From: [redacted]
To:
Subject: West Berkshire Local Plan Review 2022-2039 (LPR) Consultation on Proposed Main Modifications
Date: 30 January 2025 21:35:50
Attachments: [redacted]

Hello

Please find attached Thatcham Town Council's representations on the West Berkshire Local Plan Review 2022-2039 (LPR)
Consultation on Proposed Main Modifications.

I would be grateful if you could please acknowledge receipt.

Thank you.

Kind Regards
[redacted]

Mel Taylor [redacted]
[redacted]

Thatcham Town Council
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West Berkshire Council	**West Berkshire Local Plan Review 2022-2039 (LPR)** **Consultation on Proposed Main Modifications** **(6 December 2024 – 31 January 2025)** Representation Form **Ref:** **(For official use only)**

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

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

This form has two parts:

PART A – Your details

PART B – Your representation(s)

Version approved by Thatcham Town Council at its meeting on 27th Jan 2025

PART A: Your details

Please note the following:

- *We cannot register your representation without your details.*
- *Representations cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.*

	1. Your details	2. Agent's details (if applicable)
Title	Ms	
First Name*	Mel	
Last Name*	Taylor	
Job title *(where relevant)*	[redacted]	
Organisation *(where relevant)*	Thatcham Town Council	
Address* *Please include postcode*	Council Offices Brownsfield Road Thatcham RG18 3HF	
Email address*	[redacted]	
Telephone number		
Consultee ID (if known)		

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

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)	MM25

2. Do you consider the Proposed Main Modification or Proposed Policy Map Change to be:

a) Legally compliant Yes [X] No [ ]

b) Sound Yes [X] No [ ]

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:

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

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

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 the revision marks in the Schedule of Main Modifications. 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.

Green infrastructure

Thatcham Town Council welcomes and supports the provisions for green infrastructure, and in particular:

> "Conservation of the areas of ancient woodland by providing appropriate buffers between the development and the ancient woodland";
>
> "A band of green infrastructure/new community park across the higher land on the northern part of the allocation (as shown on the indicative map fig. X) to be retained outside the settlement boundary."

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	Schedule of Proposed Main Modifications (MM) - November 2024
Modification/Change reference number (MM / PMC)	MM25

2. Do you consider the Proposed Main Modification or Proposed Policy Map Change to be:

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

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:

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

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

Note that this text is presented in final form without the revision marks in the Schedule of Main Modifications. 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**~~)

West Berkshire Vision 2050

The proposed Main Modification states:

"It is anticipated that approximately half of the site will be set aside as green infrastructure, to serve the new population at North East Thatcham **and be retained in perpetuity,** taking into account the site's location within the setting of the North Wessex Downs National Landscape (AONB). *[our emphasis]*

The West Berkshire Vision 2050 contradicts this, by suggesting in its Figure 6 "Potential Growth Areas" and Figure 11 "Emerging Vision for Growth at Newbury and Thatcham" that the

areas that Policy SP17 states would be retained as green infrastructure “in perpetuity” should be considered for development in future plan periods.

Therefore, as a consequential change to this Main Modification MM25, the references to the West Berkshire Vision 2050 MUST be deleted from the supporting text to Policy SP17 in MM25:

6.54 The Thatcham Strategic Growth Study was carried out in 2019 – 2020 to understand how to plan for growth in Thatcham over the plan period. ~~The West Berkshire Strategic Vision 2050 was drafted in 2022 to guide sustainable growth over the long term in the context of paragraph 22 of the updated NPPF published in 2021.~~ This~~ese~~ document~~s~~ include~~s~~ relevant information that form part of the justification for the LPR’s spatial strategy and the strategic allocations in Newbury and Thatcham.

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~~ suggests a sustainable way for development to come forward in the town and this policy draws on that evidence.

As the text suggests, the West Berkshire Strategic Vision 2050 was produced in response to the update of NPPF in 2021. However Paragraph 22 of this NPPF states that “policies should be set within a vision that looks further ahead (at least 30 years)”, which means that the long term vision and the policy must be consistent; there is no requirement for this vision to be referenced in individual policies. The Strategic Vision 2050 DOES NOT “confirm” that Thatcham is “a sustainable location for development”, but takes this as a starting assumption.

Therefore, if a reference is required to the West Berkshire Strategic Vision 2050, this should be in Policy SP1 rather than in SP17 (or indeed in SP16). There should be a footnote to this reference: “The content of this report represents the views of the consultants that prepared it, and not necessarily of the Council”.

There is no evidence in TSGS that this is “the most sustainable” approach to development of NE Thatcham, especially as policy SP17 as proposed to be amended does not follow many of its recommendations (such as an 8-form entry secondary school).

Secondary and SEND education provision

The Town Council remains concerned that the wording of the proposed Main Modification does not ensure that the provision for secondary education and SEND will be viable – the phrase “informed by” is inadequate. The evidence submitted and presented at Examination has demonstrated convincingly that a free-standing secondary school is not sustainable, whether for a development of 1500 or 2500 dwellings. It is therefore likely that the provision of secondary education will need to be delivered in partnership with an existing provider. We therefore propose the following amendments to the Main Modifications:

x.xx New education provision, including early years, primary and secondary provision will be required to support the needs of the development. Early years and primary provision will be provided on site. The requirements for secondary and SEND will be determined following the completion of a feasibility study which will consider the best solution for secondary education requirements in Thatcham that is in conformity with DfE guidance. It is expected that land will be required on the site, and financial contributions to support delivery of the preferred solution, together with the agreement of any partner that is needed for its delivery;

Community Indoor facilities

With the proposed deletion of the area of these facilities (formerly 1200 sq m), it is totally unclear what would be provided. Would this be suitable for: darts? Table tennis? Squash? Badminton? Football?

This needs to be made more specific.

Long-term security of green infrastructure

The current wording of the Main Modification does not provide much assurance of the long-term security of the green infrastructure and country park, We therefore request the following amendment:

x.xx It is anticipated that approximately half of the site will be set aside as green infrastructure, to serve the new population at North East Thatcham. This shall be secured and retained in perpetuity through a legal agreement, taking into account the site's location within the setting of the North Wessex Downs National Landscape (AONB).

