly arising households that require access to some form of affordable home ownership, <u>including shared ownership, discounted market sale and First Homes.</u>'</p>
MM30	73	Policy SP20	<p><i>Amend text in the policy as follows:</i></p> <p>'Through the LPR the Council will seek to facilitate the growth and forecasted change of business development over the plan period <u>through site allocations and</u> by promoting the supply of office and industrial space across the District <u>to meet the identified shortfall needs. For the plan period 2023 – 2041 there is a requirement across the District for a minimum of 57,531sqm (NIA) of office space and a minimum of 98,196sqm (GIA) (24.5ha) of industrial space.</u></p> <p>Appropriate proposals for business development (offices, industrial and storage and distribution) will be supported where they are located:</p> <ul style="list-style-type: none"> a) On sites allocated for business development as set out Policy SP21 and in accordance with the individual site specific policy <u>(ESA1 – ESA6) in this Plan or any subsequent neighbourhood plans;</u> or b) On a suitable site within a settlement boundary; or c) Within a Designated Employment Area (DEA) in accordance with Policy DM32, <u>and as listed in Appendix 4 and as defined on the Policies Map;</u> or d) On previously developed land within existing suitably located employment sites; or e) Within the countryside provided the proposal is in accordance with other relevant policies within the Plan, in particular policy DM35.

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			<p>Proposals for'</p> <p><i>Amendments to the boundary of the following Designated Employment Areas:</i></p> <ul style="list-style-type: none"> • <i>Youngs Industrial Estate</i> • <i>Membury Industrial Estate</i> <p><i>as shown in the Schedule of Changes to the Policies Map (PMC8 & PMC9)</i></p>
MM31	73-75	Supporting text to policy SP20	<p><i>Amend paragraph 7.1 as follows:</i></p> <p>'7.1 The purpose of this policy is to set the framework to facilitate and promote the growth and forecasted change of business development across the District over the plan period to <u>2041-2039</u>. For the purposes of this Plan business uses/development are office (<u>Egi and Egii</u>), industrial, storage and distribution (<u>Egiii, B2 and B8</u>), and the term employment land/site refers to the land on which these uses are located. It is recognised that the term economic development is broader and encompasses other employment generating uses including main town centre uses, as well as community and public uses.'</p> <p><i>Amend paragraph 7.4 as follows:</i></p> <p>'7.4 The ELR 2022 concludes that whilst the office sector in West Berkshire has been steadily shrinking over the past decade, the economic forecast predicts positive job growth over the plan period and recommends a need for a net increase in office space of <u>a minimum 57,531 sqm (NIA) to 2041. 50,816sqm to 2039.</u>'</p> <p><i>Amend last sentence of paragraph 7.8 as follows:</i></p> <p>'7.8 The ELR 2022 therefore recommends a minimum industrial requirement of <u>98,196sqm or 24.5ha</u> 91,109sqm or 23 ha of land to 2041 2039 to meet identified needs.'</p>

Ref	Page of submitted LPR	Policy/ Paragraph of submitted LPR	Main Modification
			<p><i>Insert additional text after paragraph 7.9 as follows:</i></p> <p><u>Any sites allocated through the neighbourhood planning process will be in addition to those sites allocated within this Plan and/or existing planning commitments within the neighbourhood planning area.</u></p> <p><i>Amend paragraph 7.10 as follows:</i></p> <p>'7.10 The ELR is clear that the industrial requirement of 91,109sqm is a minimum and therefore the regeneration of the London Road Industrial Estate (LRIE) Bond Riverside area (formerly known as London Road Industrial Estate (LRIE)) will has the potential to provide flexibility to the figures deliver additional supply in the later part of the plan period. The redevelopment and regeneration of the Bond Riverside areaLRIE is a long held vision of the Council and a recent decision by the Council's Executive (June 2022) agreed a new approach for the site which focuses on job creation, attracting investment to Newbury and achieving carbon neutrality. The site the area has scope, subject to overcoming other policy constraints, for regeneration and the intensification of employment uses to maximise the potential of the site as an employment location, which at present is not optimum and does not provide an attractive environment for modern day use. At this stage the Bond Riverside area is not considered as part of the supply due to uncertainty with regard to the timing of delivery, but the LPR recognises its potential. The majority of the LRIE siteBond Riverside area falls within the London Road Industrial Estates DEA, an area designated for business uses. It is important to note that the DEA includes the majority of the Council owned LRIEBond Riverside area and the adjoining Riverpark Industrial Estate but excludes the football ground. A key aspiration of the regeneration is to increase the type and level of employment opportunities on the site through intensification and more efficient use of brownfield land. The Council are currently preparing a comprehensive strategy for the delivery of regeneration on the LRIE site. Due to the timing of this strategy and the site's location within the settlement boundary of Newbury, the site has not been identified as a site allocation, however it does need to be recognised as an area of regeneration for its potential to deliver flexibility to the employment figures over the plan period.'</p>

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			<p><i>Amend paragraph 7.14 as follows:</i></p> <p>'As a result the ELR recommends safeguarding existing employment sites. West Berkshire has a number of designated employment areas (DEA) which are specific locations across the District designated for business uses/development providing a range of sites and locations to promote sustainable economic growth. <u>Those areas known as Protected Employment Areas (PEAs) are renamed Designated Employment Areas (DEAs) through this LPR. All DEAs are listed in Appendix 4 and defined on the Policies Map.</u> The District's DEA's contribute significantly to the supply of employment land and provide opportunities for regeneration and intensification and therefore Policy DM32 seeks to safeguard these areas to protect and strengthen their function and integrity.'</p> <p><i>Insert new paragraph after paragraph 7.15 as follows:</i></p> <p><u>'Greenham Business Park has a Local Development Order in place across the site. This sets our development parameters by which certain schemes can proceed without planning permission. Proposals which are outside of the scope of the Local Development Order and require planning permission shall be determined in accordance with the relevant LPR policies.'</u></p>
MM32	77	Policy SP21	<i>Delete the policy and supporting text. Remove references to this policy throughout LPR.</i>
MM34	83	Policy SP24	<p><i>Amend the first paragraph of the policy as follows:</i></p> <p>'New development will be supported where it contributes to the delivery of infrastructure to support the overall spatial strategy of West Berkshire. This includes making contributions to the delivery of all relevant infrastructure projects included in the IDP in the form of financial contributions or on-site provision. Infrastructure, facilities and services both on and off site, that are necessary to make the development acceptable, will be supported if provided at the appropriate stage.'</p> <p><u>'Development will be required to ensure the timely and coordinated delivery of necessary infrastructure, having regard to the latest version of the Council's Infrastructure Delivery Plan, through proportionate financial contributions and/or on-site provision. Where necessary, the phasing of development will be</u></p>

Ref	Page of submitted LPR	Policy/ Paragraph of submitted LPR	Main Modification
			<p><u>linked to infrastructure provision.'</u></p> <p><i>Delete the fifth paragraph of the policy as follows:</i></p> <p>'The key strategic and local infrastructure schemes required to facilitate new development and secure the delivery of development within this plan will be linked to the phasing of new development. Phasing and specific infrastructure requirements are set out within the Infrastructure Delivery Plan (IDP).'</p>
MM35	85	Paragraph 8.2	<p><i>Amend the final three sentences of paragraph 8.2 as follows:</i></p> <p>'... The actual numbers achieved on any site may vary slightly depending on the detailed design work carried out in preparation for a planning application and will be influenced by the topography and other specific site characteristics. Final densities will depend on the housing type and mix. Approximate numbers are therefore given in the site policies to enable some flexibility at the more detailed design stage. The approximate numbers are indicative, and actual numbers will be determined during the planning application process through detailed design work in accordance with the parameters set out below and other relevant policies, having regard to the particular characteristics of the site and its surroundings.'</p>
MM36	85	After Paragraph 8.2	<p><i>Insert additional text and table after paragraph 8.2 as follows:</i></p> <p><u>'Sites allocated for residential development: Newbury and Thatcham</u></p> <p><u>8.3. The main focus for growth in West Berkshire is the Newbury and Thatcham area, where two strategic urban extensions are proposed; the first, the existing Core Strategy allocation at Sandleford Park, south of Newbury, which is carried forward with a redefined policy boundary where approximately 1,500 homes could be developed; and the second, another greenfield site, to the northeast of Thatcham for up to approximately 2,500 homes. These two sites are allocated under policies SP16 and SP17, with the remainder of the growth in the Newbury and Thatcham area comes through smaller site allocations set out below.</u></p>

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			<p>8.4. <u>There is significant potential on previously developed land within settlement boundaries, particularly in Newbury town centre and periphery. Sites within settlement boundaries are not being allocated. This is because settlement boundaries are a long-established planning tool. They identify the main built up area of a settlement within which development is considered acceptable in principle, subject to other policy considerations.</u></p> <table border="1" data-bbox="651 571 2085 1193"> <thead> <tr> <th data-bbox="651 571 797 647"><u>Policy</u></th> <th data-bbox="797 571 1861 647"><u>Allocation</u></th> <th data-bbox="1861 571 2085 647"><u>Approximate numbers</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="651 647 797 715"><u>RSA1</u></td> <td data-bbox="797 647 1861 715"><u>Land north of Newbury College, Monks Lane, Newbury (Site Ref: HSA 1)</u></td> <td data-bbox="1861 647 2085 715"><u>15 dwellings</u></td> </tr> <tr> <td data-bbox="651 715 797 782"><u>RSA2</u></td> <td data-bbox="797 715 1861 782"><u>Land at Bath Road Speen (Site Ref: HSA 2)</u></td> <td data-bbox="1861 715 2085 782"><u>100 dwellings</u></td> </tr> <tr> <td data-bbox="651 782 797 849"><u>RSA3</u></td> <td data-bbox="797 782 1861 849"><u>Land at Coley Farm, Stoney Lane, Newbury (Site Ref: HSA 3)</u></td> <td data-bbox="1861 782 2085 849"><u>75 dwellings</u></td> </tr> <tr> <td data-bbox="651 849 797 916"><u>RSA4</u></td> <td data-bbox="797 849 1861 916"><u>Land off Greenham Road, South East Newbury (Site Ref: HSA 4)</u></td> <td data-bbox="1861 849 2085 916"><u>160 dwellings</u></td> </tr> <tr> <td data-bbox="651 916 797 983"><u>RSA5</u></td> <td data-bbox="797 916 1861 983"><u>Land at Lower Way, Thatcham (Site Ref: THA025)</u></td> <td data-bbox="1861 916 2085 983"><u>85 dwellings</u></td> </tr> <tr> <td data-bbox="651 983 797 1050"><u>RSAX</u></td> <td data-bbox="797 983 1861 1050"><u>Land at Henwick Park, Bowling Green Road, Thatcham (Site Ref: CA12)</u></td> <td data-bbox="1861 983 2085 1050"><u>225 dwellings</u></td> </tr> <tr> <td data-bbox="651 1050 797 1117"><u>RSAX</u></td> <td data-bbox="797 1050 1861 1117"><u>Land east of Regency Park Hotel, Bowling Green Road, Thatcham (Site Ref: CA17)</u></td> <td data-bbox="1861 1050 2085 1117"><u>45 dwellings</u></td> </tr> <tr> <td data-bbox="651 1117 797 1184"><u>RSA25</u></td> <td data-bbox="797 1117 1861 1184"><u>Long Copse Farm, Enborne (Site Ref: TS2)</u></td> <td data-bbox="1861 1117 2085 1184"><u>24 plots</u></td> </tr> </tbody> </table>	<u>Policy</u>	<u>Allocation</u>	<u>Approximate numbers</u>	<u>RSA1</u>	<u>Land north of Newbury College, Monks Lane, Newbury (Site Ref: HSA 1)</u>	<u>15 dwellings</u>	<u>RSA2</u>	<u>Land at Bath Road Speen (Site Ref: HSA 2)</u>	<u>100 dwellings</u>	<u>RSA3</u>	<u>Land at Coley Farm, Stoney Lane, Newbury (Site Ref: HSA 3)</u>	<u>75 dwellings</u>	<u>RSA4</u>	<u>Land off Greenham Road, South East Newbury (Site Ref: HSA 4)</u>	<u>160 dwellings</u>	<u>RSA5</u>	<u>Land at Lower Way, Thatcham (Site Ref: THA025)</u>	<u>85 dwellings</u>	<u>RSAX</u>	<u>Land at Henwick Park, Bowling Green Road, Thatcham (Site Ref: CA12)</u>	<u>225 dwellings</u>	<u>RSAX</u>	<u>Land east of Regency Park Hotel, Bowling Green Road, Thatcham (Site Ref: CA17)</u>	<u>45 dwellings</u>	<u>RSA25</u>	<u>Long Copse Farm, Enborne (Site Ref: TS2)</u>	<u>24 plots</u>
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MM37	85	Policy RSA1	<p><i>Delete the criterion as follows:</i></p> <p>'e. An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water and waste water, both on and</p>																											

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			<p>off site. Development will be occupied in line with this strategy.'</p> <p><i>Insert the criterion as follows:</i></p> <p><u>'The scheme will be supported by a Flood Risk Assessment that will advise on any appropriate mitigation measures.'</u></p>
MM38	87	Policy RSA2	<p><i>Delete the criterion as follows:</i></p> <p>'g. An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water and waste water, both on and off site. Development will be occupied in line with this strategy.'</p> <p><i>Amend criteria as follows:</i></p> <p>'h) iii) A tree planted landscape buffer to the A34, slip road and A4 to maintain the rural <u>and historic</u> character of the western approach into Newbury;'</p> <p>'j) Development will protect and enhance the special architectural and historic interest of the Speen Conservation Area. <u>Particular attention will be paid to the design of the scheme when approaching the Conservation Area along Bath Road, responding sensitively to the character, density and scale of existing development.'</u></p> <p><i>Include additional criterion as follows:</i></p> <p><u>'The scheme will be supported by a Flood Risk Assessment that will include the consideration of surface water flooding and will advise on any appropriate mitigation measures.'</u></p>
MM39	89	Policy RSA3	<p><i>Delete the criterion as follows:</i></p>

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			<p>'e. An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water and waste water, both on and off site. Development will be occupied in line with this strategy.'</p>
MM40	91	Policy RSA4	<p><i>Delete the criterion as follows:</i></p> <p>'f. An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water and waste water, both on and off site. Development will be occupied in line with this strategy.'</p> <p><i>Include additional criterion as follows:</i></p> <p><u>'The scheme will be supported by a Flood Risk Assessment that will include the consideration of surface water flooding and will advise on any appropriate mitigation measures.'</u></p>
MM41	93	Policy RSA5	<p><i>Delete the criterion as follows:</i></p> <p>'j. An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water and waste water, both on and off site. Development will be occupied in line with this strategy.'</p>
MM42	-	New RSA policy – Land at Henwick Park, Bowling Green Road, Thatcham	<p><i>Insert new RSA policy and accompanying indicative site map into LPR after policy RSA5 as follows:</i></p> <p><u>'Policy RSAX</u></p> <p><u>Land at Henwick Park, Bowling Green Road, Thatcham (Site ref CA12)</u></p> <p><u>The site, as shown on the indicative map, will be required to be developed in accordance with the following parameters:</u></p> <p>a. <u>The provision of approximately 225 dwellings;</u></p>

Ref	Page of submitted LPR	Policy/ Paragraph of submitted LPR	Main Modification
			<ul style="list-style-type: none"> b. <u>Access to the site will be provided via Cold Ash Hill / Heath Lane and Bowling Green Road, with further pedestrian accesses onto Cold Ash Hill, Heath Lane, Bowling Green Road, and site allocation RSAX (Land east of the Regency Park Hotel);</u> c. <u>Internal walking and cycling routes for the site will be provided and will be linked to existing routes;</u> d. <u>Measures will be provided to mitigate the impact of development on the local road network which may include the widening of Heath Lane and Bowling Green Road fronting the site. A Transport Assessment will be required;</u> e. <u>Measures will be included to improve accessibility by, and encourage the use of, non-car transport modes. These measures will be set out in a Travel Plan;</u> f. <u>The scheme will comprise a development design and layout in line with policy SP7 and policy DM2 that will be further informed by a full detailed Landscape Visual Impact Assessment (LVIA), and will include the following measures:</u> <ul style="list-style-type: none"> i. <u>No development above the 95-metre AOD contour;</u> ii. <u>The balance of land to the north and west of the developed area to be retained as an open landscape buffer in order to maintain the open character between Thatcham and Cold Ash and which will be retained outside the settlement boundary for Thatcham; and</u> iii. <u>Green Infrastructure and public open space will be provided taking into account the requirements set out in DM40;</u> g. <u>A Heritage Impact Assessment will be required to inform the development design and layout and to protect the setting of the nearby Grade II listed Henwick Old Cottage;</u> h. <u>Development will be informed by an archaeological desk based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site;</u> i. <u>Small areas of the site are at risk from surface water flooding. Development proposals for the site will be supported by a Flood Risk Assessment (FRA), in accordance with policy SP6. The FRA will need to take into account of the Thatcham Surface Water Management Plan and set out:</u> <ul style="list-style-type: none"> i. <u>Adequate flood mitigation measures to ensure there is no detrimental flood risk; and</u> ii. <u>How flood alleviation measures already present on the site will be retained, protected and enhanced;</u> j. <u>Development will be informed by an Ecological Impact Assessment (EclA). Appropriate avoidance and mitigation measures will need to be implemented, to ensure any designated sites and/or</u>

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			<p><u>protected habitats and/or species are not adversely affected;</u></p> <p>k. <u>The development design will respond positively to the challenge of climate change and be designed for climate resilience, including maximising the efficient use of sustainable technologies, resources, materials and solar gain, in accordance with policy SP5; and</u></p> <p>l. <u>The site lies within a Mineral Safeguarding Area and so consideration of policy 9 of the West Berkshire Minerals and Waste Local Plan will be required.'</u></p> <p><i>Insert indicative site map as set out in Annex A below. Consequential changes to the Policies Map as shown in the Schedule of Changes to the Policies Map (PMC12)</i></p>
MM43	-	New RSA policy – Land east of Regency Park Hotel, Bowling Green Road, Thatcham	<p><i>Insert new RSA policy and accompanying indicative site map into LPR after policy RSA5 as follows:</i></p> <p><u>'Policy RSAX</u></p> <p><u>Land East of Regency Park Hotel, Bowling Green Road, Thatcham (Site ref CA17)</u></p> <p><u>The site, as shown on the indicative map, will be required to be developed in accordance with the following parameters:</u></p> <p>a. <u>The provision of approximately 45 dwellings;</u></p> <p>b. <u>Access to the site will be provided via Bowling Green Road with the exact access arrangements to be determined at the planning application stage. A walking and cycling link to site allocation RSAX (Land at Henwick Park) must also be provided;</u></p> <p>c. <u>Internal walking and cycling routes for the site will be provided, and will be linked to existing routes;</u></p> <p>d. <u>Measures will be provided to mitigate the impact of development on the local road network. A Transport Assessment will be required;</u></p> <p>e. <u>Measures will be included to improve accessibility by, and encourage the use of, non-car transport modes. These measures will be set out in a Travel Plan;</u></p> <p>f. <u>The site will be developed in accordance with the Landscape Capacity Assessment (2015). The scheme will comprise a development design and layout in line with policy SP7, that will be further</u></p>

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			<p><u>informed by a full detailed Landscape and Visual Impact Assessment (LVIA), and will include the following measures:</u></p> <ul style="list-style-type: none"> i. <u>No development above the 95 metre AOD contour;</u> ii. <u>The balance of land in the north of the site to be retained as a landscape buffer which will be retained outside the settlement boundary for Thatcham;</u> iii. <u>Reinforcement of the existing tree line along the Bowling Green Road, eastern, and northern boundaries; and</u> iv. <u>Green Infrastructure to break up the built form;</u> <p>g. <u>A Heritage Impact Assessment will be required to inform the development design and layout due to the presence of non-designated heritage assets;</u></p> <p>h. <u>Development will be informed by an archaeological desk based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site;</u></p> <p>i. <u>Development proposals for the site will be supported by a Flood Risk Assessment (FRA), in accordance with policy SP6. The FRA will need to take account of all potential sources of flood risk, including surface water flooding, and will advise on any appropriate mitigation measures. It will also need to take account of the Thatcham Surface Water Management Plan;</u></p> <p>j. <u>Development will be informed by an Ecological Impact Assessment (EclA); Appropriate avoidance and mitigation measures will need to be implemented, to ensure any designated sites and/or protected habitats and/or species are not adversely affected;</u></p> <p>k. <u>The development design will respond positively to the challenge of climate change and be designed for climate resilience, including maximising the efficient use of sustainable technologies, resources, materials and solar gain, in accordance with policy SP5; and</u></p> <p>l. <u>Part of the site lies within a Mineral Safeguarding Area and so consideration of policy 9 of the West Berkshire Minerals and Waste Local Plan will be required.'</u></p> <p><i>Insert indicative site map as set out in Annex E below. Consequential changes to the Policies Map as shown in the Schedule of Changes to the Policies Map (PMC13)</i></p>
MM44	95	New paragraphs	<i>Insert additional text and table before policy RSA6 as follows:</i>

