

## Report of responses received to the Consultation on the Proposed Main Modifications to the West Berkshire Local Plan Review

(from 6 December 2024 – 31 January 2025)

Public consultation on the Proposed Main Modifications to the West Berkshire Local Plan Review (LPR) took place for a period of eight weeks from 6 December 2024 to 31 January 2025. 270 individuals and organisations responded to the consultation, generating 733 separate comments. A list of respondents can be found in Appendix 1 of this report.

This report sets out a summary of the main issues raised in the responses to each individual Proposed Main Modification and, where relevant, proposed change to the Policies Map, together with a brief Council response to them.

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
Plan as a whole	Multiple	General observations	9

Respondent	Summary of Main Issues	Council response
National Highways	The changes are relatively minor and importantly, do not significantly change land allocations or transport policies. There is a minor increase to the housing requirement over the plan period, to match the extension of the plan period from 2039 to 2041, however this is proportionate to the end date extension and does not change the yearly housing requirement. It is noted that a small number of dwellings in Lambourn and Hungerford will be allocated in their neighbourhood plans, rather than the Local Plan. The small number of dwellings to be allocated combined with the relative large distance to M4 J14 means that this is unlikely to cause any concerns, but National Highways should still be consulted when these plans come forwards. The updated Sustainability Appraisal does not contain anything or relevance to the strategic road network (SRN). Having reviewed all the proposed main modifications, there are none that we	Comments noted. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modifications. No further changes are proposed to the LPR.

Respondent	Summary of Main Issues	Council response
	would deem to have an effect upon the SRN. We therefore have no objection to the proposed main modifications submitted.	
Environment Agency	<p>In relation to RSA24: New Stocks Farm, Aldermaston and ESA6: Land adjacent to Padworth IWMF, Padworth Lane, Padworth:</p> <p>We have reviewed the Schedule of Proposed Additional (minor) Modifications (AM) and find that some EA comments agreed with the LPA in the agreed in the Statement of Common Ground with the Environment Agency have not been included in the proposed additional modifications. We are unclear if these comments have been or would be considered and included in the adopted plan.</p> <p>We note modifications suggested for polices in Chapter 8 <i>Non-Strategic Site allocations: Our Place Based Approach</i>, which the LPA agreed to include in the local plan (as we agreed with the LPA in the SoCG – attached to rep) has not been included.</p>	<p>Comments noted. They do not relate specifically to the Proposed Main Modifications. Policy ESA6 is subject of an AM, relating to the archaeological assessment. The Statement of Common Ground (SoCG) with the Environment Agency (<u>EXAM24</u>) proposes a Main Modification for Policies RSA24 and ESA6. This relates to the need for an integrated water supply and drainage strategy for both policies.</p> <p>The Council refers to its response under MM38 (policy RSA2).</p> <p>No further changes are proposed to the LPR.</p>
Olivia Bailey, MP	<p>The importance of the Local Plan cannot be understated. It sets the framework for the sustainable development within West Berkshire that is so desperately needed. In particular there is no doubt that after years of missed targets, we are facing a housing crisis that can only be met by building. I am pleased to see a strong commitment within the Local Plan for affordable housing, as in our area with such high house prices, local people struggle to get on the housing ladder. This is particularly acute in rural villages in West Berkshire. While I welcome developments such as that at the Pirbright Institute site in Compton, more needs to be done to give young people the option of living where they have grown up,</p>	<p>Comments noted. They do not relate specifically to the Proposed Main Modifications. Some of the issues raised have previously been considered and discussed as part of the Examination. The other issues raised will be considered as part of the preparation of the next Local Plan. The representation does not raise any issues which would</p>

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	<p>with small developments of affordable housing, ensuring that our villages remain vibrant places for the future.</p> <p>The NPPF 2024 states that in order to be considered sound, local plans need to take into account reasonable alternatives. The development of the West Berkshire Local Plan has been a bodged process, which reflects poorly on both the current administration and their immediate predecessors. There has been a failure to properly evaluate alternative, more suitable sites which meet the needs of current and future residents, and a missed opportunity to include more strategic sites. All that has happened is that previously disregarded sites have been added back into the plan at a late stage.</p> <p>Furthermore, paragraph 16.c of the National Planning Policy Framework (NPPF) states that plans should “be shaped by early, proportionate and effective engagement between plan- makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;”.</p> <p>While significant consultation was carried out between 2018 and 2023, the Main Modifications, particularly in relation to the sites that have been included for housing, mean that what is currently proposed is materially different.</p> <p>West Berkshire needs more housing, in particular affordable housing, aligned with the necessary infrastructure, to support local families and help grow our economy. In order to achieve this and deliver the ambition for West Berkshire to be a driver of growth within the UK economy, we need a sound plan.</p> <p>It is disappointing that West Berkshire Council, over two administrations have failed to deliver that ambition. Rather than identifying sites for new homes where they are needed, such as in our villages where families cannot afford to stay together, they have overseen a bodged process which first failed to deliver enough housing, and then rather than taking a strategic approach, sites previously</p>	<p>prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

