

# Position Statement

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**Our ref** 16668/01/MS/RC  
**Date** 21 June 2024  
**To** WBC Local Plan Review EIP  
**From** Lichfields on behalf of the North East Thatcham Partnership

## Subject Position Statement of the NET Partnership

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### 1.0 Introduction

1.1 This Position Statement summarises the position of the NET Partnership in response to work undertaken in response to the Inspector's requested Action Points from week 2. This Position Statement should be read in conjunction with the following documents submitted to the Inspector by West Berkshire Council:

- 1 Revised policy wording for SP17 including reasoned justification (AP15, AP21);
- 2 Proposed site plan (AP22);
- 3 Statement of Common Ground concerning operational and economic viability of a secondary school on the NET site (AP25); and
- 4 Statement of Common Ground regarding the NET Trajectory (AP26).

### 2.0 Policy SP17

2.1 The Partnership and Council have exchanged a number of iterations of Policy SP17 with the aim of seeking common ground over how the policy and supporting text might be worded. The Council has taken on board a number of suggestions. However, there are a number of aspects where agreement has not been reached.

2.2 We append a full copy of the Policy SP17 draft text (version supplied to us by West Berks Council on 20th June 2024) with a suggestion for how we consider the policy /supporting text should change in red text. In summary, this includes:

- 1 Under 'Homes' - rather than approximately 1,500 dwellings, the policy ought to read "a minimum of" or "at least"<sup>1</sup>.
- 2 Under 'Community' – it should be clarified that the feasibility study is required to determine the level of provision needed to meet the needs generated by the development. The same applies for the supporting text on new education provision.
- 3 In the supporting text regarding 'Green Infrastructure' – text stating "*Areas of isolated development should be avoided*" should be removed. Ultimately the form and location

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<sup>1</sup> To be clear, the Partnership's position is that 1,500 is not justified or consistent with national policy, and that the allocation should be for 2,500 homes, consistent with the evidence base underpinning the plan.

of development is to be determined by the LVIA and other technical studies feeding into the masterplan, and this specific point is imprecise and unnecessary.

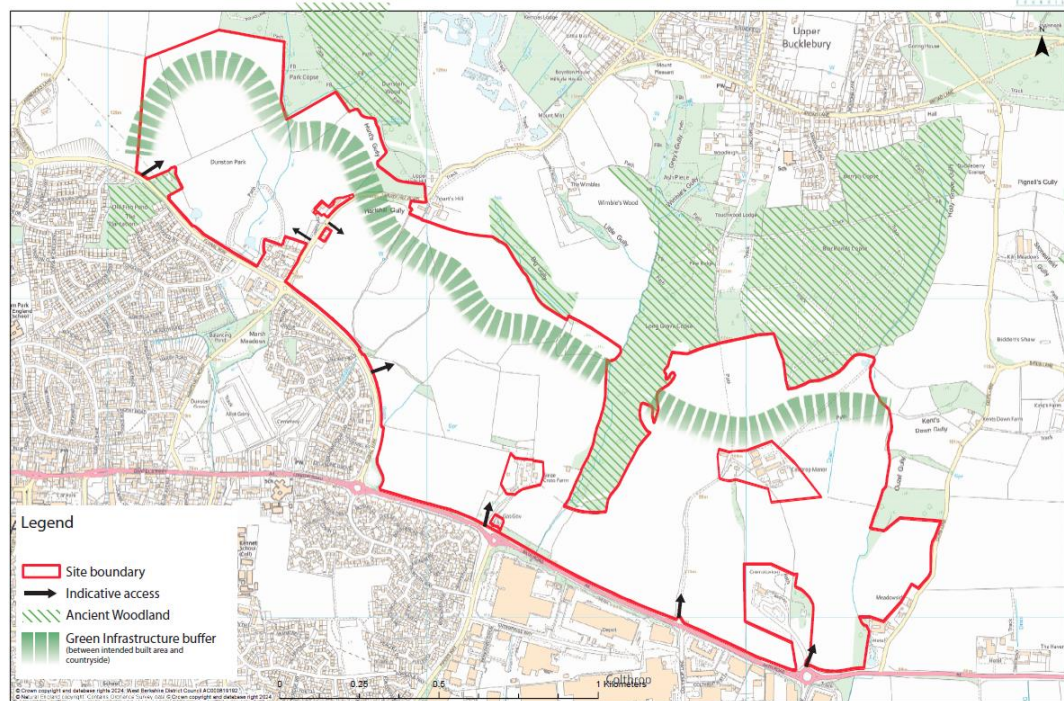
- 4 Reference to the GI buffer's extent being determined by contour lines set out within the TSGS 3 should be removed. Although the TSGS3 does refer to contour lines, it states this *"should form a 'soft constraint' to development, with local conditions considered"* (para 2.43). Later, at para 2.46 it states: *"Although this section presents an overview of landscape issues, detailed skyline and impact analysis has not been undertaken, ... All proposals should be further substantiated with detailed impact assessments."* The NETP analysis suggests in some parts of the site, one might restrict development at a lower contour., but that in other locations one might go higher. This would suggest it more appropriate to say that built development should respond to the LVIA.
- 5 We suggest removal of supporting text on flood risk which refers to the history of previous flood events. This is not what has been asked for in AP.18, is superfluous and adds unnecessary length to the plan text.
- 6 At para. 6.63 we suggest deleting the wording in relation to the responsibility and timing of the Masterplan and design code. The Council seeks that that the masterplan be commissioned by them and approved before an application. We consider that this requirement is unnecessary (not least because the NETP control the whole of the allocation); further, given the stance taken by the Council on the Local Plan and NETP since May 2023, NETP is concerned the Council's preferred approach risks adding delay and uncertainty. It also sets expectations that do not reflect the Council's proposed wording of that part of the policy). In other respects the supporting text on the masterplan and design code adds nothing to the policy itself, unnecessarily lengthens the plan, and should be removed.

