

**West Berkshire Council**  
**Local Plan Review 2022-2039**

**Local Plan Review 2022-2039**  
**Examination**

**Written Statement for Matter 4**

**North East Thatcham strategic site**  
**(Policy SP17)**

**March 2024**

## West Berkshire Local Plan Review 2022-2039 (LPR) Examination

### West Berkshire Council

#### Written Statement for Matter 4: North East Thattham strategic site (policy SP17)

Response to each question raised by the Inspector :

#### M4.1 Response alternatives and the West Berkshire Strategic Vision 2050

##### **Q4.1. Was the North East Thattham site selected for allocation in the Plan following appropriate consideration of reasonable alternatives?**

- 1.1. Yes, the Council considers that the site at North East Thattham (NET) was selected for allocation following appropriate consideration of reasonable alternatives. The site selection methodology is set out in the Site Selection Methodology Paper ([SIT1](#)), with the assessment of alternatives set out in the SA/SEA [\[CD3a\]](#). It refers to its responses to PQ21c (in [EXAM2](#) pages 45-47) to the Inspector's Preliminary Questions ([IN2](#)).

##### **Q4.2. Is it necessary to modify the reasoned justification to policy SP17 to refer to the West Berkshire Strategic Vision 2050 in order to make the Plan sound?**

- 1.2. Yes, the Council considers that it is necessary to modify the supporting text to Policy SP17 to make the Plan sound. The West Berkshire Strategic Vision 2050 [\[SET3a\]](#) forms part of the evidence base undertaken in response to paragraph 22 of the NPPF ([NAT1](#)) which sets out the requirement for strategic policies to look ahead over a minimum 15 year period from adoption and for large scale development, which would include North East Thattham as a significant extension to Thattham, policies should be set within a vision that looks further ahead, at least 30 years. The West Berkshire Strategic Vision 2050 does this and provides the long-term context for the two strategic sites proposed within the LPR, Sandleford Park and North East Thattham. Thus, in consideration of soundness, the main modification proposed in the Council's response to PQ33 (in [EXAM2](#) page 75) to the Inspector's Preliminary Questions ([IN2](#)) ensures it is clear that the policy is both justified and consistent with national policy.

- 1.3. The main modification is proposed to paragraph 6.54 as follows:

"6.54 In reviewing the vision for Thattham 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 Thattham might go over the longer-term period up to 2050. In addition and in order to best understand how to plan for growth in Thattham within the plan period, the Council commissioned masterplanning work (Thattham Strategic Growth Study (TSGS) 2020)."

## **M4.2 Infrastructure**

### **M4.3 Transport Infrastructure**

**Q4.3. What specific transport infrastructure projects and other measures are expected to be necessary to ensure the following in relation to the development proposed on the North East Thatcham allocation:**

**(a) Appropriate opportunities to promote sustainable transport modes can be taken up.**

**(b) Safe and suitable access to the site can be achieved for all users.**

**(c) Any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree at an appropriate time<sup>1</sup>.**

- 1.4. In relation to the development proposed on the North East Thatcham (NET) allocation, the Council considers that the following specific transport infrastructure projects and other measures to be necessary as follows:
- 1.5. (a) It is envisaged that NET will comprise a range of local services, including retail facilities and schools. The site will be designed so that it will be served by an internal road network that will run the length of the site along with a comprehensive pedestrian and cycle network. This will allow for the internalisation of trips to be contained within the development and encourage sustainable transport options.
- 1.6. It is expected that being a strategic development site, the NET site will provide and sustain bus services to serve the site. Concept options have been explored to design a bus service to connect the site with frequent services to key locations in Thatcham, such as the town centre and railway station. The internal layout of the site should allow residential parcels on the site to be within an accepted walk to a bus stop.
- 1.7. Rail services would also have a role in maximising opportunities for sustainable travel. Active travel access between the NET site and the station would be improved, along with access from the bus service. This would be complemented by a series of improvements to passenger facilities at the station in partnership with the train operator.
- 1.8. A comprehensive travel planning package will be developed for the whole of the NET site to encourage and promote sustainable travel choices to residents. It is envisaged that this would be led by the Council, who would prepare and promote the various measures and initiatives, plus undertaking the necessary monitoring and reporting.
- 1.9. The infrastructure required to support the development is listed in the background workings to the Infrastructure Delivery Plan (IDP) [[INF1](#)].
- 1.10. (b) Providing safe and suitable access to the NET site from the Thatcham urban area is an important component of the wider mitigation package. This

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<sup>1</sup> NPPF110

will include ensuring that there is excellent active travel connectivity between the site and Thatcham so that the A4 and Floral Way do not act as a barrier to pedestrian and cycle movements and ensuring a good route and access to Thatcham railway station.

- 1.11. The concept designs for the junction improvements outlined in the highways mitigation package include measures to enhance active travel connectivity. Pedestrian and cycle facilities within the designs will be compliant with current standards outlined in the Department for Transport's Local Transport Note LTN 1/20 (Cycle Infrastructure Design).
- 1.12. The background to the Infrastructure Delivery Plan (IDP) ([INF1](#)) lists the following transport projects as necessary for North East Thatcham:

#### On-Site Measures

- Primary and Secondary link roads through the site to be funded and delivered by the developer.
- Access arrangements including access to Floral Way, modifications to the Floral Way/Harts Hill and A4/Pipers Way roundabouts to be funded by the developer and delivered as S278 works.
- Pedestrian and Cycle improvements/provision at access points to the site to be funded by the developer and delivered as S278 works.

#### Off-Site Measures

- Capacity improvements to Floral Way and allowance for other works along the A4 corridor or other affected routes. The locations and nature of the required improvements are yet to be finalised and negotiations will take place throughout the planning process. The cost would be met by the developer and delivered by WBC.
  - Pedestrian and cycle improvements including improved crossing facilities at Floral Way/Harts Hill Roundabout, along the A4 (Harts Hill/Stoney Lane), A4/Pipers Way roundabout and footway/cycle way improvements in various locations across Thatcham to be funded by the developer and delivered by WBC.
- 1.13. (c) Detailed transport modelling work undertaken as part the LPR Transport Assessment process outlined that although there would not be widespread congestion as a result of the NET proposals, there would be several junctions in the vicinity of the site that would be forecast to experience delays. The results also indicated that high numbers of vehicles would divert off the A4 corridor onto more unsuitable local routes to avoid delays on the A4.
- 1.14. A highways mitigation package has been developed that seeks to improve junctions along the A4 corridor between the Gables Way roundabout and the Floral Way roundabout. The concept designs for the highway improvements have been developed in consultation with WBC Highways Officers and take into account constraints such as land availability and the presence of utilities. The designs include pedestrian and cycle facilities to provide safe active

travel movements through the junctions and across the A4 and Floral Way to ensure connectivity between the site and the existing Thatcham urban area. The finalised highways mitigation package will feed into the wider package of infrastructure for the NET site outlined in the Infrastructure Delivery Plan.