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	deemed unsuitable have simply been added in at the last minute. Pincents Hill is the most egregious example of this.	
Neal Courtney	<p>The proposal to build a specified number of homes in any location should be based on demographic requirements - what are these in West Berkshire ie: who actually needs homes (is it people who have to rent and can't afford to buy; first time buyers; young families; growing families; retired people; single people etc). such an understanding should then determine what facilities and access is necessary to support the relevant demographics. I have seen none of this in any published proposals or in the media and this must be the starting point before a single new house is built in my opinion.</p> <p>I would also express concern regarding the fact that a substantial number of new apartments have been built in and around Newbury and yet many are still empty so who exactly are we building new homes for and can they afford them?</p> <p>Furthermore, the number of large employers in the area has declined significantly. This in turn means that new house dwellers will need to travel to their work. How will they do this especially if it is to out of town business parks - most likely by car. The proposed location of so many of the new houses is hemmed in by local low capacity roads and although Thatcham has a station with connectivity to Theale and Reading, it is likely that working people will still want to travel to the station by car, putting further pressure on the local roads network which is already unfit for purpose.</p> <p>What is the infrastructure planned to support all these new homes. The local dental practices cannot accept new NHS patients, the Royal Berkshire Hospital is at capacity, and I am not aware of any plans to increase the facilities/capacity/capabilities significantly of the West Berkshire Community Hospital. There does not appear to be any joined up thinking between building for building sake and specific geographic and demographic needs. If there is, this needs to be explained at the of</p>	<p>Comments noted. They do not relate specifically to the Proposed Main Modifications. The issues raised will be considered as part of the preparation of the next Local Plan. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

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	<p>front of document to impress upon central Government that a target for no other reason than it provides a media headline is utter nonsense and damaging to our local sustainability.</p> <p>Lastly, and specifically regarding current and future environmental concerns, what are central Government doing about house design. Not a single house, in the yet to be finished, Donnington Heights estate has been built with solar panels and battery storage as part of the house builders remit - why not? Surely this should be a mandatory requirement of every new house and can be demanded by WBC as part of their approval process - yet it does not appear in this plan.</p> <p>I would finish by saying that, far from being against new homes being built, I merely share the concerns of many people who I have spoken with, who also see that, with these new imposed spurious targets, there is a real risk of building inappropriate, poorly sited, eco-unfriendly housing in areas which have either (or both) poor infrastructure now or will create future infrastructure support problems that will be incredibly costly to address unless these concerns are fully addressed now.</p>	
John Davies	<p>The government wishes to build extra houses in the green belt or empty used land near towns. They have allocated houses to Hungerford that can only be built on open, very visible farmland in the AONB to the south of the town. Does this accord with the LPR?</p>	<p>Comments noted. They do not relate specifically to the Proposed Main Modifications. The wider issues raised will be considered as part of the preparation of the next Local Plan. No further changes are proposed to the LPR.</p>
Jonathan Hendry	<p>The modifications proposed by the Council undermine the integrity of the original Local Plan and fail to align with sustainable development principles, local community needs, and national planning policy. The CAPC document highlights a number of significant concerns that I fully endorse, including:</p>	<p>Comments noted. The issues raised have previously been considered and discussed as part of the Examination. The wider issues raised will be considered</p>

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	<p><b>1. Failure to Prioritise Sustainability and Infrastructure Readiness</b> The PMMs disproportionately shift development towards areas where infrastructure—such as roads, public transport, healthcare, and schools—is already under significant strain. There is insufficient evidence that essential infrastructure improvements will precede or even accompany the proposed growth. This contradicts the National Planning Policy Framework’s (NPPF) emphasis on sustainable development, which requires infrastructure to be considered alongside housing expansion.</p> <p><b>2. Overreliance on Greenfield Development, Contradicting Environmental and Climate Goals</b> The proposed modifications weaken the protection of greenfield sites, leading to an excessive reliance on such areas for housing. This contradicts both West Berkshire’s own climate commitments and national objectives for biodiversity, carbon reduction, and sustainable land use. The original Local Plan provided a more balanced approach, whereas the modifications appear to disregard environmental considerations in favour of short-term housing targets.</p> <p><b>3. Ignoring Local Consultation and Community-Led Planning</b> The modifications undermine the democratic process by disregarding the feedback and concerns of local communities, including those in Cold Ash and surrounding areas. Neighbourhood Plans, which represent a legally recognised tier of planning, are devalued by these changes, diminishing local decision-making and public trust in the planning system.</p> <p><b>4. Flawed Housing Allocation Strategy &amp; Questionable Evidence Base</b> The methodology used to justify the revised housing allocations lacks transparency and appears to be driven more by arbitrary targets than by genuine housing needs and land suitability. The CAPC response provides a compelling critique of the data and assumptions underpinning the PMMs, which should be addressed before any further modifications are considered.</p>	<p>as part of the preparation of the next Local Plan.</p> <p>The Council also refers to its response to Cold Ash Parish Council under MM42.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

