

## Examination of West Berkshire Local Plan 2022-2039

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### IN30: Interim findings and further action points relating to North East Thatcham and housing land supply

#### Introduction

Following the hearing sessions held between 8 May and 26 June 2024 I have published action points, which the Council has responded to and proposed main modifications accordingly.

Having now considered all of the relevant evidence in the examination library, the discussions at the hearing sessions, and the Council's main modifications proposed so far, I set out below some interim findings and further action points relating to two matters: North East Thatcham strategic site and housing land supply. I consider these to be necessary at this stage of the examination to inform my consideration of how the Plan could be modified to make it sound.

The Council is requested to respond by **midday on Friday 16 August 2024**.

When I have considered the Council's response, I will publish a note setting out the next steps in the examination. If I decide that further hearing sessions are needed they are likely to be on 1, 2 and/or 3 October 2024.

#### North East Thatcham strategic site: scale of development

Policy SP17 allocates a strategic site at North East Thatcham for approximately 1,500 dwellings to be completed during the plan period, with the final capacity to be informed by a Landscape and Visual Impact Assessment. The Council has advised that it is not currently anticipated that the site will continue to be developed for more than 1,500 dwellings beyond the plan period<sup>1</sup>.

Part of the justification for strategic scale development at Thatcham is that it would assist in the regeneration of the town, including through supporting local services

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<sup>1</sup> EXAM2 response to PQ32 (28 September 2023).

and providing new social infrastructure<sup>2</sup>. The policy proposes that the site provides a GP surgery, a primary school and early years provision, a secondary school and a new indoor community centre along with around half of the site being provided as green infrastructure including a community park, sports pitches and other public open space.

The evidence (including the Thatcham Strategic Growth Study Stage 3<sup>3</sup> and the North East Thatcham Partnership's Development Statement<sup>4</sup>) indicates that the allocation has capacity for up to approximately 2,500 homes along with the physical, social and green infrastructure proposed in policy SP17. The evidence (including the Council's Viability Assessment<sup>5</sup>, the North East Thatcham Partnership's Viability Note<sup>6</sup> and the Statement of Common Ground on Secondary School Provision<sup>7</sup>) also indicates that there is a reasonable prospect that such a scale and mix of development could be viably developed.

On the other hand, the evidence referred to above casts significant doubt on whether a development comprising around 1,500 homes could viably deliver all of the physical, social and green infrastructure proposed in policy SP17 whilst meeting all of the policy requirements in the Plan. Furthermore, the reference to 1,500 homes is not consistent with the evidence about the capacity of the site or with national policy about making efficient use of land and optimal use of the potential of sites<sup>8</sup>.

As submitted, therefore, policy SP17 is not effective, justified or consistent with national policy.

In the context of the above, policy SP17 should be modified to refer to up to around 2,500 dwellings, with the final number to be determined through the masterplanning process (see below). This would make it effective in ensuring that there is a reasonable prospect of a significant number of homes being developed on the site by 2041 (see housing land supply below) and that all of the proposed physical, social and green infrastructure would be provided. Furthermore, such a modification would provide greater clarity about the final scale and mix of development on the site, and be consistent with national planning policies relating to meeting housing need; larger scale development through significant extensions to towns; and making optimal use of the potential of sites<sup>9</sup>.

**AP75.** Council to amend the proposed modifications to policy SP17 and reasoned justification to refer to "up to around 2,500 dwellings" and, if necessary, propose further consequential modifications to the Plan.

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<sup>2</sup> Plan policy SP1 and paragraphs 6.52, 6.56 and 6.61.

<sup>3</sup> SIT2c (September 2020).

<sup>4</sup> WS4/6 Appendix (March 2024).

<sup>5</sup> VIA1a, VIA1c and VIA1d(i) (Autumn 2022).

<sup>6</sup> WS4/6 Viability Note prepared by Turner Morum (March 2024) (Appendix 9 of the Development Statement)

<sup>7</sup> EXAM42 Annex D (June 2024).

<sup>8</sup> NPPF September 2023 paragraph 125.

<sup>9</sup> NPPF September 2023, in particular paragraphs 11, 35a, 60, 68, 73 and 125.

## North East Thatcham strategic site: masterplanning

Policy SP17 requires numerous studies to be carried out, and a masterplan to be prepared. National planning policy guidance advises that masterplans should provide clarity about the scale and layout of development, mix of uses, transport and green infrastructure, and set out an implementation strategy<sup>10</sup>. It seems necessary, therefore, for some of the studies referred to in policy SP17 to be carried out to inform the masterplan, for example the Landscape and Visual Impact Assessment, secondary school feasibility study, and health centre feasibility study.