- 1.15. In addition to the junction improvements, the designs will look to improve capacity along the A4 corridor between the Gables Way and the Floral Way roundabouts. The modelling shows that this improved capacity helps to draw traffic back to the main A4 route away from the less suitable local routes. The work to improve capacity will also include high-quality pedestrian and cycle facilities, which reflect the A4 corridor being designated as a Strategic Cycle Corridor in the West Berkshire Local Cycling and Walking Infrastructure Plan (LCWIP) ([INF8](#)).
- 1.16. The current concept designs have been limited to within the extent of the highway boundary, except where land is in control of the NET site. This should allow any improvements to be delivered in a timely manner and avoid any time-consuming and costly land acquisition.
- 1.17. The following infrastructure requirements are set out in the IDP at an estimated cost of £22million to be funded through developer contributions:

#### On-site measures

- Primary and Secondary link roads with cycle, pedestrian and green ways to be delivered by the developer as an integral part of the proposals. Phasing for the infrastructure would be determined at the planning application stage.
- Site Travel Plan funded by the deliverer and delivered by WBC, phasing to be determined at the planning application stage, but to be delivered through the build period and beyond.

#### Off-site measures

- Improvements to pedestrian and cycle facilities including crossing facilities at the following junctions Floral Way / Harts Hill roundabout, Harts Hill/Stoney Lane, A4/Pipers Way roundabout, facilities along the A4 to be funded by the developer through S106 agreements or CIL and delivered through S278 agreements.
  - Improvements to cycleway/footway facilities in the following locations: Pipers Way, between A4 and Edwin Close, between A4 and Domoney Close (Stoney Lane). NCN4 of carriageway improvements between Pipers Way/Station Road Roundabout and the Station, Harts Hill Road and The Broadway funded by CIL and delivered by the Council.
- 1.18. Legal agreements and conditions relating to phasing plans will be used at the planning application stage will be used to ensure that infrastructure is provided in a timely manner.

**Q4.4. Will policy SP17, along with other relevant policies, be effective in ensuring the timely delivery of the necessary transport infrastructure projects and other measures to support development proposed at North East Thatcham?**

- 1.19. Yes, the Council considers that the policy will be effective in ensuring the timely delivery of the necessary transport infrastructure projects and other measures to support development. The transport assessment work for the site undertaken as part of the wider transport assessment process for the Local Plan Review has considered what transport mitigation measures will be required to support the NET site. These issues are outlined in the responses to Question 4.3 above and apply to both highway and non-highway measures, which will form the basis of the Transport Strategy for the site mentioned in policy SP17.
- 1.20. The draft Infrastructure Delivery Plan ([INF1](#)) indicates that a package of infrastructure measures will be delivered to support the NET site to ensure the site is well integrated into existing networks and can be delivered to support sustainable access to services and facilities for its residents. This also includes looking at good access to and appropriate facilities at Thatcham railway station.
- 1.21. The work undertaken so far as part of the transport assessment will help to guide the development of the package of transport infrastructure measures that will be required for the NET site. This will feed into the wider masterplanning for the site to ensure that transport infrastructure will be provided both within and connecting to existing networks outside the site boundaries.
- 1.22. The inclusion of transport infrastructure as part of the wider masterplanning for the site should identify the improvements that will be required and provide greater certainty that the delivery will take place in a timely and co-ordinated manner in accordance with policy SP17. These infrastructure measures will be incorporated in to the wider package of measures for the NET site indicated in the Infrastructure Delivery Plan ([INF1](#)).
- 1.23. Planning conditions, Section 106 agreements, and supporting legal agreements such as Section 278 for highway works will ensure the transport infrastructure projects and other measures will be delivered in a timely manner to support the development of North East Thatcham. Such conditions and legal agreements will detail the timing of the delivery of each infrastructure project, and this is reflected in the IDP ([INF1](#)) as outlined in the response to question 4.3 above.
- 1.24. As outlined in the Council's response to the Inspector's Preliminary Question PQ46c) (in [EXAM2](#) pages 98-99) to the Inspector's Preliminary Questions ([IN2](#)) discussions are underway with National Highways and the Statement of Common Ground will be submitted once signed. A Statement of Common Ground has been agreed with Network Rail in relation to the Thatcham Level Crossing ([EXAM18](#)).

- 1.25. To ensure the policy is effective and justified, the Council proposes a main modification to the policy under the Transport heading to ensure the details included in the background to the IDP are included in the policy:

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

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

- Active travel Improvements on routes between the site, Thatcham town centre and the railway station;
- Multiple access points and A a vehicular through route;
- Sustainable transport through routes;
- Mitigation of the development's impacts on the highways network with improvements to existing junctions where they are needed and delivery of new access points for all forms of movement and transport to the site at locations to be agreed with the planning authority; ....”

#### **M4.4 Education Infrastructure**

**Q4.5. (a) Are the requirements of policy SP17 for early years, primary school and secondary school provision to meet the needs of the North East Thatcham development clear and unambiguous, and are they justified?  
(b) Will policy SP17, along with other relevant policies, be effective in ensuring that the provision is made in a timely and coordinated manner?**

- 1.26. (a) The education requirements are based on evidence from the Council's Education Place Planning Team and require the development to provide education provision to meet the needs of the development.
- 1.27. In order to provide clarity and ensure that the policy is effective in ensuring adequate education facilities are provided on the site to meet the needs of the development the Council proposes a main modification to the policy under the Community heading as follows:
- “Early years provision on site;
  - ~~A 2.5FTE p Primary school~~ provision on site and sports infrastructure requirements of the school. † Land to be provided and build costs to be met by the applicant;
  - Secondary school provision on site and sports infrastructure requirements for the school ~~land to meet the impact of development.~~ The nature and cost of the required provision ~~mitigation~~ will be informed by a feasibility study, undertaken at the applicants expense and prepared in collaboration with the Council and local stakeholders;”
- 1.28. (b) The policy requires that the provision of infrastructure will be timely and co-ordinated to ensure that it is in place as and when required. It is anticipated that the specific timings of when the education infrastructure will need to be

provided would be determined at the planning application stage as part of a discussions around the phasing of the development. The IDP states:

- Education provision (for all types) will need to be in place to meet the demand created by the development. [INF1].

1.29. Legal agreements and conditions relating to phasing plans will be used at the planning application stage will be used to ensure that infrastructure is provided in a timely manner.