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	<p>5. Unbalanced Development Distribution</p> <p>The modifications place disproportionate pressure on certain settlements while failing to explore alternative strategies, such as maximising brownfield regeneration in more sustainable locations. The original Plan had a more considered spatial distribution strategy, which has been significantly weakened by the proposed changes.</p> <p>Conclusion - For the reasons outlined above—and as thoroughly detailed in the Cold Ash Parish Council response—I urge the Council to reconsider these modifications. The original Local Plan was the product of extensive consultation and careful planning; these changes erode its integrity and fail to deliver sustainable, community led development. I strongly encourage the Council to reject the PMMs and instead work collaboratively with local communities to ensure that West Berkshire’s development is truly sustainable, well-supported by infrastructure, and aligned with the long-term needs of both residents and the environment.</p>	
Mark Knight	<p>No developer seems to pay much heed to the present plan. Indeed, the Council’s own officers in other departments seem blissfully unaware of any constraints. The present stance of the Government also significantly reduces its use and value. For me, this suggests the onerous task of keeping it amended and updated is wholly unnecessary and the costs saved would be better employed in an education programme for staff and similarly the public - specifically to help them cope with the consequential lifestyle changes that will come with the district’s renewal and accompanying alternative accommodation styles. The present approach seems to be wholly negative and greatly contributes to the poor view of local governance many now hold.</p>	<p>Comments noted. They do not relate specifically to the Proposed Main Modifications. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
Paula Saunderson	<p>Some of the approaches taken by the Plan and the words within several Main Modifications are not justified as we can find no evidence by comparison to many other Local Plans that not allocating sites within settlement boundaries is a justified approach to take. It is forcing key sites and major PDL sites out of this Plan and into windfall.</p>	<p>Comments noted. The issues raised have previously been considered and discussed as part of the Examination. The wider issues raised will be considered</p>

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	<p>The various Main Modifications which mention Neighbourhood Development Plans seem to contradict each other, are confusing and far from clear for the various types of Urban Areas and Villages in the Settlement Hierarchy. We need better clarity and then it will likely all be justifiable.</p>	<p>as part of the preparation of the next Local Plan. No further changes are proposed to the LPR.</p>
Brian Withers	<p>The review by the inspector has placed a large burden on Thatcham which will turn what was a village into a small town. This, I believe is the result of the policy which blocks alternative sites around the smaller villages in West Berkshire. A number of villages have lost facilities that have declined because of insufficient local people to support them. Small general shops, village schools, and public houses need local support to survive. This is a direct result of policy DM1 blocking virtually any application that is outside a settlement boundary, even those which are adjacent to village settlements which may not have a boundary, but if they do, the West Berks planning will refuse as a matter of course any smaller developments which could support our villages. There is virtually no change from a policy written a couple of decades ago when the need for housing was not urgent. (Policy C1). Today, that need is urgent according to government sources. Thatcham and Pincents Lane could have been spared this burden if there had been some dilution across the Authority as a whole. I believe that is a major flaw in the plan which the inspector and the local plan appear to have missed both in the initial flawed plan and the inspector's proposed revision. Local builders should have been encouraged to build out small locations of less than 10 homes rather than shutting them down with a no hope policy and we might then have seen a fairer distribution with quality homes rather than the swathes of developer knock outs. I understand that this may be outside the comments that are being examined but it needs to be borne in mind that this policy will last until 2039 and should be examined in depth if only to assist in providing windfall sites that are called for in the plan.</p>	<p>Comments noted. The issues raised have previously been considered and discussed as part of the Examination. The wider issues raised will also be considered as part of the preparation of the next Local Plan. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>



<b>Ref</b>	<b>Page</b>	<b>Policy/Paragraph of submitted LPR</b>	<b>No of responses</b>
<b>General</b>	<b>Multiple</b>	<b>No comments</b>	<b>3</b>

<b>Respondent</b>	<b>Summary of Main Issues</b>	<b>Council response</b>
Canal & River Trust	No comments	N/A
Exolum Pipeline System	No comments	N/A
Transport for London	No comments	N/A

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM1	14	Paragraph 4.11 Vision	3

Respondent	Summary of Main Issues	Council response
Newbury Town Council	'Sustainable growth' is mentioned in paragraph 4.11, and it should be made clearer what the term covers, for example drainage issues, water infrastructure, road ways, etc.	Comments noted. Sustainable development is defined within the glossary (Appendix 9) of the LPR. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.
Councillor Chris Read	The "long term vision" stated was not created to joint consultation and agreement with local residents or town and parish councils. This should be struck from the local plan.	Comments noted. The long-term Vision ( <a href="#">SET3a</a> ) was subject to public consultation, and further information on this is set out within Appendix 1 ( <a href="#">SET3b</a> ) and Appendix 2 ( <a href="#">SET3c</a> ). The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.
Paula Saunderson	No real long-term vision for Newbury. In preparing the response, consideration has been given to definitions used in the NPPF	Comments noted. As explained within the Settlement Boundary