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:	Compliance of Sustainability Appraisal with Statutory Requirements
Document name	Schedule of Proposed Main Modifications (MM) - November 2024
Modification/Change reference number (MM / PMC)	Throughout the document, wherever a Policy impacts on the National Landscape (AONB) or its setting, but particularly MM4, MM5, MM25, MM42 & MM43

2. Do you consider the Proposed Main Modification or Proposed Policy Map Change to be:

e) Legally compliant Yes [ ] No [X]

f) Sound Yes [ ] No [X]

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:

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

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

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.

<u>Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA)</u>

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	Schedule of Proposed Main Modifications (MM) - November 2024
Modification/Change reference number (MM / PMC)	MM25 & Housing Trajectory 2023/24-2040/41

2. Do you consider the Proposed Main Modification or Proposed Policy Map Change to be:

g) Legally compliant Yes [ ] No [ ]

h) Sound Yes [ ] No [X]

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:

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

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

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…"

Given that the Housing Trajectory 2023/24-2040/41 on page 164 of the Main Modifications document predicts a total of 1760 houses within the plan period, this figure should also have been considered as an option for the total number of dwellings.

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:

Section 12 of The Environmental Assessment of Plans and Programmes Regulations 2004 states:

(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.

(2) The report shall identify, describe and evaluate the likely significant effects on the environment of—

(a) implementing the plan or programme; and

(b)reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme.

This assessment should therefore be justified:

- The provisions of policy SP17
- Another identified policy in the draft Local Plan.
- The NPPF or PPG
- Legislation
- Government statements
- Other clearly referenced evidence.

It should NOT be based on unsubstantiated speculation.

The current SA/SEA 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.

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 would delete.

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”.

Any future SA/SEA appraisal should also include the option of 1760 dwellings. The figure of 2500 dwellings is an arbitrary number, unrelated to the current plan period. It appears to be derived from a rudimentary calculation in TSGS3, which did not take into account the proposed provisions of Policy SP17, or subsequent development such as the flood attenuation basin.

Any changes to the assessment in this table resulting from this or other representations should be reflected in the non-technical summary and the main body of the document.

	1a: North East Thatcham (up to 2500 dwellings)			1b: North East Thatcham (1,500)			
		WBC	TTC		WBC	TTC	TTC Comments
9: To reduce emissions contributing to climate change and ensure adaptation measures are in place to respond to climate change	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. None of these are the case for the proposed Policy SP17 or other policies in the draft Local Plan update.
1: To enable provision of housing to meet identified need in sustainable locations	Allocation of the site would deliver a significantly *[higher?]* 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 this 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.
2: To improve health, safety and wellbeing and reduce inequalities	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		WBC	TTC	TTC Comments
3: To improve accessibility to community infrastructure	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 (e.g. 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 statement in the Main Modification that "the site will deliver a number of community benefits, both for the new residents of the site and for existing residents of Thatcham" is totally vague, and does not mention or even imply infrastructure, Therefore, it cannot be given any weight in this assessment. 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.
4: To promote and maximise opportunities for all forms of safe and sustainable travel	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).
5: Ensure that the character and distinctiveness of the natural, built and historic	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

environment is conserved and enhanced							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**
6: To protect and improve air, water and soil quality, and minimise noise levels throughout West Berkshire	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.
7: To promote and improve the efficiency of land use	The site is a greenfield site	**-**	**-**	The site is a greenfield site	**-**	**-**	
8: To reduce consumption and waste of natural resources and manage their use efficiently	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.
10: To support strong, diverse and sustainable economic base which meets identified needs	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 **small-scale employment** *[our emphasis]* 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	Schedule of Proposed Main Modifications (MM) - November 2024
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 [X]

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:

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

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

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 SA/SEA assessment is therefore seriously flawed, so a proper assessment needs to be undertaken. 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	Appendix 5, pages 62-66
Paragraph number	
Comments:	
Section 12 of The Environmental Assessment of Plans and Programmes Regulations 2004 states: (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.	

(2) The report shall identify, describe and evaluate the likely significant effects on the environment of—

(a) implementing the plan or programme; and

(b)reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme.

This assessment should therefore be justified:

- The provisions of policy SP17
- Another identified policy in the draft Local Plan.
- The NPPF or PPG
- Legislation
- Government statements
- Other clearly referenced evidence.

It should NOT be based on unsubstantiated speculation.

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. See the table below, with the assessment and comments of the Town Council added.

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. This assessment also reaches incompatible conclusions with the assessment for 2,500 houses in Appendix 5 of the Interim Sustainability Appraisal that the Council published at the time of the Regulation 18 consultation. This is attached to these representations as Appendix 1.

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".

Any changes to the assessment in this table resulting from this or other representations should be reflected in the non-technical summary and the main body of the document.

++	+	O	-	- -
Significantly Positive	Positive	Neutral	Negative	Significantly Negative

Appendix 5 SA/SEA of Strategic Policies						Thatcham Town Council assessment	
						The Town Council has reviewed its comments made at Reg. 19. Where these are unchanged, they are shown with *[italics in square brackets]*	
SA Objective	**SA Sub-Objective**	**Effects of Policy on SA Objectives**	**Justification for assessment**	**Mitigation / Enhancement**	**Comment**	**Comment**	**Effects of Policy on SA Objectives**
9: To reduce emissions contributing to climate change and ensure adaptation measures are in place to respond to climate change.	9(a): To reduce West Berkshire's contribution to greenhouse gas emissions	**+**	The policy I 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. *[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.]*	**-**
	9(b): To sustainably manage flood risk to people, property and the environment	**? / +**	The policy requires consideration of SuDS that could deliver net gains for Thatcham, but there is no other	The policy, in combination with other policies in the plan (e.g. The			**? / +**

			reference made to flood risk. The policy does includes requirements for GI, ecology and sustainability measures to be included which may all have a positive impact on flood risk,	flooding policy) should result in a positive impact.			
1: To enable provision of housing to meet identified need in sustainable locations	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.			*[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.]*	**+**
2: To improve health, safety and wellbeing and reduce inequalities	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. *[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].*	**O**
	2(b): To reduce levels and fear of crime and anti-social behaviour	**+**	The policy is likely to have a positive impact as the design of the site should			*[The policy does not address crime or antisocial behaviour. Indeed, crime is only mentioned once anywhere in*	**O**

			be such to design out crime.			*the draft Local Plan (in the context of levels of exterior lighting) and antisocial behaviour is not mentioned at all*	
	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.			*[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.]*	**+**
3: To improve accessibility to community infrastructure	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. *[The wording for SP16 is more appropriate: 'Specific mention of IT facilities is not mentioned within the policy, therefore, it is likely to have a neutral impact.'].*	**O**

