



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

Representation Form

**Ref:**  
 (For official use only)

<b>Please complete and return this form:</b>	<b>By email:</b> <a href="mailto:planningpolicy@westberks.gov.uk">planningpolicy@westberks.gov.uk</a>
	<b>By post:</b> Planning Policy, Development and Housing, Council Offices, Market Street, Newbury, RG14 5LD
<b>Return by:</b>	<b>11:59pm on Friday 31 January 2025</b>

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

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

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

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cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.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

\*Mandatory Field

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

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

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

Issue	Welcome improvements to Policy SP17
Document name	Schedule of Proposed Main Modifications (MM) - November 2024
Modification/Change reference number (MM / PMC)	

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

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

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

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

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

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

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

Notwithstanding the concerns of the Thatcham Town Council in subsequent representations, the Council generally welcomes the following elements of the Main Modifications to policy SP17. However, some aspects are still insufficiently clear, and we propose amendments to address these.

*Note that this text is presented in final form without revision marks. The specific words that are being commented on in **bold** and our proposals for further clarification are shown with revision marks (underlined and ~~struck through~~)*

Policy; Introductory paragraph:

Proposals **must** demonstrate how the provision of all infrastructure, services, open space and facilities will meet the needs of the development and be delivered in a **timely and** co-ordinated way in advance of need across the whole site alongside the phased delivery of residential development.

Given that the provision of all of these elements is essential to the sustainability of the development, this provision needs to be demonstrated in the proposal. The use of ‘must’ is therefore justified.

“Timely” has a number of meanings, and it is unclear whether this is the opportune time for the residents or the developer. This needs to be made more precise.

Homes:

... **the final number of dwellings to be determined by the adopted Masterplan Supplementary Planning Document (SPD) required by this policy.**

The estimate of the number of homes in the Thatcham Strategic Growth Study Stage 3 is rudimentary. It is unclear whether the underlying assumptions are consistent with the policies in the Plan and NPPF, and constraints on the site such as the new flood alleviation scheme, the area compromised by the oil pipelines and the maximum elevation AOD. It is therefore inappropriate to specify a set number in this policy.

Community – healthcare:

Primary Healthcare provision and associated infrastructure, **which is operationally and financially viable**, the details of which ~~should~~**must** be agreed with the Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board ...

The wording of the Main modification is a substantial improvement over Regulation 19, which was not viable – and therefore was unsound. However, we understand that a new primary healthcare facility will not receive funding unless it is approved by the ICB, so the details of it must be agreed with them for it to be viable.

Masterplanning and Design Code:

The site will be masterplanned and a **Supplementary Planning Document (SPD)** prepared by the Council. The SPD will be funded by the applicant and prepared in collaboration with the applicant, relevant **town and parish councils**, the community and other stakeholders. The SPD will be adopted by the Council prior to the submission of a planning application.

**Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA)**

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

*(Please be as precise as possible)*

Page number	
Paragraph number	
Comments:	

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

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

Issue	Aspects of policy SP17 that remain unsound
Document name	
Modification/Change reference number (MM / PMC)	

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

- c) **Legally compliant**                      Yes                       No
- d) **Sound**                                      Yes                       No

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

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

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

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

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

**To be completed**

**Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA)**

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

Page number	
Paragraph number	
Comments:	



Section 245 of Levelling-up and Regeneration Act 2023 strengthens the protection given to National Landscapes (AONBs) under Section 85 of The Countryside and Rights of Way Act 2000:

“In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty in England, a relevant authority other than a devolved Welsh authority must seek to further the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty.”

Paragraph 176 of NPPF (July 2021) states:

“Great weight should be given to conserving and enhancing landscape and scenic beauty in ... Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues” and that “...development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.”

Paragraph 5 of Schedule 2 of The Environmental Assessment of Plans and Programmes Regulations 2004 states:

“The environmental protection objectives, established at ... national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.”

The new requirement in the 2023 Act is clearly an ‘environmental protection objective’, is clearly relevant to the Local Plan update, and both West Berkshire Council and the Planning Inspectorate are ‘relevant authorities’ under the 2000 Act.

It follows that the Sustainable Appraisal on the draft Local Plan update must take into account the consequences of the new requirement in the 2023 Act, as it might impact policies both within the area of the National Landscape itself and within its setting.

However, there is no mention of Section 245 of Levelling-up and Regeneration Act 2023 or the amendment that it makes to Section 85 of The Countryside and Rights of Way Act anywhere in the 965 pages of the November 2024 version of the Sustainability Appraisal, and no evidence that it has been taken into account in this most recent version.

Paragraph 8 of the 2004 Regulations stipulates that a plan, programme or modification until account has been taken of the environmental report for the plan or programme; it is implicit that the environmental report must comply with statutory requirements. This Sustainable Appraisal clearly does not.