Ref	Page of submitted LPR	Policy/ Paragraph of submitted LPR	Main Modification									
		and table before Policy RSA6	<p>'Sites allocated for residential development: Eastern Area</p> <p><u>8.5. In the Eastern Area the significant constraints to development mean provision for new development is more limited. Constraints include the Detailed Emergency Planning Zone (DEPZ) of Atomic Weapons Establishment (AWE) Aldermaston and AWE Burghfield. The DEPZ was defined following changes to legislation in 2019 (Radiation (Emergency Planning Preparedness and Public Information) Regulations 2019) which resulted in the redetermination of the emergency planning arrangements around AWE Aldermaston and AWE Burghfield in 2020. Given the constraints in this spatial area the LPR does not propose any strategic allocations, but non-strategic allocations are proposed on the edge of existing settlements as set out below.</u></p> <p><u>8.6. Land adjacent to New Stocks Farm (policy RSA24), which is located within the DEPZ of AWE Aldermaston, is already in use for Gypsy and Traveller accommodation (transit site). The allocation of the site for eight permanent pitches was not considered to have an impact upon the emergency plan.</u></p> <p><u>8.7. Land adjoining Pondhouse Farm, Burghfield (policy RSA12), which is located within the DEPZ of AWE Burghfield, was granted outline planning permission in December 2019. When the DEPZ was reconsidered in 2020, the 100 units proposed were included in the detailed calculations undertaken by Emergency Planning.</u></p> <p><u>8.8. If in the future the DEPZ is reviewed and the emergency planning arrangements be amended, then future reviews of the Local Plan will consider whether allocations in this area would be suitable.</u></p> <table border="1" data-bbox="651 1161 2063 1385"> <thead> <tr> <th data-bbox="651 1161 797 1257"><u>Policy</u></th> <th data-bbox="797 1161 1832 1257"><u>Allocation</u></th> <th data-bbox="1832 1161 2063 1257"><u>Approximate numbers</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="651 1257 797 1310"><u>RSAX</u></td> <td data-bbox="797 1257 1832 1310"><u>Land at Pincents Lane, Tilehurst (Site Ref: TIL13)</u></td> <td data-bbox="1832 1257 2063 1310"><u>138 dwellings</u></td> </tr> <tr> <td data-bbox="651 1310 797 1385"><u>RSA6</u></td> <td data-bbox="797 1310 1832 1385"><u>Stoneham's Farm, Long Lane, Tilehurst (Site Ref: HSA 9)</u></td> <td data-bbox="1832 1310 2063 1385"><u>65 bedspace care home</u></td> </tr> </tbody> </table>	<u>Policy</u>	<u>Allocation</u>	<u>Approximate numbers</u>	<u>RSAX</u>	<u>Land at Pincents Lane, Tilehurst (Site Ref: TIL13)</u>	<u>138 dwellings</u>	<u>RSA6</u>	<u>Stoneham's Farm, Long Lane, Tilehurst (Site Ref: HSA 9)</u>	<u>65 bedspace care home</u>
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			RSA7	<u>72 Purley Rise, Purley on Thames (Site Ref: HSA 11)</u>	<u>35 dwellings</u>
			RSA8	<u>Land adjacent to Bath Road & Dorking Way, Calcot (Site Ref: HSA 13)</u>	<u>35 dwellings</u>
			RSA9	<u>Land between A340 & The Green, Theale (Site Ref: HSA 14)</u>	<u>100 dwellings</u>
			RSA10	<u>Whitehart Meadow, Theale (Site Ref: THE1)</u>	<u>40 dwellings</u>
			RSA11	<u>Former Sewage Treatment Works, Theale (Site Ref: THE7)</u>	<u>60 dwellings</u>
			RSA12	<u>Land adjoining Pondhouse Farm, Clayhill Road, Burghfield Common (Site Ref: HSA 15)</u>	<u>100 dwellings</u>
			RSA13	<u>Land north of A4 Bath Road, Woolhampton (Site Ref MID4)</u>	<u>16 dwellings</u>
			RSA24	<u>New Stocks Farm, Paices Hill, Aldermaston</u>	<u>8 pitches</u>
MM45	-	New RSA policy – Land at Pincents Lane, Tilehurst	<p><i>Insert new RSA policy and accompanying indicative site map into LPR before policy RSA6 as follows:</i></p> <p><u>'Policy RSA X</u></p> <p><u>Land at Pincents Lane, Tilehurst (Site Ref: TIL13)</u></p> <p><u>The site, as shown on the indicative map, will be required to be developed in accordance with the following parameters:</u></p> <ol style="list-style-type: none"> a) <u>The provision of approximately 138 dwellings, providing a mix of dwellings sizes and types including custom and self-build units;</u> b) <u>Access to the site will be obtained from Pincents Lane from the south, with an additional emergency vehicle access to be provided;</u> c) <u>Measures will be provided to mitigate any impact of the development on the local road network. A Transport Assessment will be required to inform development proposals;</u> 		

Ref	Page of submitted LPR	Policy/ Paragraph of submitted LPR	Main Modification
			<p>d) <u>Walking and cycle routes into and through the site will be provided and will be linked to existing routes, including existing Public Rights of Way which will be protected and enhanced. The dedication/acceptance of a public footpath running north/south through the community parkland and the creation of pedestrian links to the recreation ground should also be considered;</u></p> <p>e) <u>Measures will be included to improve accessibility by, and encourage use of, non-car transport modes. These measures will be set out in a Travel Plan;</u></p> <p>f) <u>The site lies within the setting of the North Wessex Downs National Landscape (AONB) and will be developed in accordance with policy SP2 and the Landscape Capacity Assessment¹³ for the site. The scheme will comprise a development design and layout in line with policy SP7, that will be further informed by a full detailed Landscape and Visual Impact Assessment (LVIA) and will include the following measures:</u></p> <ul style="list-style-type: none"> i. <u>development will be expected to be contained below 75m AOD contour. Any minor incursions above 75m shall not exceed 80m AOD and would need to demonstrate that the development would not be visually prominent from sensitive viewpoints;</u> ii. <u>development will be contained to the area west of the existing conifer line between the existing retail units and the recreation ground.</u> iii. <u>retain open views from the A4 and the recreation ground to the wooded skyline;</u> iv. <u>reinforce the wooded skyline and woodland links between the AONB and Withy and Oliver's Copses;</u> v. <u>include a substantial 15m wooded landscape buffer along the east side of Pincents Lane;</u> vi. <u>reinforce the tree belt along the southern edge of the site towards the adjoining commercial area; and</u> vii. <u>avoid creating isolated built form through the creation of landscaped links into adjoining built form;</u> <p>g) <u>A key part of this development allocation will be the establishment of community parkland to be provided as green infrastructure and public open space in perpetuity on the eastern part of the site. This area of land will remain outside the settlement boundary;</u></p>

¹³ Landscape Capacity Assessment of Potential Housing Sites within and adjacent to the North Wessex Downs Area of Outstanding Natural Beauty: Eastern Urban Area Additional Sites (August 2015)

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			<p>h) <u>The development will be informed by an Ecological Impact Assessment (EclA). Appropriate avoidance and mitigation measures will need to be implemented to ensure any designated sites and/or protected habitats and/or species are not adversely affected;</u></p> <p>i) <u>The development will be informed by a Tree Survey due to the presence of TPOs on the site;</u></p> <p>j) <u>The development will be informed by a Flood Risk Assessment (FRA) , in accordance with policy SP6. The FRA will need to take into account all potential sources of flood risk, including surface water flooding, and will advise on any appropriate mitigation measures;</u></p> <p>k) <u>Given the proximity of the site to the M4 and adjacent commercial area the development will be informed by a noise and air quality survey which will advise on appropriate mitigation measures, where necessary;</u></p> <p>l) <u>A Heritage Impact Assessment (HIA) will be required to inform the development design and layout, and to protect the setting of the Grade II listed Pincents Manor;</u></p> <p>m) <u>Development will be informed by an archaeological desk-based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site;</u></p> <p>n) <u>Development will be informed by a desk-based assessment (as a minimum) detailing the likelihood and extent of land contamination, followed by, where necessary, an intrusive investigation and undertaking of appropriate remediation measures. Further monitoring may be required depending on the nature of contamination and remediation;</u></p> <p>o) <u>Much of the site lies within a Mineral Safeguarding Area, and so the scheme will be informed by the Minerals Resource Assessment already undertaken for the site; and</u></p> <p>p) <u>The development design will respond positively to the challenge of climate change and be designed for climate resilience, including maximising the efficient use of sustainable technologies, resources, materials and solar gain, in accordance with policy SP5.'</u></p> <p><i>Insert indicative site map as set out in Annex F below. Consequential changes to the Policies Map as shown in the Schedule of Changes to the Policies Map (PMC14)</i></p>
MM46	95	Policy RSA6	<p><i>Delete the criterion as follows:</i></p> <p>'d. An integrated water supply and drainage strategy will be provided in advance of development to</p>

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			ensure the provision of adequate and appropriate infrastructure for water and waste water, both on and off site. Development will be occupied in line with this strategy.'
MM47	97	Policy RSA7	<p><i>Delete the criterion as follows:</i></p> <p>'d. An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water and waste water, both on and off site. Development will be occupied in line with this strategy.'</p>
MM48	99	Policy RSA8	<p><i>Delete the criterion as follows:</i></p> <p>'d. An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water and waste water, both on and off site. Development will be occupied in line with this strategy.'</p>
MM49	101	Policy RSA9	<p><i>Delete the criterion as follows:</i></p> <p>'e. An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water and waste water, both on and off site. Development will be occupied in line with this strategy.'</p> <p><i>Include additional criterion as follows:</i></p> <p><u>'The scheme will be informed by the archaeological assessment already undertaken of the site.</u></p> <p><u>The scheme will conserve the listed milestone in the north east corner of the site and enhance its setting.'</u></p>
MM50	103	Policy RSA10	<i>Delete the criterion as follows:</i>

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			'l. An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water and waste water, both on and off site. Development will be occupied in line with this strategy.'
MM51	106	Policy RSA11	<p><i>Delete the criterion as follows:</i></p> <p>'l. An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water and waste water, both on and off site. Development will be occupied in line with this strategy.'</p>
MM52	109	Policy RSA12	<p><i>Amend the criterion as follows:</i></p> <p>'(c) The scheme will be supported by an Ecological Impact Assessment (EclA) <u>and a protected species survey</u>. Appropriate avoidance and mitigation measures will need to be implemented, to ensure any designated sites and/or protected habitats and/or species are not adversely affected'</p> <p><i>Delete the criterion as follows:</i></p> <p>'f. An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water and waste water, both on and off site. Development will be occupied in line with this strategy.'</p>
MM53	111	Policy RSA13	<p><i>Delete the criterion as follows:</i></p> <p>'f. An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water and waste water, both on and off site. Development will be occupied in line with this strategy.'</p> <p><i>Delete criterion j and criterion k as follows:</i></p>

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			<p>'j. An odour assessment will be required due to the nearby location of the Woolhampton Waste Water Treatment Works; k. Part of the site is underlain by aggregate mineral deposits and a Minerals Resource Assessment will be required; and'</p> <p><i>Include additional criterion as follows:</i></p> <p><u>'The development design will respond positively to the challenge of climate change and be designed for climate resilience, including maximising the efficient use of sustainable technologies, resources, materials and solar gain, in accordance with policy SP5.'</u></p>																		
MM54	113	New paragraph and table before Policy RSA14	<p><i>Insert additional text and table before policy RSA14 as follows:</i></p> <p>'Sites allocated for residential development: North Wessex Downs <u>National Landscape (AONB)</u></p> <p><u>8.9. The special characteristics of the North Wessex Downs AONB mean that development will be modest, helping to meet local needs, support the rural economy and sustain local facilities in accordance with policy SP12.</u></p> <table border="1" data-bbox="651 1018 2119 1426"> <thead> <tr> <th data-bbox="651 1018 797 1094"><u>Policy</u></th> <th data-bbox="797 1018 1890 1094"><u>Allocation</u></th> <th data-bbox="1890 1018 2119 1094"><u>Approximate numbers</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="651 1094 797 1161"><u>RSA14</u></td> <td data-bbox="797 1094 1890 1161"><u>Land adjoining Lynch Lane, Lambourn (Site Ref: HSA 19)</u></td> <td data-bbox="1890 1094 2119 1161"><u>60 dwellings</u></td> </tr> <tr> <td data-bbox="651 1161 797 1228"><u>RSA15</u></td> <td data-bbox="797 1161 1890 1228"><u>Land at Newbury Road, Lambourn (Site Ref: HSA 20)</u></td> <td data-bbox="1890 1161 2119 1228"><u>5 dwellings</u></td> </tr> <tr> <td data-bbox="651 1228 797 1295"><u>RSAX</u></td> <td data-bbox="797 1228 1890 1295"><u>Land North of Pangbourne Hill, Pangbourne (Site Ref: PAN8)</u></td> <td data-bbox="1890 1228 2119 1295"><u>25 dwellings</u></td> </tr> <tr> <td data-bbox="651 1295 797 1362"><u>RSA16</u></td> <td data-bbox="797 1295 1890 1362"><u>Land North of Southend Road, Bradfield Southend (Site Ref: BRAD5)</u></td> <td data-bbox="1890 1295 2119 1362"><u>20 dwellings</u></td> </tr> <tr> <td data-bbox="651 1362 797 1426"><u>RSA17</u></td> <td data-bbox="797 1362 1890 1426"><u>Land at Chieveley Glebe, Chieveley (Site Ref: CHI23)</u></td> <td data-bbox="1890 1362 2119 1426"><u>15 dwellings</u></td> </tr> </tbody> </table>	<u>Policy</u>	<u>Allocation</u>	<u>Approximate numbers</u>	<u>RSA14</u>	<u>Land adjoining Lynch Lane, Lambourn (Site Ref: HSA 19)</u>	<u>60 dwellings</u>	<u>RSA15</u>	<u>Land at Newbury Road, Lambourn (Site Ref: HSA 20)</u>	<u>5 dwellings</u>	<u>RSAX</u>	<u>Land North of Pangbourne Hill, Pangbourne (Site Ref: PAN8)</u>	<u>25 dwellings</u>	<u>RSA16</u>	<u>Land North of Southend Road, Bradfield Southend (Site Ref: BRAD5)</u>	<u>20 dwellings</u>	<u>RSA17</u>	<u>Land at Chieveley Glebe, Chieveley (Site Ref: CHI23)</u>	<u>15 dwellings</u>
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			<u>RSA18</u>	<u>Pirbright Institute Site, High Street, Compton (Site Ref: HSA 22)</u>	<u>140 dwellings</u>
			<u>RSA19</u>	<u>Land west of Spring Meadows, Great Shefford (Site Ref: GS1)</u>	<u>15 dwellings</u>
			<u>RSA20</u>	<u>Land off Charlotte Close, Hermitage (Site Ref: HSA 24)</u>	<u>15 dwellings</u>
			<u>RSA21</u>	<u>Land to the south east of the Old Farmhouse, Hermitage (Site Ref HSA 25)</u>	<u>10 dwellings</u>
			<u>RSA22</u>	<u>Land adjacent Station Road, Hermitage</u>	<u>42 dwellings</u>
			<u>RSA23</u>	<u>Land adjoining The Haven, Kintbury (Site Ref: KIN6)</u>	<u>20 dwellings</u>
MM55	113	Policy RSA14	<p><i>Amend the criterion as follows:</i></p> <p>'f An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. Development will be occupied in line with this strategy. Infiltration from groundwater into the network has been identified as a strategic issue within Lambourn; therefore development on the site will connect to the mains sewerage system. A housing phasing plan will be required to ensure development does not outpace delivery of essential network upgrades to the East Shefford Sewage Treatment Works;</p> <p><i>Amend the criterion as follows:</i></p> <p>'h. Development will need to ensure the retention of existing riverside vegetation and To ensure the provision of a significant <u>an appropriate buffer for /stand-off between the woodland and adjacent River Lambourn SSSI/SAC and any development. In light of an initial Phase 1 Habitat Survey it is considered that no development on the site will take place within 15m of the outer edge of Flood Zone 2, allowing a minimum buffer/stand-off from the SSSI/SAC of 38m (max. 88m);'</u></p>		

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MM56	115	Policy RSA15	<p><i>Amend the criterion as follows:</i></p> <p>'h. An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. Development will be occupied in line with this strategy. Infiltration from groundwater into the network has been identified as a strategic issue within Lambourn; therefore development on the site will connect to the mains sewerage system.'</p>
MM57	-	New RSA policy – Land North of Pangbourne Hill, Pangbourne	<p><i>Insert new RSA policy and accompanying indicative site map into LPR after policy RSA15 as follows:</i></p> <p><u>'Policy RSAX</u></p> <p><u>Land north of Pangbourne Hill, Pangbourne (Site ref PAN8)</u></p> <p><u>The site, as shown on the indicative map, will be required to be developed in accordance with the following parameters:</u></p> <ol style="list-style-type: none"> a. <u>The provision of approximately 25 dwellings, in a low density scheme;</u> b. <u>Access to the site will be provided via Sheffield Close, off Pangbourne Hill;</u> c. <u>Measures will be provided to mitigate the impact of development on the local road network. A Transport Assessment will be required. The following elements shall be undertaken to inform the Transport Assessment:</u> <ol style="list-style-type: none"> i. <u>Updated speed surveys fronting the access onto Pangbourne Hill, with any required adjustments to sight lines provided;</u> ii. <u>A Junction 10 PICADY traffic model submitted for the access onto Pangbourne Hill and for the Pangbourne Hill/A340 junction.</u> d. <u>Internal walking and cycle routes for the site will be provided and will be linked to existing routes;</u> e. <u>Measures will be included to improve accessibility by, and encourage use of, non-car transport modes. These measures will be set out in a Travel Information Pack;</u> f. <u>The scheme will be informed by a full detailed Landscape Visual Impact Assessment (LVIA) which</u>

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			<p><u>takes account of the Landscape Sensitivity and Capacity Assessment (2020) (LSCA). The proposals will include the following measures:</u></p> <ul style="list-style-type: none"> i. <u>To ensure it is not visually prominent, development will be limited to the lower slopes on the eastern side of the site only, adjacent to Riverview Road; and</u> ii. <u>No development shall be located on the elevated upper slopes in order to conserve and enhance the National Landscapes (AONB) of both the North Wessex Downs and the Chilterns. This part of the site will be retained as a landscape buffer which will remain outside the settlement boundary;</u> g. <u>An arboricultural survey will be required to inform the delivery of the site, to take into account the protected trees adjacent to the site on the eastern side;</u> h. <u>Development proposals for the site will be supported by a Flood Risk Assessment, in accordance with policy SP6. The FRA will need to take into account all potential sources of flood risk, including surface water flooding, and will advise on any appropriate mitigation measures;</u> i. <u>Development will be informed by an Ecological Impact Assessment (EclA). Appropriate avoidance and mitigation measures will need to be implemented, to ensure any designated sites and/or protected habitats and/or species are not adversely affected;</u> j. <u>Development will be informed by an archaeological desk based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site;</u> k. <u>The development design will respond positively to the challenge of climate change and be designed for climate resilience, including maximising the efficient use of sustainable technologies, resources, materials and solar gain, in accordance with policy SP5.'</u> <p><i>Include indicative site map as set out in Annex G below. Consequential changes to the Policies Map as shown in the Schedule of Changes to the Policies Map (PMC15)</i></p>
MM58	117	Policy RSA16	<p><i>Delete the criterion as follows:</i></p> <p>'b. An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water and waste water, both on and off site. Development will be occupied in line with this strategy.'</p>

Ref	Page of submitted LPR	Policy/ Paragraph of submitted LPR	Main Modification
			<p><i>Amend the criterion as follows:</i></p> <p>'f) <u>Appropriate landscaping</u> A substantial tree belt will be provided along the northern boundary, <u>responding positively linking</u> to the existing tree belt to the north of the site, on the eastern boundary and with new planting on land at Stretton Close.'</p>
MM59	119	Policy RSA17	<p><i>Amend text in the policy as follows:</i></p> <p>'b) Access will need to be obtained <u>provided</u> from East Lane. <u>The existing frontage hedgerow should be retained and enhanced as much as possible as part of the design and so proposals should allow for a maximum of three access points from East Lane. To achieve the sight lines of 2.4 x 43 metres, these will accesses may need to serve more than one dwelling.</u></p> <p>e) A footway fronting the site which links to the existing footway to the west of the site; Opportunities should be taken to enable linkages to connect to existing footways along East Lane;. ...</p> <p>g) <u>The development design and layout will be further informed by a Heritage Impact Assessment. The development will protect and enhance the special architectural and historic interest of the Chieveley Conservation Area, with particular attention paid to the western end of the site adjoining the boundary of the Grade II listed the Old House.'</u></p> <p><i>Insert additional criteria as follows:</i></p> <p><u>'Development will be informed by an archaeological desk-based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site.'</u></p> <p><u>'Development of the site provides an opportunity to be able to establish a burial ground at the western end of the site adjoining the boundary of the Grade II listed the Old House. Further consideration will be required at the planning application stage in order to determine the detailed layout of this area.'</u></p> <p><u>'Development proposals should explore the opportunity to provide a footpath link to Chieveley</u></p>

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			<p><u>recreation ground from the western part of the site adjoining the boundary of the Grade II listed the Old House.'</u></p> <p><i>Delete criterion as follows:</i></p> <p>'An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. Development will be occupied in line with this strategy. A housing phasing plan will be required to ensure development does not outpace delivery of essential network upgrades to the Chieveley Sewage Treatment Works'</p> <p><i>Include additional criterion as follows:</i></p> <p><u>'The development design will respond positively to the challenge of climate change and be designed for climate resilience, including maximising the efficient use of sustainable technologies, resources, materials and solar gain, in accordance with policy SP5.'</u></p> <p><i>Include additional criterion as follows:</i></p> <p><u>'The scheme will be supported by a Flood Risk Assessment that will include the consideration of surface water flooding and will advise on any appropriate mitigation measures.'</u></p> <p><i>Amend indicative site map to show three access points as set out in Annex H below</i></p>
MM60	121	Policy RSA18	<p><i>Delete the criterion as follows:</i></p> <p>'An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water and waste water, both on and off site. Development will be occupied in line with this strategy.'</p>

Ref	Page of submitted LPR	Policy/ Paragraph of submitted LPR	Main Modification
			<p><i>Include additional criterion as follows:</i></p> <p><u>'k iii Detailed modelling of the River Pang which runs to the south of the site will be required to inform development proposals, including the latest Climate Change Allowances.'</u></p> <p><i>Amend the criterion as follows:</i></p> <p><u>'n) ...The scheme # will also conserve and enhance explain how the special architectural and historic interest of the Compton Conservation Area and protect its setting has been taken into account....'</u></p>
MM61	124	Policy RSA19	<p><i>Amend the criterion as follows:</i></p> <p>'i. An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. Development will be occupied in line with this strategy. Infiltration from groundwater into the network has been identified as a strategic issue within this catchment; therefore development on the site will connect to the mains sewerage system. A housing phasing plan will be required to ensure development does not outpace delivery of essential network upgrades to the East Shefford Sewage Treatment Works;'</p> <p><i>Include additional criterion as follows:</i></p> <p><u>'The development design will respond positively to the challenge of climate change and be designed for climate resilience, including maximising the efficient use of sustainable technologies, resources, materials and solar gain, in accordance with policy SP5.'</u></p>
MM62	126	Policy RSA20	<p><i>Amend the criterion as follows:</i></p> <p><u>'b) The site will be accessed via Charlotte Close with the provision of pedestrian and cycle linkages through the site to the allocations RSA21 (Land to the south east of the Old Farmhouse) and the public</u></p>