4: To promote and maximise opportunities for all forms of safe and sustainable travel.	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.	This policy does not address accidents or safety, nor does any other part of the draft Local Plan.	**O**
	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.			*[Neither Policy SP17 nor the supporting text mention public transport, although the Traffic Study and the Thatcham Strategic Growth Study do.]*	**+**
5: Ensure that the character and distinctiveness of the natural, built and historic environment is conserved and enhanced.	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 within the setting of the AONB..	**- -**
	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			*[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.]*	**-**
6: To protect and improve air, water and soil quality, and minimise noise	6(a): To reduce air pollution	**O**	The policy is unlikely to impact on air quality	Other policies in the plan will ensure that there is no negative	The policy is unlikely to impact on any element of sustainability in		**O**

levels throughout West Berkshire.				impact on air quality.	relation to air, water, soil or noise.		
	6(b): To manage noise levels	**O**	The policy is unlikely to impact on noise levels				**O**
	6(c): To maintain and improve soil quality	**O**	The policy is unlikely to impact on soil quality				**O**
	6(d): To maintain and improve water quality	**O**	The policy is unlikely to impact on water quality.			*[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.]*	**-**
7: To promote and improve the efficiency of land use.	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	**-**
8: To reduce consumption and waste of natural resources and	8(a): To reduce energy use and promote the development and use of sustainable /renewable energy	**++**	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 any expectations on the	**O**

manage their use efficiently.	technologies, generation and storage		provide on-site renewable energies.			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	**O**	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.			*[The Integrated Water Supply and Drainage Strategy required by SP17 makes no mention of reduction of water consumption or reuse.]*	**O**
	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.			*[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.]*	**O**
10: To support a strong, diverse and sustainable economic base which meets identified needs.	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 opportunities, to be provided on site.			At Reg. 19 policy SP17 stated: "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".	**-**

						The Main Modifications delete any reference to the size of this local centre. However, it will certainly provide fewer employment opportunities than needed by its residents, so will have an overall negative impact on meeting the needs of the district	
	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 Study Stage 3, 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.			*[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.* *Policy SP17 says nothing about regeneration of Thatcham Town Centre, and the increase in population will make the existing provision less sustainable.]* There is nothing in the Policy to justify the assertion that the development will support	**- -**

						other improvements within Thatcham. This was also not supported by the Infrastructure Delivery Plan that was published with Reg. 19, and the Council has not since updated the IDP to reflect the 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	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	Schedule of Proposed Main Modifications (MM) - November 2024
Modification/Change reference number (MM / PMC)	MM42 and MM43

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 [X]

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

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

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

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

Long-term security of green infrastructure

The current wording of the Main Modification does not provide much assurance of the long-term security of the green infrastructure and country park, We therefore request the following amendments:

CA12: ii. The balance of land to the north and west of the developed area to be retained as an open landscape buffer in order to maintain the open character between Thatcham and Cold Ash. **This shall be secured and retained in perpetuity through a legal agreement,** and ~~which~~ will be retained outside the settlement boundary for Thatcham;

CA17: ii. The balance of land in the north of the site to be retained as a landscape buffer. **This shall be secured and retained in perpetuity through a legal agreement,** and ~~which~~ will be retained outside the settlement boundary for Thatcham;

The SA/SEA assessments of sites CA12 and CA17 have serious shortcomings, and therefore do not demonstrate that they are capable of the delivery of sustainable development in accordance with the policies of the NPPF, based on an objective assessment.

The inclusion of these sites in the draft Local Plan update must therefore be reconsidered once an adequate SA/SEA assessments has been undertaken.

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
Paragraph number	Appendix 8a; CA12 and CA17
Comments:	

Sites CA12 and CA17 are adjacent, and the SA/SEA assessments for the two sites are almost identical. The comments below are added to the table for CA12, but they also apply to CA17.

The SA/SEA assessments for sites CA12 and CA17 are clearly inadequate and incorrect, as demonstrated in the table below. A large number of the individual assessments are generalisations, which do not address the related elements that are contained within the policies.

The SA/SEA assessments of these policies need to be undertaken properly. This might find that these sites are not capable of the delivery of sustainable development in accordance with the policies of the NPPF.

Any changes to the assessment in this table resulting from this or other representations should be reflected in the non-technical summary and the main body of the document.

++	+	O	-	- -
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**
9: To reduce emissions contributing to climate change and ensure adaptation measures are in place to respond to climate change.	9(a): To reduce West Berkshire's contribution to greenhouse gas emissions	**?**	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.	**-**
	9(b): To sustainably manage flood risk to people, property and the environment	**0 / -**	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.			**O**

1: To enable provision of housing to meet identified need in sustainable locations	1(a): To maximise the provision of affordable housing to meet identified Need	**+**	The site is likely to have a positive impact on provision of affordable housing as it is of a scale to provide affordable housing		There is likely to be a positive impact on social sustainability as the site would help to deliver housing to meet identified needs.	The two policies are silent on provision of affordable and other types of housing, so there is no evidence than these developments will provide more than the minimum specified by other policies in the plan.	**O**
	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.				**O**
2: To improve health, safety and wellbeing and reduce inequalities	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.	Every site is an opportunity for good design, but they are also an opportunity for poor design. These policies do nothing to preclude bad design.	**O**
	2(b): To reduce levels and fear of crime and anti-social behaviour	**O**	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	**O**
	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	Policies in the plan require consideration of GI, therefore, should the site be retained as an allocation consideration of GI			