#### **M4.5 Health care Infrastructure**

**Q4.6. (a) Is the requirement of policy SP17 for a 450 sqm GP surgery on the site justified, and would it be effective in ensuring that the additional need for primary health care arising from the development can be met?**  
**(b) Will policy SP17, along with other relevant policies, be effective in ensuring that the provision is made in a timely and coordinated manner?**

1.30. For the Proposed Submission LPR (CD1) the Council considered that including specific space requirements for infrastructure provision would give certainty about what would be required on site. However, it has now become clear that this approach will not provide the flexibility needed to deliver the infrastructure requirements on the site.

1.31. It is acknowledged that the ICB has stated that a facility of 450sqm for a GP surgery will be too small to operate effectively and there is no information available demonstrating otherwise. The ICB has suggested a floor area of at least 1000sqm would be required to support a new surgery. It acknowledges that funding would need to be made available for the balance over and above the needs of the development. The ICB has proposed that land should be provided, and a capital contribution made towards the buildings.

1.32. The Council therefore proposes a main modification to the policy to remove the specific space requirements and instead adopt a more general policy requirement for health care facilities to be provided to meet the needs of the development, allowing for negotiations between the ICB, the Council and the landowners to ensure a satisfactory solution to be found that meets the needs of the development as well as local health care needs. The following main modification is proposed under the Community heading of the policy:

“Health Care facility, the details of which should be agreed with 450sq-meters GP Surgery to be offered to the Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board or other such appropriate body;”

1.33. The Council has continued to work closely with the ICB who has recently confirmed it is looking to undertake a feasibility study relating to health care provision in Thatcham which will enable an informed decision to be made and would inform the masterplan/development framework.

- 1.34. Legal agreements and conditions relating to phasing plans at the planning application stage will be used to ensure that infrastructure is provided in a timely manner.

## **M4.6 Community Infrastructure**

**Q4.7. Is the requirement of policy SP17 for a 1,200 sqm indoor facility for sport and community uses on the site justified? Will policy SP17, along with other relevant policies, be effective in ensuring that the provision is made in a timely and coordinated manner?**

- 1.35. The requirement for the provision of an indoor facility for community use arose from the community workshops held as part of the preparation for the Thatcham Strategic Growth Study (TSGS) ([SIT2c](#)). One of the key themes which emerged from the workshop was the need for public spaces and uses, such as a community centre.
- 1.36. For the Proposed Submission LPR ([CD1](#)) the Council considered that including specific space requirements for infrastructure provision would give certainty about what would be required on site. However, it has now become clear that this approach will not provide the flexibility needed to deliver the infrastructure requirements on the site.
- 1.37. The Council therefore proposes a main modification to remove the specific space requirements for Local Centres so that the details can be determined through the masterplan exercise in collaboration with the community and other stakeholders and further details agreed through the planning application process.
- 1.38. The following modification is proposed to the policy under the Community heading:
- “The site will provide a range of community facilities to meet the needs of the development including:
- Local centres providing local retail facilities and small-scale employment for community use. ~~(approximately 1,100sq.meters Class E and F2);~~
  - ~~A 1,200sqm e~~ Community indoor facility to be used for sport and community uses with a variety of room sizes ~~(currently use classes E and F);”~~
- 1.39. Legal agreements and conditions relating to phasing plans at the planning application stage will be used to ensure that infrastructure is provided in a timely manner.

## **M4.7 Landscape and provision of green infrastructure**

**Q4.8. Will policy SP17, along with other relevant policies, be effective in ensuring the provision of a comprehensive green infrastructure network on the site including outdoor formal and informal sports pitches and other areas of open space to meet the needs of the development; a new community park linking Thatcham to the AONB; and greenways through the site for walkers and cyclists?**

- 1.40. In order to give certainty that the policy will be effective in ensuring the provision of a comprehensive green infrastructure network on the site the Council proposes main modifications to the policy as set out below.
- 1.41. The Council considers that the proposed modifications will also give the clarity sought that a significant portion of the site will be safeguarded as a green infrastructure buffer outside of the developable area of the site. The Council considers that this buffer is necessary to ensure a strong defensible boundary between the developable area and the adjoining countryside and Ancient Woodland. This area equates to approximately 50% of the whole site, as stated in the TSGS 3 [[SIT2c](#)].

### **“Community Infrastructure...**

- Outdoor formal and informal sports pitches ~~and areas~~ to meet the identified needs of the development;
- Open space and play areas to meet the needs of the development in accordance with policy DM40~~4~~

### **Green Infrastructure**

The site will provide a comprehensive green infrastructure network ~~and landscape strategy~~ which will take advantage ~~respond positively to the sensitivities~~ of the landscape, protect and enhance landscape and ecological biodiversity features of value within and around the site and make provision for biodiversity net gain.

This network will comprise:

- ~~A new community park linking Thatcham to the North Wessex Downs AONB;~~
- A Green Infrastructure buffer that creates a strong defensible boundary between the developable area and the adjoining countryside and Ancient Woodland.
- Provision of Open Space within the developable area in accordance with Policy DM40;
- Greenways which connect through the site ~~to the park,~~ and facilitate connections to the wider landscape and existing Public Rights Of Way network ~~AONB, and include leisure routes accessible to all users;~~

- ~~A comprehensive network of other accessible routes and connections within the development which provide walking and cycling links along desire lines;~~
- Protection of ~~£~~ existing and creation of new Public Rights of Way; and
- Retained and new trees, hedgerows and other appropriate native planting ~~which contribute to biodiversity net gain;~~
- Provision of allotments

### Landscape

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

- 1.42. The developable area of the site will be expected to provide the open space required to support the development in line with Policy DM40 and a linked network of green infrastructure across the site.
- 1.43. The background information to the IDP [[INF1](#)] sets out the following Green Infrastructure requirements, to be funded by S106 or CIL and to be delivered by WBC in partnership with other organisations:
  - Improvements to open space
  - Contribution towards the North Wessex Downs National Landscape
  - Contribution towards Local Wildlife sites, Local Nature reserves, SACs and SSSI
  - Contribution towards woodland and hedgerows
  - Contribution towards rights of way
  - Contribution towards play areas
- 1.44. Legal agreements and conditions relating to phasing plans and the management of the open space element of the site at the planning application stage will be used to ensure that infrastructure is provided in a timely manner and managed appropriately.
- 1.45. With the modifications proposed above, the Council considers that the policy, together with other relevant policies, will be effective at providing a comprehensive green infrastructure network.