To ensure effective engagement with the community and other stakeholders, and that the masterplan effectively guides the development of the site, the Council should lead and coordinate the process, in collaboration with the site promoters, and agree the masterplan before any planning applications are submitted. Whilst the evidence indicates this would be likely to delay the commencement of development on the site<sup>11</sup>, it is necessary given the significance of the issues to be resolved through the masterplan process as referred to above. Furthermore, for those reasons, in particular to ensure effective community engagement, the masterplan should be prepared and adopted as a supplementary planning document under part 5 of the 2012 Regulations.

**AP76.** Council to amend the proposed modifications to policy SP17 and reasoned justification to further clarify what will be determined through the masterplan process in advance of the submission of a planning application, and to clarify that the masterplan will be prepared and adopted as a supplementary planning document.

## Housing land supply identified in the Plan

Proposed modifications to the Plan identify a requirement for at least 9,270 additional dwellings between 2023 and 2041. The Council's latest housing trajectory identifies a land supply for a total of 8,873 dwellings between 2023 and 2041<sup>12</sup>.

On the basis of the Council's latest housing trajectory there is, therefore, a shortfall of around 400 dwellings compared to the minimum requirement for the period 2023 to 2041.

The latest evidence about the intentions of the developers of the Sandleford Park strategic allocation indicate that there is a reasonable prospect of around 1,200 dwellings being built on that site by 2041, rather than 1,500 dwellings<sup>13</sup>.

The latest evidence about the timing of development on the North East Thatcham strategic allocation indicates that, given the need for a masterplan to be prepared and adopted as SPD by the Council before a planning application is submitted, fewer than 1,500 homes may be completed by 2041<sup>14</sup>.

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<sup>10</sup> PPG ID: 26-006 and 007-20191001.

<sup>11</sup> EXAM42 Annex E (21 June 2024).

<sup>12</sup> EXAM22 (26 April 2024).

<sup>13</sup> WS5/7 Donnington New Homes and WS5/9 Bloor Homes.

<sup>14</sup> EXAM42 Annex E Table 2 indicates 1,492 dwellings built by 2041 and Table 3 1,340 dwellings.

In total, therefore, there could be a shortfall of around 850 dwellings compared to the minimum requirement of 9,270 dwellings for the period 2023 to 2041.

Furthermore, the small site windfall assumption in the Plan is higher than has been achieved in recent years, and it is possible that some of the dwellings assumed on the sites with planning permission or other allocations without permission may not be delivered. This casts further doubt on whether the minimum housing requirement can be met from the housing land supply identified in the Plan.

The AONB, areas of flood risk and the two Atomic Weapon Establishments, along with other constraints, mean that opportunities to identify further sites that are suitable for housing development are limited having regard to national policy and the Plan's spatial strategy. However, the Council has identified a number of sites that, since the Plan was submitted for examination, it has reassessed as now being suitable and available for housing development during the plan period<sup>15</sup>.

The Council's latest evidence<sup>16</sup> indicates that the Plan identifies a five year supply of specific, deliverable sites from 1 April 2023, the latest date on which comprehensive housing land supply information is available. However, the more recent evidence about the timing of development on the North East Thatcham site<sup>17</sup> suggests that the five year supply from 1 April 2026 (ie "year 1" following the intended date of adoption)<sup>18</sup> is marginal, even assuming significant contributions from small site windfalls and sites to be identified in two neighbourhood plans.

I have not yet reached a conclusion about what the overall housing land supply would need to be, or whether the Plan needs to identify a five year supply following the intended date of adoption, to allow me to conclude that the Plan is sound. However, the Council should consider how the Plan could be modified to boost the housing land supply in the context of the above.

**AP77.** Council to propose modifications to the Plan to identify additional deliverable sites and/or developable sites and/or broad locations. The response should suggest specific sites, and/or broad locations along with relevant policy wording.

**AP78.** Council to update the housing trajectory in EXAM22 to take account of all relevant subsequent action points and proposed modifications, including those in response to this note.

*William Fieldhouse*

19 July 2024

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<sup>15</sup> Council response to AP14 in EXAM26 (17 May 2024).

<sup>16</sup> EXAM12 (15 February 2024) and EXAM22 (26 April 2024).

<sup>17</sup> EXAM42 Annex E (21 June 2024).

<sup>18</sup> NPPF 69 and 76 (December 2023).