As the Sustainability Appraisal is not legally compliant, the draft Local Plan update must be unsound.

#### **Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA)**

#### **4. Do you have any comments on the updated Sustainability Appraisal/Strategic Environmental Assessment Report – Proposed Main Modifications (November 2024)?**

Page number	The whole document
Paragraph number	The whole document
Comments:	
As discussed above, the Sustainable Appraisal on the draft Local Plan update must take into account the consequences of the new requirement in Section 245 of The Levelling-up and Regeneration Act 2023 the 2023 Act, as it might impact policies both within the area of the	



National Landscape itself and within its setting. The November 2024 version of the Sustainability Appraisal clearly has not done this, so it now needs to be reviewed and updated.

It is clear from Paragraphs 8 and 13 of The Environmental Assessment of Plans and Programmes Regulations 2004 that any consultation on a “relevant document” is a consultation on the whole document. While the focus of this consultation is on the impact of the Main Modifications on the Sustainability Appraisal, the Council must also take account of any other comments, and in particular any comments relating to any changes in legislation or guidance relating to an ‘environmental protection objective’ since the last version of the Sustainability Appraisal was developed in 2022 and published in January 2023.

Furthermore, the consultation on the sustainability appraisal that the Council undertook in parallel with the Regulation 19 consultation did not comply with the statutory requirements for notification, and many respondents were probably unaware that they were invited to comment on it.

The Main Modifications might have an indirect impact on other aspects of the Sustainability Appraisal that the Council has not identified.

For these reasons, the Council must give full weight to comments made on any part of the Sustainability Appraisal, not just those parts that are directly related to Main Modifications.

## Proposed Main Modifications and Proposed Changes to the Policies Map

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

Issue	Quantum of Development at North East Thatcham
Document name	Main Modifications
Modification/Change reference number (MM / PMC)	MM25

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

- g) Legally compliant                      Yes                       No
- h) Sound    Yes                       No

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

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

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

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

The sustainability appraisal for the quantum of development is seriously flawed, so needs to be reviewed. Once that has been done, the Main Modification to increase the size of the development from 1,500 to 2,500 dwellings must be reconsidered, in particular the following:

“Homes

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

**Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA)**

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

Page number	Pages 21-23 of Appendix 4
Paragraph number	Table in Section 2.4
Comments:	
<p>Section 12 of The Environmental Assessment of Plans and Programmes Regulations 2004 states:</p> <p>(1) Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible authority shall prepare, or secure the preparation of, an environmental report in accordance with paragraphs (2) and (3) of this regulation.</p> <p>(2) The report shall identify, describe and evaluate the likely significant effects on the environment of—</p> <p>(a) implementing the plan or programme; and</p> <p>(b) reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme.</p> <p>This assessment should therefore be justified:</p> <ul style="list-style-type: none"> <li>- The provisions of policy SP17</li> <li>- Another identified policy in the draft Local Plan.</li> <li>- The NPPF or PPG</li> <li>- Legislation</li> <li>- Government statements</li> <li>- Other clearly referenced evidence.</li> </ul> <p>It should NOT be based on unsubstantiated speculation.</p> <p>The current SA for the quantum of development is based on assumptions that are inconsistent with the content of policy SP17, both at Reg.19 and with the Main Modifications, and which are unsubstantiated and questionable assumptions.</p> <p>It is clear that this sustainability appraisal has not been adequately reviewed in the light of the proposed Main Modifications – for example, it still refers to ‘BREEAM Excellent’, which the Main Modification deletes.</p> <p>A proper sustainability appraisal therefore needs to be undertaken, and the decision on the size of the development then reconsidered.</p> <p>Until this is done, the size of the development in Policy SP17 should remain as “approximately 1,500”.</p>	

	1a: North East Thattham (up to 2500 dwellings)	1b: North East Thattham (1,500)					
		WBC	TTC		WBC	TTC	TTC Comments
<b>9: To reduce emissions contributing to climate change and ensure adaptation measures are in place to respond to climate change</b>	Allocation of a site of this size would provide the potential for significant climate mitigation measures to be included within the development. There is limited flood risk on the site, which could be used within the design of the site to provide GI and other measures to mitigate against climate change.	++	--	Allocation of a site of this site would provide the potential for climate change mitigation measures to be included within the development. There is limited flood risk on the site, which could be used within the design of the site to provide GI and other measures to mitigation against climate change.	+	-	The wording of this SA Objective is “To reduce emissions contributing to climate change and ensure”. Any development will only REDUCE emissions if the construction of the development, the use of the buildings and the activities of its residents are all carbon positive.
<b>1: To enable provision of housing to meet identified need in sustainable locations</b>	Allocation of the site would deliver a significantly <i>[higher?]</i> proportion of houses needed to meet local needs, in a sustainable location. Fewer additional sites in other areas across the district would be required.	++	+	Allocation of the site would deliver a high proportion of houses need to meet local needs, in a sustainable location. Other alternative sites across the district may be required to provide for the Council's total housing requirement.	+	+	The Housing Trajectory 2023/24-2040/41 predicts that only 1760 houses will be completed in the plan period, and only exceeds 1500 houses in the final two years of the plan period. Therefore, the remaining 740 houses are not needed to meet predicted housing needs.
<b>2: To improve health, safety and wellbeing and reduce inequalities</b>	New development should be designed with health, safety and wellbeing in mind to ensure that inequalities are reduced.	+	O	New development should be designed with health, safety and wellbeing in mind to ensure that inequalities are reduced.	+	O	This issue is not addressed in Policy SP17 or anywhere else in the draft Local Plan update, so this is pure speculation without justification.