Ref	Page of submitted LPR	Policy/ Paragraph of submitted LPR	Main Modification
			<p><u>open space in</u> RSA22 (land adjacent Station Road). Opportunities should be taken to enable making these linkages part of a Hermitage to Newbury off-road path and to providing footpath links to the local Primary School to enable sustainable travel;'</p> <p><i>Amend indicative site map to show linkages as set out in Annex I below</i></p> <p><i>Delete the criterion as follows:</i></p> <p>'e. An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water and waste water, both on and off site. Development will be occupied in line with this strategy.'</p>
MM63	128	Policy RSA21	<p><i>Amend the criterion as follows:</i></p> <p>'e) The site will be accessed via Newbury Road and/or Lipscombe Close with the provision of pedestrian and cycle linkages from Lipscombe Close through the site to the allocations at RSA20 (Land off Charlotte Close) and <u>the public open space in</u> RSA22 (land adjacent Station Road). Opportunities should be taken to enable making these linkages part of a Hermitage to Newbury off-road path and to providing footpath links to the local primary school to enable sustainable travel;'</p> <p><i>Amend indicative site map to show linkages as set out in Annex J below</i></p> <p><i>Delete the criterion as follows:</i></p> <p>'h. An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water and waste water, both on and off site. Development will be occupied in line with this strategy.'</p> <p><i>Include additional criterion as follows:</i></p>

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			<p><u>'The design of the development should protect the setting of the nearby Listed Building (Barnaby Thatch)'</u></p>
MM64	130	Policy RSA22	<p><i>Amend text in the policy as follows:</i></p> <p>'a) The provision of approximately 34 42 dwellings in a low density scheme that provides a mix of dwellings sizes and types appropriate for the local area;</p> <p>b) Access to the site will be provided by Station Road, <u>with options for other accesses from Lipscomb Close and / or B4009 Newbury Road being explored. If required, any access from Lipscomb Close should be a through route. for Walking and cycle links will be provided</u> to the allocations RSA20 (Charlotte Close) and RSA21 (Old Farmhouse). Opportunities should be taken to enable making these linkages part of a Hermitage to Newbury off-road path and to providing footpath links to the local primary school to enable sustainable travel; ...</p> <p>d) ... ii) Retain the the land to <u>in</u> the north <u>western part</u> of the site as <u>a public open space</u> an open area which could have a character of a village green;</p> <p>d) ... iv) Be<u>15 metres width</u> set back from Station Road to retain the rural character and the setting of the mature roadside trees;'</p> <p><i>Delete the criterion as follows:</i></p> <p>'i An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. Development will be occupied in line with this strategy. A housing phasing plan will be required to ensure development does not outpace delivery of essential network upgrades to the Chieveley Sewage Treatment Works;'</p> <p><i>Amend the criterion as follows:</i></p>

Ref	Page of submitted LPR	Policy/ Paragraph of submitted LPR	Main Modification
			<p>'k) A Heritage Impact Assessment will be required due to the presence of non-designated heritage assets <u>and the nearby Scheduled Monument (Grimsbury Castle).</u>'</p> <p><i>Include additional criterion as follows:</i></p> <p><u>'Development will be informed by an archaeological desk based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site.'</u></p> <p><i>Include additional criterion as follows:</i></p> <p><u>'Part of the site is underlain by aggregate mineral deposits and a Minerals Resource Assessment will be required'</u></p> <p><i>Amend indicative site map as set out in Annex K below. Consequential changes to the Policies Map as shown in the Schedule of Changes to the Policies Map (PMC16)</i></p>
MM65	132	Policy RSA23	<p><i>Delete criterion as follows:</i></p> <p>'f. An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water and waste water, both on and off site. Development will be occupied in line with this strategy.'</p> <p><i>Include additional criterion as follows:</i></p> <p><u>'The scheme will be supported by a Flood Risk Assessment that will include the consideration of surface water flooding and will advise on any appropriate mitigation measures.'</u></p>
MM66	136	Policy RSA25	<p><i>Delete the criterion as follows:</i></p> <p>'k) No caravans will be permitted within Flood Zones 2 and 3 at the northern edge of the site'.</p>

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MM67	138	Paragraph 8.3	<p data-bbox="651 395 1888 427"><i>Amend paragraph 8.3 and insert additional text and table after first sentence as follows:</i></p> <p data-bbox="651 469 1211 501">'Sites allocated for employment land</p> <p data-bbox="651 542 2078 612"><u>8.3 Policies for the employment site allocations are set out below. The following sites are allocated to facilitate the growth and forecasted change in industrial land over the plan period to 2041 2039:</u></p> <table border="1" data-bbox="651 647 2040 1212"> <thead> <tr> <th data-bbox="651 647 797 762"><u>Policy Ref:</u></th> <th data-bbox="797 647 1619 762"><u>Site Name:</u></th> <th data-bbox="1619 647 1850 762"><u>Approximate floorspace (sqm)</u></th> <th data-bbox="1850 647 2040 762"><u>Use</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="651 762 797 831"><u>ESA1</u></td> <td data-bbox="797 762 1619 831"><u>Land east of Colthrop Industrial Estate, Thatcham</u></td> <td data-bbox="1619 762 1850 831"><u>20,400</u></td> <td data-bbox="1850 762 2040 831"><u>B2/B8</u></td> </tr> <tr> <td data-bbox="651 831 797 917"><u>ESA2</u></td> <td data-bbox="797 831 1619 917"><u>Land west of Ramsbury Road, Membury Industrial Estate</u></td> <td data-bbox="1619 831 1850 917"><u>10,381 10,390</u></td> <td data-bbox="1850 831 2040 917"><u>B2/B8</u></td> </tr> <tr> <td data-bbox="651 917 797 1003"><u>ESA3</u></td> <td data-bbox="797 917 1619 1003"><u>Land to the south of Trinity Grain, Membury Industrial Estate, Lambourn Woodlands</u></td> <td data-bbox="1619 917 1850 1003"><u>5,200</u></td> <td data-bbox="1850 917 2040 1003"><u>Egiii/B2</u></td> </tr> <tr> <td data-bbox="651 1003 797 1072"><u>ESA4</u></td> <td data-bbox="797 1003 1619 1072"><u>Beenham Landfill, Pips Way, Beenham</u></td> <td data-bbox="1619 1003 1850 1072"><u>14,000</u></td> <td data-bbox="1850 1003 2040 1072"><u>B2/B8</u></td> </tr> <tr> <td data-bbox="651 1072 797 1141"><u>ESA5</u></td> <td data-bbox="797 1072 1619 1141"><u>Northway Porsche, Grange Lane, Beenham</u></td> <td data-bbox="1619 1072 1850 1141"><u>6,400</u></td> <td data-bbox="1850 1072 2040 1141"><u>Egiii/B2</u></td> </tr> <tr> <td data-bbox="651 1141 797 1212"><u>ESA6</u></td> <td data-bbox="797 1141 1619 1212"><u>Land adjacent to Padworth IWMF, Padworth Lane</u></td> <td data-bbox="1619 1141 1850 1212"><u>12,400</u></td> <td data-bbox="1850 1141 2040 1212"><u>B2/B8</u></td> </tr> </tbody> </table> <p data-bbox="651 1254 2022 1391"><u>The Council will seek to ensure that sufficient sites are provided in the right locations to foster sustainable economic growth. The allocated sites are focused around or near to areas of existing employment activity, and mainly adjacent to defined Designated Employment Areas. Those sites allocated on land adjacent to a DEA, will, through this LPR, now form part of that DEA.</u></p>	<u>Policy Ref:</u>	<u>Site Name:</u>	<u>Approximate floorspace (sqm)</u>	<u>Use</u>	<u>ESA1</u>	<u>Land east of Colthrop Industrial Estate, Thatcham</u>	<u>20,400</u>	<u>B2/B8</u>	<u>ESA2</u>	<u>Land west of Ramsbury Road, Membury Industrial Estate</u>	<u>10,381 10,390</u>	<u>B2/B8</u>	<u>ESA3</u>	<u>Land to the south of Trinity Grain, Membury Industrial Estate, Lambourn Woodlands</u>	<u>5,200</u>	<u>Egiii/B2</u>	<u>ESA4</u>	<u>Beenham Landfill, Pips Way, Beenham</u>	<u>14,000</u>	<u>B2/B8</u>	<u>ESA5</u>	<u>Northway Porsche, Grange Lane, Beenham</u>	<u>6,400</u>	<u>Egiii/B2</u>	<u>ESA6</u>	<u>Land adjacent to Padworth IWMF, Padworth Lane</u>	<u>12,400</u>	<u>B2/B8</u>
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			<p><u>Thatcham</u> <u>Thatcham's main industrial area is Colthrop Estate, comprising a mix of larger distribution units and smaller workshops, and is described in the ELR as 'the District's premier logistics and distribution park'. There are some vacancies in the office stock, and a very high occupancy in the industrial and warehousing stock. The allocated site to the east of the Colthrop Estate (ESA1) is a logical extension and would aid in meeting the identified need in the Urban Area of Thatcham.</u></p> <p><u>Membury Industrial Estate</u> <u>Membury Industrial Estate has seen a number of redevelopments and expansions in recent years and through the LPR the boundary of the DEA has been extended to reflect these changes and to support the creation of local job opportunities in the more western rural areas of the District. The allocated sites at Membury (ESA2 and ESA3) will also aid in addressing a local and rural demand.</u></p> <p><u>Beenham</u> <u>Beenham Grange Industrial Area is largely occupied by industrial operators, with a mix of locally based companies and larger companies servicing the area. At the time of the ELR there were no available industrial units, reflecting the nature of the industrial market in this location. The sites allocated in this area (ESA4, ESA5 and ESA6) would aid in meeting the identified need towards the east of the District. The site at Northway Porsche would encourage light industrial units, compatible with surrounding uses. The site at Padworth sidings, whilst it is not directly adjacent to a DEA, it would make use of brownfield land and is adjacent to the Padworth Household Waste Recycling Centre.</u></p> <p>For each <u>site policy (ESA1-ESA6)</u>, the site allocation is identified on the indicative site map. The area shown on the map is the gross site area. The policies provide approximate floorspace for development, based on standard plot ratios as set out within the HELAA, unless the site promoter has suggested a development potential that is lower than that calculated. The actual floorspace achieved may vary slightly depending on the detailed design work carried out in preparation for a planning application and will be influenced by the topography and other specific site characteristics.'</p>

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MM68	138	Policy ESA1	<p><i>Amend criterion a of the policy to insert footnote as follows:</i></p> <p>'a. The provision of approximately 20,400 square metres of employment floorspace for B2 and/or B8 uses <u>[insert footnote]</u> across the site;</p> <p><i>Footnote:</i> <u>As at June 2024 the site had extant planning permission 21/02130/OUTMAJ for 19,536sqm of B2/B8 space with ancillary office space, and a second extant permission 23/02965/FULMAJ for a Logistics Hub comprising approximately 7,800sqm of office space and associated uses for Thames Valley Police.'</u></p>
MM69	140-141	Policy ESA2	<p><i>Amend criterion a of the policy as follows:</i></p> <p>'a. The provision of approximately 40,384 <u>10,390</u> square meters of employment floorspace for B2 and/or B8 uses;'</p> <p><i>Amend policy to include additional criterion as follows:</i></p> <p><u>'Development will be informed by an archaeological desk-based assessment as a minimum and field evaluation if required to assess the historic environment of the site.'</u></p> <p><i>Amend indicative map as set out in Annex L below. Consequential changes to the Policies Map as shown in the Schedule of Changes to the Policies Map (PMC17)</i></p>
MM70	142	Policy ESA3	<p><i>Amend policy to include additional criterion as follows:</i></p> <p><u>'Development will be informed by an archaeological desk-based assessment as a minimum and field evaluation if required to assess the historic environment of the site.'</u></p>

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MM71	144	Policy ESA4	<p><i>Amend criterion i of the policy as follows:</i></p> <p>'i The site lies within a Mineral and Waste Safeguarding Area and so consideration of Policy 9 and Policy 10 of the West Berkshire Minerals and Waste Local Plan will be required; and'</p>
MM72	146	Policy ESA5	<p><i>Amend policy to include additional criterion as follows:</i></p> <p><u>'Development will be informed by a desk based assessment (as a minimum) detailing the likelihood and extent of land contamination, followed by, where necessary, an intrusive investigation and undertaking of appropriate remediation measures. Further monitoring may be required depending on the nature of contamination and remediation.'</u></p>
MM73	150	Policy DM1	<p><i>Amend the policy as follows:</i></p> <p>'Exceptionally, new residential development outside of adopted settlement boundaries will be permitted. These exceptions are solely limited to development which is appropriately designed and located and which satisfies one or more of the following criteria:</p> <ul style="list-style-type: none"> a. Sites allocated as part of the development plan; b. Sites for Gypsies and Travellers and Travelling Showpeople (<u>RSA24, RSA25 and DM20</u>); c. Rural exception housing and/or First Homes exception sites (<u>DM16 and DM17</u>); d. The conversion of redundant or disused buildings (<u>DM24</u>); e. Housing to accommodate rural workers (<u>DM23</u>); f. The extension to or replacement of existing residential dwellings (<u>DM25 and DM28</u>); g. The subdivision of existing residential dwellings (<u>DM27</u>); <u>h. Student or staff accommodation necessary to meet the reasonable needs and operational requirements of existing educational and institutional sites in the countryside (Policy DM38) or</u> <u>i. h. Limited residential infill in settlements in the countryside with no defined settlement boundary where:</u> <ul style="list-style-type: none"> i. It is within a closely knit cluster of 10 or more existing dwellings adjacent to, or fronting an

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			<p>existing highway; and ii. The scale of development consists of infilling a small undeveloped plot commensurate with the scale and character of existing dwellings within an otherwise built up frontage; and iii. It does not extend the existing frontage at either end; and iv. The proposed plot size and spacing between dwellings is similar to adjacent properties and respects the rural character and street scene of the locality.</p> <p>Planning permission will not be granted where a proposal harms or undermines the existing relationship of a settlement within the open countryside, where it does not contribute to the character and distinctiveness of the rural area, including the special qualities and natural beauty of the landscape of the AONB or where development would have an adverse cumulative impact on the environment or highway safety.'</p>
MM74	153	Policy DM3	<p><i>Amend the policy as follows:</i></p> <p>'Development proposals will be required to promote, support and enhance positive mental and physical health and wellbeing and thus contribute to reducing health inequalities. Where any potential adverse impacts are identified, they will need to be addressed and mitigated in an appropriate manner.</p> <p><u>Proposals for development should support healthy lifestyles, including through the use of active design principles. Where appropriate, the provision of new or improved health facilities will be required as part of new development, proportionate to the additional demand that they would generate.</u></p> <p><u>Proposals for major development, or other development likely to have a potentially significant health impact on the health and wellbeing of the local population or particular groups within it in relation to either the nature of the its use proposed and/or its location in relation to other uses, should be accompanied by a fit for purpose Health Impact Assessment (HIA) in accordance with the current guidance (39) from Public Health England. The level of information required should be proportionate to the scale and nature of the development proposed. The purpose of the HIA is to assess any health impacts, positive or negative, that may arise from the proposed development and it should show how</u></p>

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			<p><u>any potential health risks can be avoided or minimised, with particular emphasis on disadvantaged sections of communities that may be affected.</u> Development proposals should demonstrate how the conclusions of the HIA have been taken into account in the design of the scheme.</p> <p>Development that would have an unacceptable impact on the health or wellbeing of existing or new communities will not be permitted.'</p>
MM75	155	Policy DM4	<p><i>Amend text in part 1(A) of the policy as follows:</i></p> <p>'A. New development of one or more new dwellings (C3 or C4 use class) will meet the following minimum standards of construction:</p> <ul style="list-style-type: none"> • Equal to or less than 15kWh/m2/year space heat demand <u>the following targets, evidenced by using the Building Regulations Part L SAP Fabric Energy Efficiency (FEE) metric.:</u> <ul style="list-style-type: none"> o <u>End terrace: 32.9 kWh/m2/year FEE</u> o <u>Mid terrace: 25.1 kWh/m2/year FEE</u> o <u>Room in roof (semi detached): 32.5 kWh/m2/year FEE</u> o <u>Detached: 43.6 kWh/m2/year FEE</u> o <u>Bungalow: 51.0 kWh/m2/year FEE</u> o <u>Low-rise apartment: 21.0 kWh/m2/year FEE</u> o <u>Mid to high-rise apartment: 13.5 kWh/m2/year FEE</u> o <u>Where the proposed home type does not precisely reflect any of the above, the applicable target from the list above will be that of the most similar home type to that proposed, with a note to justify why this is thought to be the most similar. In apartment buildings, it will be acceptable to meet this target via a weighted average of all residential floor space in the building (recognising that there may be variation between floors in the building).</u> • <u>For outline applications and where the home type is not known, it will be required to commit to</u>

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			<p><u>delivering the relevant target(s) through reserved matters. This will be secured by a condition.'</u></p> <p><i>Amend text in part 1 (B) of the policy as follows:</i></p> <p>'B. New Residential refurbishment developments of 10+ units will meet BREEAM Domestic Refurbishment <u>2014 (or future equivalent)</u> Excellent as a minimum.'</p> <p><i>Amend text in part 2 of the policy as follows:</i></p> <p>'2. New Non-Residential Development, <u>including</u> hotels, residential institutions, secure residential institutions - minimum construction standard</p> <p>New development of 100sqm or more of new non-residential floorspace, <u>including</u> hotels (C1 use class), residential institutions (C2 use class) or secure residential institutions (C2A use class) will meet the following minimum standards of construction:.....</p> <p><i>Amend text in part 3 (A) of the policy as follows:</i></p> <p>3. Renewable Energy</p> <p>A. Subsequent to the achievement of the minimum construction standards under parts 1 and 2, new development of one or more new dwellings (C3 or C4 use class) and/or 100sqm or more of new non-residential floorspace, <u>including</u> hotels (C1 use class), residential institutions (C2 use class) or Secure Residential Institutions (C2A use class).... '</p>
MM76	157 - 158	Supporting text to policy DM4	<p><i>Insert new paragraph after 10.22 as follows:</i></p> <p><u>'For residential refurbishment developments of 10+ units that require planning permission, BREEAM</u></p>

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			<p><u>Domestic Refurbishment to a rating of Excellent is required as a minimum. This includes change of use to residential development and refurbishment of existing residential properties.'</u></p> <p><i>Amend paragraph 10.23 as follows:</i></p> <p>'10.23 Applications for commercial development <u>and residential refurbishment developments of 10+ units</u> should include a BREEAM pre-assessment, undertaken by a licensed BREEAM assessor and where deemed appropriate supported by a BREEAM accredited professional at the start of the design process to demonstrate how the target rating will be met and ensure early action credits are not missed.'</p> <p><i>Insert additional text to the end of paragraph 10.28 as follows:</i></p> <p><u>'In order to provide further guidance the Council intends to prepare an update to its existing Planning Obligations SPD which it anticipates adopting in 2025.'</u></p>
MM77	163	Supporting text to policy DM6	<p><i>Insert new paragraph after 10.55 as follows:</i></p> <p><u>'On 24 May 2024, the Secretary of State published a Notice of Designation of Sensitive Catchment Areas. Under this Notice, the River Lambourn SAC has been designated as a phosphorus sensitive catchment area, whilst the catchment of the Solent Maritime SAC as a nitrogen sensitive catchment area under the Water Industry Act 1991.'</u></p> <p><i>Insert new paragraphs after 10.58 as follows:</i></p> <p><u>'To stop pollution at source, the Levelling-up and Regeneration Act 2023 created a new duty on water companies to upgrade wastewater treatment works by 1 April 2030, in catchments of Habitats Sites identified by the Secretary of State as being in an unfavourable condition due to nutrient pollution.'</u></p>

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			<p><u>Within the Sensitive Catchment Areas, designated catchments, water companies must guarantee that waste water treatment works serving a population equivalent to more than 2,000 meet specifies nutrient removal standards by 1 April 2030. Local Planning Authorities, when considering applications, will need to consider that the nutrient pollution standard will be met by the upgrade date for the purposes of Habitats Regulations Assessments.'</u></p>
MM78	165	Policy DM7	<p><i>Amend first sentence of first paragraph of the policy as follows:</i></p> <p>'Development will be required to minimise water use and aim to be water neutral as far as practicable by incorporating appropriate water efficiency and water recycling measures.....'</p> <p><i>Amend third sentence of second paragraph of the policy as follows:</i></p> <p>'...All new residential developments (including replacement dwellings) will meet the Building Regulation optional higher water efficiency standard of 110 litres per person per day, using the 'Fittings Approach' as set out in <u>in table 2.2 of the Building Regulations part G2.'</u></p> <p><i>Delete criterion a of the policy as follows:</i></p> <p>'a. There is adequate water supply and waste water treatment infrastructure capacity resources are available, or can be provided, to support the development proposed at the time of occupation, and will be safeguarded from the potential impacts of development;'</p> <p><i>Delete criterion c of the policy as follows:</i></p> <p>'c. Foul water treatment and disposal of adequate design and capacity already exists or can be provided in time to serve the development ensuring that the environment and amenity of local residents are not adversely affected;'</p> <p><i>Amend penultimate paragraph of the policy as follows:</i></p>

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			<p><u>'Development which would overload available facilities and create or exacerbate problems of flooding or pollution will not be permitted. Where upgrades to water supply and wastewater are required and where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development. consideration should be given to phasing the development so that the necessary infrastructure is in place. The identified need for the development or expansion of other water supply or wastewater facilities, required for existing or proposed development, is an important material consideration in the consideration of planning applications for such proposals.'</u></p>
MM79	167	Supporting text to policy DM7	<p><i>Delete paragraph 10.70 as follows:</i></p> <p>'10.70 Developers will need to demonstrate that existing, planned and/or committed infrastructure is sufficient to accommodate new development proposals. This could be through a Utilities Assessment which includes demonstrating that there is adequate water supply, surface water drainage, foul drainage and sewage treatment capacity both on and off site to service the development. Necessary improvements to sewerage water treatment infrastructure will be programmed by the water companies and need to be completed prior to occupation of the development. This is to ensure that such infrastructure is in place to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property and pollution of land and watercourses. In some circumstances this may make it necessary for developers to arrange for appropriate studies to ascertain whether the proposed development will lead to the overloading of existing local infrastructure. Where there is a capacity problem in the local network developers will be expected to requisition or otherwise fund local infrastructure improvements.'</p>
MM80	170	Policy DM9	<p><i>Amend criterion g as follows:</i></p> <p>'g. To ensure it does not generate levels of traffic, parking or other environmental problems which would result in substantial harm to the character, appearance or significance of the area, and ...'</p>