**Q4.9. Will policy SP17, along with other relevant policies, be effective in ensuring the development proposed is sympathetic to its landscape setting, and preventing harm to the AONB and other valued landscapes<sup>2</sup>?**

- 1.46. Yes, the Council considers that the policy, in conjunction with other relevant policies, will be effective in ensuring the development is sympathetic to its landscape setting and preventing harm to the North Wessex Downs National Landscape (AONB) and other valued landscapes.
- 1.47. The allocation of the site has been supported by a Landscape Sensitivity and Capacity Study ([LAN7e](#)) and the policy makes clear that the final capacity, development design and layout of the site will be informed by a Landscape and Visual Impact Assessment.

**M4.8 Flood risk and surface water**

**Q4.10. Will policy SP17, along with other relevant policies, be effective in ensuring that the development will be safe from flooding for its lifetime and will not increase flood risk elsewhere<sup>3</sup>?**

- 1.48. An SFRA ([WAT2](#)) has been carried out to support the development of the LPR. This considered the flood risk on all sites, including at NET. The site is not within a flood zone, and while there are surface water flow paths across the site, and flood attenuation basins on the site the policy requires that these are protected and maintained.
- 1.49. An FRA is also required to support any future application. For clarity and to ensure the policy is effective, the Council proposes main modifications to the policy to ensure that the Thatcham surface water management plan is taken into account. A modification is also proposed to include a clause that ensures that the existing flood defences and attenuation ponds already on the site are retained, protected and enhanced to ensure that there will be no impact on flood risk downstream of the site as a result of the development.
- 1.50. The modifications are proposed as follows to the Flooding and Water Environment section of the policy:

**“Flooding and Water Environment**

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

- Measures to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site;
- Details of the phasing of development to consider likely upgrades needed for the water supply network infrastructure; and

<sup>2</sup> LAN7e paragraph 1.7

<sup>3</sup> NPPF 159 and 167

- Surface water drainage management approaches that could deliver net gain for Thatcham town, including use of on-site sustainable drainage systems (SuDS);
- A Flood Risk Assessment taking into account the Thatcham Surface Water Management Plan"

1.51. With these modifications the Council considers that the policy, in conjunction with other relevant policies, will be effective.

#### **M4.9 Air and noise pollution**

**Q4.11. (a) Is the location of the site suitable for the development proposed taking into account the likely effects of noise and pollution on the health and living conditions of future residents<sup>4</sup>? (b) If so, will the Plan be effective in helping to ensure that any potential adverse effects will be adequately mitigated?**

1.52. (a) Yes, the Council considers the location of the site is suitable for the development proposed taking into account the likely effects of noise and air pollution on the health and living conditions of future residents.

1.53. There is no evidence of pollution or contamination on the site.

1.54. An Air Quality Assessment [[AQu1](#)] has been carried out to support the Plan and it determines that air quality will not be negatively impacted by the development.

1.55. (b) For effectiveness, the Council proposes a main modification to the policy to make clear that an air quality management plan will be required to detail how adverse impacts on air quality will be minimised as follows:

"An air quality management plan detailing How adverse impacts on air quality will be minimised."

1.56. With this modification, the Council considers that the Plan will be effective in helping to ensure any potential adverse effects will be adequately mitigated. Policy SP17 will be considered in conjunction with other policies in the Plan, in particular policies DM8 Air Quality and policy DM5 Environmental Nuisance and Pollution Control.

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<sup>4</sup> NPPF 185

#### **M4.10 Affordable homes and housing mix**

**Q4.12. Are the requirements in policy SP17 for (a) at least 40% affordable homes and (b) a mix of house types that complies with Table 3 in the Plan on the North East Thatcham site justified, including in terms of need and viability?**

- 1.57. Yes, the Council considers that the requirements are justified.
- 1.58. (a) 40% affordable housing on the site is consistent with the requirements for SP19 Affordable Housing, which is based upon policy CS6 of the adopted Core Strategy ([SD1](#)) which also includes a requirement for 40% affordable housing for sites of 10 + dwellings on greenfield land.
- 1.59. (b) Table 3 is based upon the Local housing Needs Assessment ([HOU5](#)) which, based on evidence, sets out the recommended future housing mix.
- 1.60. These figures are included within the whole plan viability assessment 2022 ([VIA1](#)) which demonstrates that the policy requirements are viable.

#### **M4.11 Self build plots**

**Q4.13. Is the requirement in policy SP17 for at least 3% of dwellings to be delivered via serviced custom/self-build plots justified, including in terms of need and viability?**

- 1.61. Yes, the Council considers that the requirement for at least 3% of dwellings to be delivered via serviced custom/self-build plots is justified and this figure has been included in the viability testing of the Plan ([VIA1](#)).
- 1.62. There are currently 585 people registered on the Council's Self-build register, of these 207 have Thatcham listed as a location they would like to consider. On average 83 new people are added to the register each year, and the Council delivers an average of 25 self or custom build plots a year (data taken from the CIL self-build exemption).
- 1.63. The requirement of at least 3% of the dwellings at the North East Thatcham site to be delivered as served self or custom build plots would deliver 45 plots, which would go some way to meeting the demand for self-build plots in the District.
- 1.64. It is noted that increasing the percentage requirement for self-build/custom build would go further to meeting the identified need e.g. Increasing the requirement to 5% would result in the delivery of 75 plots for self/custom build but this would require additional viability testing to ensure it could be accommodated.

## **M4.12 Biodiversity**

**Q4.14. Will policy SP17, along with other relevant policies, be effective in minimising impacts on and providing net gains for biodiversity? In particular:**  
**(a) Will sites of biodiversity value be protected and enhanced in a manner commensurate with their statutory status or identified quality<sup>5</sup>?**  
**(b) Will significant harm to biodiversity be avoided, adequately mitigated, or as a last resort compensated for<sup>6</sup>?**  
**(c) Will development avoid the loss or deterioration of any irreplaceable habitats<sup>7</sup>?**

- 1.65. Yes, the Council considers that with modifications as set out below policy SP17, along with other relevant policies, will be effective in minimising impact on and providing net gains for biodiversity.
- 1.66. a) There are no statutory designations of protected wildlife sites within the site itself, however, it is adjacent to a number of ancient woodlands and close to a number of other statutory protected sites (within 1km of the Kennet and Avon Canal SSSI and 2km of the Kennet and Lambourn Floodplain SAC). The development will need to demonstrate that it will be able to achieve biodiversity net gain (BNG) and that there will be no negative impacts on any site of biodiversity value.
- 1.67. b) Yes, significant harm to biodiversity will be avoided where possible, adequately mitigated where avoidance is not possible and as a last resort compensated for.
- 1.68. For effectiveness, the Council proposes a main modification to the policy to make clear that all details relating to the impact on biodiversity will be provided through a Biodiversity Strategy as follows:

### “Biodiversity

Development proposals for the site will be supported by A an Ecology Biodiversity Strategy which will set out:

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

- 1.69. c) Yes, the development will avoid the loss or deterioration of irreplaceable habitats. Details given above indicate the main modifications proposed to SP17.