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	<p>(Town Centre, Out of Centre, and Out of Town), rather than settlement boundary, which is not a term used within the NPPF and PPG. This is because they are false boundaries, which move constantly and are not community based or based on Ward or Parish Boundaries.</p> <p>Any vision documents which exist for Newbury are incomplete or miss out key sites. The West Berkshire Vision 2050 produced in November 2022 is not for the whole of West Berks and it does not mention key sites, like the Kennet Centre.</p>	<p>Review Background Paper (<a href="#">SET9</a>), settlement boundaries are a long established planning tool. The issues raised have previously been considered and discussed as part of the Examination The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
	<p>The approach towards Newbury as a Major Town is not good practice in achieving cohesive Town Centre, Out of Centre, and Out of Town planning.</p> <p>Disagreement with the approach of not including allocations within settlement boundaries. This approach, which has not been taken by other LPAs, will result in key brownfield sites coming forward as windfall. Other issues with the approach of not allocating within settlement boundaries includes:</p> <ul style="list-style-type: none"> <li>• Inappropriate for infrastructure planning – in Newbury there is already issues with and a shortage of services (GPs, pharmacies, dentists, outdoor playing pitches so there will be reliance on existing public open spaces) and infrastructure (upgrades to sewage treatment works needed, no Flood Risk Management Plan, no Surface Water Management Plan for Newbury, highways). These issues would have been considered has sites in settlement boundaries been allocated.</li> </ul>	<p>Comments noted. The current Local Plan does not allocate any sites within settlement boundaries as the principle in favour of development is already established. This approach is being retained in the LPR. The Plan should be read and interpreted as a whole, and all policies should be viewed together in the preparation and consideration of planning applications. The Plan includes policies on the spatial strategy (policy SP1), infrastructure provision (policy SP24), flood risk (policy SP6), water resources and</p>

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	<ul style="list-style-type: none"> <li>• March 2024 LDS includes only two SPDs for Newbury (Sandleford Park and Newbury Town design Statement). As a major town, there should be more which cover the Kennet Centre / Eagle Quarter, and Bond Riverside. The Newbury Town Centre Masterplan should be adopted as a SPD.</li> <li>• Forces Newbury to have a high percentage of windfall development, which results in the sustainability of the town not being properly assessed. Retail areas in decline, permitted development allowed in Protected Employment Areas, no zoning, and no strategic approach to shaping Newbury to 2041 and beyond.</li> <li>• No incentive for developers to promote sites for the Local Plan during call for sites. They will instead wait to bring forward sites through the planning application process as windfall sites. This approach means sites receive less attention than under the robust Local Plan making process. West Berkshire Council has been under resourced for years.</li> <li>• No cohesive vision.</li> </ul> <p>Disagreement with policy ADPP2 of the Core Strategy not being retained in the Plan, and there is now no policy for Newbury. The eastern phase of Newbury Racecourse does not have a SPD and is not included within the Plan.</p>	<p>waste water (policy DM7), the provision of public open space (policy DM40). Regardless of whether a site is allocated or not, it must still be subject to a planning application. The purpose of SPDs is to provide additional guidance on detail linked to policies in a local plan. There is no need for every policy in a local plan to be supported by a SPD. Newbury is covered within policy SP1 (Spatial Strategy) of the Plan. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

<b>Ref</b>	<b>Page</b>	<b>Policy/Paragraph of submitted LPR</b>	<b>No of responses</b>
<b>MM2</b>	<b>15</b>	<b>Paragraph 4.17 Key diagram</b>	<b>0</b>

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM3 PMC1 PMC2 PMC3 PMC4 PMC5	16-17	Policy SP1 Spatial strategy	<b>101</b> (including Save Pincents Hill Group obo 30 individual signatories)

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Holybrook Parish Council	<b>Settlement boundaries:</b> The Proposed Main Modifications include changes to the Policies Map that appear to expand settlement boundaries, potentially leading to urban sprawl and the erosion of distinct community identities. This blurring of boundaries threatens the character of existing settlements and encroaches upon valuable green spaces that serve as natural buffers between communities. Maintaining clear and well-defined settlement boundaries is essential to preserve the unique identity of our already over-developed parishes. There is little green space left in the East of the District and it must be preserved at all costs.	Comments noted. The issues raised have previously been considered and discussed as part of the Examination. The proposed changes to the settlement boundaries are in accordance with the Settlement Boundary Review criteria (Appendix 2 of the <a href="#">submitted LPR (CD1)</a> .) No further changes are proposed to the LPR.
Hungerford Town Council	It agrees with and accepts the proposed 55 dwelling allocated in the plan which is identified in our draft Hungerford Neighbourhood Plan. 2) The text in several locations is still referring to the AONB. Presumably all references should now only refer consistently to either the North Wessex Downs National Landscape, or National Landscape. <b>Densities:</b> Policy SP1. In this policy it refers to housing net densities on the edge of settlements of 30 and 20 per hectare on	Comments noted. The issues raised have previously been considered and discussed as part of the Examination. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further