			the site be allocated.	provision would be required.			
3: To improve accessibility to community infrastructure	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 as it is well located for services and facilities, including education and employment facilities.		The site is likely to have a positive impact on social sustainability as it is located close to existing community infrastructure.	This assessment is untrue. For primary education, these sites are within the catchment area of St Marks school in Cold Ash, which is around 2km away along Cold Ash Hill; this is a busy road with extremely narrow footways, which is unsafe for primary age children to walk or cycle. For Secondary education, these sites are within the catchment area of the Downs School, which around 13km away along minor roads.	**- -**
	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.			The Main Modifications delete all of the specific requirements from Policy DM41. This objective is now delivered through Government policies, not the Local Plan.	**O**
4: To promote and maximise opportunities	4(a): To reduce accidents and improve safety	**?**	There is likely to be an unknown impact on road safety, as			This policy does not address accidents or safety, nor does any	**-**

for all forms of safe and sustainable travel.			development of the site could result in road safety concerns but could also provide improvements.			other part of the draft Local Plan update. The route from the developments to Cold Ash primary school is dangerous for primary age children to walk or cycle.	
	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.			See comment to subobjective 3(a)	**-**
5: Ensure that the character and distinctiveness of the natural, built and historic environment is conserved and enhanced.	5(a): To conserve and enhance the biodiversity and geodiversity of West Berkshire	**?**	The site is likely to have an unknown impact on biodiversity as the site is also within 2km of a SAC and SSSI and adjacent to a LWS.			The site development itself will have a negative impact on biodiversity, and the Green Infrastructure and public open space is unlikely to be sufficient to offset this.	?
	5(b): To conserve and enhance the character of the landscape	**- / ?**	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.			This assessment is inconsistent with the objective and the text description. The objective is to 'conserve and enhance'. As these sites are within the setting of the AONB, this is a statutory requirement. The justification states that there would be a negative impact that could be mitigated (i.e. made less negative).	**-**

						It follows that the assessment must be negative	
	5(c): To protect or, conserve and enhance the built and historic environment to include sustaining the significant interest of heritage assets	**0**	The site is unlikely to impact on the historic environment				**0**
6: To protect and improve air, water and soil quality, and minimise noise levels throughout West Berkshire.	6(a): To reduce air pollution	**0**	The policy is unlikely to impact on air quality		The site is likely to have an overall neutral impact on environmental sustainability.		**0**
	6(b): To manage noise levels	**0**	The policy is unlikely to impact on noise levels				**0**
	6(c): To maintain and improve soil quality	**0**	The policy is unlikely to impact on soil quality				**0**
	6(d): To maintain and improve water quality	**0**	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.	**-**

7: To promote and improve the efficiency of land use.	7(a): To maximise the use of previously developed land and buildings where appropriate	**-**	The 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 determined the development potential of the site.			**0**
8: To reduce consumption and waste of natural resources and manage their use efficiently.	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.	The requirement of point k. of the policy RSAX is no better than the minimum required by policy SP5 in the draft Local Plan.	**0**
	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	**0**	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	**?**	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.			
10: To support a strong, diverse and	10(a): To encourage a range of employment		The site is unlikely to impact on			The policy does nothing to encourage	**-**

sustainable economic base which meets identified needs.	opportunities that meet the needs of the District	**0**	employment opportunities.		The site is unlikely to impact on any element of sustainability.	employment opportunities.	
	10(b): To support key sectors and utilise employment land effectively and efficiently	**0**	The site is unlikely to impact on use of employment land.				**-**
	10(c): To support the viability and vitality of town and village centres	**0**	The site is unlikely to impact on the viability and vitality of the town centre.				**0**

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	Settlement Boundary for Thatcham: Colthrop Industrial Estate
Document name	Draft Local Plan update and Policies Map
Modification/Change reference number (MM / PMC)	Draft Local Plan Appendix 2 (Settlement Boundary Review) PMC4

2. Do you consider the Proposed Main Modification or Proposed Policy Map Change to be:

a) Legally compliant Yes ☐ No ☐

b) Sound Yes ☐ No ☒

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:

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

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.

In document IN14 "Action Points from week one hearing sessions" AP11, the Inspector asked the Council to clarify, with reference to the relevant criteria used in the settlement boundary review, why the Designated Employment Area east of Thatcham [is] not included within any settlement boundary.

The Council responded in EXAM26:

"The existing settlement boundary excludes the DEA to the east of Thatcham. **The feedback that the Council received from Thatcham Town Council as part of the SBR was to support the continuation of the existing boundary in this area.** *[our emphasis]* As far as possible the Council used the feedback it received from the relevant town and parish councils as a clear community steer for the way forward. It did not therefore propose to extend the boundary around the DEA as part of the LPR.

It is acknowledged however that this was very much an ‘on balance’ decision in order to protect the character and form of the existing settlement. At the same time the Council recognises that due to its scale, the DEA has both a close physical and functional relationship with the existing residential part of the built up of area of Thatcham.

Should the Inspector consider it appropriate, the Council could therefore propose a Main Modification to extend the settlement boundary of Thatcham to include the DEA.”

In document IN18 “Action Points from week two hearing sessions” AP22, the Inspector then gave an action to the Council to “include the Colthrop Industrial Estate Designated Employment Area within the Thatcham settlement boundary”.

The south eastern corner of the Colthrop Industrial Estate (south of the railway line, and south and east of the Colthrop level crossing) is largely used for lorry parking and open storage – see the satellite image on the following page. Policy SP1 states that “development and redevelopment within the settlement boundaries of those settlements identified in Appendix 2 and outlined on the Policies Map will be supported.”

This site might be considered a suitable location for a canal-side residential development, which there is often high demand.

However, Policy DM32 on Protected Employment Areas states that “Development which either individually or cumulatively would undermine the integrity or function of the DEA will not be permitted”. For a site that is within both a settlement boundary and a DEA, it is unclear whether the presumption in favour of development of Policy SP1 and the NPPF or the restriction of Policy DM32 would take precedence.

The documentation for the Examination therefore does not provide any explanation for the inclusion of Colthrop Industrial Estate within the settlement boundary. The resulting potential for development of the south east corner of the estate (and possibly also other parts) therefore appears to be an unintended consequence of this decision.

For the modification to the settlement boundary for Thatcham to be sound, the criteria need to be applied consistently across all portions of that boundary. We comment on that boundary in relation to Newbury Leisure Park in another representation.