	1a: North East Thatcham (up to 2500 dwellings)	1b: North East Thatcham (1,500)					
		WBC	TTC				
				TTC Comments			
<b>3: To improve accessibility to community infrastructure</b>	Allocation of this site would allow for infrastructure necessary to support the development of the site to be provided within the development, close to where the new homes will be located. A development of this size would also support regeneration and improvement of other community facilities within Thatcham.	++	-	Allocation of this site would allow for some of the infrastructure necessary to support the development of the site provided within the development, close to where new homes will be located. However, development of this size may not be able to support some of the larger community infrastructure projects required to allow for greater support for Thatcham (eg. Education provision).	+/ ?	-	These assessments are inconsistent with the content of SP17 at Reg.19 and after Main Modifications. Both versions of the policy only provide the infrastructure needed to support the residents of the development, and both have uncertainty about the viability of the provision for health and secondary education. The Council has not updated its Infrastructure Delivery Plan since Reg.19 (and that version was inconsistent with the draft Local Plan, so there is no other evidence to support the assertion that 2500 dwellings would provide more infrastructure.
<b>4: To promote and maximise opportunities for all forms of safe and sustainable travel</b>	Allocation of this site would provide internal routes for walking, cycling and public transport as well as linking into the existing networks. The site is however, some way from the station, so creating safe links to the station would be key.	+	0	Allocation of this site would provide internal routes for walking, cycling and public transport as well as linking into the existing networks. The site is however, some way from the station, so creating safe links to the station would be key.	+	0	Internal routes are of little value unless they lead to safe external routes. We have doubts about the feasibility of creating safe cycling routes to the station and along the A4 (particularly in Chapel Street).
<b>5: Ensure that the character and distinctiveness of the natural, built and historic environment is conserved and enhanced</b>	Development of the site could result in impacts on the natural, built and historic environment without adequate mitigation measures being in place.	?	--	Development of the site could result in impacts on the natural, built and historic environment without adequate mitigation measures being in place.	?	-	This development (whatever its size) will clearly have a negative impact on the natural environment, given its location in the setting of the AONB. It will clearly have a negative impact on the rural setting of the listed farm buildings located within the proposed area for housing. A larger development will have a greater impact/

	1a: North East Thatcham (up to 2500 dwellings)	1b: North East Thatcham (1,500)					
		WBC	TTC		WBC	TTC	TTC Comments
<b>6: To protect and improve air, water and soil quality, and minimise noise levels throughout West Berkshire</b>	Development of the site could result in impacts on air, water and soil quality and noise without adequate mitigation measures being in place.	?	O	Development of the site could result in impacts on air, water and soil quality and noise without adequate mitigation measures being in place.	?	O	We have come concerns about the impact of abstraction of water from chalk aquifers.
<b>7: To promote and improve the efficiency of land use</b>	The site is a greenfield site	-	-	The site is a greenfield site	-	-	
<b>8: To reduce consumption and waste of natural resources and manage their use efficiently</b>	Development of a strategic site allows for more efficient use of resources and should help to reduce waste generation as part of the development process.	+	?	Development of a strategic site allows for more efficient use of resources and should help to reduce waste generation as part of the development process.	+	?	There is no evidence for this assertion.
<b>10: To support strong, diverse and sustainable economic base which meets identified needs</b>	As a strategic site development would include a mix of uses including employment.	+	- -	As a strategic site development would include a mix of uses including employment.	+	-	This statement is not justified by the policy SP17. The site will only contain housing, the infrastructure needed to support the residents, and "Local centres providing local retail facilities and <b>small-scale employment</b> <i>[our emphasis]</i> including for community use. The Main Modification deletes the 1,100 sq m area.