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	<p>the AONB (National Landscape). We would suggest that the 30 per hectare should also apply to the AONB because:</p> <p>a) There is little evidence to suggest a lower density of 20 per hectare fits in any better within an AONB</p> <p>b) It means that to achieve the housing target 50% extra land is required and the key to minimising impact to the AONB is to take up less land</p> <p>c) Lower densities make housing less affordable and harder to deliver low cost housing.</p> <p>Recommend that the wording is changed to state:  <u>Developments on the edge of defined settlements are generally expected to secure a net density of 30 dwellings per hectare outside of the AONB, and 20 dwellings per hectare within the AONB.</u></p>	<p>changes are proposed to the LPR.</p>
Newbury Town Council	<p><b>Settlement boundaries:</b> Newbury Town Council would like Parish Council boundaries to be aligned with the Settlement boundaries</p> <p><b>Densities:</b> Newbury Town Council disagrees with the blanket net density and flatted developments. There needs to be consideration of conservation areas and their needs. Likewise, Newbury Town Council would like the LPR to consider current challenges in local areas such as Town Centre Flooding in Newbury. The LPR needs to consider housing mix and not simply refer to 'Flatted Developments.'</p>	<p>Comments noted. The issues raised have previously been considered and discussed as part of the Examination. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
Thatcham Town Council  David Bridle	<p><b>Thatcham settlement boundary:</b>  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</p>	<p>Comments noted. The issues raised have previously been considered and discussed as part of the Examination. The proposed changes to the settlement</p>

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	<p>the Designated Employment Area east of Thatcham [is] not included within any settlement boundary.</p> <p>The Council responded in EXAM26: “The existing settlement boundary excludes the DEA to the east of Thatcham. <b>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.</b> <i>[our emphasis]</i> 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.”</p> <p>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.”</p>	<p>boundaries are in accordance with the Settlement Boundary Review criteria (Appendix 2 of the <a href="#">submitted LPR (CD1)</a>.)</p> <p>The Plan needs to be read and interpreted as a whole, and all policies should be viewed together and not in isolation in the preparation and consideration of planning applications. This is made clear in paragraph 1.6 of the <a href="#">submitted LPR (CD1)</a>.</p> <p>Newbury Leisure Park was discussed at the Examination Hearing Session on 2 October 2024. Newbury Leisure Park was not identified as being recommended for inclusion within the settlement boundary because it did not meet the criteria for inclusion.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>



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	<p>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.</p> <p>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</p>	

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	<p>as much use as possible of previously-developed or ‘brownfield’ land”</p> <p>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...”</p> <p>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.”</p> <p>“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 ...”</p> <p>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</p>	

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	<p>that the report was prepared. The definition of the block is arbitrary, and not related to the land usage within them. For example, Parcel 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).</p> <p>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</p>	

Respondent	Summary of Main Issues	Council response
	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.	
<p>Tilehurst Parish Council</p> <p>Tony Linden</p> <p>Councillor Clive Taylor</p> <p>Leanne Taylor</p> <p>Steve Taylor</p>	<p><b>Tilehurst settlement boundary:</b> It seems the change of settlement boundary has been proposed primarily to increase the likelihood of the site being developed;</p> <p>There has been no consultation with Tilehurst Parish Council over the proposed change, nor has there been any consultation with the Neighbourhood Development Plan Steering Group;</p> <p>If the settlement boundary is to be changed, the Parish Council and communities affected should be properly consulted;</p> <p>The settlement boundary is intended to maintain a strategic gap between Tilehurst and neighbouring parishes.</p>	<p>Comments noted. The proposed change to the Tilehurst settlement boundary is as a consequence of the proposed allocation and is in accordance with the Settlement Boundary Review criteria (Appendix 2 of the <a href="#">submitted LPR (CD1)</a>.) The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
AWE & MOD	<p>AWE plc (and AWE plc on behalf of the Ministry of Defence (MOD)) welcomes the clarity of the amendments which the Inspector has included in the modifications.</p> <p>AWE and MOD accept that it is necessary to read and apply the plan as a whole. AWE and MOD, however, are mindful of first: the current formal Office for Nuclear Regulation (ONR) position in respect of the adequacy of the AWE Off Site Emergency Plan (OSEP) and their land use planning policy position on development which increases the population within the Detailed Emergency</p>	<p>Comments noted. The Plan should be read and interpreted as a whole. This is made clear in paragraph 1.6 of the <a href="#">submitted LPR (CD1)</a>.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed</p>