<sup>5</sup> NPPF 174

<sup>6</sup> NPPF 180a.

<sup>7</sup> NPPF 180c and Annex 2 definition of irreplaceable habitat.

1.70. The Biodiversity Strategy will show how net gain will be achieved. This should include details on:

- “How priority habitats and ecological features will be protected and enhanced;
- The creation of new ecological features”

1.71. The policy also requires that the existing trees and hedgerows are protected, and appropriate native planting is carried out across the site.

#### **M4.13 Historic Environment**

**Q4.15. Will policy SP17, along with other relevant policies, be effective in ensuring that the development proposed conserves and enhances the historic environment in accordance with national policy<sup>8</sup>? If not, would the Council’s proposed main modification ensure the Plan is sound in that respect?**

1.72. Yes, subject to the proposed modification relating to this element of the policy. This will ensure that the development conserves and enhances the historic environment in accordance with national policy. Further details regarding the proposed modification can be found in the Council’s response to PQ49 ([EXAM 2](#) page 102).

1.73. The modification is set out below:

##### **“Heritage**

- Development proposals for the site will be supported by A a Historic Environment Strategy 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. It should:
  - Be informed by a proportionate heritage impact assessment, desk-based archaeological assessment and if needed, field evaluation; and
  - Articulate how the proposed scheme would support an appropriate future use of the listed buildings in the area and minimise harm to their significance (including demonstrating ~~listed buildings in the area will be conserved and~~ how the impact of the development on their settings has been considered)”

#### **M4.14 Masterplanning and the Thatcham Strategic Growth Study**

**Q4.16. Does policy SP17 set out an effective approach to masterplanning to achieve the comprehensive development of the site along with the timely and coordinated provision of infrastructure and services? In particular:**

<sup>8</sup> NPPF section 16.

**(a) Is it clear who is responsible for preparing the various strategies referred to and the masterplan, what status those documents will have, and how they relate to each other and to the preparation and determination of planning applications?**

**(b) Will effective mechanisms be in place to ensure that all necessary physical, social and green infrastructure is provided in a timely and coordinated manner in relation to the proposed new homes?**

1.74. (a) The policy sets out the overall key requirements for the development and states that a masterplan will be developed for the site to provide additional information and details around the policy requirements. It acknowledges however, that the policy could be clearer in how this is expected to be achieved.

1.75. The Council therefore proposes main modifications to the policy as follows:

“Land as shown on the Policies Map is allocated for the delivery of a comprehensive, sustainable, low carbon, residential-led 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 in collaboration with the community and other stakeholders to provide a framework to guide development. Proposals must have regard to this and demonstrate how it has guided proposals in a positive manner. Proposals must also demonstrate how and delivered as a whole to achieve a comprehensive development the provision of all infrastructure, services, open space and facilities will be delivered in a timely and co-ordinated way.”

1.76. (b) Where the policy wording requires the provision of strategies or statements, the Council proposes that the policy should be modified to be clear that the development proposals for the site will be supported by such strategies, plans or statements and as such this would be clear that it is produced by the developer/land consortium.

1.77. It is anticipated details of phasing of the development, including number of houses and infrastructure to be delivered at each phase will determined by the applicant and submitted to support a planning application for the site.

1.78. The Council proposes a main modification to the policy to make it clear that the development will be phased over the plan period as follows:

“The site is ~~to be~~ allocated for the phased delivery of approximately 1,500 dwellings which will be completed within the period of the plan.”

1.79. The use of S106 agreements, or similar legal agreements will be required, along with planning conditions to ensure that the provision of infrastructure is provided in a timely and coordinated manner.

- 1.80. The Council proposes a minor modification to the supporting text at paragraph 6.63 to make it clear that the masterplan or development framework needs to be developed using the existing evidence:

“6.63 Further detailed work will be required to develop a coherent masterplan or development framework to take the development forward, which will be produced in collaboration with the community and other stakeholders, based on existing evidence and information already produced to support the allocation of the site, including the Thatcham Strategic Growth Study.”

**Q4.17. (a) Is the requirement for proposals to respond positively to the guiding principles provided in the Thatcham Strategic Growth Study justified?  
(b) If so, does it provide a clear and unambiguous approach for the preparation of a masterplan and preparation and determination of planning applications?**

- 1.81. The Thatcham Strategic Growth Study [[SIT2c](#)] is a technical background document which considered a range of different factors to development proposals for development in Thatcham and specifically to give a framework for any future development at North East Thatcham. As part of the Study, a workshop was also held with community representatives to help understand the needs and wants from any future development. The Council acknowledges however, the TSGS provides a development option of 2500 dwellings, and therefore, while it provides guiding principles for development it is based on a higher number of dwellings than is proposed in the policy. For clarification and effectiveness, the Council therefore proposes a main modification to the policy to remove specific reference to the TSGS as follows:

~~“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.”~~

- 1.82. The TSGS will still be used to provide background information for the Development Framework and Masterplan, as much of the information included within the study is still relevant and based upon evidence and collaboration with the local community. A main modification is proposed to the supporting text to make this clear (para 6.54)

‘6.54... Stage 3 of the Thatcham Growth Study report lays out a potential vision and approach to strategic growth in Thatcham, intended to inform the decision-making process of the Local Plan Review in choosing suitable allocation sites across the District as a whole. The study identified a larger quantum of development than proposed through this policy, however the guiding principles continue to remain relevant.’

#### **M4.15 Viability and delivery**

**Q4.18. Is there a reasonable prospect that development proposed at North East Thatcham could start in 2029/30, and that 1,500 dwellings could be viably developed, meeting all of the requirements of policy SP17 and other relevant policies, by 2039?**

- 1.83. Yes, the Council considers that there is a reasonable prospect that 1,500 dwellings could be viably developed on the site, meeting all the requirements of policy SP17 and other relevant policies during the plan period. This is confirmed by the viability assessment for the plan [\[VIA1a \(para 3.223\)\]](#). It is acknowledged that some of the infrastructure originally envisaged for the site may not be deliverable with a lower number on the site, however, the proposed modifications to the policy make it clear that infrastructure needs to be provided to meet the needs of the development.
- 1.84. The agent for the landowner has confirmed that the site could deliver dwellings in 2028/29, and that at least 1,500 dwellings will be delivered within the plan period.