## Proposed Main Modifications and Proposed Changes to the Policies Map

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

Issue	Sustainability Appraisal for SP17 with 2,500 homes
Document name	Main Modifications
Modification/Change reference number (MM / PMC)	MM25

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

- i) **Legally compliant**                      Yes                       No
- j) **Sound**                                      Yes                       No

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

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

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

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

The sustainability appraisal for Policy SP17 has not been properly updated to reflect the extensive Main Modifications to the policy, and some of the assessments and comments are demonstrably incorrect.

This sustainability appraisal is therefore seriously flawed, so needs to be reviewed. Once that has been done, the Main Modification to increase the size of the development from 1,500 to 2,500 dwellings must be reconsidered, in particular the following:

**“Homes**

The site is to be allocated for the phased delivery of approximately 1,500 up to approximately 2,500 dwellings, with the final number of dwellings to be determined by the adopted Masterplan Supplementary Planning Document (SPD) required by this policy...”

**Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA)**

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

Page number	
Paragraph number	
Comments:	
<p>Section 12 of The Environmental Assessment of Plans and Programmes Regulations 2004 states:</p> <p>(1) Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible authority shall prepare, or secure the preparation of, an environmental report in accordance with paragraphs (2) and (3) of this regulation.</p> <p>(2) The report shall identify, describe and evaluate the likely significant effects on the environment of—</p> <p>(a) implementing the plan or programme; and</p> <p>(b) reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme.</p> <p>This assessment should therefore be justified:</p> <ul style="list-style-type: none"> <li>- The provisions of policy SP17</li> <li>- Another identified policy in the draft Local Plan.</li> <li>- The NPPF or PPG</li> <li>- Legislation</li> <li>- Government statements</li> <li>- Other clearly referenced evidence.</li> </ul> <p>It should NOT be based on unsubstantiated speculation.</p> <p>The current SA for the quantum of development is based on assumptions that are inconsistent with the content of policy SP17, both at Reg.19 and with the Main Modifications, and which are unsubstantiated and questionable assumptions.</p> <p>It is clear that this sustainability appraisal has not been adequately reviewed in the light of the proposed Main Modifications – for example, it still refers to ‘BREEAM Excellent’, which the Main Modification deletes.</p>	



A proper sustainability appraisal therefore needs be undertaken, and the decision on the size of the development then reconsidered.

Until this is done, the size of the development in Policy SP17 should remain as “approximately 1,500”.

<b>++</b>	<b>+</b>	<b>O</b>	<b>-</b>	<b>--</b>
Significantly Positive	Positive	Neutral	Negative	Significantly Negative

<b>Appendix 5 SA/SEA of Strategic Policies</b>						<b>Thatcham Town Council assessment</b>	
						The Town Council has reviewed its comments made at Reg. 19. Where these are unchanged, they are shown with <i>[italics in square brackets]</i>	
SA Objective	SA Sub-Objective	Effects of Policy on SA Objectives	Justification for assessment	Mitigation / Enhancement	Comment	Comment	Effects of Policy on SA Objectives
<b>9: To reduce emissions contributing to climate change and ensure adaptation measures are in place to respond to climate change.</b>	9(a): To reduce West Berkshire's contribution to greenhouse gas emissions	<b>+</b>	The policy is likely to have a positive impact as it seeks for a sustainable, low carbon development.		The policy is likely to have a positive impact on all element of sustainability in relation to responding to climate change.	The objective is to REDUCE West Berkshire's contribution to greenhouse gas emissions. Any development will inevitably increase emissions unless the construction and operation of the development and the activities of its residents are all carbon neutral or positive. Policy SP17 clearly falls far short of this. <i>[The policy does not address the considerable contribution to greenhouse gas emissions from the manufacture of building materials, transport of them and construction of the site.]</i>	<b>-</b>
	9(b): To sustainably manage flood risk to people, property		The policy requires consideration of SuDS that could deliver net	The policy, in combination with other			

	and the environment	? / +	gains for Thatcham, but there is no other reference made to flood risk. The policy does include requirements for GI, ecology and sustainability measures to be included which may all have a positive impact on flood risk,	policies in the plan (eg. The flooding policy) should result in a positive impact.			
<b>1: To enable provision of housing to meet identified need in sustainable locations</b>	1(a): To maximise the provision of affordable housing to meet identified need	++	The policy includes specific reference to the provision of affordable housing to be provided on the site.		The policy is likely to have a significantly positive impact on social sustainability as it will help to meet housing to meet local needs, including affordable housing and provision to meet needs across all sectors of the community.		++
	1(b): To enable provision of housing to meet all sectors of the community, including those with specialist requirements	++	The policy includes requirements for a range of dwellings types as set out in SP18. There is also a requirement for 3% of dwellings to be delivered via serviced custom/self-build.			<i>[The mix of housing types, provisions for social housing for rent and specialist requirements for wheelchairs are addressed in policies SP18 and SP19, and these are not mentioned within Policy SP17. They should be assessed under those policies.]</i>	○
<b>2: To improve health, safety and wellbeing and reduce inequalities</b>	2(a): To support healthy, active lifestyles	++	The policy includes requirements for sports facilities, sustainable modes of travel to be designed into the site to allow for safe, active travel.		The policy is likely to have a significantly positive impact as it seeks to support and improve health, safety and wellbeing.	The policy has no indication of the suitability of the community facility for different sports or the number and size of pitches.  <i>[The requirement for sustainable modes of travel on the site are likely to be compromised by the constraints in providing safe and welcoming cycle routes along the A4 and to Thatcham Station].</i>	○
	2(b): To reduce levels and fear of	+	The policy is likely to have a positive impact as the			<i>[The policy does not address crime or antisocial behaviour.]</i>	○