Respondent	Summary of Main Issues	Council response
	<p>Planning Zone and secondly that as recent appeal decisions have demonstrated it is important to take into account the potential cumulative impact of smaller scale developments and not just the impact of one development in isolation.</p> <p>The impacts of cumulative development may not always be immediately apparent, and it is not possible to evidence a tipping point where an OSEP which is adequate becomes inadequate. If such evidence of impact of one development on AWE's operations were to exist, the threat to AWE's operations would have already materialised and it is imperative to avoid reaching this point given the national and international importance and irreplaceable nature of the AWE sites. Cumulative development, by whatever means (except for the purposes of development of the AWE sites and facilities themselves), within a DEPZ leads to a rise in population within the DEPZ and a proportionate increase in the consequence should a radiation emergency occur.</p> <p>AWE and MOD are concerned that the importance of policy SP4 and its application to ALL policies and proposed development within the DEPZ should be restated where policies could lead to an increase in residential or non-residential population or activity. This should avoid any confusion and to avoid any suggestion that a proposal that complies with these policies but not SP4 is otherwise compliant with the plan as a whole such that a decision to grant planning permission is in accordance with the development plan. This could undermine the effectiveness of SP4 in protecting the current and future operations at AWE and public safety and therefore raises soundness concerns. AWE and MOD suggest that this soundness issue could easily be resolved by including the following text within the overall policy</p>	<p>Main Modification. No further changes are proposed to the LPR.</p>

Respondent	Summary of Main Issues	Council response
	<p><i>“Any development proposal, including regeneration and change in an existing built up areas or DEAs located within the Detailed Emergency Planning Zones for AWE must comply fully with policy SP4”.</i></p>	
Michael Hirst	<p><b>Pangbourne settlement boundary:</b> The Parish Council is concerned about the extension of the village settlement boundary but any development on the north side of Pangbourne Hill will require the settlement boundary to be extended. The inclusion of a buffer between existing housing and new housing far outweighs any concerns about the size of the overall village settlement boundary. Development should be repositioned to the opposite side of the field identifies in PMC15 Annex N</p>	<p>Comments noted. The proposed change to the Pangbourne settlement boundary is as a consequence of the proposed allocation and is in accordance with the Settlement Boundary Review criteria (Appendix 2 of the <a href="#">submitted LPR (CD1)</a>.) The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
Councillor Chris Read	<p><b>Thatcham settlement boundary:</b> The SP17 settlement boundary must be around the actual housing proposed of 2,500 and not the “green buffer”. As we have seen in Donnington and Hungerford the developer will only build further on the “green buffer”, with the potential for a further 2,000 houses and encroachment on the separate settlement of Upper Bucklebury.</p>	<p>Comments noted. <a href="#">PMC4</a> sets out the modification to the settlement boundary at Thatcham to exclude the site from the settlement boundary. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

Respondent	Summary of Main Issues	Council response
JPPC obo Mr & Mrs Fenton	<b>Pangbourne settlement boundary:</b> In principle objection due to the proposed site allocation at land north of Pangbourne Hill	Comments noted. The proposed change to the Pangbourne settlement boundary is as a consequence of the proposed allocation and is in accordance with the Settlement Boundary Review criteria (Appendix 2 of the <a href="#">submitted LPR (CD1)</a> .) The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.
Reading West Mid Berks Labour Party  Charles Croal	<b>Tilehurst settlement boundary:</b> worried that inclusion of the Retail Park within the settlement boundary may have the eventual result of this area switching from commercial use to domestic building land at a future date. I think this would be detrimental to the area and result in a loss of shopping facilities and employment opportunities for local residents.	Comments noted. The proposed change to the Tilehurst settlement boundary is as a consequence of the Inspector's Action Point AP47 contained within IN26 and is in accordance with the Settlement Boundary Review criteria (Appendix 2 of the <a href="#">submitted LPR (CD1)</a> .) The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further

Respondent	Summary of Main Issues	Council response
		changes are proposed to the LPR.
Atkins, Chris Carr, Eileen Carver, Linda Cheverton, Celestine Fleming, Maurice Hay, Helen Horne, Kevin Horne, Liz Kelly, Caroline Lau, Mr McManus-Fry, Ellen Pottinger, Emma Prior, Eileen Tuttle, Annmarie Vaughan, Anne Wilkinson-Flood, Karen Yau, Susanna Save Pincents Hill Group obo 30 individual representors	<b>Tilehurst settlement boundary:</b> In principle objection to extending the Tilehurst settlement boundary around the proposed allocated site at Pincents Lane.	Comments noted. The proposed change to the Tilehurst settlement boundary is as a consequence of the proposed allocation and is in accordance with the Settlement Boundary Review criteria (Appendix 2 of the <a href="#">submitted LPR (CD1)</a> .) The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.
Beeney, Nicola Betkowski, Mark Boon, Stuart Booth, Anne Booth, John Hallett, Florence Magnusson, Anna	<b>Tilehurst settlement boundary:</b> Opposes the inclusion of the proposed allocated site and the extension of the settlement boundary around it due to the loss of the independent characters of Tilehurst and Theale.	Comments noted. The proposed change to the Tilehurst settlement boundary is as a consequence of the proposed allocation and is in accordance with the Settlement Boundary Review criteria (Appendix 2 of the <a href="#">submitted LPR (CD1)</a> .) The