### **3.0 Site Plan**

- 3.1 In response to AP22, the NETP initially prepared an indicative site map which shows a less precise Green Infrastructure boundary, broadly covering the higher parts of the site and other areas adjoining ancient woodland. We consider it is important that this boundary is shown as indicative as this will enable flexibility in line with SP17 policy requirements for *"The precise nature of the band of GI to be informed by a Landscape and Visual Impact Assessment and the masterplanning process."*

## North East Thatcham indicative map

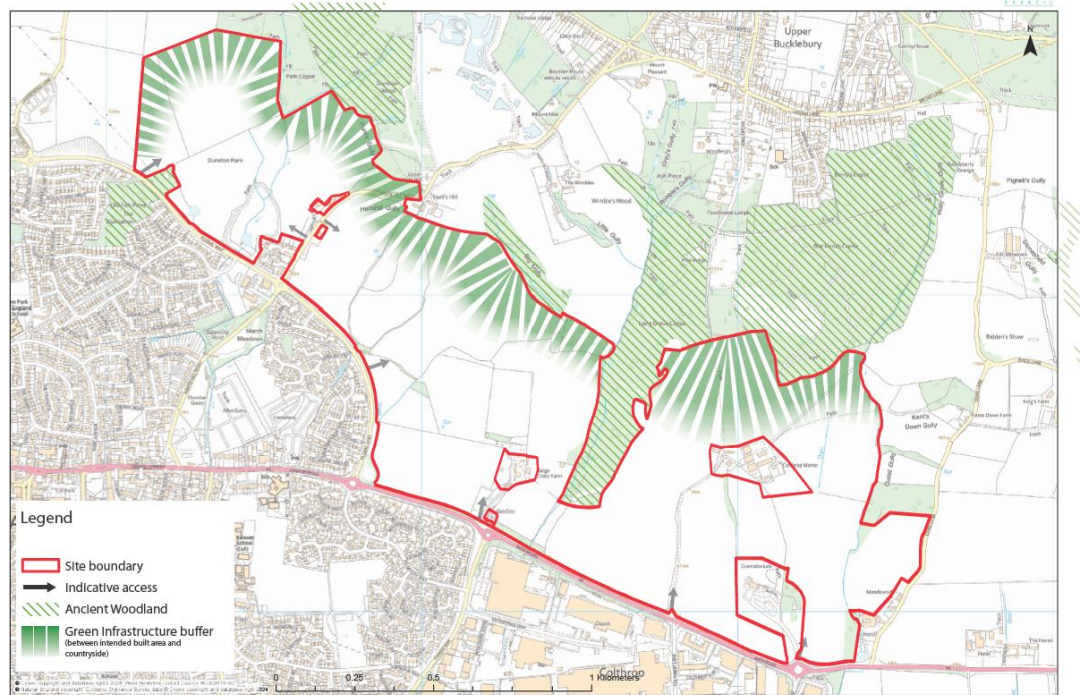
North East Thatcham



- 3.2 The Council did not agree to this approach and has instead preferred to show a plan with a more prescriptive boundary based on contour lines. NETP believes this is not consistent with the policy.
- 3.3 The NETP has subsequently updated its proposed map from that initially seen by the Council to 'colour in' up the white northern red line boundary of the allocation. The map below is suggested as being a more appropriate response to AP22 and the wording of the policy.

## North East Thatcham indicative map

North East Thatcham



## 4.0 Secondary Education Provision

- 4.1 At the time of writing a statement of common ground on education being concluded. This includes updated information from the Council on possible secondary school size and costs, including an illustrative maximum cost of £44m, compared to £26.4m from TSGS3.
- 4.2 In simple terms, the NETP position is that, although a feasibility study is required to determine the form, cost and s.106 contribution required to meet secondary education provision, it can be concluded that at 2,500 homes, the development can be adequately mitigated based on any reasonable option that might arise from the feasibility study, including necessary contributions towards a secondary school should that be the option concluded by the feasibility study.
- 4.3 However, at 1,500 homes, the Partnership considers it is a reasonable possibility that the required mitigation might not be capable of being delivered if the costs of secondary provision required to be funded by the development are materially greater than considered by the viability evidence underpinning the Local Plan. The headline reasoning is set out in the SoCG.