	crime and anti-social behaviour		design of the site should be such to design out crime.			<i>Indeed, crime is only mentioned once anywhere in the draft Local Plan (in the context of levels of exterior lighting) and antisocial behaviour is not mentioned at all</i>	
	2c: To enable the protection and enhancement of high quality multi-functional GI across the District	++	The policy is likely to have a significantly positive impact as it includes details of the GI provision required.			<i>[The development will inevitably be to the detriment of the green existing infrastructure of the site. There is insufficient information about the proposed 'Country Parks / Public Open Spaces' to assess to what extent they will enhance the overall GI, or just mitigate the detriment to GI of the development.]</i>	+
<b>3: To improve accessibility to community infrastructure</b>	3(a): To improve access to education, health and other services	++	The policy is likely to have a positive impact on accessibility community services and facilities, including education provision, health care provision and other services/facilities		The policy is likely to have a positive impact on all elements of sustainability as it seeks to improve accessibility to community infrastructure.	The policy itself does not demonstrate the viability of the provision of healthcare and secondary education, because these are left to subsequent studies and agreement. The policy provides very little else on-site and nothing whatsoever to remedy the lack of infrastructure of the town.	--
	3(b): To support the development of access to IT facilities including Broadband particularly in rural locations	?	Other policies in the plan require consideration of digital infrastructure, so overall the development should result in a positive impact on digital accessibility.			The Main Modifications delete all of the specific requirements from Policy DM41. These requirements are now delivered through Government policies, not the Local Plan. <i>[The wording for SP16 is more appropriate: 'Specific mention of IT facilities is not mentioned within the policy,</i>	0

						<i>therefore, it is likely to have a neutral impact.'].</i>	
<b>4: To promote and maximise opportunities for all forms of safe and sustainable travel.</b>	4(a): To reduce accidents and improve safety	+	The policy is likely to have a positive impact on road safety as safe travel will be critical to the design of the site.		The policy is likely to have a significantly positive impact on all element of sustainability as it seeks to provide opportunities for safe and sustainable travel.	<i>[This policy does not address accidents or safety.]</i>	○
	4(b): To increase opportunities for walking, cycling and use of public transport	++	The policy is likely to have a significantly positive impact on walking, cycling and public transport as the development should be designed with these in mind.			<i>[Neither Policy SP17 nor the supporting text mention public transport, although the Traffic Study and the Thatcham Strategic Growth Study do.]</i>	+
<b>5: Ensure that the character and distinctiveness of the natural, built and historic environment is conserved and enhanced.</b>	5(a): To conserve and enhance the biodiversity and geodiversity of West Berkshire	++	The policy is likely to have a significantly positive impact on biodiversity as it sets out specific ecological requirements for the development		The policy is likely to have a significantly positive impact on environmental sustainability as it seeks to conserve and enhance the natural, built and historic environment.	The Policy calls for Biodiversity Strategy, but this is in part to mitigate the loss of biodiversity from the development.	+
	5(b): To conserve and enhance the character of the landscape	+	The policy is likely to have a positive impact on landscape character as consideration of the landscape is written into the policy.			It is inconceivable that a development of 2,500 dwellings can have a positive impact on landscape character.	--
	5(c): To protect or, conserve and enhance the built and historic environment to include sustaining the significant interest of heritage assets	+	The policy is likely to have a positive impact on the historic environment as it includes the requirement for a Historic Environment Strategy to be submitted			<i>[The development will undoubtedly be detrimental to the settings of Siege Cross Farm and the barn at Colthrop Manor, both of which are listed buildings. The Historic Environment Strategy can only address how to mitigate this detriment.]</i>	-
<b>6: To protect and improve air, water and soil quality, and</b>	6(a): To reduce air pollution	○	The policy is unlikely to impact on air quality	Other policies in the plan will ensure that there is no	The policy is unlikely to impact on any element of sustainability in		○