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			<p><i>Amend criterion ii and add new criterion iii as follows:</i></p> <p>'ii. The replacement would make an equal or greater contribution to the character and appearance of the Conservation Area; <u>or</u> <u>iii. The development would generate planning benefits that outweigh the harm arising from its loss in accordance with national policy.'</u></p>
MM81	171	Supporting text to policy DM9	<p><i>Amend paragraphs 10.81 (paragraph moved to supporting text in policy SP9) and 10.82 as follows:</i></p> <p>'10.81 The Council has a statutory duty to pay special attention to the desirability of preserving or enhancing the character and appearance of the District's 53 Conservation Areas. As part of this duty and as part of its strategy to maximise opportunities for the conservation and enjoyment of the historic environment the Council is undertaking a phased programme of Conservation Area Appraisals (CAAs), in partnership with the West Berkshire Heritage Forum. As well as helping to define what is special about a particular Conservation Area, the project will provide local communities with an understanding of how and why Conservation Area status is appraised, designated, and applied in future development and conservation management decisions. This will help communities better engage with the management of change in their area, allowing them to more effectively champion the significance and values of local heritage. The project has involved the setting up of a Conservation Area Working Group, which has developed a 'Toolkit', which contains a variety of guidance, list of resources, and an appraisal report template, to assist parish councils and volunteers in undertaking a Conservation Area Appraisal and Management Plan.</p> <p>10.82 The NPPF clarifies that not all elements of a Conservation Area will necessarily contribute to its significance. Therefore, where a building (or other element) does not make a positive contribution to the heritage significance of the area, the loss of that building or feature should be treated as less than substantial harm or no harm. In these cases the level of harm should be weighed against the wider benefits of the proposal including the potential to enhance or reveal further the heritage significance of the area.'</p>

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MM82	172	Policy DM10	<p><i>Amend second paragraph of the policy as follows:</i></p> <p>Development will not be permitted if applicants fail to provide adequate or accurate detailed information to show the effect on the significance and architectural and historic interest of the Listed Building and/or <u>the contributions made by its setting and any curtilage listed features.</u></p> <p><i>Amend third paragraph of the policy as follows:</i></p> <p><u>Unless justified otherwise, D</u>development will not be permitted if it would:</p> <p><i>Amend fourth paragraph of the policy as follows:</i></p> <p>In particular, development <u>should avoid</u> will not be permitted if it would directly, indirectly or cumulatively lead to any of the following:</p> <p>xi. The removal of historic boundary treatments,; unless justified to the satisfaction of the Council, that the proposed changes, loss or irreversible damage, and/or addition of new features to the Listed Building and its setting are:</p> <ul style="list-style-type: none"> • Less than substantial in terms of impact/harm on the character and significance of the Listed Building and its setting; and • Is off set by the public benefit from making the changes, including enabling optimal viable use, and net enhancement to the Listed Building and its setting. Clear justification for this harm should be set out in full in the Statement of Heritage Significance accompanying the proposals.
MM83	174	Policy DM11	<p><i>Amend criterion c of policy as follows:</i></p> <p>c. Have particular regard to all of the following characteristics, depending on the type of asset affected:</p>

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MM84	182	Policy DM15	<p><i>Amend third paragraph of the policy as follows:</i></p> <p>'The loss or deterioration of protected trees, groups of trees, woodland or important hedgerows will only be permitted in exceptional circumstances and in accordance with the relevant legislation, policy and good practice recommendations. Development affecting trees protected by a Tree Preservation Order (TPO) must be justified and the impact of the proposal will be assessed on the amenity of the area. Where these and other protected trees are subject to felling, a replacement of an appropriate number, and size in an appropriate location will be required.'</p>
MM85	183	Supporting text to policy DM15	<p><i>Amend paragraph 10.132 of supporting text as follows:</i></p> <p>'10.132 Protected trees includes trees protected by a Tree Preservation Order (<u>whether that be an individual tree, a group of individual trees or a woodland</u>) or those located within a Conservation Area. They also include those hedgerows meeting the criteria of "important hedgerow" in the Hedgerow Regulations <u>1997 (as amended)</u>.'</p>
MM86	189	Policy DM19	<p><i>Amend first paragraph of the policy as follows:</i></p> <p>'...b) The location is appropriate in terms of design, layout and accessibility of facilities, services and public transport, <u>subject to other policies in the Plan being satisfied</u>.'</p> <p><i>Insert additional paragraph at end of the policy as follows:</i></p> <p><u>'Affordable housing contribution will be required in accordance with the requirements of Policy SP19: Affordable Housing depending upon whether the accommodation falls within Use Class C2 (Residential Institutions) or C3 (dwelling house) of the Use Classes Order.'</u></p>
MM87	189	Supporting text to policy DM19	<p><i>Amend paragraph 11.17 as follows:</i></p> <p>'11.17 For the purposes of this policy, specialist housing will meet an identified local need where</p>

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			<p>it is regulated for both care and accommodation purposes. Development which provides unregulated on-site care and support, such as sheltered housing, will be considered in the same way as conventional housing. In terms of the latter, these typically comprise owner-occupied retirement living products. Pre-application advice should be sought if clarification is needed to whether a development is likely to constitute a specialist care housing provision. <u>Housing for older people covers a wide range of needs, from sheltered housing (where residents live mainly independent lives whilst sharing some communal facilities) through to extra care housing and care homes, where a level of personal health care is typically provided. Proposals for specialist housing will be considered on their own merits having regard to whether the proposal falls within Class C2 or Class C3 of the of the Use Classes Order. This will depend upon factors such as the level of personal care offered; the type of accommodation and level of communal space and facilities. Pre-application advice should be sought if clarification is needed as to whether a development is likely to constitute a specialist care housing provision.</u></p>						
MM88	192-193	Supporting text to policy DM20	<p><i>Amend the supporting text as follows:</i></p> <p>'11.27 Need Gypsy and Traveller sites</p> <p>11.278 <u>Table 7</u> The following table sets out the need for <u>Gypsy and Traveller pitches up to 31 March 2038</u>, correlating to the study period for the GTAA and for Travelling Showperson plots. For clarity, the cultural and the Planning Policy for Traveller Sites (PPTS) need figures are two different representations of need. The PPTS need based on the PPTS definition of 'Gypsies and Travellers', and cultural need, which is defined as those Gypsy and Travellers and Travelling Showpeople who do not travel and identify themselves as part of the Traveller and Travelling Showpeople community.</p> <p>Table 7 Gypsy and Traveller Accommodation Assessment Identified Need 2021/22 to 2037/38 cultural need/PPTS need</p> <table border="1" data-bbox="651 1313 2047 1420"> <thead> <tr> <th data-bbox="651 1313 1482 1366"></th> <th data-bbox="1482 1313 1709 1366">Cultural Need</th> <th data-bbox="1709 1313 2047 1366">Of which PPTS need</th> </tr> </thead> <tbody> <tr> <td data-bbox="651 1366 1482 1420">5-year Authorised Pitch Shortfall (2021/22 to 2025/26)</td> <td data-bbox="1482 1366 1709 1420">13</td> <td data-bbox="1709 1366 2047 1420">0</td> </tr> </tbody> </table>		Cultural Need	Of which PPTS need	5-year Authorised Pitch Shortfall (2021/22 to 2025/26)	13	0
	Cultural Need	Of which PPTS need							
5-year Authorised Pitch Shortfall (2021/22 to 2025/26)	13	0							

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			Longer term need		
			2026/27 to 2030/31	5	3
			2031/32 to 2035/36	9	6
			2036/37 to 2037/38	3	2
			Longer term need total to 2037/38	17	11
			Net Shortfall 2021/22 to 2037/38	30	20
			Table 8 Travelling Showperson plot requirements 2021/22 to 2037/38		
			Travelling Showperson plots	2021/22 to 2025/26 20	2026/27 to 2037/38 4
				Total 24	
			Table 7 Gypsy & Traveller Accommodation		
			<u>Additional permanent pitches required 1 April 2021 to 31 March 2038</u>	30	
			<u>Additional permanent pitches planned for 1 April 2021 to 31 March 2023</u>		
			• <u>New Stocks Farm, Paices Hill, Aldermaston</u>	8	
			• <u>Four Houses Corner, Padworth</u>	1	
			• <u>Ermin Street, Lambourn Woodlands</u>	1	
			<u>Total pitches planned for 2021-2023</u>	10	
			<u>Permanent pitches required 1 April 2023 to 31 March 2038</u>	20	

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			<p><u>11.28 The GTAA 2021, in updating the 2019 study, identifies that there is a residual overall need for 30 permanent pitches between 1 April 2021 and 31 March 2038, considering existing supply on established sites, and accounting for household formation and net in-migration. Taking into account the 10 pitches already planned this leaves a residual need of 20 pitches which are required between 1 April 2023 and 31 March 2038.</u></p> <p><u>11.29 Table 7 sets out the total need for Gypsy and Traveller accommodation. Of the 30 pitches needed to 2038, 13 are required in the short term up to 31 March 2026. 10 pitches have been planned for in the period 1 April 2021 and 31 March 2023. The site at New Stocks Farm, Paices Hill, Aldermaston has been allocated in RSA24 to replace 8 transit pitches with 8 permanent pitches. This takes forward the existing allocation in the Housing Site Allocations Development Plan Document and the recommendations of the GTAA to create permanent pitches. Planning permission (reference 22/00120/FUL) was granted in September 2022 for this use and is yet to be implemented. Since the GTAA was updated Four Houses Corner, a Council operated site in Padworth, had planning permission approved for 17 permanent pitches (reference 23/01552/REG3 approved in April 2024). This represents an increase of 1 pitch above the 16 pitches counted in the GTAA. The permission is yet to be implemented. Also since the GTAA was updated 1 pitch has been provided on land at Ermin Street, Lambourn Woodlands (reference 21/02045/FUL approved in August 2022).</u></p> <p><u>11.30 Table 7 outlines that 20 permanent pitches are required between 1 April 2023 and 31 March 2038. To meet this need the Council is preparing a Gypsy and Traveller Accommodation Development Plan Document. Site allocations will be made in the context of a further update to the GTAA which would follow the repopulation of Four Houses Corner, Padworth. In contributing to meeting the need planning applications will be assessed in accordance with the criteria set out in this policy.</u></p> <p><u>11.31 There is no requirement to identify a site for transit pitches. However, the GTAA 2021 recommends that tolerated stopping places or negotiated stopping places should be provided. The Council will explore this further through the Gypsy and Traveller Accommodation DPD and/or through developing a Council policy to govern this.</u></p>

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			<p>11.29 The GTAA identifies a need for four transit pitches, which would accommodate eight caravans.</p> <p>11.30-11.32The GTAA does not identify a need for houseboat dwellers and thus the LPR does not provide for any permanent houseboats.</p> <p>Supply</p> <p>11.31 There is an existing private site at New Stocks Farm, Paices Hill, Aldermaston. There are 24 permanent pitches, with 15 transit sites. Policy RSA32 seeks to allocate 8 permanent pitches at Paices Hill, which uses the land used as transit sites. This results in the reduction of 8 transit pitches.</p> <p>11.32 There is an existing Council operated site at Four Houses Corner, Reading Road, Ufton Nervet, which is due to be refurbished. When it reopens there will be 17 pitches. The updated GTAA is clear that when the site reopens a survey of households is required to determine the long term needs from children and young people living on the site.</p> <p>11.33 There are other authorised small private traveller sites in the District.</p> <p><u>Travelling Showperson sites</u></p> <p>11.34 11.32 There is currently one Showperson's Yard in the District which is located at Long Copse Farm, Enborne. 24 plots are allocated for use by Travelling Showpeople, as defined in the Planning Policy for Traveller Sites, under policy RSA25. The eastern part of the site has an authorised use for Circus headquarters and agricultural holding as a dual use. The allocation would enable a residential and operational base for staff and families associated with the Circus. The 2019 GTAA concludes that there is no additional need for Travelling Showpersons yards and any need that does arise can be addressed on the Long Copse yard.</p> <p>11.35 To address the longer term need for Gypsy and Traveller pitches and for transit sites/short term</p>

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			stopping places a Development Plan Document will be prepared. The Local Development Scheme outlines the timetable, with evidence being prepared between February 2023 and December 2025, leading up to adoption by September 2027.
MM89	202	Policy DM27	<p><i>Amend criterion c of the policy as follows:</i></p> <p>'c. It would not <u>require</u> lead to significant extensions, including alterations and outbuildings, which would have a detrimental impact on the character and appearance of the original building or surrounding area;'</p>
MM90	207	Policy DM30 and supporting text	<i>Delete policy DM30 and its supporting text from the LPR</i>
MM91	208	Policy DM31	<p><i>Amend criterion i of the policy as follows:</i></p> <p>'i. Functional private amenity space of a quality and size to meet the needs of the occupants;'</p>
MM92	208	Supporting text to policy DM31	<p><i>Amend paragraphs 11.112 and 11.113 of the supporting text as follows:</i></p> <p><u>'11.112 For flats, there may be a variety of approaches to providing outdoor amenity space for flats which will vary according to the location and character of the proposed development. As a guide, for 1 or 2 bedroom flats at least 25 square metres of communal open space should be provided per unit. For three or more bedroom flats at least 40 square metres of communal open space should be provided per unit. Additionally, balconies could compensate for limited garden space if they provide high quality space, and the space offered would be taken into consideration when looking at the overall amenity space proposed for a flatted development.'</u></p> <p>11.113 Balconies may not be counted towards the provision of amenity space for houses or flats, unless in exceptional circumstances, where they provide high quality space.'</p>

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MM93	210	Supporting text to policy DM32	<p><i>Amend paragraph 12.2 as follows:</i></p> <p>'12.2 For the purposes of this Plan business uses/development are offices (<u>Egi and Egii</u>), industrial, storage and warehousing and distribution (<u>Egiii/B2/B8</u>), and the term employment land refers to the land on which these uses are located.'</p>
MM94	-	New DM policy and supporting text	<p><i>Insert new Development Management policy and supporting text into LPR after policy DM33 as follows:</i></p> <p><u>Policy DMXX: RAF Welford and Denison Barracks</u></p> <p><u>Development within the site boundary of RAF Welford and/or Denison Barracks will be supported where it directly sustains the functioning of these defence establishments.</u></p> <p><u>Development in the areas around RAF Welford and/or Denison Barracks will not be supported where it would adversely affect the defence related operation or capability of these sites and/or the safety and wellbeing of those within the relevant statutory safeguarding zones.</u></p> <p><u>Supporting text</u></p> <p><u>RAF Welford and Denison Barracks provide important outputs that support national defence activities. The NPPF outlines that planning policies and decisions should recognise and support development required for operational defence and security purposes.</u></p> <p><u>National policy also seeks to ensure that operational sites are not affected adversely by the impact of other development proposed in the area and that existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established.</u></p> <p><u>RAF Welford is safeguarded due to its capacity as a military explosive storage area and as such it has statutory safeguarding zones to ensure that development and land uses will be compatible with MOD</u></p>

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			<p><u>capability. The inner and outer safeguarding zones¹⁴ are defined on the Policies Map and within the safeguarded area of RAF Welford the MOD is a statutory consultee under the provisions of the Town and Country Planning (safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2022 (DfT/ODPM Circular 01/2003).</u></p> <p><u>The MOD will object to development proposals which support people living, working, or congregating within the inner safeguarding zone of RAF Welford. In principle, the MOD does not object to land in the outer safeguarding zone being developed for residential, commercial and/or industrial land use purposes. However, within this zone, where applicable, requirements relating to the siting, design and construction of buildings, or changes to land use may apply.</u></p> <p><u>Whilst Denison Barracks in Hermitage does not have safeguarding zones around the site, consideration should be given to the impact of development proposals on the operation and capability of the site as a defence establishment and the local planning authority will consult with Denison Barracks and/or MOD as appropriate.</u></p> <p><i>Include a as set out in Annex M below. Consequential changes to the Policies Map as shown in the Schedule of Changes to the Policies Map (PMC18 & PMC19)</i></p>
MM95	216	Policy DM35	<p><i>Amend criteria within the policy as follows:</i></p> <p><i>'..... a. The proposals demonstrate that the business can make a <u>positive long term</u> contribution to the rural economy;</i></p> <p><i>c. The development is proposals are <u>proposals are</u> compatible with uses in the surrounding area in terms of noise, smell, dust, pollution, lighting or operations at unreasonable hours;</i></p>

¹⁴ The extent of the safeguarding zones shown on the Policies Map could change before the Plan is updated or superseded. Policy DMXX will be applied to the latest version of the RAF Welford safeguarding zones as determined by the MOD.

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			<p>e. The design respects local building styles and materials;</p> <p>e. f. Any <u>proposals new buildings, conversions and curtilage treatments</u> are of a high quality design, are appropriate in terms of siting scale, form, massing, character and appearance having regard to the surrounding rural area and its setting in the wider rural landscape;'</p>
MM96	217	Supporting text to policy DM35	<p><i>Amend paragraph 12.20 as follows:</i></p> <p>'New economic development, or proposals to expand existing premises in the countryside will be supported provided they are suited to a rural location, meet the requirements of this policy, and where relevant, other national and local policies on employment locations and protected environments e.g. SP2, SP20, etc. In demonstrating that the business can make a <u>positive long term</u> contribution to the rural economy <u>supporting evidence will be provided with a planning application. Such evidence could include it is expected that</u> a business plan, whole estate plans or similar, will be presented with a planning application. For new businesses in particular, this can aid in illustrating the viability of the proposal. It is considered necessary to demonstrate a long term contribution to avoid pressure for non-economic uses in locations which may not be suitable (e.g. residential). To this end aAn assessment will be made as to whether planning conditions will be required to limit changes of use which would otherwise be permitted under the Town and Country Planning (Use Classes) Order 1987 (as amended) in order to achieve the objectives of the policy, <u>and to avoid pressure for non-economic uses in locations which may not be suitable (e.g. residential).</u>'</p>
MM97	220-221	Policy DM37	<p><i>Amend the first paragraph of the policy as follows:</i></p> <p>'Proposals for <u>all</u> equestrian development that help to strengthen the rural economy and increase opportunities for people to enjoy the countryside in a sustainable way, will be supported.'</p> <p><i>Amend the third paragraph of the policy as follows:</i></p> <p>'In all cases, proposals will be expected to demonstrate the adequate provision of land to allow for the</p>

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			<p>proper care of horses, including stabling, grazing and exercise, in accordance with <u>having regard to</u> the Equine Industry Welfare Guidelines, and the British Horse Society standards or the British Horseracing Authority as appropriate.'</p> <p><i>Amend the North Wessex Downs AONB Horseracing Industry section as follows:</i></p> <p>'Whilst conserving environmental quality and countryside character, the horseracing industry in the AONB will be maintained <u>protected</u>, and its sensitive growth will be allowed for. Within this context:</p> <ol style="list-style-type: none"> i. <u>Suitable existing establishments or facilities are expected to be retained and. Re-development or conversion of those establishments away from uses essential to the horseracing industry will be subject to the tests of both suitability and necessity outlined in the supporting text to this policy;</u> ii. <u>Permanent fragmentation will be resisted; and</u> iii. Re-development away from uses essential to the horseracing industry will be subject to the tests of suitability and necessity outlined in the supporting text to this policy. <u>Proposals for associated new residential accommodation in the countryside will be permitted in accordance with policy DM23 where genuine need is suitably demonstrated through a business case and accommodation cannot be reasonably secured within existing settlements-;</u> iv. <u>Development proposals, particularly within or around Lambourn and Upper Lambourn, which would negatively impact on the long term vitality and/or viability of the horseracing industry as a whole, will be resisted. There must be clear and convincing evidence that the development would generate planning benefits that would outweigh any significant harm to the horseracing industry as a whole; and</u> v. <u>Proposals for related development such as those providers of goods and services to the industry will be supported and considered in accordance with Policy DM35.'</u>
MM98	221-223	Supporting text to policy DM37	<p><i>Amend the supporting text as follows:</i></p> <p>'12.36 Whilst this policy sets out the Council's approach specifically to equestrian development, <u>it also makes clear that</u> proposals for related development such as those providers of goods and services</p>

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			<p>to the <u>horseracing</u> industry will be considered in accordance with Policy DM35.'</p> <p>'12.46 The policy aims to allow for <u>the protection and</u> sensitive development and growth of the horseracing industry whilst conserving environmental quality and countryside character....'</p> <p>'12.50 In terms of interpreting the policy, existing establishments or facilities includes land and buildings relating to the horseracing industry, including residential development. <u>The policy makes clear that re-development or conversion of those establishments away from uses essential to the horseracing industry will be subject to the tests of suitability and necessity given the importance of the industry to West Berkshire and the Lambourn Valley in particular. It is considered important to adopt such an approach in order to protect and sensitively grow this specialist industry whilst responding to its unique characteristics.</u>'</p> <p>'12.51 Suitability test: In considering the suitability of existing establishments, the key factors to consider will be:</p> <ul style="list-style-type: none"> a. The location of the site relating to the form and character of the settlement; b. The existing range of facilities on the site and their adequacy for the purpose of training and/or breeding horses, or their capability for adaptation to meet such needs; <u>and</u> c. The availability of and access to (including the potential for improved access) suitable gallops and training areas; d. The impact on local roads including the safety of horses and riders and traffic using the highway; <u>and</u> e. The availability of sources of labour and the accommodation of personnel on site or in the locality.' <p>'12.55 Whilst racing charities <u>and training yard owners</u> provide some subsidised <u>low cost</u> and/or hostel accommodation in the area, it is recognised there is still a specific need for affordable single person accommodation in Lambourn. <u>The policy makes clear that proposals for associated new residential accommodation in the countryside will be permitted in accordance with policy DM23. In</u></p>

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			<u>accordance with that policy, the occupation of any residential accommodation will be restricted by a planning condition or legal agreement to rural workers involved in the day-to-day operations of the horseracing industry.'</u>
MM99	224	Policy DM38	<p><i>Amend criteria within the policy as follows:</i></p> <p><u>'b. There are no existing buildings that are available and suitable, including locationally, that could reasonably be used to accommodate the proposal;</u> There are no existing buildings or accommodation within the site or wider ownership of the establishment, or in proximity that can reasonably be used;</p> <p>d. The design respects local building styles and materials;</p> <p><u>d.e. Any proposals buildings, structures and curtilage treatments</u> are appropriate in in terms of siting, scale, form, massing, character and appearance, having regard to the local environment and setting within the wider landscape. Development should positively reinforce local distinctiveness;</p> <p><u>e.f. Any Nnew or replacement buildings are located within or adjoining existing buildings or within or adjoining an existing groups of buildings, unless otherwise justified for operational reasons;'</u></p>
MM100	224	Supporting text to policy DM38	<p><i>Delete final two sentences of paragraph 12.58 as follows:</i></p> <p>'12.58 Policy DM1 is also applicable in considering applications for staff accommodation in locations in the countryside, in terms of infill. Policy DM26 is applicable for replacement dwellings.'</p> <p><i>Amend paragraph 12.59 as follows:</i></p> <p>'12.59 In the case of new staff or student accommodation this policy applies. Pplanning conditions may be applied, or the applicant will be required to enter into a legal agreement, to ensure that such accommodation remains ancillary to the main use of the site and to ensure that such accommodation is</p>