The proposed amendment to the Policies Map for Thatcham in PMC4 is therefore unsound, because it is not based on objective assessment or whether this is the most appropriate strategy.

Satellite image of the south east corner of the Colthrop Industrial Estate, showing proposed settlement boundary

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	Settlement boundary for Thatcham: Newbury Leisure Park
Document name	Draft Local Plan Appendix 2 (Settlement Boundary Review) Policy DM2, settlement boundary for Thatcham and Policies Map
Modification/Change reference number (MM / PMC)	MM3 PMC4

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 [X]

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

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

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

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

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

Paragraph 119 of NPPF (2021) states:

“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**”

The Secretary of State for Housing, Communities and Local Government, made a written statement on 30 July 2024, which included the following:

“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**…”

Appendix 2 of Appendix D of the draft Local Plan update describes the Council’s approach to the review of settlement boundaries. It states:

Settlement Boundaries “identify the main built up area of a settlement within which development is considered acceptable in principle, subject to other policy considerations. While allowing for development, settlement boundaries protect the character of a settlement and prevent unrestricted growth into the countryside. They create a level of certainty about whether or not the principle of development is likely to be acceptable.”

“Specific issues to be considered on a site by site basis:
… Employment and leisure uses located on the edge of settlements will be considered according to their scale, functionality, visual and physical relationship to the settlement …”

The site of the Newbury Leisure Park is within the ‘Parcel 4’ in the Appropriate Countryside Designation Study. The map on page 113 of this report shows a dot for “established recreation areas/uses” at its location, but it is not mentioned at all in the text.

The report treats each parcel as a monolithic block, with their boundary starting at the settlement boundary that was proposed at the time that the report was prepared. The definition of the block is arbitrary, and not related to the land usage within them. For example, Parcel 5 includes both the Colthrop Industrial Estate and the farmland to the south of the River Kennet which are entirely different in character but were considered together.

There is no evidence in the report that the consultants considered the nature and status of the Newbury Leisure Park. As the settlement boundary was a starting assumption for the study and not a conclusion, very little weight can be given to that part of the boundary of the block.

We also note that the garden centre adjacent to the A4/Tull Way roundabout, which is site THA12 is within the settlement boundary, despite being outside of the current residential area of the town and immediately adjacent to the gap between Thatcham and Newbury defined by Policy DM2 and the Policies Map (both before and after the proposed amendment).

The Inspector has directed the Council to include the Colthrop Industrial Estate within the settlement boundary of Thatcham, although it does not include (and is not envisaged to include) any development for housing. The spatial relationship of the Newbury Leisure Park to the town of Thatcham is similar to Colthrop Industrial Estate, and both currently have approval for non-housing use.

Therefore, having included Colthrop Industrial Estate within the settlement boundary, it would be unsound not to also include the Newbury Leisure Park. This does not mean that any future development of the site would be for housing, as is the case for Colthrop Industrial Estate.

As was discussed during Examination, the current use for the site as a leisure park is no longer financially viable, and the site is therefore previously developed land. It follows that the case for including Newbury Leisure Park within the settlement boundary is stronger for Newbury Leisure Park than for Colthrop Industrial Estate, in order to comply with paragraph 119 of NPPF and the written Ministerial Statement, and for the Plan to be positively prepared.

The Newbury Leisure Park must therefore be included within the settlement boundary for Thatcham, as an essential consequential change resulting from the inclusion of the Colthrop Industrial Estate within the settlement boundary.

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	Appendix 6, pages 6-10
Paragraph number	Assessment of policy DM2: Separation of settlements around Newbury and Thatcham, SA Objectives 1, 2, 5 and 7
Comments:	
The SA/SEA for policy DM2 is seriously flawed and contains demonstrably incorrect statements, because it has not taken into account the Newbury Leisure Park, which is previously developed land that immediately adjoins the proposed settlement boundary. This SA/SEA must be reviewed and amended. Any changes to the assessment in this table resulting from this or other representations should be reflected in the non-technical summary and the main body of the document.	

Appendix 5 - SA/SEA of DM2: Separation of settlements around Newbury and Thatcham						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**
1: To enable provision of housing to meet identified need in sustainable locations	1(a): To maximise the provision of affordable housing to meet identified need	-	The policy will have unknown impact on the provision of affordable housing as it prevents development from taking place within the gaps.		Protecting the gaps could have a negative impact on sustainability as it will not allow housing development within the protected gaps	These statements are incorrect. This policy, and its implementation on the Policies Map, has a known negative impact on the provision of affordable housing and housing to meet all sectors of the community, because it would prevent redevelopment of the Newbury Leisure Park for housing	- -
	1(b):To enable provision of housing to meet all sectors of the community, including those with specialist requirements	-	The policy will have unknown impact on the provision of affordable housing as it prevents development from taking place within the gaps.				- -
2: To improve health, safety and wellbeing and reduce inequalities	2c:To enable the protection and enhancement of high quality multi-functional GI across the District	+	The policy is likely to have a positive impact on GI as it will keep green spaces between existing settlements.		The policy is likely to have a positive impact on environmental sustainability as it seeks to protect green spaces between settlements some of which form GI provision.	This assessment does not apply to the Newbury Leisure Park, which is not GI.	+
4: To promote and maximise opportunities for all forms of safe and sustainable travel.	4(b): To increase opportunities for walking, cycling and use of public transport	0	There is likely to be a positive impact as the site is close to local walking and cycling opportunities, with local bus routes		The policy is unlikely to impact on opportunities for walking, cycling or public transport	This policy has a negative impact on opportunities for cycling and public transport, as it prevents development of a site that is immediately adjacent to National Cycle Route NC4 and very close to cycle lanes and bus routes to	-