<b>minimise noise levels throughout West Berkshire.</b>				negative impact on air quality.	relation to air, water, soil or noise.		
	6(b): To manage noise levels	○	The policy is unlikely to impact on noise levels				○
	6(c): To maintain and improve soil quality	○	The policy is unlikely to impact on soil quality				○
	6(d): To maintain and improve water quality	○	The policy is unlikely to impact on water quality.			<i>[The assessment that “The policy [SP17] is unlikely to impact on water quality” is inconsistent with the district-wide assessments of Water Supply and Water Quality on p9 of the SA/SEA Environmental Report November 2022. The increase in abstraction to provide water for the site could be detrimental to the chalk aquifers of the Kennet Valley, and therefore to its chalk streams.]</i>	-
<b>7: To promote and improve the efficiency of land use.</b>	7(a): To maximise the use of previously developed land and buildings where appropriate	-			The policy is likely to have an overall neutral impact, with a positive impact on social sustainability as it seeks to provide suitable densities of dwelling across the site.	The site is entirely greenfield, within the setting of the North Wessex Downs AONB.	--
	7(b): To apply sustainable densities of land use	+	The policy is likely to have a positive impact on density of land use, as the number of dwellings on the site takes into account appropriate densities.			Policy SP17 only applies the densities defined in other policies	-
<b>8: To reduce consumption and waste of natural resources and</b>	8(a): To reduce energy use and promote the development and use of sustainable	++	The policy is likely to have a significantly positive impact on energy use as it requires the site to consider energy use and			The Main Modifications delete all specific requirements for energy efficiency from Policy SP17. Policy SP17 does not provide	○

<b>manage their use efficiently.</b>	/renewable energy technologies, generation and storage		provide on-site renewable energies.			any expectations on the content of the Energy Statement. It follows that Policy SP17 itself no longer contributes to reduction of energy use.	
	8(b): To reduce waste generation and disposal in line with the waste hierarchy and reuse of materials	○	The policy is unlikely to have an impacts on waste generation. However, the policy does require 'BREEAM' excellent for non-residential buildings which can include consideration of waste management.			This statement is now factually incorrect, since the Main Modification deletes the reference to BREEAM excellent from SP17.	-
	8(c): To reduce water consumption and promote reuse	+	The policy is likely to have a positive impacts on water consumption as it requires an integrated water supply and drainage strategy to be submitted.			<i>[The Integrated Water Supply and Drainage Strategy required by SP17 makes no mention of reduction of water consumption or reuse.]</i>	○
	8(d): To reduce the consumption of minerals and promote reuse of secondary materials	+	The policy is likely to have a positive impact on the consumption of minerals as it requires a MRA to be submitted.			<i>[The production of an MRA does nothing by itself to reduce consumption of materials. A very small part of the site is on the periphery of the Minerals Safeguarding Area, but the oil pipeline runs through this area which would probably prevent any extraction.]</i>	○
<b>10: To support a strong, diverse and sustainable economic base which meets identified needs.</b>	10(a): To encourage a range of employment opportunities that meet the needs of the District	+	The policy is likely to have a positive impacts on employment opportunities as it includes a requirement for community facilities, which could include employment			Policy SP17 states: "Local centres providing local retail facilities and small-scale employment for community use (approximately 1,100 sq. metres Class E and F2). Local retail facilities by their nature do not "meet the needs of the District".	?

			opportunities, to be provided on site.			The relatively small floor area and broad range of uses that fall within Classes E and F2 make it impossible to assess the extent to which these facilities meet this sub-objective, if at all.	
	10(b): To support key sectors and utilise employment land effectively and efficiently	O	The site is unlikely to impact on the effective and efficient use of employment land			Site ESA1 (Land east of Colthrop Industrial Estate, Thatcham) was within the area considered in the Thatcham Strategic Growth, and we understand that it is in the ownership of a proponent of THA20. This has now been granted planning permission for a police logistics centre. However, this is unrelated to the Local Plan.	-
	10(c): To support the viability and vitality of town and village centres	++	The policy is likely to have a significantly positive impact on the viability and vitality of Thatcham as the development will support itself and other improvements within Thatcham.			<i>[The vision for regeneration of Thatcham Town Centre and improvement of provision of leisure and community facilities that in the DPD of the 2012 Local Plan has not materialised; they have, if anything, deteriorated in that period.</i>  <i>Policy SP17 says nothing about regeneration of Thatcham Town Centre, and the increase in population will make the existing provision less sustainable.]</i>	--



## Proposed Main Modifications and Proposed Changes to the Policies Map

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

Issue	Sustainability Appraisal of sites CA12 and CA17 (Land at Henwick Park, and Land east of Regency Park Hotel, both at Bowling Green Road, Thatcham)
Document name	
Modification/Change reference number (MM / PMC)	