# Appendix 1 Policy SP17 draft text suggestions

## PROPOSED MODIFICATIONS -

### Policy SP17 North East Thatcham Strategic Site Allocation

Land as shown on the Policies Map is allocated for the delivery of a comprehensive, sustainable, low carbon, urban extension comprising of distinct neighbourhoods defined by their landscape, and connected and contributing to Thatcham, and woven through with natural habitats and links. ~~The site will be masterplanned~~ Proposals must demonstrate how and delivered as a whole to achieve a comprehensive development the provision of all infrastructure, services, open space and facilities will be delivered in a timely and co-ordinated way alongside the phased delivery of residential development. ~~The Thatcham Strategic Growth Study provides guiding principles for the delivery of the site therefore proposals will demonstrate that these guiding principles have been positively responded to.~~

#### Homes

The site is ~~to be~~ allocated for the phased delivery of approximately a minimum of 1,500 dwellings which will be completed within the period of the Plan. These dwellings will comprise an appropriate mix of a housing types, tenures and sizes having regard to mix ~~which complies with the housing mix contained in Table 3 of Policy SP18.~~ In addition at least:

- 40% of dwellings will be affordable housing in accordance with SP19; and
- 3% of dwellings will be delivered via serviced custom/self-build plots.

#### Community

~~The site will provide~~ A range of community facilities will be provided to serve the development, including:

- Local centres providing local retail facilities and small-scale employment including for community use ~~(approximately 1,100sq.metres Class E and F2);~~
- Primary Healthcare provision and associated infrastructure, which is operationally and financially viable, the details of which should be agreed with 450sq.metres GP Surgery to be offered to the Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board (BOB-ICB) or other such appropriate body, taking into account the feasibility study carried out by BOB-ICB. Further detailed feasibility work should be carried out at the applicant's expense in collaboration with BOB ICB.
- ~~Early years provision;~~
- A 2.5FTE p Early years and Pprimary school provision on site and sports infrastructure requirements of the school. L with land to be provided and build costs to be met by the applicant;