			passing close to the site.			Newbury, Thatcham and Reading.	
5: Ensure that the character and distinctiveness of the natural, built and historic environment is conserved and enhanced.	5(b): To conserve and enhance the character of the landscape	**+ +**	The policy is likely to have a positive impact on GI as it will keep green spaces between existing settlements which conserve the landscape character.		The policy is likely to have a significantly positive impact on environmental sustainability as it seeks to protect open spaces and landscape character which in turn will help to protect the landscape character.	The Newbury Leisure Park is not green space or GI. The decrepit state of the Newbury Leisure Park, for which this policy would seek to prevent redevelopment, detracts from the character of the surrounding landscape.	**+**
7: To promote and improve the efficiency of land use.	7(a): To maximise the use of previously developed land and buildings where appropriate	**0**	The policy is unlikely to impact on PDL		The policy is unlikely to impact on efficient use of land	This assessment is demonstrably incorrect. The Newbury Leisure Park is *de facto* previously developed land, for which this policy seeks to prevent redevelopment.	**-**
The policy is likely to have an overall neutral impact on sustainability. There are likely to be significantly positive impacts on environmental sustainability as the policy seeks to retain green gaps between the settlements of Newbury and Thatcham to retain their separate identities. This will result in positive impacts for landscape character and biodiversity. Potential negative sustainability impacts have been identified in relation to social sustainability as the policy restricts development in these areas.						The final sentence is demonstrably untrue, because the impact on social sustainability though redevelopment of the Newbury Leisure Park has not been identified or taken into account.	

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)

The publication of the report of the Inspector appointed to carry out the examination	
The adoption of the Local Plan Review	

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

Signature		**Date**	

Spatial Area:	Newbury/Thatcham	**Settlement:**	Thatcham	**Parish:**	Thatcham

Site ID:	SP17 (HELAA THA20)	**Site Address:**	Land at Bath Road, Thatcham
Use(s) proposed by site promoter	Residential-led development with infrastructure	**Development Potential:**	Up to 2,500 dwellings with associated infrastructure requirements

Headline SA Objective	**Sub-objective**	**Criteria for determining the likely significance of effect from implementing site allocation**	**Effects on SA objective (aggregated)**	**Justification for assessment**	**Avoidance / Mitigation / Enhancement / Offsetting**	**Comments / Assumptions / Uncertainties**
1: To enable provision of housing to meet identified need in sustainable locations	1(a): To maximise the provision of affordable housing to meet identified need	• Will it enable affordable housing to meet the need to its fullest extent? • Will it enable affordable housing to be provided in sustainable locations across the district?	++	The proposed use is residential led, and the development potential on the site is up to 2,500 dwellings. Policy SP19 is proposing that 40% of housing provided is affordable housing on sites of 10 dwellings or more, on greenfield land. Hence this site would provide 1,000 affordable homes which would equate to a significant percentage of the identified affordable housing need over the plan period. Thatcham is an Urban Area within the settlement hierarchy meaning that it has a wide range of services and opportunities for employment, community and education and is a sustainable location for affordable housing development.		
	1(b):To enable provision of housing to meet all sectors of the community, including those with specialist requirements	• Will the policy provide an equitable distribution of housing in the most sustainable locations? • Will it provide for an appropriate mix of housing to meet the needs of all members of the community?	++	Thatcham is an Urban Area within the settlement hierarchy meaning that it has a wide range of services and opportunities for employment, community and education and is suitable for a strategic level of development. The site is of a scale to provide an appropriate mix of housing type		

Headline SA Objective	Sub-objective	Criteria for determining the likely significance of effect from implementing site allocation	Effects on SA objective (aggregated)	Justification for assessment	Avoidance / Mitigation / Enhancement / Offsetting	Comments / Assumptions / Uncertainties
		• Will it support the provision of 'non mainstream' housing such as gypsy and traveller sites, houseboats? • Will it support suitable accommodation and infrastructure for older people? • Will it encourage self and custom build housing? • [Will it support model standards of design with consideration of local context?] • Will it provide for cross border demands agreed with neighbouring authorities?		and tenure. It would provide 1,000 affordable homes which would equate to a significant percentage of the identified affordable housing need over the plan period. A site of this size would be expected to deliver at least 3% of dwellings as serviced custom/self-build plots.		
2: To improve health, safety and wellbeing and reduce inequalities	2(a): To support healthy, active lifestyles	• Will it support the reduction of health inequalities? • Will it facilitate and active and healthier lifestyles, indoors and outdoors? • Will it improve economic, environmental and social conditions (quality of life) in deprived areas or deprived groups? • Will it foster a sense of place and beauty?	**++**	The developer would provide new open space and recreation facilities. The site is well located to benefit from existing facilities in the town such as the Kennet Leisure Centre. The site is also well located to maximise sustainable transport options to the train station, local employment opportunities, local facilities and the town centre. In addition, the site is of a size that it will create new neighbourhoods and foster a sense of place and beauty, as its design will be sensitive to the nearby AONB.		
	2(b): To reduce levels and fear of	• Will it support the reduction of crime or the fear of crime?	**?**	At this stage it is difficult to establish what impacts		At the scheme design stage crime and safety issues need to be considered e.g. overlooking

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	crime and anti-social behaviour	• Will it promote development that creates safer places?		development in this area will have on crime and antisocial behaviour		of public spaces and well-lit footpaths in order to design out crime higher level policy provisions seek to meet this objective through policies SP7 (Design Principles) and XX (Health and Wellbeing) which seek to secure high quality safe, sustainable and inclusive design and development standards. These policies require development to demonstrate the application of the guidance set out within the Councils Quality Design Supplementary Planning Document (SPD). The SPD includes guidance and standards amongst others relating to crime.
	2(c): To enable the protection and enhancement of high quality multi-functional GI across the District	• Will it provide opportunities for, or improve the quantity and quality of rights of way, recreation areas, open space and green infrastructure generally? • Will it foster beauty and a sense of pride and place?	++	Public Rights of Way THAT/4/1, THAT/3/3, THAT/2/1, THAT/3/5, THAT3/1/, THAT/1/1, traverse the site. The developer would incorporate these within the development, in addition to providing additional PROW as appropriate. Public open space and green and blue infrastructure to support the development would be provided with development.		
3: To improve accessibility to community infrastructure	3(a) To improve access to education, health and other services	• Will it provide better access to educational and training facilities and enable higher levels of attainment in education and skills progression? • Will it provide better access to medical facilities?	++	The developer would provide additional educational and training facilities and other facilities such as health facilities and local retail centres commensurate with development. Existing public rights of way traverse the site. The developer would incorporate these within the		