**Q4.19. (a) Could more than 1,500 dwellings be satisfactorily accommodated on the North East Thatcham site, meeting all of the requirements of policy SP17 and other relevant policies? (b) If so, is it necessary to modify the reference in policy SP17 to refer to a different scale of development?**

- 1.85. (a and b) The Thatcham Strategic Growth Study ([SIT2c](#)) lays out a potential vision and approach to strategic growth in Thatcham and identified a quantum of development of up to 2,500 dwellings. The purpose of the report was to inform the decision making process of the Local Plan Review (as stated in paragraph 1.6 of the report). Therefore whilst it is recognised that up to 2,500 units was identified as an option, the Council took the decision to reduce the quantum of development for the site to 1,500 to address the concerns raised in the significant number of objections to the site regarding the potential environmental and infrastructure impacts.
- 1.86. The Council does not, therefore, consider it is necessary to modify the reference in the policy to refer to a different scale of development.

#### **4.16 Policies Map**

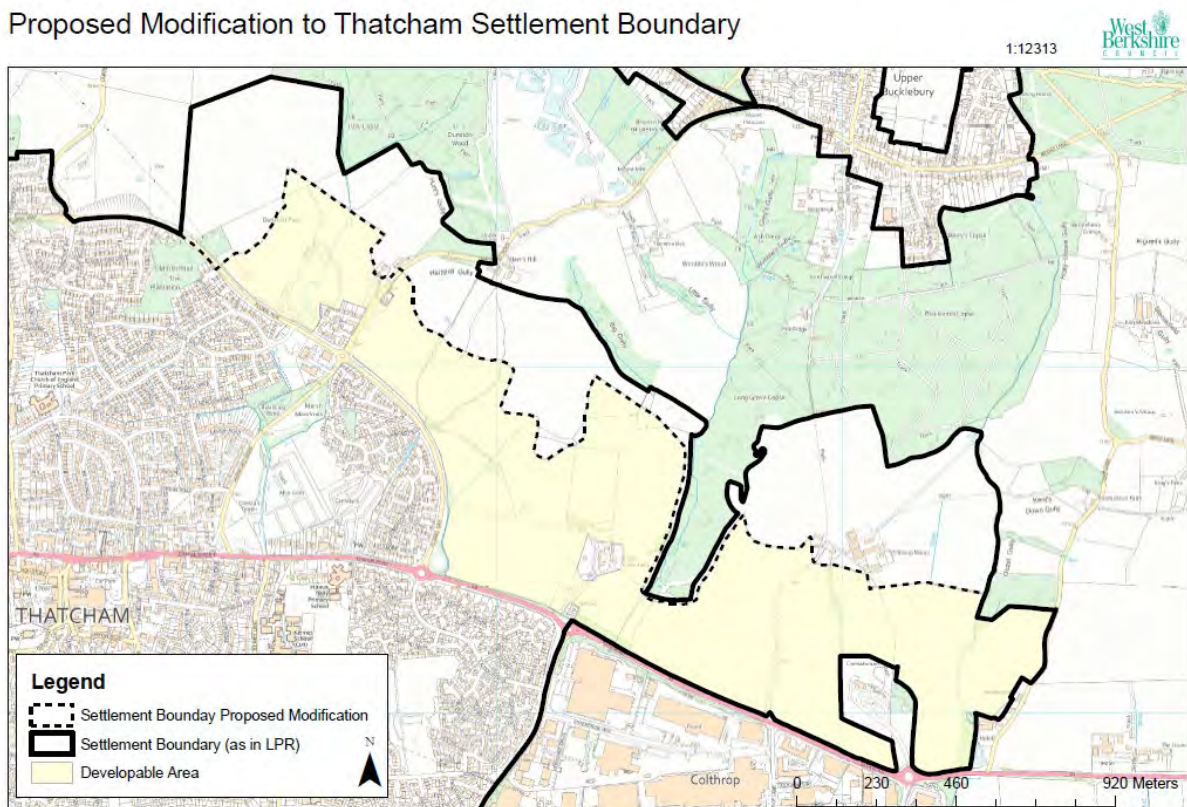
**Q4.20. Does the settlement boundary shown on the submitted policies map need to be changed around the North East Thatcham allocation? How could a new revised settlement boundary be defined on the adopted policies map following the studies and work identified in policy SP17?**

- 1.87. The settlement boundary for Thatcham is currently drawn around the whole of the allocated site, but it is considered that due to the site constraints such as

the gas network pipe running across the northern part of the site, the adjoining ancient woodland and the rising land levels, much of the northern part of the site would not be identified as part of the developable area. The Council acknowledges the uncertainties and difficulties of defining the settlement boundary at a later stage and so has undertaken further work in this regard to try and give more clarity to the local community.

- 1.88. The Council has carried out an exercise to establish the development potential of the site, using the Council’s Density Pattern Book Study ([SIT3](#)) and the details within the Thatcham Strategic Growth Study ([SIT2c](#)), the Landscape Sensitivity and Capacity Study ([LAN7e](#)) as well as information contained within the Consortium’s masterplan for the site. The development potential of the site has been estimated using an average density of 35 dph, although it is recognised that as a strategic site there will be a range of densities across the site. Using this information the Council has been able to establish what it considers to be the developable area of the site.
- 1.89. In a similar way to the approach taken for the strategic site at Sandford, it is proposed to redraw the settlement boundary around the developable area of the site as shown below.

Proposed Modification to Thatcham Settlement Boundary



- 1.90. As a result the Council proposes a main modification to redraw the settlement boundary as shown above and remove reference in the supporting text to updating the settlement boundary as follows:

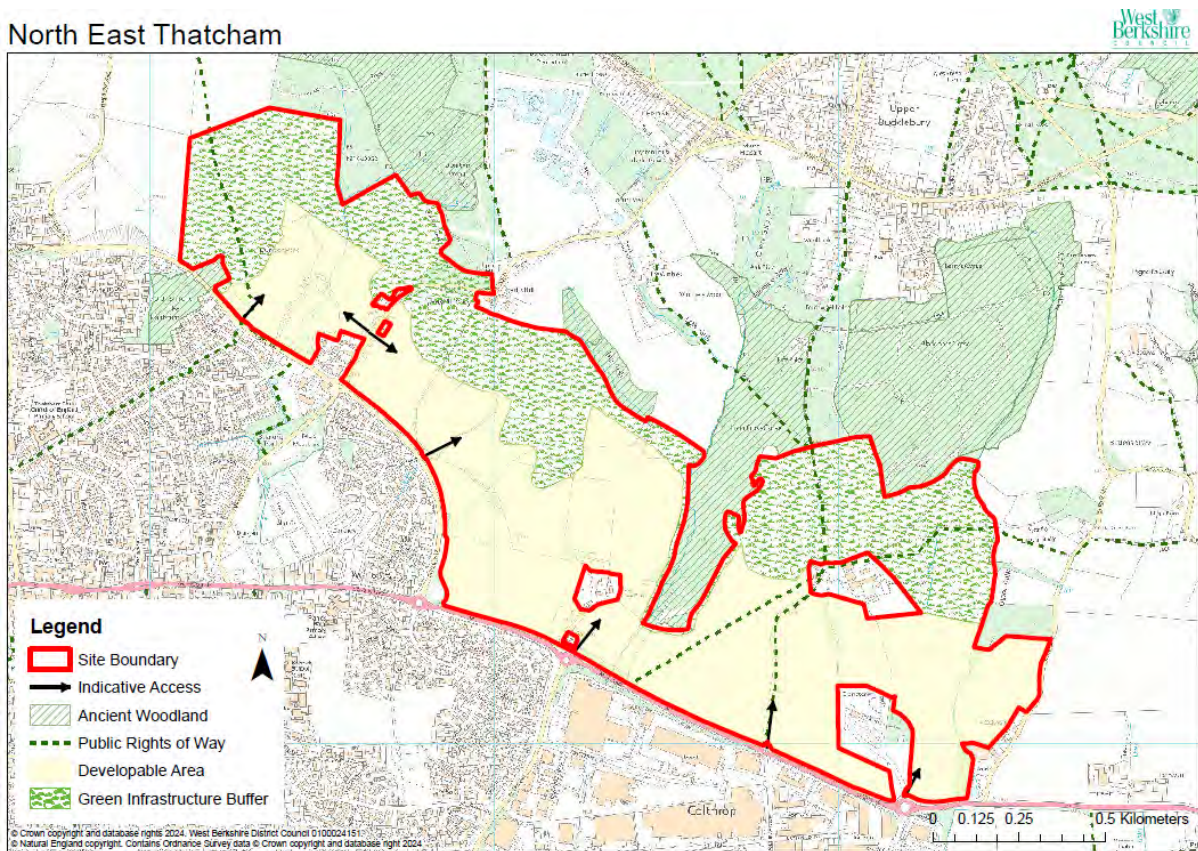
“6.58 The western edge of the site is adjacent to the existing Thatcham settlement boundary along Floral Way and Bath Road (A4). The eastern end of the site is adjacent to Colthrop Industrial Estate, which is contiguous with

Thatcham. The new revised settlement boundary will be defined following the studies and work identified in the policy at the application stage.'

**Q4.21. Are the areas within the allocation defined on the policies map as country park and green links justified, and will they be effective in illustrating geographically the application of relevant parts of policy SP17?**

1.91. In order for the Policies Map to be justified and effective, the Council proposes a main modification to simplify the site map accompanying the policy text to clarify the area to be set aside as a green infrastructure buffer in accordance with its response to Q4.8 above and as set out below.

North East Thatcham



**Q4.22. Which policy in the Plan does the car park designated on the policies map relate to?**

1.92. There is no policy basis for the car park currently included on the policies map, therefore, the Council proposes a modification to remove the car park from the map. As per the map included at paragraph 1.80 above.

#### **4.17 North East Thatcham map**

<b>Q4.23. Is the purpose of the North East Thatcham map in the Plan, and its relationship with the policies map, clear and unambiguous?</b>
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- 1.93. The purpose of the indicative map included at the end of the policy text is to compliment the policy text and provide a pictorial reference as to the key site constraints and relationship to the surroundings. As set out in its response to Q4.21 above, the Council proposes a main modification to the map to simplify it and make its relationship with the Policies Map clear and unambiguous.

The Council acknowledges that it is proposing a number of both main and minor modifications to policy SP17 and its supporting text and so for ease of reading sets out a tracked changes version of the policy and its supporting text in Appendix A.

## APPENDIX A

## PROPOSED MODIFICATIONS -

**Policy SP17 North East Thatcham Strategic Site Allocation**

Land as shown on the Policies Map is allocated for the delivery of a comprehensive, sustainable, low carbon, residential-led 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 in collaboration with the community and other stakeholders to provide a framework to guide development. Proposals must have regard to this and demonstrate how it has guided proposals in a positive manner. Proposals must also demonstrate how and delivered as a whole to achieve a comprehensive development. the provision of all infrastructure, services, open space and facilities will be delivered in a timely and co-ordinated way. ~~The Thatcham Strategic Growth Study provides guiding principles for the delivery of the site therefore proposals will demonstrate that these guiding principles have been positively responded to.~~

**Homes**

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

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

**Community**

The site will provide a range of community facilities to meet the needs of the development including:

- Local centres providing local retail facilities and small-scale employment for community use (~~approximately 1,100sq.metres Class E and F2~~);
- Health care facility, 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 or other such appropriate body;
- Early years provision on site;
- ~~A 2.5FTE p~~ Primary school provision on site and sports infrastructure requirements of the school. Land to be provided and build costs to be met by the applicant;
- Secondary school provision on site and sports infrastructure requirements for the school 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 applicants expense and prepared in collaboration with the Council and local stakeholders;
- A ~~1,200sqm~~ community indoor facility to be used for sport and community uses with a variety of room sizes (~~currently use classes E and F~~);

- Outdoor formal and informal sports pitches ~~and areas~~ to meet the identified needs of the development;
- Open space and play areas to meet the needs of the development in accordance with Policy DM41.

## Green Infrastructure

The site will provide a comprehensive green infrastructure network ~~and landscape strategy~~ which will respond positively to the ~~take advantage of the~~ sensitivities of the landscape, protect and enhance landscape and ecological biodiversity features of value within and around the site and make provision for biodiversity net gain.

This network will comprise:

- ~~A new community park linking Thatcham to the North Wessex Downs AONB;~~
- A green infrastructure buffer that creates a strong defensible boundary between the developable area and the adjoining countryside and Ancient Woodland.
- Provision of open space within the developable area in accordance with Policy DM40;
- Greenways which connect through the site to the park and facilitate connection to the wider landscape and existing Public Rights of Way network AONB, and include leisure routes accessible to all users
- ~~A comprehensive network of other accessible routes and connections within the development which provide walking and cycling links along desire lines;~~
- Protection of ~~£~~ existing and creation of new Public Rights of Way;
- Retained and new trees, hedgerows and other appropriate native planting ~~which contribute to biodiversity net gain;~~
- Provision of allotments

## Transport

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

Development proposals for the site will be supported by A a Transport Strategy to ~~will~~ provide detail on how this will be achieved, including:

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

## **Sustainability**

Development ~~proposals for~~ of the site will be supported by a **Sustainability Statement Charter** which will establish how policy requirements will be achieved. This will be informed by:

- An **Energy Strategy** which sets out measures to achieve a model low carbon development (following the energy hierarchy) in accordance with Policies SP5 and DM4, including:
  - Net zero carbon (regulated and unregulated energy) emissions for dwellings;
  - BREEAM 'excellent' non residential buildings;
  - on-site renewable energy to assist in the delivery of a net zero carbon neutral development; and
  - carbon off-setting.
- A **Construction and Operations Management Plan (COMP)** shall accompany any planning application on the site. The COMP shall safeguard the oil pipeline from operational works, including the provision of an appropriate buffer.