- Secondary school and SEND provision, including the provision of land and a financial contribution, land to meet the impact of the development. The nature and cost of the required provision mitigation will be informed by a feasibility study, undertaken at the applicant's expense and prepared in collaboration with the Council and local stakeholders. **This will determine the level of provision required to meet the needs generated by the development.**
- A 1,200sqm e Community indoor facility to be used for sport and community uses with a variety of room sizes (currently use classes E and F);
- Outdoor formal and informal sports pitches and areas for community use to meet the identified needs of the development;
- Open space to meet the needs of the development in accordance with Policy DM41.

## Green Infrastructure

The site will provide a comprehensive network of green infrastructure and open space across the whole site in accordance with SP10 and DM40 and landscape strategy which will respond positively to the take advantage of the sensitivities of the landscape, protect and enhance landscape and ecological biodiversity features of value within and around the site and make provision for biodiversity net gain.

~~This network will comprise:~~

The provision will include:

- Conservation of the areas of ancient woodland by providing appropriate buffers between the development and the ancient woodland.
- Enhancements for biodiversity.
- A band of green infrastructure/new community park across the higher land on the northern part of the allocation (as shown on the indicative map fig.X) to be retained outside the settlement boundary. This is to create a buffer between the built development of the allocation and the adjoining countryside and the village of Upper Bucklebury to the north. The precise nature of the band of GI to be informed by a Landscape and Visual Impact Assessment and the masterplanning process.
- ~~A new community park linking Thatcham to the North Wessex Downs AONB;~~
- Green Infrastructure and open space within the developed parts of the site in addition to the community park.
- Greenways which connect through the site to the park and facilitate connectivity to the wider landscape and the existing Public Rights of Way network. AONB, and include leisure routes accessible to all users.
- ~~A comprehensive network of other accessible routes and connections within the development which provide walking and cycling links along desire lines;~~
- A **Public Rights of Way Strategy** to demonstrate how existing Public Rights of Way will be protected and enhanced and how new ones will be established, including bridleway links and safe crossing points.
- Retention of existing, ~~and~~ provision of new, trees, hedgerows and other appropriate native planting. which contribute to biodiversity net gain;

- Provision of allotments.
- A **Green Infrastructure Strategy** to show how the network of multifunctional green infrastructure will be delivered across the site.

## Transport

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

Development proposals for the site will be supported by A **Transport Assessment, Strategy and Travel Plan** to will provide detail on how this will be achieved, including:

- Active travel Improvements on routes between the site, Thatcham town centre and the railway station;
- Multiple access points and A-a vehicular through route;
- Sustainable transport through routes;
- Mitigation of the development's impacts on the highways network with improvements to existing junctions where they are needed and delivery of new access points for all forms of movement and transport to the site at locations to be agreed with the planning authority; and
- An air quality management plan detailing How adverse impacts on air quality will be minimised.
- ~~A Public Rights of Way Strategy to demonstrate how existing Public Rights of Way will be protected and enhanced and how new ones will be established, including bridleway links and safe crossing points.~~
- Promotion and encouragement of sustainable modes of travel, in accordance with policy DM45.

## Sustainability

Development proposals for of the site will be supported by an **Energy Statement** or a detailed energy section within the **Sustainability Statement** Charter which will establish how policy requirements will be achieved. This will be informed by: ~~An **Energy Strategy** which sets out measures to achieve a model low carbon development (following the energy hierarchy) in accordance with Policies SP5 and DM4., including:~~

- ~~Net zero carbon (regulated and unregulated energy) emissions for dwellings;~~
- ~~BREEAM 'excellent' non residential buildings;~~
- ~~on-site renewable energy to assist in the delivery of a net zero carbon neutral development; and~~
- ~~carbon off-setting.~~
- A **Construction and Operations Management Plan (COMP)** to accompany any planning application on the site. The COMP shall safeguard the oil pipeline from operational works, including the provision of an appropriate buffer.