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

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

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

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

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

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

**To Be completed**

**Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA)**

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

Issue	Sustainability Appraisal of sites CA12 and CA17 (Land at Henwick Park, and Land east of Regency Park Hotel, both at Bowling Green Road, Thatcham)
Page number	Pages 59-66 and 75 - of Appendix 8a Pdf pages 641 - 648 and 657 -
Paragraph number	Appendix 8a; CA12 and CA17

Comments:

**TO BE COMPLETED**

<b>++</b>	<b>+</b>	<b>O</b>	<b>-</b>	<b>--</b>
Significantly Positive	Positive	Neutral	Negative	Significantly Negative

Appendix 8 SA/SEA of Strategic Policies						Thatcham Town Council assessment	
SA Objective	SA Sub-Objective	Effects of Policy on SA Objectives	Justification for assessment	Mitigation / Enhancement	Comment	Comment	Effects of Policy on SA Objectives
<b>9: To reduce emissions contributing to climate change and ensure adaptation measures are in place to respond to climate change.</b>	9(a): To reduce West Berkshire's contribution to greenhouse gas emissions	<b>?</b>	The impact on climate change will depend on the design/layout of the site.	Climate change measures and mitigation would be required should the site be reallocated for development.	There is likely to be an unknown impact on all elements of sustainability as the impact would depend upon the climate change measures and mitigation proposed should the site come forward.	The objective is to REDUCE West Berkshire's contribution to greenhouse gas emissions. Any development will inevitably increase emissions unless the construction and operation of the development and the activities of its residents are all carbon neutral or positive. The proposed policies for CA12 and CA17 clearly fall far short of this.	<b>-</b>
	9(b): To sustainably manage flood risk to people, property and the environment	<b>O / -</b>	The site is in FZ1. A surface water flow route passes through the site.	Development would need to avoid areas at risk of flooding. Sustainable Drainage Systems (SuDs) would need to be provided.			<b>O</b>
<b>1: To enable provision of housing to meet</b>	1(a): To maximise the provision of affordable housing to meet identified	<b>+</b>	The site is likely to have a positive impact on provision of affordable		There is likely to be a positive impact on social sustainability as the site would help to		

<b>identified need in sustainable locations</b>	need		housing as it is of a scale to provide affordable housing		deliver housing to meet identified needs.		
	1(b):To enable provision of housing to meet all sectors of the community, including those with specialist requirements	+	The site is likely to have a positive impact on the provision of housing as it is of a scale to provide a mix of housing types and tenures.				
<b>2: To improve health, safety and wellbeing and reduce inequalities</b>	2(a): To support healthy, active lifestyles	+	The site is likely to have a positive impact on healthy, active lifestyles as the site is close to local services and facilities.		There is likely to be a positive impact on social sustainability due to the location of the site and opportunity for good design should the site be allocated for development.		
	2(b): To reduce levels and fear of crime and anti-social behaviour	0	The site is unlikely to impact on levels and fear of crime and anti-social behaviour.			The policy does not address crime or antisocial behaviour. Indeed, crime is only mentioned once anywhere in the draft Local Plan (in the context of levels of exterior lighting) and antisocial behaviour is not mentioned at all	0
	2c:To enable the protection and enhancement of high quality multi-functional GI across the District	?	There is likely to be an unknown impact on GI as it would depend on what GI would be proposed as part of the development should the site be allocated.	Policies in the plan require consideration of GI, therefore, should the site be retained as an allocation consideration of GI provision would be required.			
<b>3: To improve accessibility to community infrastructure</b>	3(a): To improve access to education, health and other services	+	The site is likely to have a positive impact on access to community facilities		The site is likely to have a positive impact on social sustainability as it is located close to		

			as it is well located for services and facilities, including education and employment facilities.		existing community infrastructure.		
	3(b): To support the development of access to IT facilities including Broadband particularly in rural locations	?	The site is likely to have an unknown impact on access to IT facilities, as although the site is of a scale that would be expected to deliver FTTP at the time of construction, this would depend on the delivery and implementation of the site should it be allocated.				
<b>4: To promote and maximise opportunities for all forms of safe and sustainable travel.</b>	4(a): To reduce accidents and improve safety	?	There is likely to be an unknown impact on road safety, as development of the site could result in road safety concerns but could also provide improvements.			This policy does not address accidents or safety.	
	4(b): To increase opportunities for walking, cycling and use of public transport	+	There is likely to be a positive impact as the site is close to local walking and cycling opportunities, with local bus routes passing close to the site.				
<b>5: Ensure that the character</b>	5(a): To conserve and enhance the		The site is likely to have an unknown				