## **Flooding and Water Environment**

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

- measures to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site;
- details of the phasing of development to consider likely upgrades needed for the water supply network infrastructure and
- surface water drainage management approaches that could deliver net gain for Thatcham town, including use of on-site sustainable drainage systems (SuDS).
- A Flood Risk Assessment taking into account the Thatcham Surface Water Management Plan

## **Biodiversity**

Development proposals for the site will be supported by A an Biodiversity Strategy which will set out:

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

## **Landscape**

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

## **Heritage**

Development proposals for the site will be supported by-A a Historic Environment Strategy 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. It should:

- Be informed by a proportionate heritage impact assessment, desk-based archaeological assessment and if needed, field evaluation; and
- Articulate how the proposed scheme would support an appropriate future use of the listed buildings in the area will be conserved and minimise harm to their significance (including demonstrating how the impact of the development on their settings has been considered)

## **Lighting**

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

## **Mineral Resources**

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

## **Supporting text**

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

6.53 The vision for Thatcham contained in the Core Strategy DPD (2012) was that Thatcham town centre would be a focus for regeneration, enabling the town to fulfil its role within the District's Hierarchy of Centres by improving the retail offer and enhancing the streetscape. The provision of leisure and community facilities for all ages would be improved and encouraged within the town centre. The town would

become more self-contained providing a range of job opportunities and encouraging residents to shop and socialise locally. Additionally, the Core Strategy concentrated housing expansion in Newbury.

6.54 In reviewing the vision for Thatcham as part of the LPR, 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. In addition and in order 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). Stage 3 of the Thatcham Growth Study report lays out a potential vision and approach to strategic growth in Thatcham, intended to inform the decision-making process of the Local Plan Review in choosing suitable allocation sites across the district as a whole. The study identified a larger quantum of development than proposed through this policy, however the guiding principles continue to remain relevant.

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

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

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

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

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

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

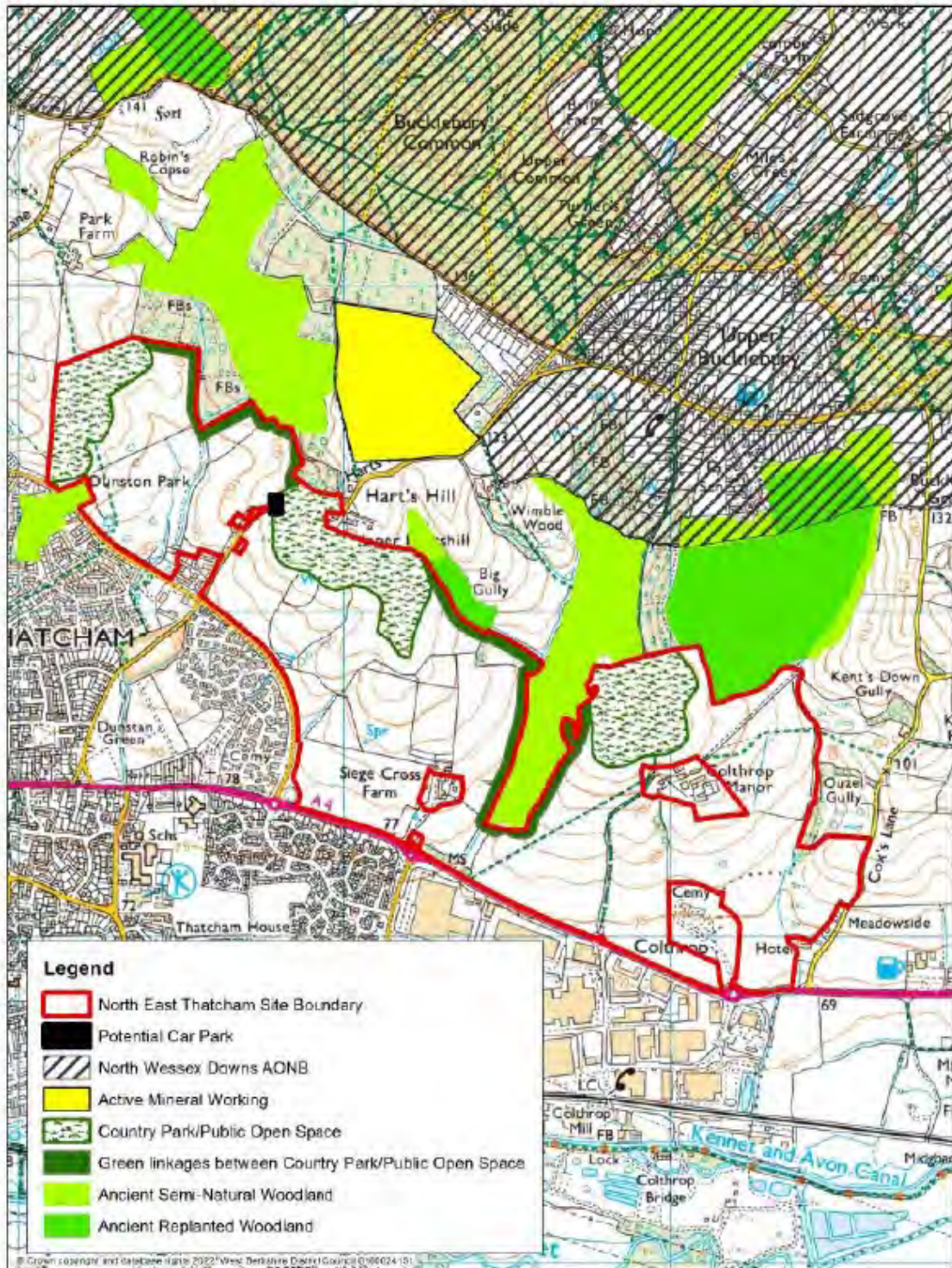
6.61 Hence, Thatcham is now a focus for regeneration, for new housing and for improved provision of services and facilities. A new urban extension to the north east of the town is allocated for development and will provide a new residential neighbourhood with supporting facilities and green infrastructure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

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

6.63 Further detailed work will be required to develop a coherent masterplan or development framework to take the development forward, which will be produced in collaboration with the community and other stakeholders, based on existing evidence and information already produced to support the allocation of the site, including the Thatcham Strategic Growth Study.

Site Plan proposed for deletion

North East Thatcham



Proposed new Site Plan:

North East Thatcham