## **Flooding and Water Environment**

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

- measures to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site;
- details of the phasing of development to consider likely upgrades needed for the water supply and waste water network infrastructure; and
- surface water drainage management approaches that could deliver net gain for Thatcham town, including use of on-site sustainable drainage systems (SuDS);
- A Flood Risk Assessment, taking into account the Thatcham Surface Water Management Plan, which sets out adequate flood mitigation measures to ensure there is no detrimental impact on flood risk in Thatcham;
- Flood alleviation measures already present on the site and how they will need to be retained, protected and enhanced.

## **Biodiversity**

Development proposals for the site will be supported by A an **Biodiversity Strategy** in accordance with SP11 which will set out:

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

## **Landscape**

Development proposals for the site will be supported by A a **Landscape and Visual Impact Assessment (LVIA)** in accordance with the Landscape Institute Guidelines for Landscape and Visual Impact Assessment 3<sup>rd</sup> ed. 2013. This will inform the final capacity, masterplan for the development, design and layout of the site and requirements for green infrastructure and the provision of public open space. The LVIA will be informed by the Landscape Sensitivity and Capacity Assessment (2021) of the site and SP5.

## **Heritage**

Development proposals for the site will be supported by A a **Historic Environment Strategy** in accordance with SP9 to demonstrate how the sites historical development, archaeological remains and historic buildings and parkland will inform the scheme and help to create a sense of place. The Historic Environment Strategy should:



- Be informed by a heritage impact assessment, desk-based archaeological assessment and if needed, field evaluation; and
- Demonstrate how the impact of the development on their setting of the adjacent listed buildings has been considered and how they will be conserved and harm to the significance minimised.

## **Lighting**

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

## **Mineral Resources**

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

## **Masterplanning and Design Code**

The site will be masterplanned, funded by the applicant and prepared in collaboration with the applicant, the Council, the community and other stakeholders, prior to the submission of a planning application. The Masterplan will provide the framework to guide the development, and should be based on the evidence base underpinning the Local Plan and outcome of further technical work prepared in line with requirements of this policy. The masterplan will provide a guide as to the location and extent of built development, land uses, green infrastructure including the green buffer, key access arrangements, community and other infrastructure. Proposals must have regard to, and demonstrate how, they have been guided positively by the agreed masterplan.

A design code, prepared by the developer and agreed with the local planning authority, should be secured by a planning condition as part of any outline planning permission.

## **Supporting text**

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

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

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

6.54 ~~In reviewing the vision for Thatcham as part of the LPR and to best understand how to plan for growth in Thatcham within the plan period, the Council commissioned masterplanning work (Thatcham Strategic Growth Study (TSGS) 2020). The Thatcham Strategic Growth Study was carried out in 2019 – 2020 to understand how to plan for growth in Thatcham over the plan period. The West Berkshire Strategic Vision 2050 was drafted in 2022 to guide sustainable growth over the long term in the context of paragraph 22 of the updated NPPF published in 2021. These documents include relevant information that form part of the justification for the LPR’s spatial strategy and the strategic allocations in Newbury and Thatcham.~~

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

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

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

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

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

6.60 The Council’s spatial strategy is outlined in Policy SP1 and affirms a continued approach to focusing development in settlements in line with a District-wide settlement hierarchy (contained in Policy SP3). Thatcham, as part of the Newbury and Thatcham urban area, is a sustainable location for development as confirmed in the Strategic Vision

2050. The TSGS shows the most sustainable way for development to come forward in the town and this policy draws on that evidence.