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			not sold off separately to be followed by applications for further housing or residential accommodation.'
MM101	230	Policy DM41	<p><i>Amend the policy to delete text as follows:</i></p> <p>Fibre to the Premises:</p> <p>a. All residential developments and all new employment generating development will enable Fibre to the Premises (FTTP) at first occupation;</p> <p>b. All new dwellings, including those provided via building conversions, must be designed and constructed in a way that enables them to meet or exceed the government's building regulations relating to the provision of high speed FTTP infrastructure in the home or any subsequent national equivalent standard should the building regulations and/or national policy be reviewed in the future;</p> <p>c. Where it can be demonstrated that FTTP is not practical, the fastest viable connection should be delivered as well as ducting to allow future delivery of FTTP.</p> <p>Telecommunications Infrastructure:</p> <p>d. All residential development and all new employment generating development should consider the mobile telecommunications requirements of the development proposal. This is to ensure that there is sufficient coverage.</p>
MM102	232	Policy DM42	<p><i>Amend the final two sentences in the first paragraph of the policy as follows:</i></p> <p>'Where required, new developed will be expected <u>Development will, where necessary, be required to make a proportionate contribution to the provision of or improvement of a range of to transport infrastructure. This transport infrastructure will specifically, but not exclusively, include including, where relevant, the following:...</u></p>
MM103	234	Policy DM43	<p><i>Amend the policy as follows:</i></p>

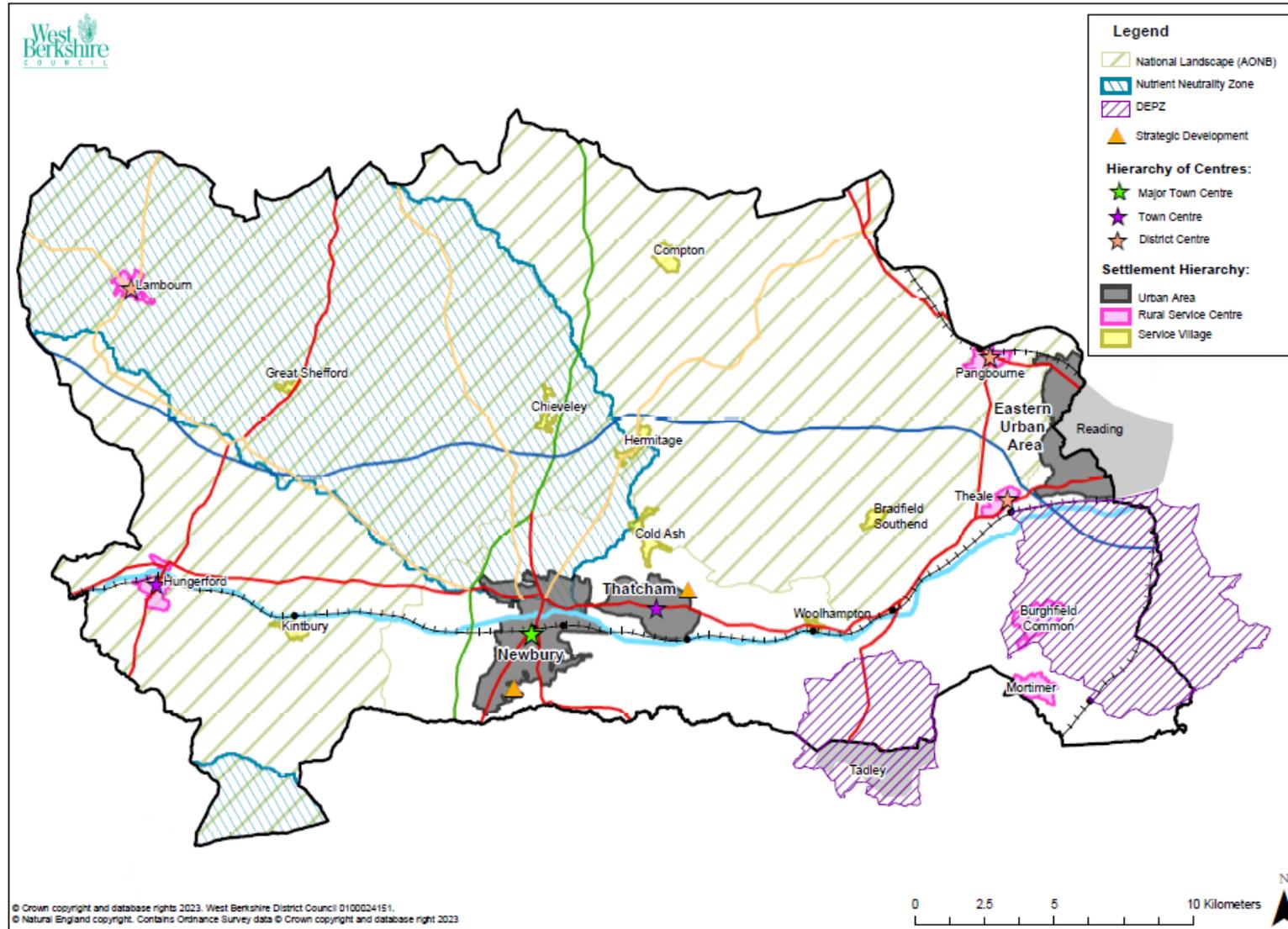
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			<p>'Policy DM43 Theale Rail – Road Transfer Site</p> <p>The <u>site at Wigmore Lane in Theale, as defined on the Policies Map, shall be safeguarded as a rail – road transfer facility.</u> site at Theale is reserved solely for those industries which require a rail-road transfer facility and access to the highway network. <u>Redevelopment for any uses not expressly for this purpose of the site, in part or in whole, for uses that would compromise the operation of this facility will not be permitted.</u></p>
MM104	234	Supporting text to policy DM43	<p><i>Amend the text as follows:</i></p> <p>12.100 The rail - road transfer site at Wigmore Lane, Theale, is an important infrastructure facility within the District allowing for the transfer of goods from rail to road, <u>and this policy seeks to safeguard the site, as defined on the Policies Map, as a rail – road transfer facility.</u></p> <p>12.101 The facility is primarily an aggregates terminal, and the <u>West Berkshire Minerals and Waste Local Plan 2022-2037 safeguards the site to ensure the supply of minerals and the continued export of minerals from the District by road. Proposals for Any non-mineral and waste development on the site would need to comply with the exceptions set out in Policy 9 of the West Berkshire Minerals and Waste Local Plan 2022 - 2037. Should the exceptions be deemed to apply, Policy DM43 will ensure the site continues to remain in use as a rail – road transfer facility, allowing the continued movement of freight from rail to road for other industries requiring such a facility, including for example the transfer of consumer goods.</u></p> <p>12.102 Nonetheless, <u>The movement of freight by rail is vital to the local economy and plays a significant role in reducing congestion and carbon emissions. Many industries rely on rail freight for the movement of goods, and with the drive to reduce carbon emissions globally it is expected that demand for rail freight will continue to grow. transport of consumer goods by rail continues to be important for the local economy and Theale is the only location which offers rail - road transfer facilities in the area and which may have the potential to support rail freight growth.</u> †The site should be protected to ensure the infrastructure exists to allow for the transfer of rail freight for those industries which require a rail-road</p>

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			<p>transfer facility and access to the highway network.</p> <p>12.103 The extent of the rail-road transfer site is defined on the Policies Map.'</p>
MM105	235	Policy DM44	<p><i>Amend second paragraph of the policy under Parking sub-heading as follows:</i></p> <p>'Cycle and motorcycle parking should be provided in accordance with <u>have regard to</u> the Council's 'Cycling and Motorcycling Advice and Standards for New Development'. This sets out design standards and expected levels of provision for different types of development.'</p> <p><i>Amend first paragraph under Residential Parking for New Development sub-heading as follows:</i></p> <p>'The layout and design of parking spaces should follow <u>take account of</u> the parking design guidance included within the Council's 'Highway Design Guidance for Residential Development' in order that good quality homes and neighbourhoods are created.'</p>
MM106	238	Policy DM45	<p><i>Amend last paragraph of the policy as follows:</i></p> <p>'Where developments are required to develop travel planning measures, it is expected that necessary targets will be set to restrict single occupancy vehicle journeys and to increase sustainable travel, and undertake regular monitoring and reporting in line with the requirements of the Local Planning Authority.'</p>
MM107	238	Supporting text to policy DM45	<p><i>Amend supporting text to include a new paragraph after 12.112 as follows:</i></p> <p>'<u>Commonly Travel Plans should be monitored for a period of five years, which should allow for travel patterns to become established. However, for large multi-occupancy developments which may be built over an extended period, the monitoring period may cover a period encompassing the construction and final occupation of the development and include a period of up to five years beyond final occupation. In</u></p>

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			<u>these incidences, the monitoring period will be agreed between the Council and the developer.'</u>
MM108	251-253	Appendix 3	<p><i>Amend text in Appendix 3 as follows:</i></p> <p>3.1 The maps set out below provide the mapping information, as at March 2020 <u>January 2023</u>, in relation to the DEPZs, OCZs (5km) and the 12km planning consultation zones for each AWE site as per the ONR consultation criteria.</p> <p><u>3.2 The extent of the DEPZs shown in Appendix 3 and the Policies Map could change before the Plan is updated or superseded and policy SP4 will be applied to the latest version of the DEPZ.</u></p>
MM109	258 - 260	Appendix 6	<i>Delete Appendix 6 How policies are applied in a neighbourhood planning context</i>
MM110	261 - 268	Appendix 7	<p><i>Delete the text under the table in appendix 7 as follows:</i></p> <p>The following site allocation policies from both the West Berkshire Core Strategy 2006-2026 and the Housing Site Allocations DPD 2006-2026 have not been carried forward as part of the LPR as they have either been built out or are nearing completion.</p> <ul style="list-style-type: none"> • CS2 Newbury Racecourse strategic site allocation • HSA7 St Gabriels Farm, The Ridge, Cold Ash • HSA8 Land to the east of Sulham Hill, Tilehurst • HSA10 Stonehams Farm, Tilehurst • HSA12 Bath Road, Calcot • HSA17 Land to the north of the A4, Woolhampton • HSA18 Salisbury Road, Hungerford • HSA21 Land north of Pangbourne Hill, Pangbourne • HSA22 Stretton Close, Bradfield Southend • HSA26 Land east of Laylands Green, Kintbury

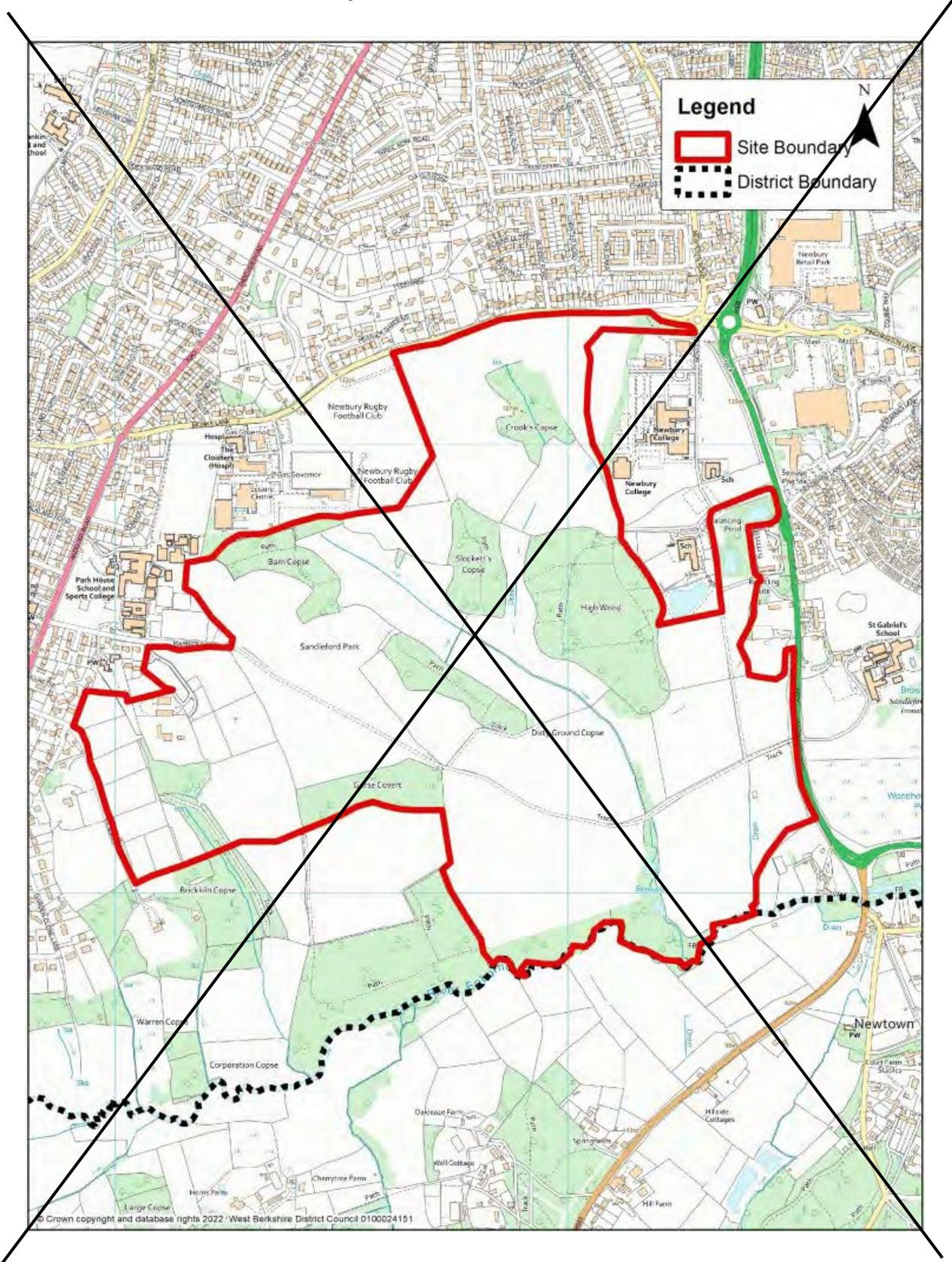
Ref	Page of submitted LPR	Policy/ Paragraph of submitted LPR	Main Modification											
			<p>The following site allocation policies from the Housing Site Allocations DPD 2006-2026 have not been carried forward as part of the LPR because they are not considered deliverable at this time:</p> <ul style="list-style-type: none"> ● HSA6 Poplar Farm, Cold Ash ● HSA16 The Hollies, Burghfield Common <p><i>Insert list of policies into the 'superseded Housing Site Allocations DPD 2006-2026 policy' column adjacent to Policy SP12 as follows:</i></p> <table border="1" data-bbox="651 643 2074 1350"> <thead> <tr> <th data-bbox="651 643 831 906">Local Plan Review Policy</th> <th data-bbox="831 643 1021 906">Superseded West Berkshire District Local Plan 1991-2006 Policy</th> <th data-bbox="1021 643 1267 906">Superseded West Berkshire Core Strategy 2006-2025 Policy</th> <th data-bbox="1267 643 2074 906">Superseded Housing Site Allocations DPD 2006-2026 Policy</th> </tr> </thead> <tbody> <tr> <td data-bbox="651 906 831 1350">SP12 Approach to Housing Delivery</td> <td data-bbox="831 906 1021 1350">-</td> <td data-bbox="1021 906 1267 1350">CS1 Delivering new homes and retaining the housing stock</td> <td data-bbox="1267 906 2074 1350"> <u>CS2 Newbury Racecourse strategic site allocation</u> <u>HSA6 Poplar Farm, Cold Ash</u> <u>HSA7 St Gabriels Farm, The Ridge, Cold Ash</u> <u>HSA8 Land to the east of Sulham Hill, Tilehurst</u> <u>HSA10 Stonehams Farm, Tilehurst</u> <u>HSA12 Bath Road, Calcot</u> <u>HSA16 The Hollies, Burghfield Common</u> <u>HSA17 Land to the north of the A4, Woolhampton</u> <u>HSA18 Salisbury Road, Hungerford</u> <u>HSA21 Land north of Pangbourne Hill, Pangbourne</u> <u>HSA22 Stretton Close, Bradfield Southend</u> <u>HSA26 Land east of Laylands Green, Kintbury</u> </td> </tr> </tbody> </table>				Local Plan Review Policy	Superseded West Berkshire District Local Plan 1991-2006 Policy	Superseded West Berkshire Core Strategy 2006-2025 Policy	Superseded Housing Site Allocations DPD 2006-2026 Policy	SP12 Approach to Housing Delivery	-	CS1 Delivering new homes and retaining the housing stock	<u>CS2 Newbury Racecourse strategic site allocation</u> <u>HSA6 Poplar Farm, Cold Ash</u> <u>HSA7 St Gabriels Farm, The Ridge, Cold Ash</u> <u>HSA8 Land to the east of Sulham Hill, Tilehurst</u> <u>HSA10 Stonehams Farm, Tilehurst</u> <u>HSA12 Bath Road, Calcot</u> <u>HSA16 The Hollies, Burghfield Common</u> <u>HSA17 Land to the north of the A4, Woolhampton</u> <u>HSA18 Salisbury Road, Hungerford</u> <u>HSA21 Land north of Pangbourne Hill, Pangbourne</u> <u>HSA22 Stretton Close, Bradfield Southend</u> <u>HSA26 Land east of Laylands Green, Kintbury</u>
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MM111	269	Appendix 8	<i>Amend the housing trajectory as set out in Annex N</i>											

Key Diagram



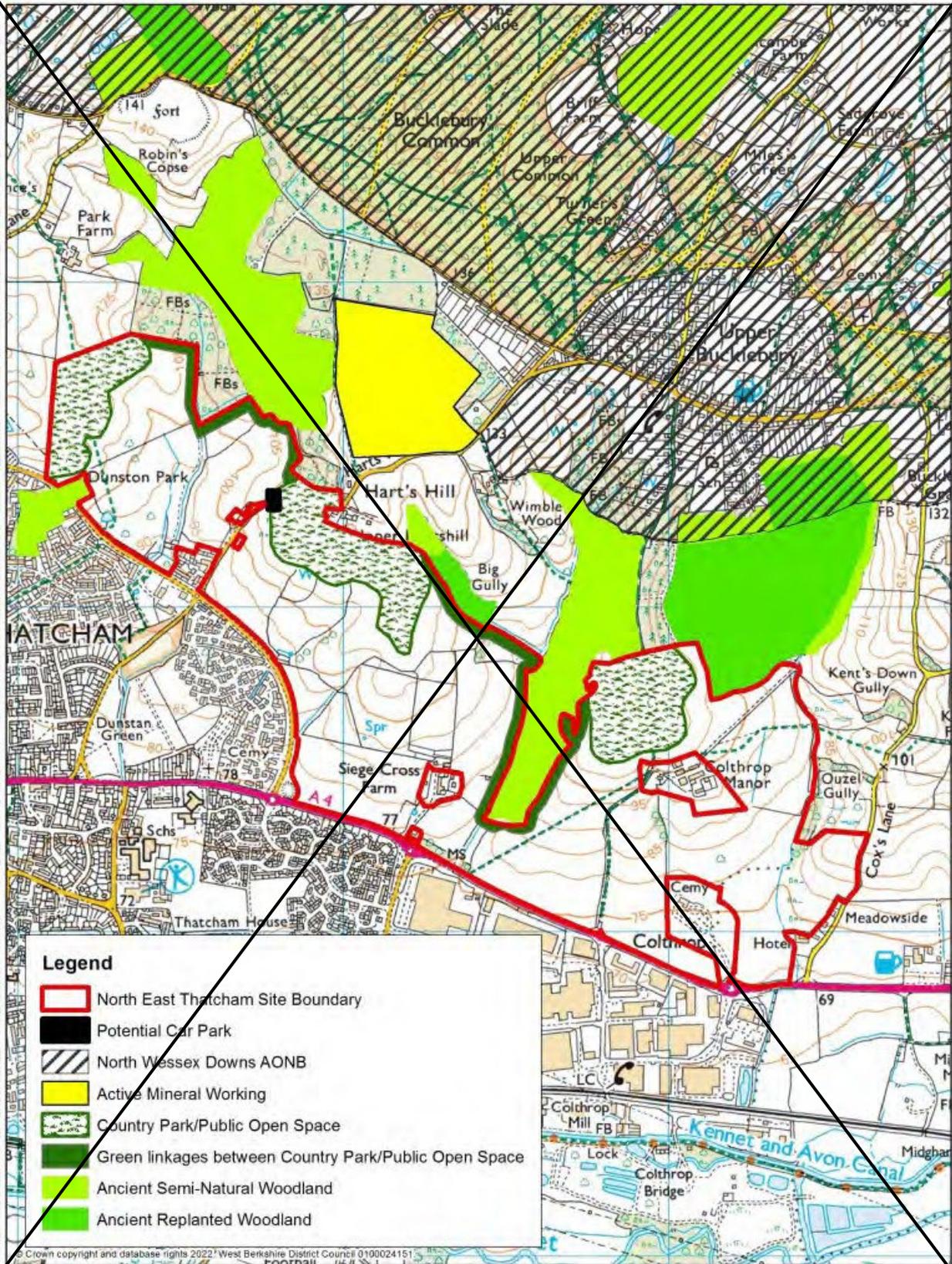
Sandleford Park

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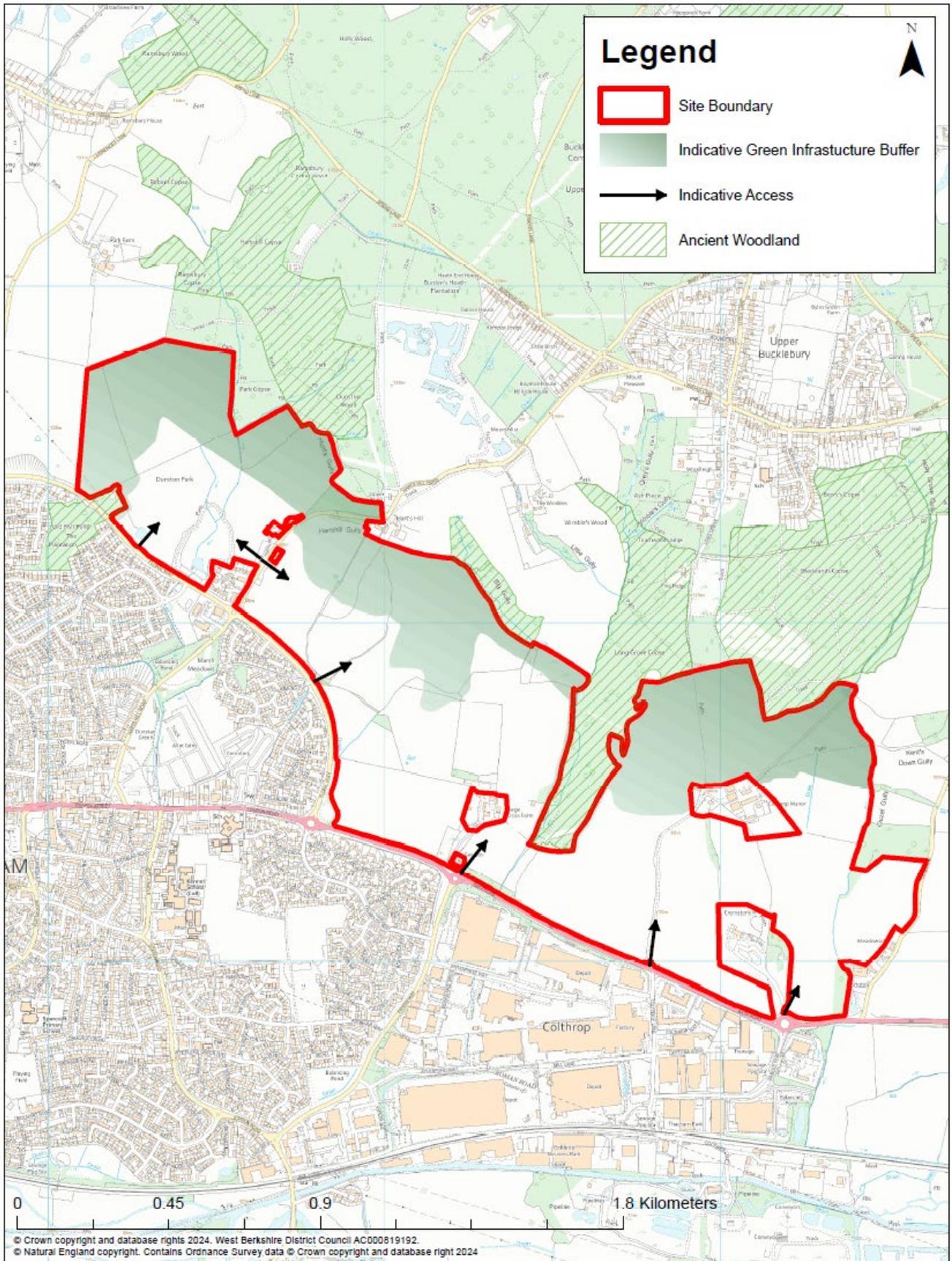