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		• Will it provide better access to major retail centres? • Will it improve access to nature, rights of way, recreation areas, open space and green infrastructure generally?		development, in addition to providing additional PROW as appropriate. Public open space and green infrastructure to support the development would be provided with development.		
	3(b): To support the development of access to IT facilities including Broadband particularly in rural locations	• Will it support access to digital services and other IT technologies?	+	The development would be of such a size that it would create three new neighbourhoods. This level of development would be expected to provide 'fibre to the premises' (FTTP) connection at the time of construction in line with policy DC38.		
4: To promote and maximise opportunities for all forms of safe and sustainable travel.	4(a): To reduce accidents and improve safety	• Will it help reduce the number of people killed or seriously injured on the roads?	?	The site is of a scale and size that there would be multiple accesses to it, via the A4 and Floral Way. Additional traffic could result in road safety concerns, but any development would have the potential to improve road safety. The Council's Highways Team have not raised any safety issues.		
	4(b): To increase opportunities for walking, cycling and use of public transport	• Will it increase access to and opportunities for walking, cycling and use of public transport? • Will it help reduce vehicular traffic? • Will it help reduce congestion in AQMAs or on major roads and/or their junctions? • Will it promote the use of locally produced or sourced goods and materials?	++	The site is well located to maximise sustainable transport options to the train station, local employment opportunities, local facilities and the town centre and active travel has been considered in relation to the site in the Thatcham Strategic Growth Study. There is already a public transport route with frequent service on the A4 which the site will link to. The promoter is proposing that the site provides a retail element commensurate with the size of the development.		

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5: Ensure that the character and distinctiveness of the natural, built and historic environment is conserved and enhanced.	5(a): To conserve and enhance the biodiversity and geodiversity of West Berkshire	• Will it encourage the conservation and enhancement of wildlife habitats and species inside and outside of designated areas? • Will it encourage habitat creation and connectivity? • Will it help tackle climate change?	**++**	The site is adjacent to, and contains, ancient woodland. The developer would provide enhancement measures such as green corridors to encourage habitat connectivity. The size and existing land use (predominately agriculture) of the site mean that it is capable of providing net biodiversity gain.	Appropriate buffers for ancient woodland would be required.	Development could have a negative impact on environmental sustainability unless appropriate buffers to the ancient woodland are provided.
	5(b): To conserve and enhance the character of the landscape	• Will it maintain and enhance the tranquillity of and the locally distinctive landscape characters within the district?	**0**	Development would have an impact on the character of the landscape. Careful design would seek to conserve and enhance the special character of the AONB, including the creation on a new country park to enable access to the surrounding countryside.	The Thatcham Strategic Growth Study has used a landscape led approach to ensure that development is sensitive to the surrounding landscape.	
	5(c): To protect or, conserve and enhance the built and historic of heritage assets	• Will it sustain or improve the value of the heritage assets in the built and historic environment? • Will it improve access to and understanding of buildings and other heritage assets? • Will it support the character of Conservation Areas?	**0**	Potential harm to setting of Siege Cross Farm: Barn at Siege Cross Farm (Grade II), Cart at Siege Cross Farm (Grade II), and Barn at Colthrop Manor (Grade II). Desk based assessment indicates potential for finds high. The development is of a scale that it could incorporate the listed buildings into the design of the site. It could also improve access to, and understanding of, the buildings.	Heritage Impact Assessment required. A field-based assessment would be required at the planning application stage.	
6: To protect and improve air, water and soil quality, and minimise noise levels throughout West Berkshire.	6(a): To reduce air pollution	• Will it help reduce vehicular traffic and/or congestion? • Will it help reduce or minimise emissions of greenhouse gases?	**0**	The site is well located to maximise sustainable transport options to the train station, local employment opportunities, local facilities and the town centre. There is already a public transport	Careful design and appropriate mitigation will reduce the impact.	

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		• Will it help improve air quality?		route with frequent service on the A4 which the site will link to. The site is adjacent to the A4, so there is the potential for air quality to impact on the site. The level of impact on minimising emissions depends on location of development within the site, building materials / construction, transport / design.	Mitigation will include Transport Assessment / Travel Plans.	
	6(b): To manage noise levels in main settlements	• Will it help reduce noise levels in the settlement?	**-**	On parts of site low risk of noise and vibration problems to future residents. On other parts (the area around Siege Cross Farm) high risk of noise and vibration problems to future residents from road and commercial. Medium risk to neighbours from commercial on central part of site.		
	6(c): To maintain and improve soil quality	• Will it help minimise or reduce the loss or damage to soil quantity or quality? • Will it help prevent or reduce risk of contamination?	**0**	The site is greenfield therefore development will result in the loss or damage to soil quantity and quality in parts. The sustainable excavation and storage for re-use of soil during construction can help with the re-establishment of soil functions following its movement. Environmental health officers have not identified any risk that the site could be contaminated.		
	6(d): To maintain and improve water quality	• Will it help improve the quality of water resources (including groundwater and surface water) in the district?	**?**	Policy DC5 requires that all development proposals must demonstrate that there would be no deterioration in the quality of waterbodies, surface and groundwater. Appropriate measures may be required to be		

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				undertaken the developer to ensure that development does not contaminate surface or groundwater resources.		
7: To promote and improve the efficiency of land use.	7(a): To maximise the use of previously developed land and buildings where appropriate	• Will it encourage the use of brownfield land in preference to greenfield? • Will it minimise the loss of high quality agricultural land?	-	The site is greenfield land hence it will not encourage the use of brownfield land in preference to greenfield. The site is predominately classified as grade 3 agricultural land and it has not been possible to determine if it is 3a or 3b. However, developing the site would not minimise the loss of agricultural land.		The greenfield nature of the site means that there could be a negative impact on environmental sustainability.
	7(b): To apply sustainable densities of land use appropriate to location and setting.	• Will it achieve the efficient use of land via appropriate density of development?	+	The West Berkshire Density Pattern Book Study was used to establish the indicative development potential on the site. The Thatcham Strategic Growth Study built further on this assumption and using a landscape led approach, suggests how development on the site could come forward in a way that will achieve the efficient use of land via appropriate densities whilst ensuring that this carefully conserves and enhances the setting of the nearby AONB.		
8: To reduce consumption and waste of natural resources and manage their use efficiently.	8(a): To reduce energy use and promote the development and use of sustainable /renewable energy technologies, generation and storage	• Will it minimise the need for energy usage and generation? • Will it support energy efficient development? • Will it promote the use of renewable energy and new technologies? • Will it discourage the use of fossil fuels?	+	The site is located on the south facing slope of the Kennet valley which would allow for a high degree of solar gain. SP5 expects that all development should contribute to West Berkshire becoming and staying carbon neutral by 2030. The site is of a scale that it will be expected to help with achieving this SA objective.		