<b>and distinctiveness of the natural, built and historic environment is conserved and enhanced.</b>	biodiversity and geodiversity of West Berkshire	<b>?</b>	impact on biodiversity as the site is also within 2km of a SAC and SSSI and adjacent to a LWS.			
	5(b): To conserve and enhance the character of the landscape	<b>- / ?</b>	Development of the whole site would result in a negative impact on landscape. Mitigation measures, including reducing the developable area of the site would reduce the impact.			It is inconceivable that a development within the setting of the AONB can have a positive impact on landscape character.
	5(c): To protect or, conserve and enhance the built and historic environment to include sustaining the significant interest of heritage assets	<b>0</b>	The site is unlikely to impact on the historic environment			
<b>6: To protect and improve air, water and soil quality, and minimise noise levels throughout West Berkshire.</b>	6(a): To reduce air pollution	<b>0</b>	The policy is unlikely to impact on air quality		The site is likely to have an overall neutral impact on environmental sustainability.	
	6(b): To manage noise levels	<b>0</b>	The policy is unlikely to impact on noise levels			
	6(c): To maintain and improve soil quality	<b>0</b>	The policy is unlikely to impact on soil quality			
	6(d): To maintain and improve water quality	<b>0</b>	The policy is unlikely to impact on water quality.			The assessment that “The policy is unlikely to impact on water quality” is inconsistent with the district-wide assessments of Water

						Supply and Water Quality on p9 of the SA/SEA Environmental Report November 2022. The increase in abstraction to provide water for the site could be detrimental to the chalk aquifers of the Kennet Valley, and therefore to its chalk streams.	
<b>7: To promote and improve the efficiency of land use.</b>	7(a): To maximise the use of previously developed land and buildings where appropriate	-	The site is likely to have a negative impact on PDL as the site is greenfield		The policy is likely to have an overall neutral impact, with a positive impact on social sustainability as it seeks to provide suitable densities of dwelling across the site.	The sites are entirely greenfield, within the setting of the North Wessex Downs AONB.	
	7(b): To apply sustainable densities of land use	0	The site is unlikely to have an impact on land use density.	The West Berkshire Density Pattern book study has been used to determine the development potential of the site.			
<b>8: To reduce consumption and waste of natural resources and manage their use efficiently.</b>	8(a): To reduce energy use and promote the development and use of sustainable/renewable energy technologies, generation and storage	?	The site is likely to have an unknown impact on energy use as the impact would depend on the proposals put forward on the site for sustainable energy use/generation.	Proposal would be able to ensure a positive impact should the site be reallocated for development.	The site is likely to have an unknown impact on environmental and social sustainability in relation to consumption of natural resources.		
	8(b): To reduce waste generation and disposal in line with the waste hierarchy and reuse of materials	0	The site is unlikely to have an impact on waste generation				

	8(c): To reduce water consumption and promote reuse	<b>0</b>	The site is unlikely to have an impact on water consumption	The site is unlikely to have an impact on water consumption			
	8(d): To reduce the consumption of minerals and promote reuse of secondary materials	<b>?</b>	The site is likely to have an unknown impact on mineral consumption as the site is partly with a MSA.	The site is likely to have an unknown impact on mineral consumption as the site is partly with a MSA.			
<b>10: To support a strong, diverse and sustainable economic base which meets identified needs.</b>	10(a): To encourage a range of employment opportunities that meet the needs of the District	<b>0</b>	The site is unlikely to impact on employment opportunities.		The site is unlikely to impact on any element of sustainability.		
	10(b): To support key sectors and utilise employment land effectively and efficiently	<b>0</b>	The site is unlikely to impact on use of employment land.				
	10(c): To support the viability and vitality of town and village centres	<b>0</b>	The site is unlikely to impact on the viability and vitality of the town centre.				



## Proposed Main Modifications and Proposed Changes to the Policies Map

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

Issue	Newbury Leisure Park
Document name	Policies Map
Modification/Change reference number (MM / PMC)	

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

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

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

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

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

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

The Settlement Boundary for Thatcham should be expanded, to include the area of the Newbury Leisure Park.

### **TO BE COMPLETED**

Paragraph 119 of NPPF (2021)

"Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, **in a way that makes as much use as possible of previously-developed or 'brownfield' land**"

Written Statement of the Secretary of State for Housing, Communities and Local Government, made on 30 July 2024:

“If we have targets that tell us how many homes we need to build, we next need to make sure we are building in the right places. **The first port of call for development should be brownfield land**, and we are proposing some changes today to support more brownfield development: being explicit in policy that **the default answer to brownfield development should be yes...**”

**Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA)**

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

Page number	
Paragraph number	
Comments:	

**Notification of Progress of the Local Plan Review**

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

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

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

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

<b>Signature</b>		<b>Date</b>	
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