North East Thatcham

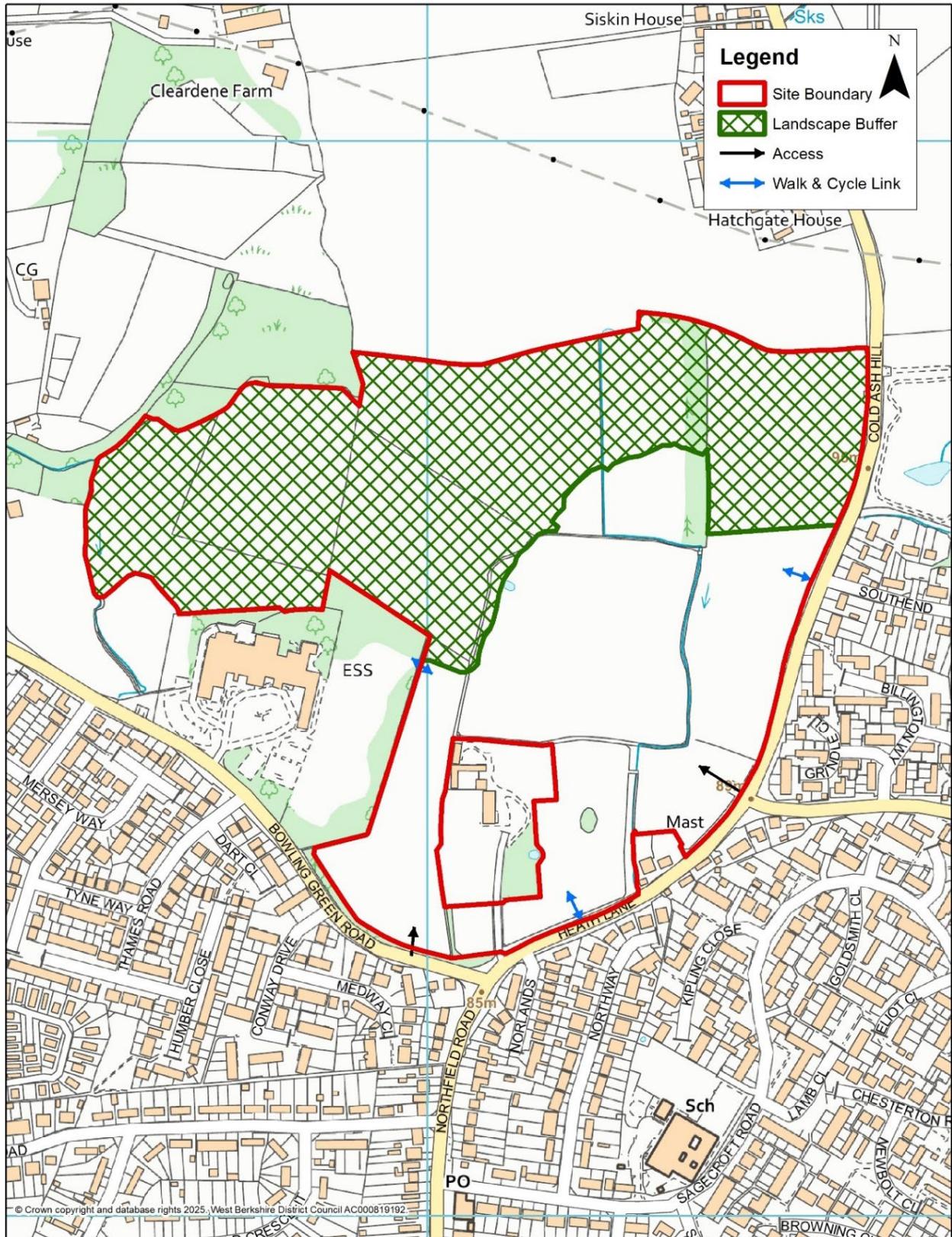
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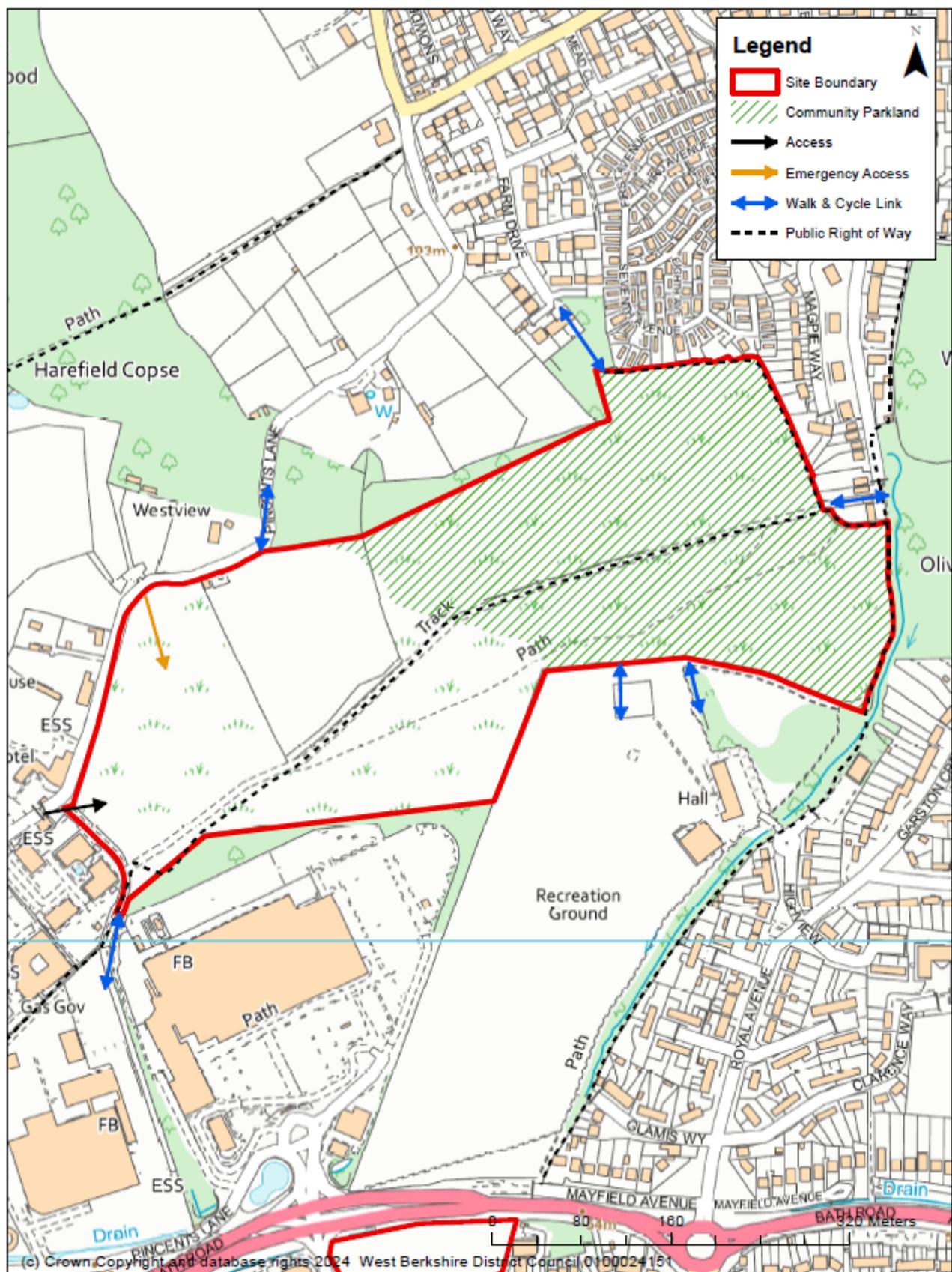
Land at Henwick Park, Bowling Green Road, Thatcham



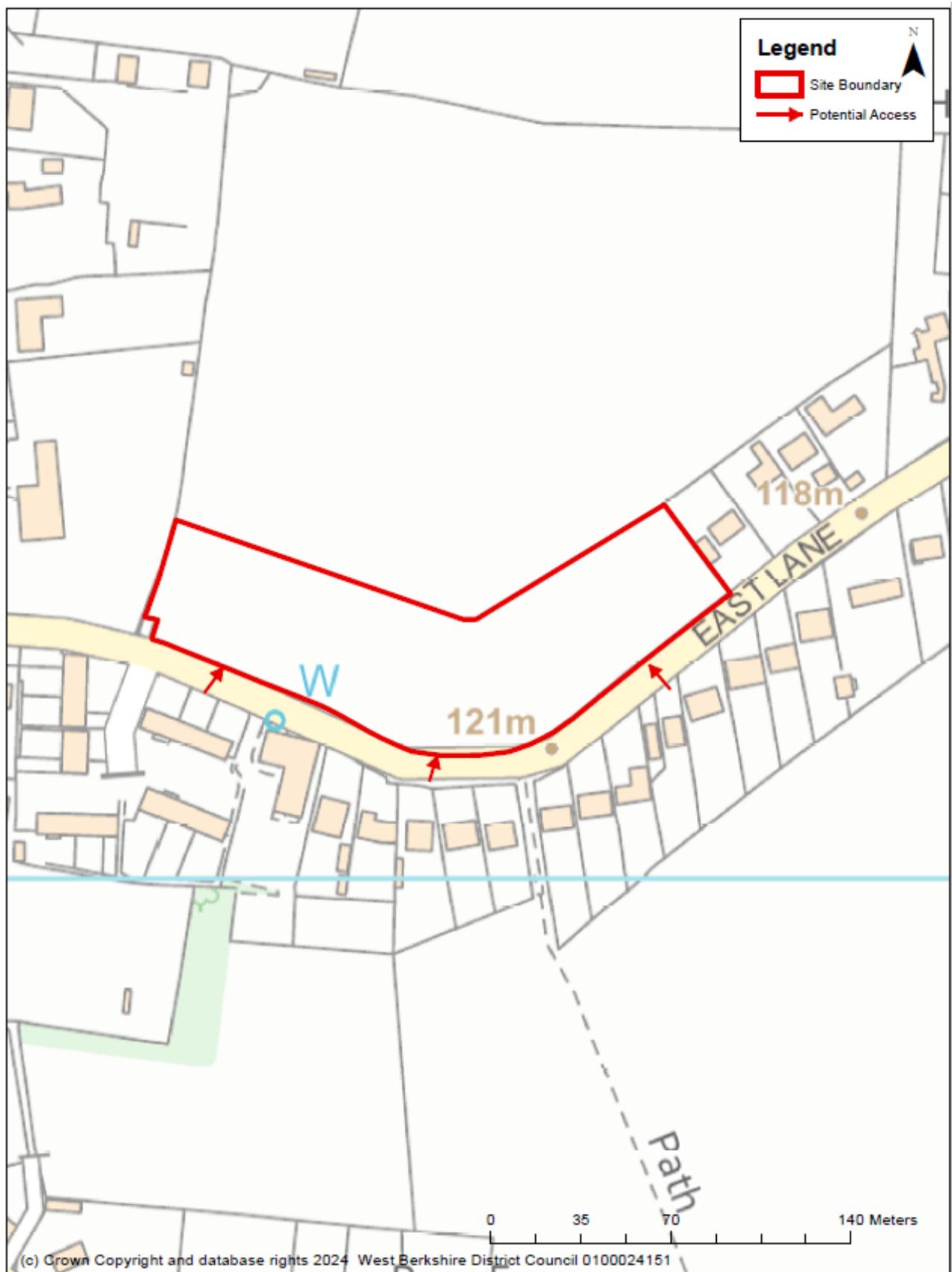
Land East of Regency Park Hotel, Bowling Green Road, Thatcham



Land at Pincents Lane, Tilehurst

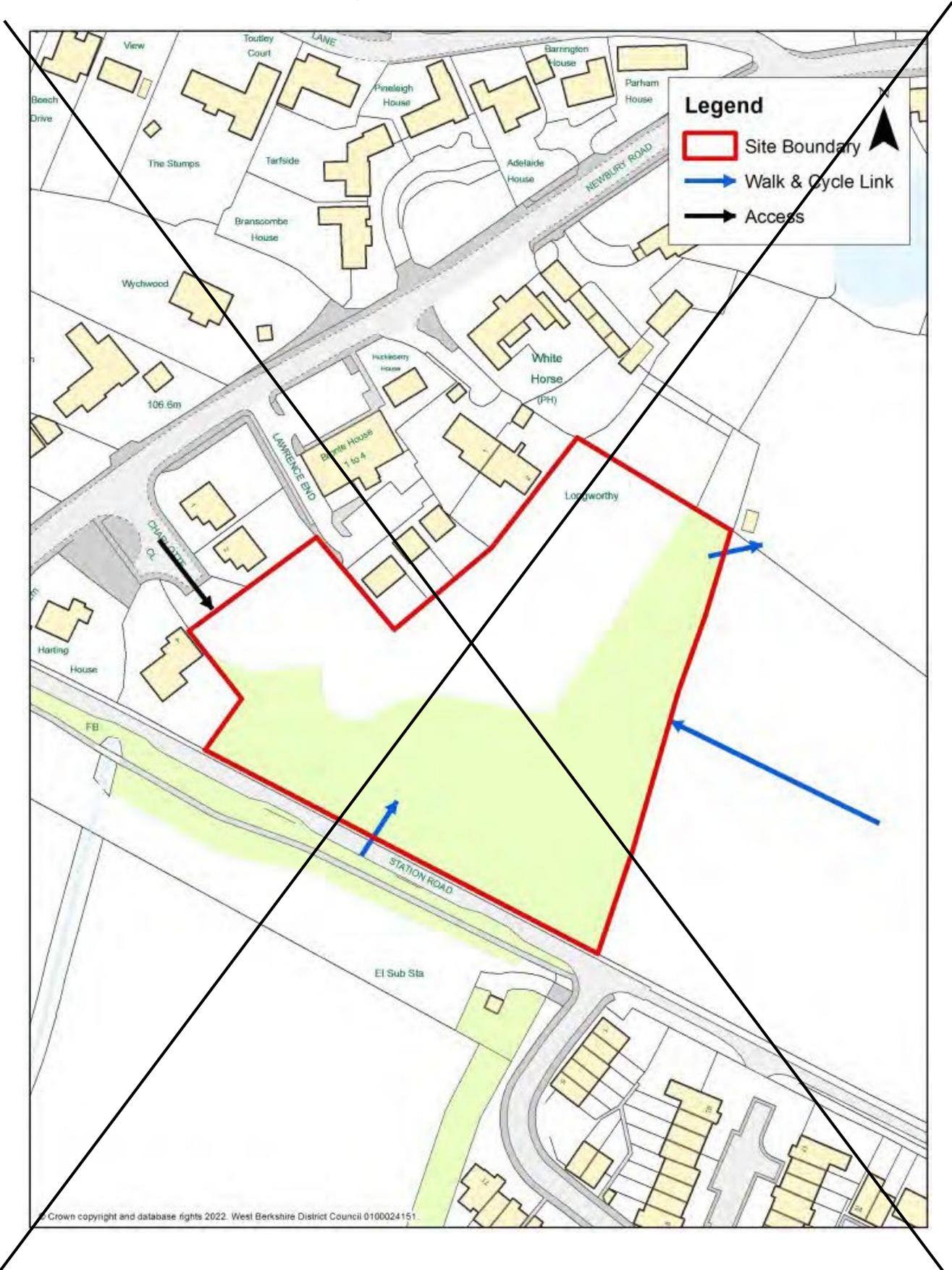


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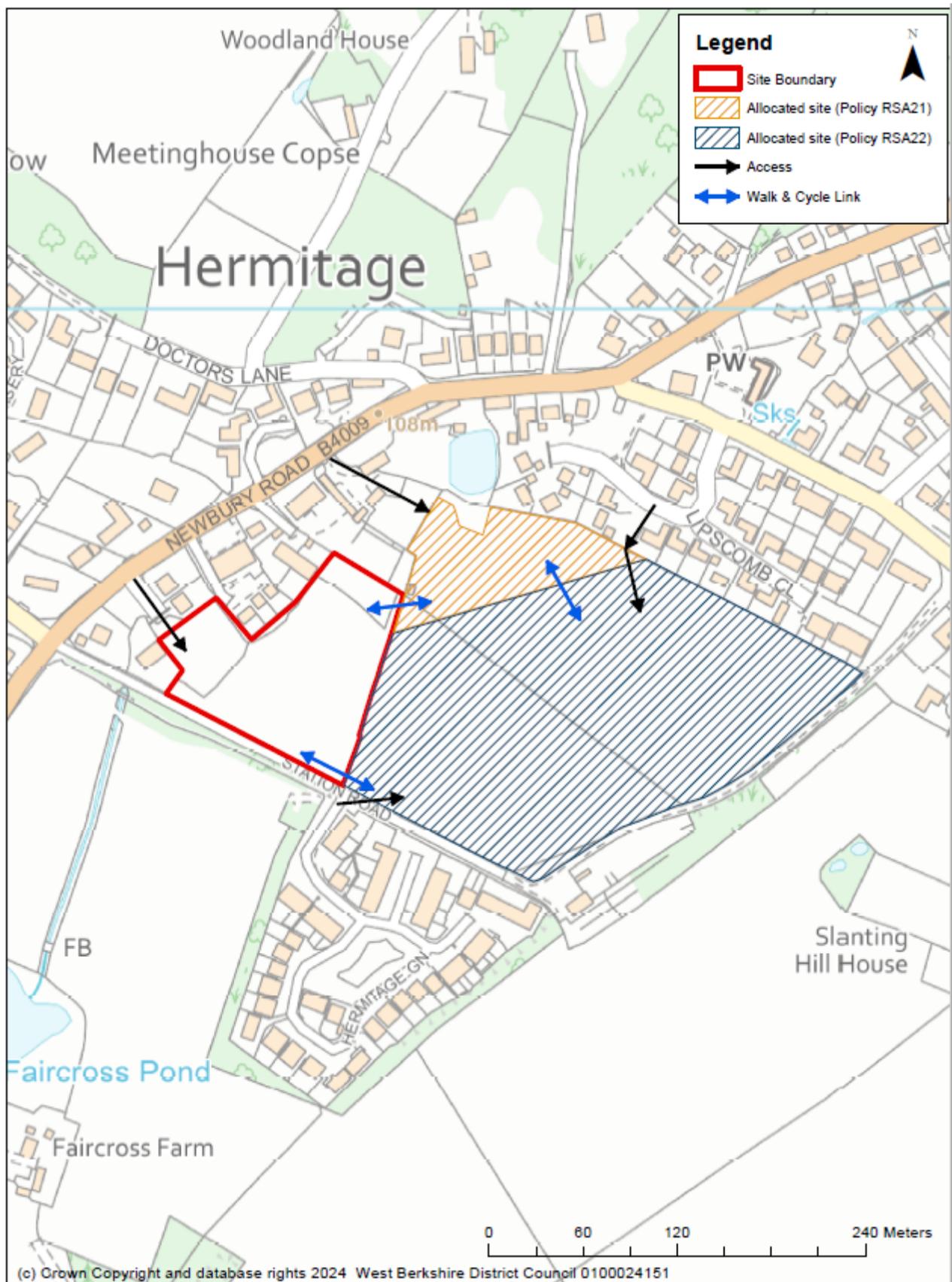