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	8(b): To reduce waste generation and disposal in line with the waste hierarchy and reuse of materials	• Will it promote the reduction, re-use and recycling of waste and materials?	+	The site is of a scale that it would be expected that a CEMP would be submitted as part of any application so that the reduction, re-use and recycling of waste and materials would be an intrinsic part of the construction phase of the development.		
	8(c): To reduce water consumption and promote reuse	• Will it minimise water consumption as a result of development? • Will it minimise the amount of waste water generated by development? • Will it promote the re-use and sustainable management of water?	?	All development will increase the overall demand for water.	Development will have potential negative impacts on water related issues; however appropriate implementation of Sustainable Drainage Systems (SuDS) can mitigate these issues (SuDS are a requirement of policy SP6 (Flood Risk))	
	8(d): To reduce the consumption of minerals and promote reuse of secondary materials	• Will it support the reduction in consumption of minerals? • Will it promote re-use of secondary materials?	0	The site is within 250m of a mineral and waste buffer zone. The developer will be required to demonstrate that development will not have a detrimental effect on an existing/proposed mineral or waste operation. The site is of a scale that it would be expected that a CEMP would be submitted as part of any application so that the reduction, re-use and recycling of waste and materials would be an intrinsic part of the construction phase of the development.		
9: To reduce emissions contributing to climate change and ensure adaptation measures are in	9(a): To reduce West Berkshire's contribution to greenhouse gas emissions	• Will it help improve resilience to climate change through adaptation and mitigation?	+	The site is well located to maximise sustainable transport options to the train station, local employment opportunities, local facilities and the town centre.	Higher level policy provisions seek to meet this objective, for example policy LPR5 (Climate Change), LPR7 (Design	

Headline SA Objective	Sub-objective	Criteria for determining the likely significance of effect from implementing site allocation	Effects on SA objective (aggregated)	Justification for assessment	Avoidance / Mitigation / Enhancement / Offsetting	Comments / Assumptions / Uncertainties
place to respond to climate change.		• Will it support the adoption of low carbon technologies? • Will it support the use of green and blue infrastructure?		Public open space and green and blue infrastructure to support the development would be provided with development.	Principles), LPR10 (Green Infrastructure).	
	9(b): To sustainably manage flood risk to people, property and the environment	• Will it [prohibit][discourage] development in areas at risk of flood? • Will it help reduce or manage flood risk? • Will it support sustainable urban drainage systems? • Will it support water resource management of surface and groundwater flows? • Will it support sustainable floodplain management?	+	Site is within Flood Zone 1 which means a low probability of fluvial flooding. In terms of surface water flood risk, there are surface flow routes through the site, one of which is a major surface water flood flow therefore attenuation measures will be necessary which will reduce the developable area. There are also parts of the site at risk of groundwater flooding. The Thatcham Strategic Growth Study has considered the how flood risk on the site can best be managed sustainably using SuDs, while also contributing to managing flood risk in the wider area.	Sustainable Drainage Systems (SuDS) would be required to manage the site's drainage in line with policy SP6. Further detail on SuDS is set out within the SuDS Supplementary Planning Document.	
10: To support a strong, diverse and sustainable economic base which meets identified needs.	10(a): To encourage a range of employment opportunities that meet the needs of the District	• Will it attract workers and residents to the district? • Will it improve people's chances of success in applying for, and retaining jobs? • Will it improve accessibility to jobs via the location of employment sites and business premises? • Will it support the needs of the racehorse industry?	+	A small portion of the site is promoted for employment use which will help encourage employment opportunities that meet the needs of the District		The development of the remainder of the site for housing will have a neutral effect on economic sustainability. Whilst housing development contributes towards economic development in the short term through the construction of the site, it is not seen to promote key business sectors and business development in the longer term.

Headline SA Objective	Sub-objective	Criteria for determining the likely significance of effect from implementing site allocation	Effects on SA objective (aggregated)	Justification for assessment	Avoidance / Mitigation / Enhancement / Offsetting	Comments / Assumptions / Uncertainties
	10(b): To support key sectors and utilise employment land effectively and efficiently	• Will it help attract businesses and inward investment to the district? • Will it ensure it meets the needs for a range of sustainable employment areas and sites?	+	The site is greenfield and there will be no loss of employment land through the development of the site for housing. In addition, industrial development is proposed for a small portion of the site. This will help attract businesses and inward investment to the district.		
	10(c): To support the viability and vitality of town and village centres	• Will it promote the sustainable economic growth of urban areas and the vitality of town centres? • Will it promote the sustainable economic growth of villages? • Will it support sustainable rural diversification?	+	The Thatcham Strategic Growth Study identifies that the most sustainable way for Thatcham to secure additional infrastructure is for strategic housing development to occur. Housing development provides additional workforce and customers which has the potential to support commercial centres. In addition, a portion of the site is promoted for industrial use which would help promote the sustainable economic growth of Thatcham and the wider Newbury and Thatcham urban area.		

Summary				
There are a number of positive and significant positive sustainability effects that developing the site would have, including maximising the provision of: affordable housing; custom and self-build plots; new green infrastructure and public open space, new community infrastructure including primary and secondary schools; and improvements to the cycling and walking network to improve opportunities for sustainable travel. In addition, the site's sustainable location on the edge of Thatcham town will encourage healthy lifestyles and use of sustainable means of transport. In contrast there are very few negative impacts that developing the site would have.				
Effect:	**Likelihood**:	**Scale:**	**Duration:**	**Timescale:**
Significantly positive	High	Districtwide	Permanent	Longterm
	Cumulative/Compound:			