Respondent	Summary of Main Issues	Council response
		representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.
Collard, Simon & Christine	<b>Tilehurst settlement boundary:</b> It appears rather curious, and suspicious, the Settlement Boundary proposal to extend this Boundary is aimed solely at including this development.	Comments noted. The proposed change to the Tilehurst settlement boundary is as a consequence of the proposed allocation and is in accordance with the Settlement Boundary Review criteria (Appendix 2 of the <a href="#">submitted LPR (CD1)</a> .) The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.
Fitchett, Laura	<b>Tilehurst settlement boundary:</b> I am unhappy with the lack of consultation and awareness of the changes to shown people in the local area with regard to the proposal to extend the Tilehurst settlement boundary. I object to this, there is no need for this to be done apart from to add any development to Pincents Lane so that the council can easily add it as a housing development site with no formal consultation. The settlement boundary does not need to be changed.	Comments noted. The proposed change to the Tilehurst settlement boundary is as a consequence of the proposed allocation and is in accordance with the Settlement Boundary Review criteria (Appendix 2 of the <a href="#">submitted LPR (CD1)</a> .) The

Respondent	Summary of Main Issues	Council response
		representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.
Hewitt, Jennifer	<p><b>Tilehurst settlement boundary:</b> Historically, ‘settlement boundaries’ have provided the ‘legal backbone’ and structure to local planning policy. They assist to differentiate and to preserve defined boundaries between settlements thus preventing urban sprawl but they also direct development towards more sustainable locations in terms of accessibility, transport infrastructure, existing essential services and facilities. They also protect the countryside from the encroachment and help protect the natural environment and landscape. Historically these legal constructs have been abided by and complied with so I would argue that the inclusion of Pincents Hill is not ‘legally compliant’.</p> <p>A criterion for assessing ‘soundness’ is that the LPR is ‘positively prepared’ with a strategy which seeks to meet an area’s objectively assessed needs and is informed by agreement with other authorities. In this sense, it is clearly not ‘sound’. Local communities, many individuals, families, and representative councils have all rallied against this development through the many different applications over the past years. This development is not ‘needed’ and not wanted by the people who will be directly impacted by it. The strategy is clearly not ‘informed by agreement with other authorities’ as both West Berkshire Council and Tilehurst Parish Council have constantly and continually rejected this application.</p>	Comments noted. The proposed change to the Tilehurst settlement boundary is as a consequence of the proposed allocation and is in accordance with the Settlement Boundary Review criteria (Appendix 2 of the <a href="#">submitted LPR (CD1)</a> .) The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.

Respondent	Summary of Main Issues	Council response
Ludford, David & Sonia	<p><b>Tilehurst settlement boundary:</b> Pincents Hill is a strategic gap which clearly sets apart Tilehurst and Calcot from Theale. Any development in this location, would erode this strategic gap and would be inappropriate and completely out of character with the natural environment and rural atmosphere that exists. It would also breach the Council's policies which previously sought to retain current settlement patterns and boundaries.</p>	<p>Comments noted. The proposed change to the Tilehurst settlement boundary is as a consequence of the proposed allocation and is in accordance with the Settlement Boundary Review criteria (Appendix 2 of the <a href="#">submitted LPR (CD1)</a>.) The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
Barnes, Paul Brickley, Carol Broady, Sarah Chenery, Abby Connell, Julie Cox, Helen, Cox, Jayne Maulini, Hannah Muncer, Graham Payne, Audrey. Pearson, Maxine L Resident, J Spice, Jo Triggs, Fay Vian, Mr & Mrs	<p><b>Tilehurst settlement boundary:</b> Similar comments including - This change is a blatant attempt to bring the proposed Pincents Lane development into a position where the council can simply justify putting housing there without further consultation. I have noted that this also includes the Calcot Recreation Ground, therefore have to assume that at some point in the future, even this space could be considered for housing, otherwise why include them in the settlement boundary changes?            I can see from the TIL13 plans that a recreational space is to be included adjacent to the Pincents Lane site, which is somewhat commendable, but this can be seen as a potential move for building on the existing recreation ground. This is completely outrageous and is simply ear marking potential new sites for development without formal consultation further down the line.</p>	<p>Comments noted. The proposed change to the Tilehurst settlement boundary is as a consequence of the proposed allocation and is in accordance with the Settlement Boundary Review criteria (Appendix 2 of the <a href="#">submitted LPR (CD1)</a>.) The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