Land off Charlotte Close, Hermitage

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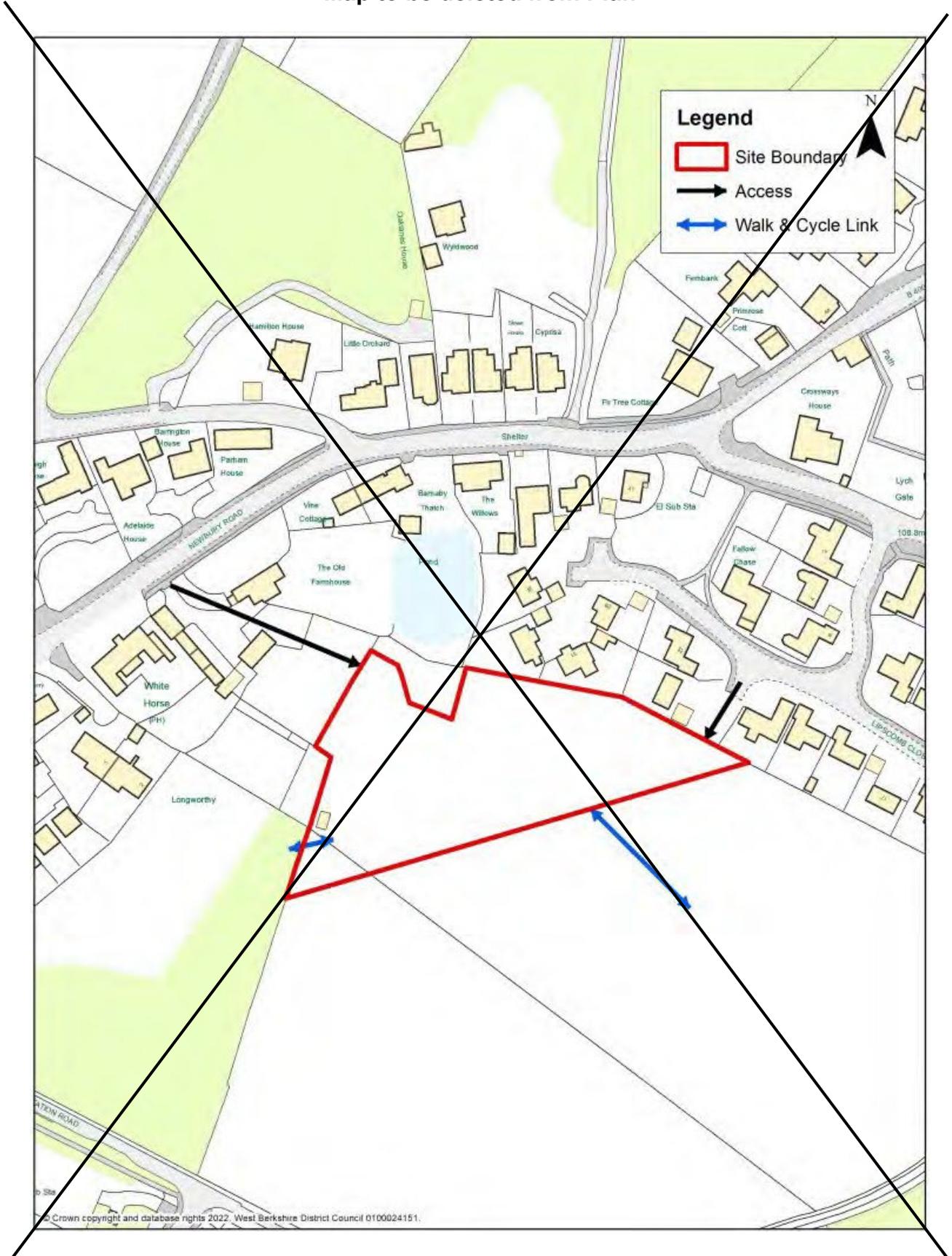


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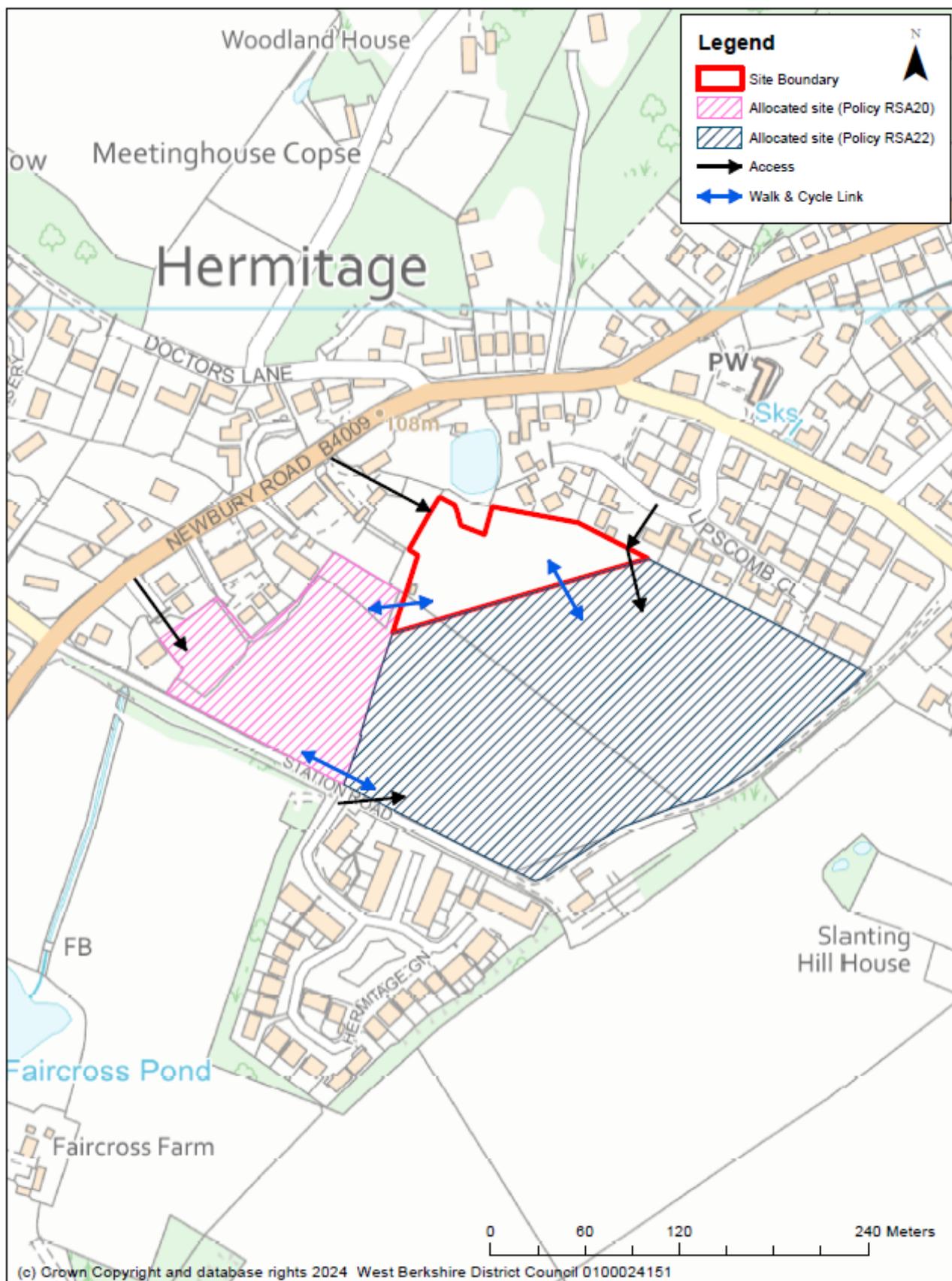


Land to the south of the Old Farmhouse, Hermitage

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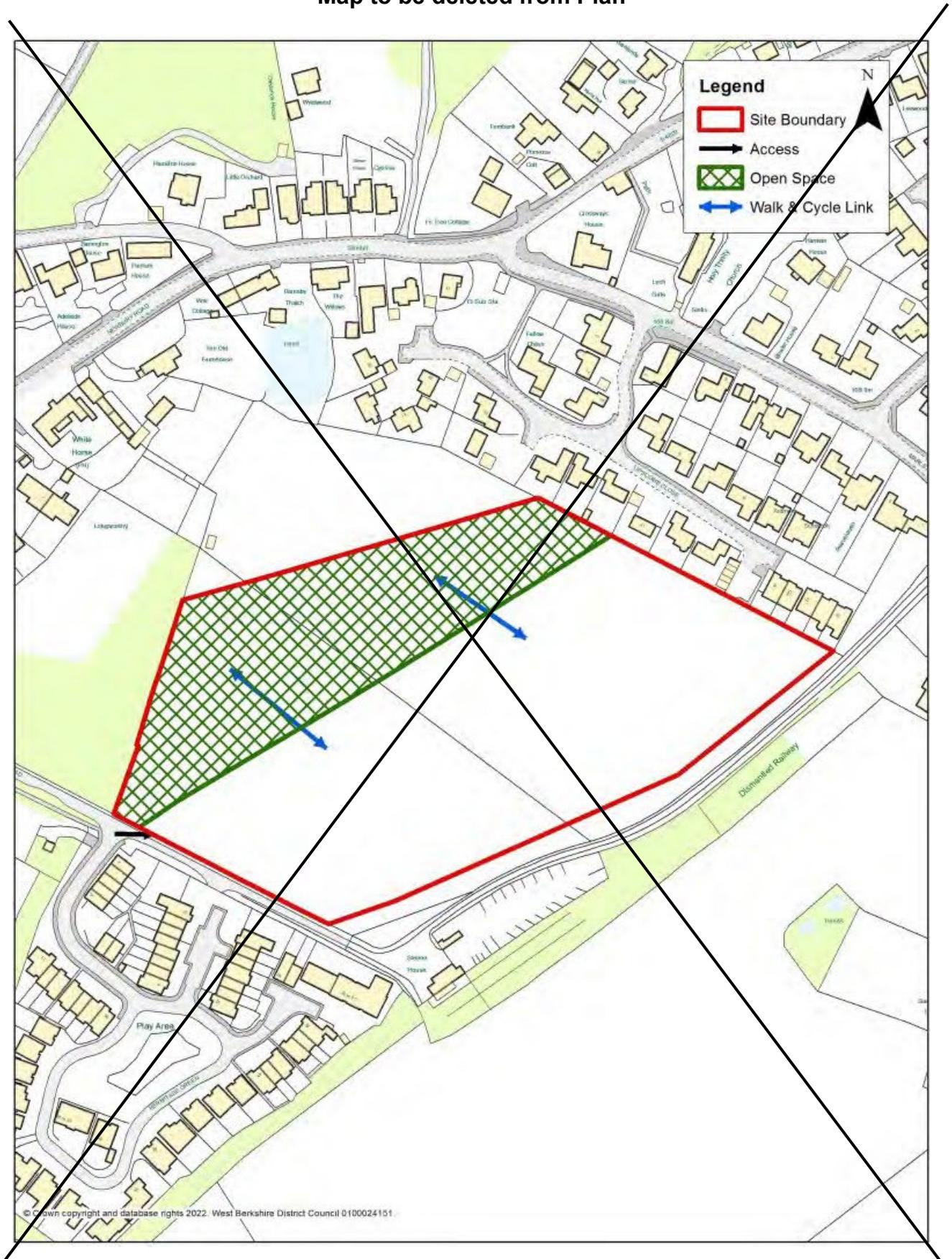


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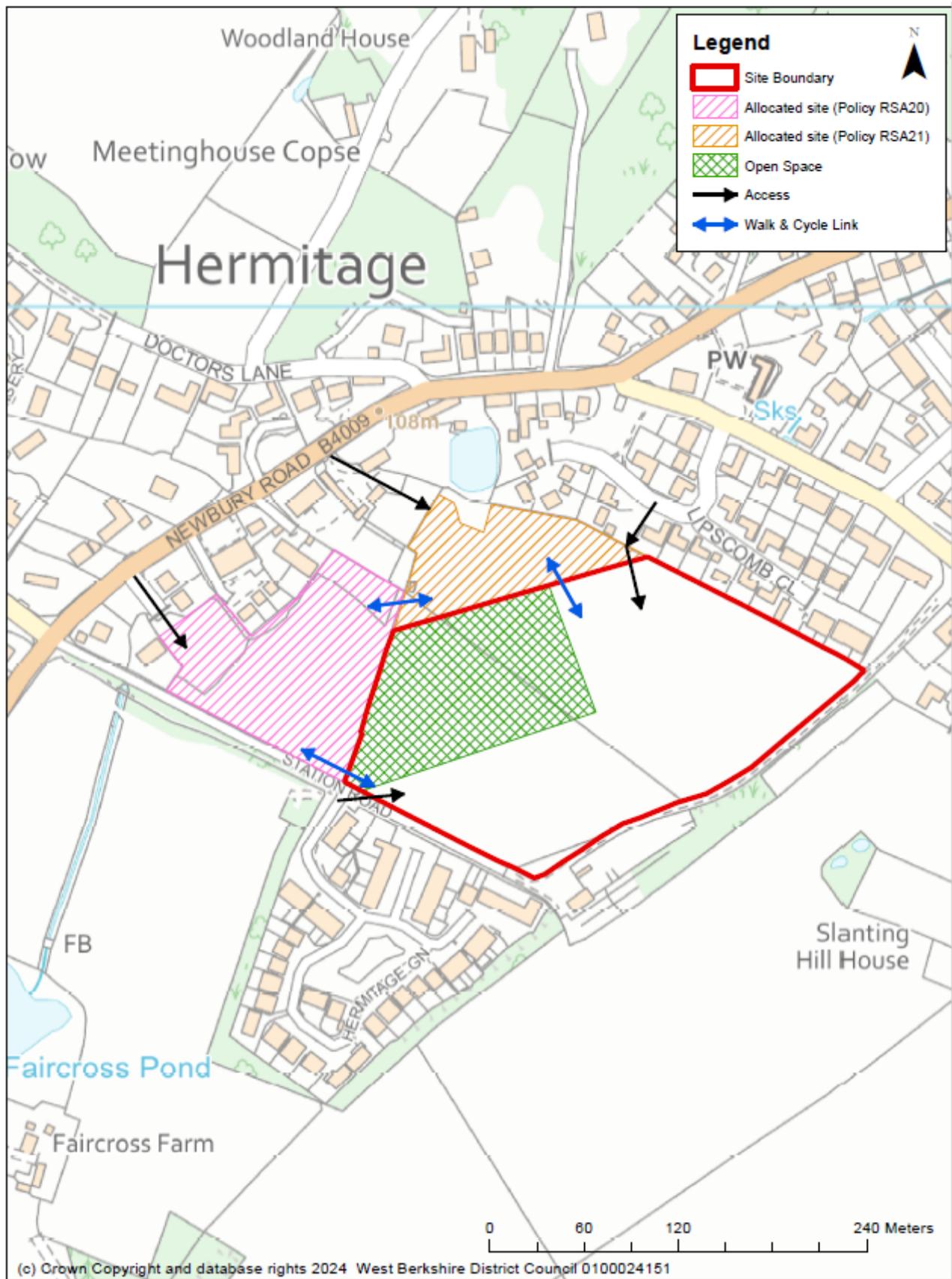


Land adjacent Station Road, Hermitage

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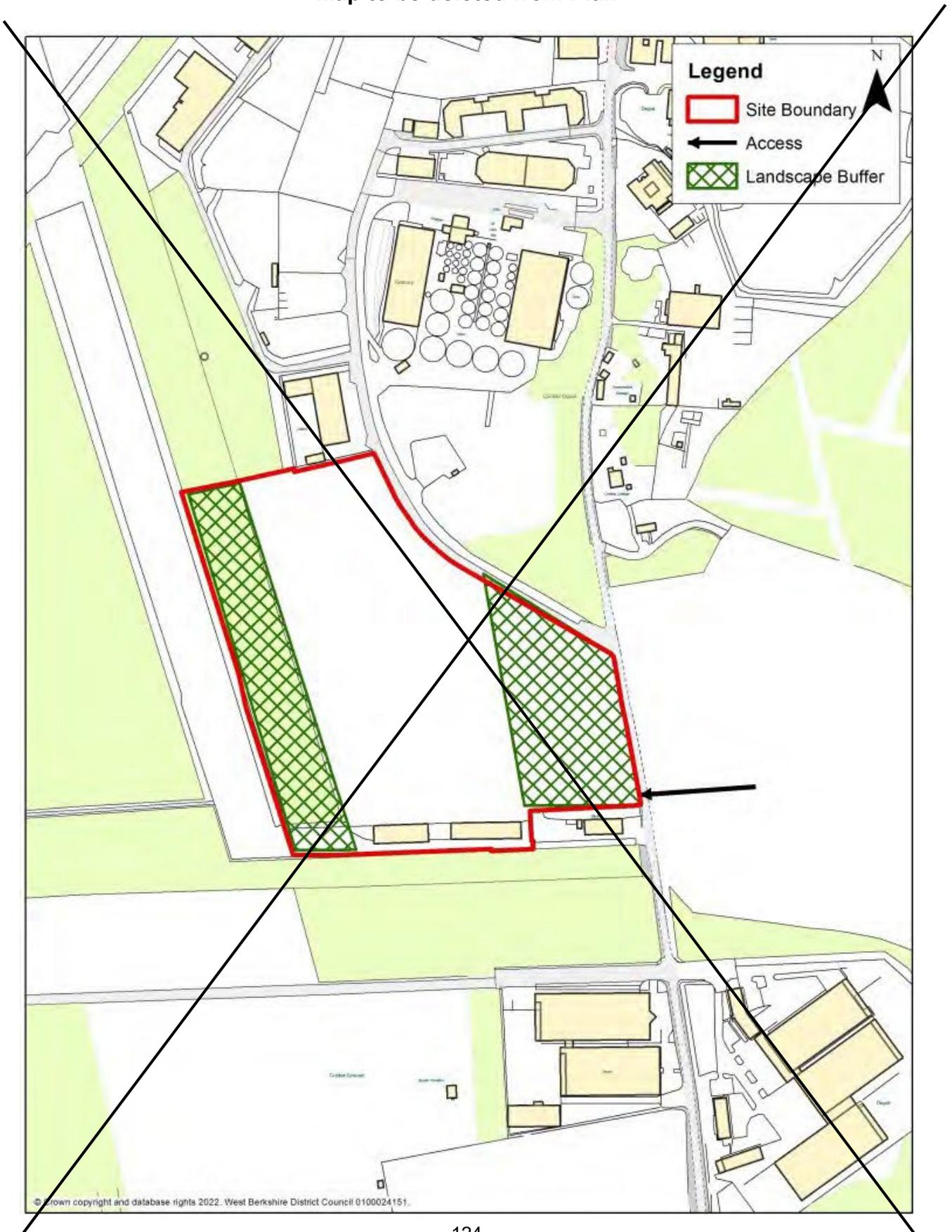


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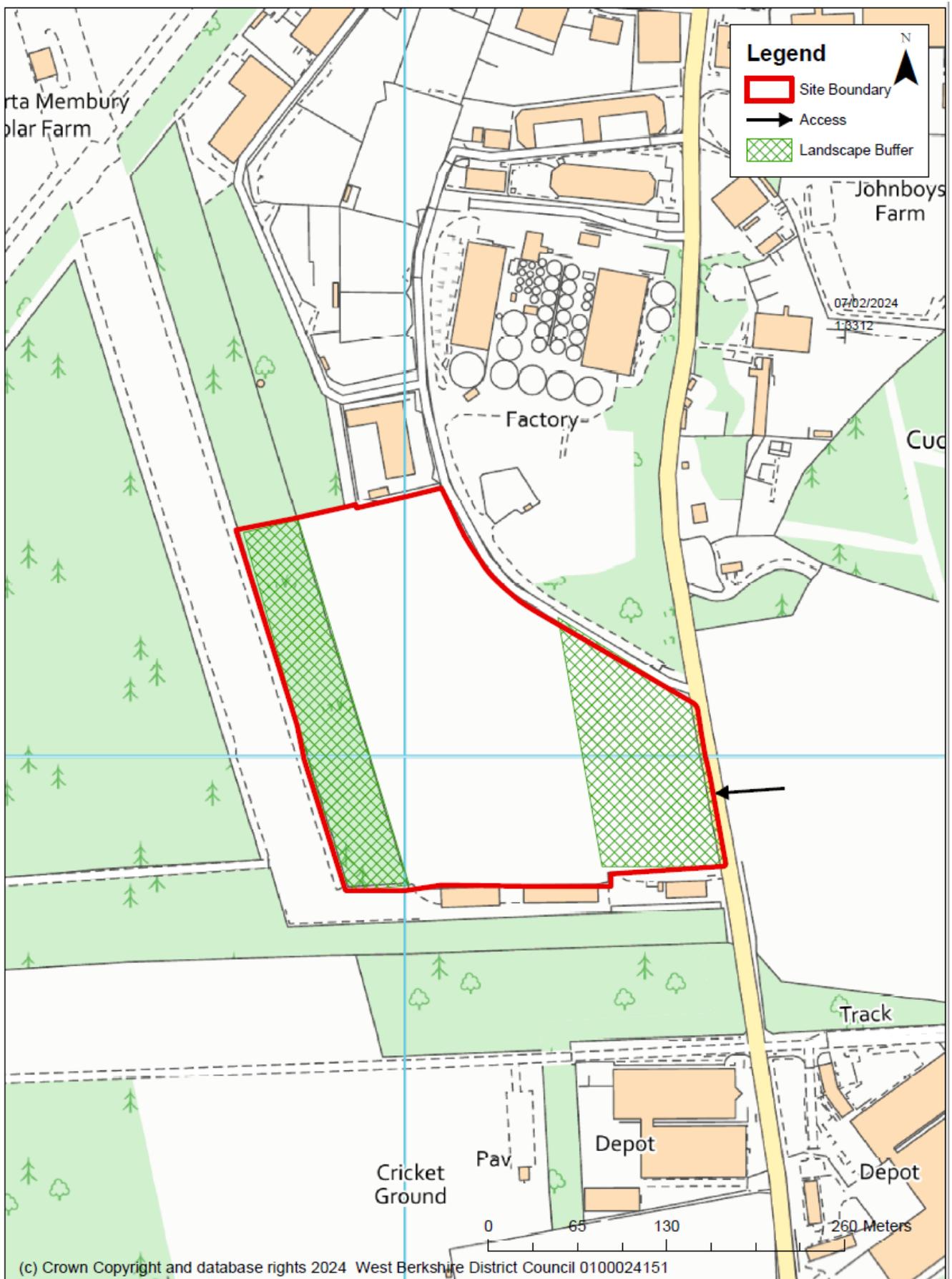