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

x.xx The site plan (figure x) shows indicative locations for access points and for the band of green infrastructure buffer to the northern part of the site. The final layout, access, landscaping and green infrastructure will be determined following the completion of further work such as LVIA and the masterplanning process required by policy SP17.

x.xx It is anticipated that approximately half of the site will be set aside as Green Infrastructure, to serve the new population at North East Thatcham and be retained in perpetuity. An area, across the north of the site, will provide a buffer between the new development and the existing community of Upper Bucklebury to the north and comprise an extensive area of multi-functional green space, which will protect ancient woodland and areas of ecological value while providing opportunities for informal recreation. In addition, green infrastructure will be provided within the areas of built development. Built development should respond to the findings of the LVIA and ensure an appropriate form of development taking into account the constraints of the site, including below ground infrastructure. ~~Areas of isolated development should be avoided.~~

x.xx The indicative GI buffer shown on the map provides ~~the a~~ starting point when considering the ~~potential~~ extent of the GI buffer at the masterplanning and planning application stages. The final extent of the GI buffer will be determined through the LVIA, masterplan and other relevant background work carried out to support a planning application on the site. ~~The indicative GI buffer boundary takes into account the landscape work done to support the TSGS, and uses the 105m contour to the west and central portion of the site, with the 100m contour to the east. The gas pipeline across the north of the site is required to have designated standoff areas, and given its location to the north of the site development to the north of the pipeline is not considered appropriate.~~

x.xx The Settlement Boundary for Thatcham, in an exception to the settlement boundary review criteria set out in Appendix 2, will be revised through a future Plan to reflect the extent of the built up area once that has been defined through the masterplanning and planning application processes required by policy SP17. Consideration of whether it is appropriate to designate a gap between Thatcham and Upper Bucklebury, in line with policy DM2, will be considered once the settlement boundary has been redrawn.

x.xx New education provision, including early years, primary and secondary provision will be required to support the needs of the development. Early years and primary provision will be provided on site. The requirements for secondary and SEND provision will be

determined following the completion of a feasibility study which will consider the best solution for secondary education requirements in Thatcham. It is expected that land will be required ~~on the site~~, and a proportionate financial contributions to support delivery of the preferred solution ~~based on need~~.

x.xx Primary healthcare facilities should be provided, with associated car parking and landscaping. The facilities should be operationally and financially viable and take into account the feasibility study commissioned by the NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board (BOB-ICB). The facility should provide room sizes that comply with the Department of Health Building Note 11-01 (or any successor documents). The provision and any contractual arrangement of the facility will need to be agreed as part of any planning application coming forward on the site. Where the onsite provision of a facility in accordance with this policy is not viable, the Council will expect other offsite mitigation measures, to ensure the primary healthcare provision can support the new population growth. The applicant should engage with the BOB-ICB at an early stage to discuss the details of any offsite provision. A further feasibility study, to identify office mitigation measures, would need to be carried out at the applicant's expense and any identified offsite mitigation measures will be funded by the applicant through developer contributions.

~~x.xx Flood risk and surface water drainage is a key consideration for Thatcham, following extensive surface water flooding in the summer of 2007 as a result of high intensity rainfall overwhelming storm drains and culverted streams. The flood event was considered to be in the order of a 1 in 200 year event. Following the flooding various studies and strategies were developed to identify opportunities for reducing flood risk in the town. The Thatcham Surface Water Management Plan (2010) sets out a number of proposed measures to reduce flood risk in Thatcham, focusing on retaining runoff upstream of Thatcham to reduce peak flows through the existing urban area and drainage system. A number of flood attenuation ponds have been constructed on the North East Thatcham site, and these are to be retained and enhanced in addition to Sustainable Drainage Systems (SuDS) provided on the site. The Integrated Water Supply and Drainage Strategy involving localised and strategic flood management measures will be required, in line with the requirements of the West Berkshire Sustainable Drainage Systems SPD (2018).~~

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

6.63 ~~Further detailed work will be required to develop a coherent masterplan to take the development forward. The Council will commission the masterplan, this which will be produced in collaboration with the applicant, the community and other stakeholders and funded by the developer as part of a Planning Performance Agreement. It will be based on existing evidence and information already produced to support the allocation of the site, including the Thatcham Strategic Growth Study. The masterplan will provide a guide as to~~

the location and extent of built development, land uses green infrastructure including the green buffer, key access arrangements, community and other infrastructure. The Masterplan will be agreed, by the Council, prior submission of a planning application.

A Design Code will be developed alongside the planning application, secured by condition, and agreed with the Council prior to submission of the first reserved matters application.