Land west of Ramsbury Road, Membury Industrial Estate, Lambourn Woodlands

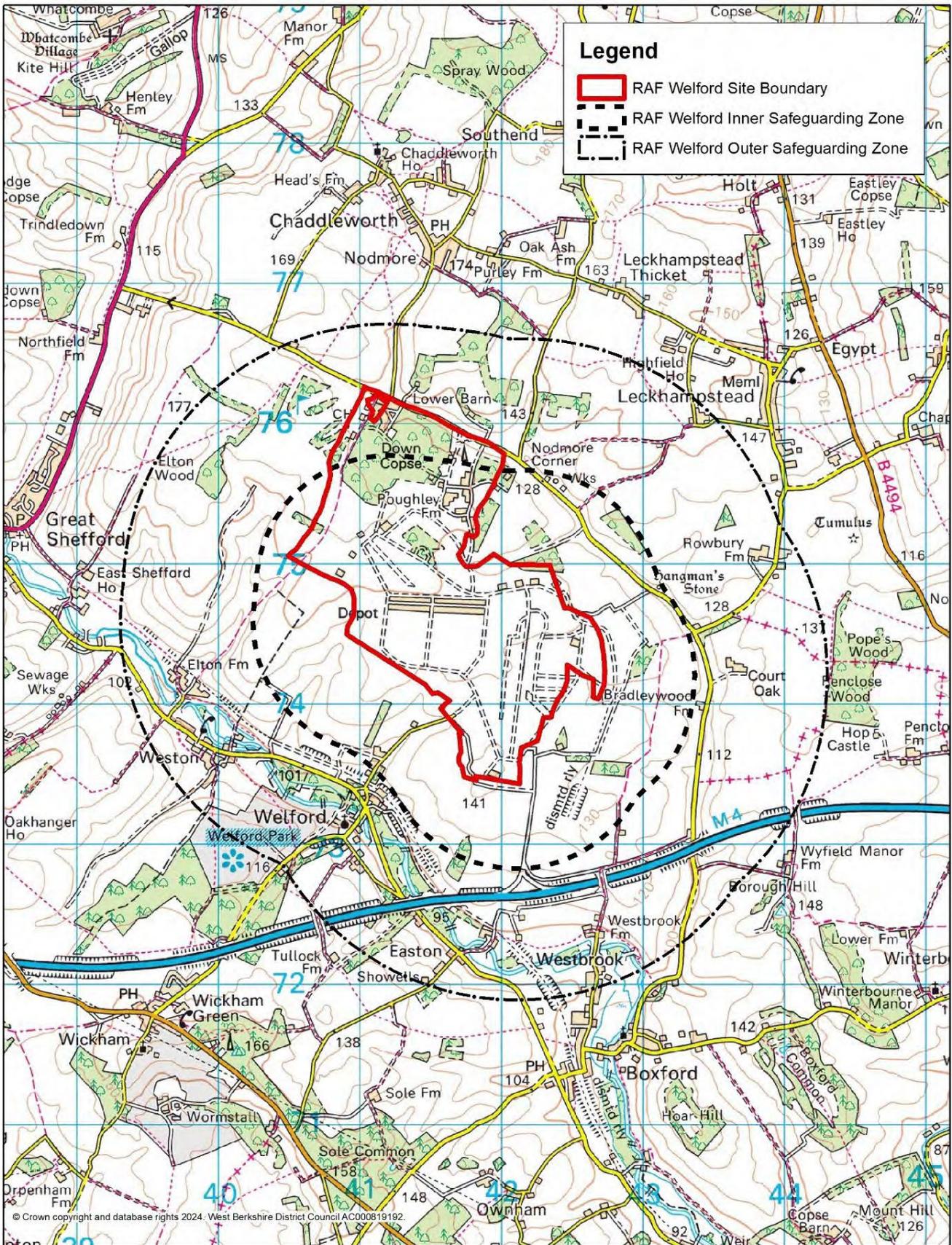
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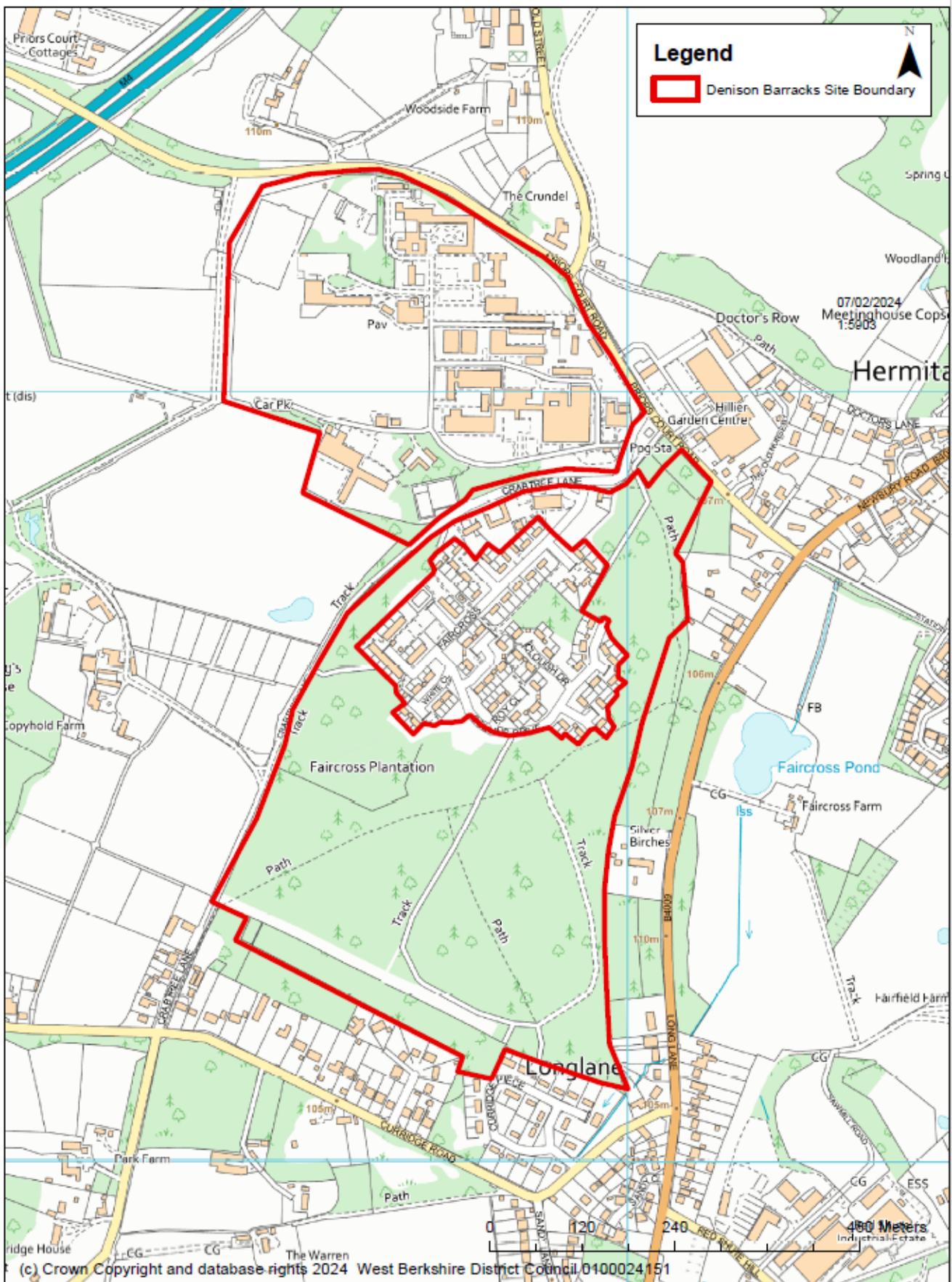
Map to be inserted in Plan



RAF Welford



Denison Barracks



Appendix 8: Housing Trajectory

Graph to be deleted

Housing Trajectory 2022/23 – 2038/39

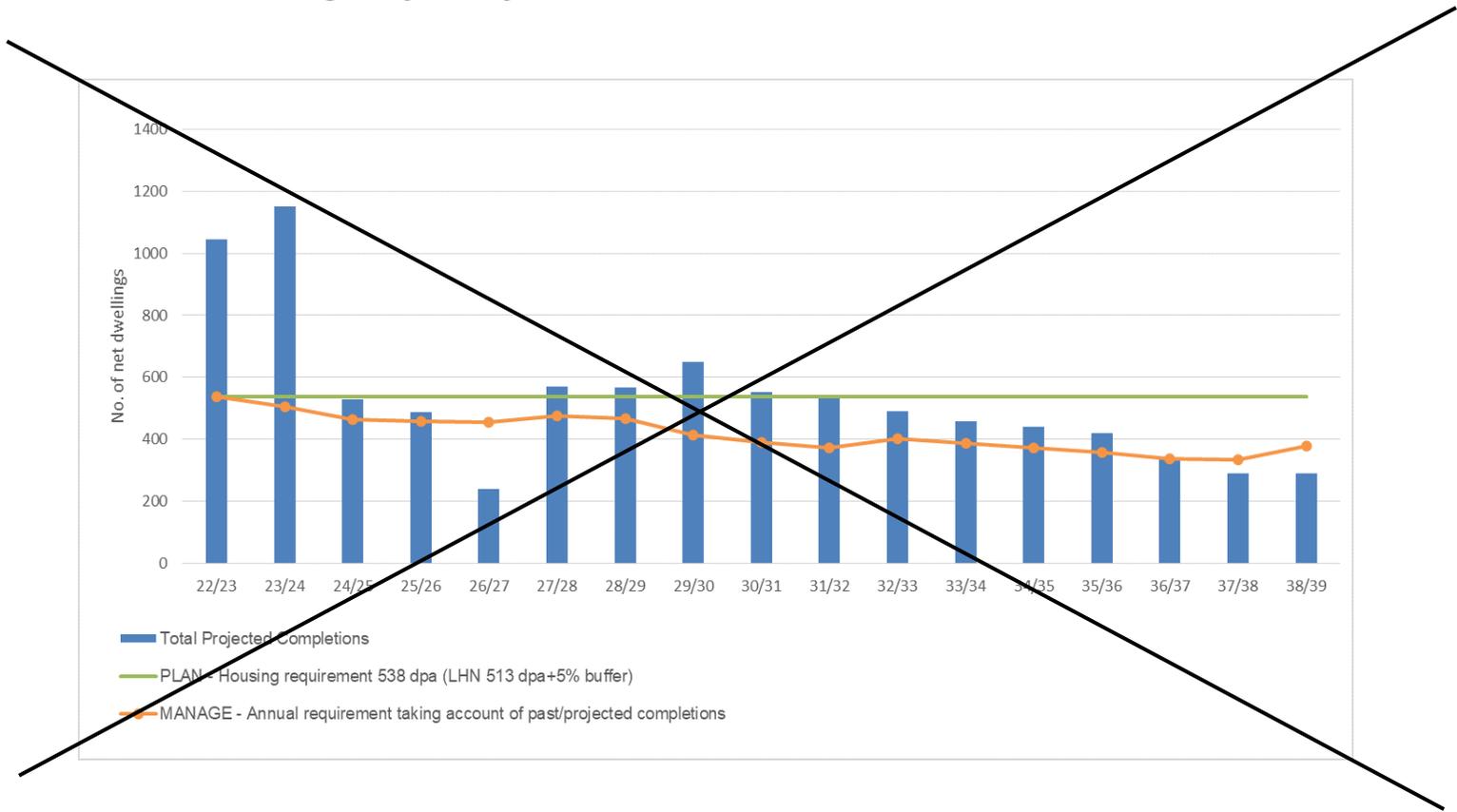


Chart and graph to be inserted into Plan

Housing Trajectory 2023/24-2040/41

(for reference)

Five Year Period Post Adoption

	Planning status at 31 March 2023	(for reference)				Five Year Period Post Adoption																TOTAL
		Submission 22/23	23/24	24/25	Adoption 25/26	Y1 26/27	Y2 27/28	Y3 28/29	Y4 29/30	Y5 30/31	Y6 31/32	Y7 32/33	Y8 33/34	Y9 34/35	Y10 35/36	Y11 36/37	Y12 37/38	Y13 38/39	Y14 39/40	Y15 40/41		
Local Plan allocations not being retained (due to site being at an advanced stage of construction)																						
Core Strategy allocated site - Newbury Racecourse	Under construction	67	51	15	39	55	46	54	40	50	48	0	0	0	0	0	0	0	0	398		
HSADPD 4B - Land west of New Road, North of Pyle Hill, Greenham	Completed	25	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
HSADPD 7 - St Gabriel's Farm, The Ridge, Cold Ash	Under construction	0	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	5		
HSADPD 10 - Stonehams Farm, Tilehurst	Under construction	35	15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	15		
HSADPD 12 - Land adjacent to Junction 12 of M4, Bath Road Calcot	Under construction	68	29	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	29		
HSADPD 17 - Land to the north of A4, Woolhampton	Completed	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
HSADPD 18 - Salisbury Road, Hungerford	Completed	66	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
HSADPD 22 - Land off Stretton Close, Bradfield Southend	Under construction	7	4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	4		
Subtotal: Local Plan allocations not being retained		270	104	15	39	55	46	54	40	50	48	0	0	0	0	0	0	0	0	451		
Existing planning commitments on unallocated sites																						
Beansheaf Farm, Bourne Close, Holybrook	Under construction	22	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3		
Sterling Industrial Estate, Newbury	Under construction	0	119	48	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	167		
Land to rear of 1-15 The Broadway (Bayer site), Newbury	Full permission	0	0	0	36	36	0	0	0	0	0	0	0	0	0	0	0	0	0	72		
Market Street redevelopment, Newbury	Under construction	2	198	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	198		
1 West Street, Newbury	Permission lapsed	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
Land off Faraday and Kelvin Road, Newbury	Full permission	0	0	0	0	0	0	80	80	0	0	0	0	0	0	0	0	0	0	160		
Westminster House, Bath Road, Padworth	Full permission	0	13	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	13		
Comfort Inn And Land To The South West , Bath Road, Padworth	Full permission	0	0	0	26	0	0	0	0	0	0	0	0	0	0	0	0	0	0	26		
Land adjacent to Hilltop, Donnington: West	Under construction	73	40	35	35	25	0	0	0	0	0	0	0	0	0	0	0	0	0	135		
Land adjacent to Hilltop, Donnington: East	Under construction	70	40	35	21	0	0	0	0	0	0	0	0	0	0	0	0	0	0	96		
Crookham House , Crookham Common, Thatcham	Completed	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
Lakeside, Theale	Full permission	0	0	30	60	60	60	60	29	0	0	0	0	0	0	0	0	0	0	299		
19 and 19A High Street, Theale	Full permission	0	0	15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	15		
Permitted non-allocated sites of 10+ dwellings at 31 March 2023		169	413	163	178	121	60	140	109	0	0	0	0	0	0	0	0	0	0	1184		
Emerald House, Newbury Business Park	Completed	109	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
Bayer House, Strawberry Hill	Under construction	0	50	141	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	191		
Bloor Homes, Southern River View House, Newbury Business Park	Alternative scheme	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
James Butcher House, 39 High Street	Completed	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
Sites identified through prior approval of 10+ dwellings at 31 March 2023		109	50	141	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	191		
Permitted non-allocated small sites at 31 March 2023		50	153	129	32	0	0	0	0	0	0	0	0	0	0	0	0	0	0	314		
Small sites identified through prior approval at 31 March 2023		16	22	18	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	40		
Subtotal: Existing planning commitments on unallocated sites		344	638	451	210	121	60	140	109	0	0	0	0	0	0	0	0	0	0	1729		

(for reference)

Five Year Period Post Adoption

	Planning status at 31 March 2023	Submission 22/23	23/24	24/25	Adoption 25/26	Five Year Period Post Adoption															TOTAL
						Y1 26/27	Y2 27/28	Y3 28/29	Y4 29/30	Y5 30/31	Y6 31/32	Y7 32/33	Y8 33/34	Y9 34/35	Y10 35/36	Y11 36/37	Y12 37/38	Y13 38/39	Y14 39/40	Y15 40/41	
Retained allocations in the Local Plan and Stratfield Mortimer NDP allocations																					
SP16 Sandleford Park Newbury - East	Outline permission	0	0	0	0	50	100	100	100	100	100	100	100	100	50	0	0	0	0	0	1000
SP16 Sandleford Park Newbury - West	No permission	0	0	0	0	0	0	50	50	50	50	50	50	50	50	50	0	0	0	0	500
RSA1 - Land north of Newbury College, Monks Lane, Newbury	Permission lapsed	0	0	0	0	0	0	15	0	0	0	0	0	0	0	0	0	0	0	0	15
RSA2 - Land at Bath Road, Speen, Newbury	Outline permission on 107 units Full permission on 11 units	0	0	10	30	30	30	18	0	0	0	0	0	0	0	0	0	0	0	0	118
RSA3 - Land at Coley Farm, Stoney Lane, Newbury	Full permission	0	0	25	25	25	0	0	0	0	0	0	0	0	0	0	0	0	0	0	75
RSA4 - Land off Greenham Road and New Road, South East Newbury	Under construction	0	0	50	50	57	0	0	0	0	0	0	0	0	0	0	0	0	0	0	157
RSA5 - Land at Lower Way, Thatcham	Full permission	0	0	30	50	11	0	0	0	0	0	0	0	0	0	0	0	0	0	0	91
RSA7 - 72 Purley Rise, Purley on Thames	Under construction	0	15	14	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	29
RSA8 - Land adjacent to Bath Road and Dorking Way, Calcot	No permission	0	0	0	0	0	0	10	10	15	0	0	0	0	0	0	0	0	0	0	35
RSA9 - Land between A340 and The Green, Theale	Full permission	0	0	37	52	15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	104
RSA12 - Land adjoining Pondhouse Farm, Clayhill Road, Burghfield	Full permission	0	0	49	51	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	100
RSA14 - Land adjoining Lynch Lane, Lambourn	No permission	0	0	0	0	0	0	20	20	20	0	0	0	0	0	0	0	0	0	0	60
RSA15 - Land at Newbury Road, Lambourn	Full permission	0	0	0	0	8	0	0	0	0	0	0	0	0	0	0	0	0	0	0	8
RSA18 - Pirbright Institute Site, High Street, Compton	Outline permission	0	0	0	0	0	0	50	50	50	10	0	0	0	0	0	0	0	0	0	160
RSA20 - Land off Charlotte Close, Hermitage	Full permission	0	0	0	0	0	0	16	0	0	0	0	0	0	0	0	0	0	0	0	16
RSA21 - Land to the south east of the Old Farmhouse, Hermitage	Outline permission	0	0	0	0	0	0	11	10	0	0	0	0	0	0	0	0	0	0	0	21
RSA24 - Land Adjacent To New Stocks Farm, Paices Hill, Aldermaston	Full permission	0	0	8	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	8
SMNDP - Land to the south of St John's School, The Street, Stratfield Mortimer	Under construction	24	26	14	18	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	58
Subtotal: Retained allocations in the Local Plan and Stratfield Mortimer NDP allocations		24	41	237	276	196	130	290	240	235	160	150	150	150	150	100	50	0	0	0	2555

	(for reference)	Five Year Period Post Adoption																			
		Planning status at 31 March 2023	Submission 22/23	23/24	24/25	Adoption 25/26	Y1 26/27	Y2 27/28	Y3 28/29	Y4 29/30	Y5 30/31	Y6 31/32	Y7 32/33	Y8 33/34	Y9 34/35	Y10 35/36	Y11 36/37	Y12 37/38	Y13 38/39	Y14 39/40	Y15 40/41
Proposed New Allocations																					
SP17 North East Thatcham	No permission	0	0	0	0	0	0	0	0	60	170	170	170	170	170	170	170	170	170	170	1760
RSA10 - Whitehart Meadow, Theale	No permission	0	0	0	0	0	0	20	20	0	0	0	0	0	0	0	0	0	0	0	40
RSA11 - Former sewage treatment works, Theale	No permission	0	0	0	0	0	0	30	30	0	0	0	0	0	0	0	0	0	0	0	60
RSA13 - Land north of A4 Bath Road, Woolhampton	No permission	0	0	0	0	0	0	8	8	0	0	0	0	0	0	0	0	0	0	0	16
RSA16 - Land north of South End Road, Bradfield Southend	No permission	0	0	0	0	0	0	10	10	0	0	0	0	0	0	0	0	0	0	0	20
RSA17 - Land at Chieveley Glebe	No permission	0	0	0	0	0	0	5	10	0	0	0	0	0	0	0	0	0	0	0	15
RSA19 - Land west of Spring Meadows, Great Shefford	No permission	0	0	0	0	0	0	8	7	0	0	0	0	0	0	0	0	0	0	0	15
RSA22 - Land adjacent Station Road, Hermitage	No permission	0	0	0	0	0	0	15	15	12	0	0	0	0	0	0	0	0	0	0	42
RSA23 - Land adjacent The Haven, Kintbury	No permission	0	0	0	0	0	0	20	0	0	0	0	0	0	0	0	0	0	0	0	20
Henwick Park, Bowling Green Road, Thatcham	No permission	0	0	0	0	0	0	50	50	50	50	25	0	0	0	0	0	0	0	0	225
Regency Park Hotel, Bowling Green Lane, Thatcham	No permission	0	0	0	0	0	0	20	25	0	0	0	0	0	0	0	0	0	0	0	45
Land at Pincents Lane, Tilehurst	No permission	0	0	0	0	0	0	50	50	38	0	0	0	0	0	0	0	0	0	0	138
Land north of Pangbourne Hill, Pangbourne	No permission	0	0	0	0	0	0	12	13	0	0	0	0	0	0	0	0	0	0	0	25
Site to be allocated in Hungerford Neighbourhood Development Plan	No permission	0	0	0	0	0	0	20	20	15	0	0	0	0	0	0	0	0	0	0	55
Site to be allocated in Lambourn Neighbourhood Development Plan	No permission	0	0	0	0	0	0	10	10	5	0	0	0	0	0	0	0	0	0	0	25
Subtotal: Proposed New Allocations		0	0	0	0	0	0	278	268	180	220	195	170	2501							
Windfall allowance		0	0	0	66	140	140	140	140	140	140	140	140	140	140	140	140	140	140	140	2166
Existing planning commitments for C2 Use Class communal accommodation		2	24	36	28	3	0	91													
Total Past Completions		640																			
Total Projected Completions			807	739	619	515	376	902	797	605	568	485	460	460	460	410	360	310	310	310	9493
Cumulative Completions (A)			807	1546	2165	2680	3056	3958	4755	5360	5928	6413	6873	7333	7793	8203	8563	8873	9183	9493	
PLAN - housing requirement 515 dwellings per annum			515	515	515	515	515	515	515	515	515	515	515	515	515	515	515	515	515	515	
Cumulative requirement (using 515 dpa) (B)			515	1030	1545	2060	2575	3090	3605	4120	4635	5150	5665	6180	6695	7210	7725	8240	8755	9270	
515dpa + 5%			538	538	538	538	538	538	538	538	538	538	538	538	538	538	538	538	538	538	
Cumulative 515dpa + 5%			538	1076	1614	2152	2690	3228	3766	4304	4842	5380	5918	6456	6994	7532	8070	8608	9146	9684	
MONITOR - No. of dwellings above or below housing requirement (A-B)			292	516	620	620	481	868	1150	1240	1293	1263	1208	1153	1098	993	838	633	428	223	
MANAGE - Annual requirement taking account of past/projected completions			515	498	483	474	471	478	443	410	391	371	357	342	323	295	267	236	199	87	

Housing Trajectory 2023/24 – 2040/41