Respondent	Summary of Main Issues	Council response
White, Diane		
Ockenden, Alan	<p><b>Tilehurst settlement boundary:</b> I am very concerned to see that your proposal has expanded the area of planned building to take in land that was previously outside the building perimeter and now takes in land that is what has long been considered as greenbelt land including long established woodland.</p> <p>It seems that this change to incorporate this area in a planned building area is only being done to make a possible access to the area through this previous green belt land, and even expand building on a site that has and should be left as a natural green area as it has been for so long.</p>	<p>Comments noted. The proposed change to the Tilehurst settlement boundary is as a consequence of the proposed allocation and is in accordance with the Settlement Boundary Review criteria (Appendix 2 of the <a href="#">submitted LPR (CD1)</a>.) The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
Neame Sutton obo Donnington New Homes	<p><b>Densities:</b> Whilst Donnington Homes supports a density policy to ensure the efficient use of land, they are of the opinion that the proposed densities set out in Policy SP1 (Spatial Strategy) may not be appropriate (20dpha to 70dpha, depending on the location). MM3 proposes the introduction of a 20dpha density on sites within the AONB/Natural Landscapes which is still considered relatively restrictive given the potential requirements for sites allocated in the respective Neighbourhood Plans, particularly when considered together with the need for landscape-led design and the requirements of Policies SP18 (Housing Type and Mix), DM31 (Residential Amenity and Gardens) and DM44 (Car Parking and Cycle Storage) and their respective requirements for the use of the Nationally Described Space Standards (NDSS), M4(2) and M4(3) standards, cycle and bin storage, mix of homes, parking and EV</p>	<p>Comments noted. The issues raised have previously been considered and discussed as part of the Examination. No further changes are proposed to the LPR.</p>

Respondent	Summary of Main Issues	Council response
	<p>charging points, as well as the now mandatory BNG, and the need to utilise renewable sources of energy.</p> <p>The densities proposed together with the development control criteria outlined above, may impact the type, size and tenure of homes provided, resulting in the Council being unable to provide an appropriate housing mix across West Berkshire, and the homes that are being delivered, unable to satisfy the need of the district. Donnington New Homes considers that the minimum net densities should be reduced, and that flexibility be included in relation to density to allow the site requirements to be considered individually and in the context of their allocations.</p>	
Nexus obo Croudace Homes	<p><b>Thatcham settlement boundary:</b> Whilst the amendments made to PMC4 seek to reflect the new site allocations to the north of Thatcham and incorporate this future development into the settlement boundary, Croudace considers it to be critical to the consideration of a future planning application on Land at Henwick Park, that the settlement boundary accurately reflects development as will be brought forward by the forthcoming full planning application.</p> <p>Given the site is allocated for approximately 225 units under Policy RSAX, and Croudace will be submitting an application for 236 dwellings in the immediate term, the area of developable land (i.e. land within the settlement boundary) should allow for this level of development. The quantum to be proposed has been tested by technical consultants and against emerging development management policy requirements, demonstrating that the site is capable of delivering 236 dwellings and supporting infrastructure. Further to this, Croudace sought formal pre-application advice from the Council in November 2024 as described above and a written response was issued in December 2024, for development</p>	<p>Comments noted.</p> <p>The Plan needs to be read and interpreted as a whole, and all policies should be viewed together and not in isolation in the preparation and consideration of planning applications. This is made clear in paragraph 1.6 of the <a href="#">submitted LPR (CD1)</a>. The Council therefore agrees that some further clarification with regard to the settlement boundary would be helpful in order to avoid future policy conflict.</p> <p>In MM42, Criterion (f) (i) of the policy requires that no development must take place above the 95-metre AOD contour. The map included within Annex D</p>

Respondent	Summary of Main Issues	Council response
	<p>described as: <i>“Full planning application for 250 dwellings (Use Class C3), public open space including parking and equipped play areas; access from Bowling Green Road and Cold Ash Hill; internal highways and vehicle parking; landscaping; sustainable drainage systems; and associated infrastructure.”</i></p> <p>The Council’s feedback covered a range of technical matters, including layout and density, highways, ecology, arboriculture and landscape. In response, Croudace has revised the proposed development, reducing the number of dwellings, and it is now considered that 236 dwellings can be brought forward at Henwick Park whilst complying with the specific requirements set out within Policy RSAX alongside the other relevant Local Plan Review policies.</p> <p>The Site Plan for the forthcoming planning application (attached at Appendix 1 to <b>rep</b>) and Croudace considers that the proposed new settlement boundary should accurately reflect the proposed developed area as shown by this plan to avoid future policy conflict.</p> <p><b>Density:</b> MM3 proposes amendments to the sixth paragraph of Policy SP1, so that it will read:  <i>“In making optimum use of land and achieving high quality design density on individual sites will vary according to their location and context, size of developable area and site specific issues such as shape and access: ...</i></p> <p><input type="checkbox"/> <i>Within Newbury, Thatcham, Tilehurst, Purley on Thames, and Calcot, developments are expected to secure a net density of at least 35 dwellings per hectare with densities of at least 70 dwellings per hectare in town centres and for flatted developments along main transport routes and close to transport nodes; ...</i></p>	<p>of the Schedule of Proposed Main Modifications shows the landscape buffer which has been drawn around the 95-metre AOD contour. It has come to the Council’s attention however that the contour data supplied to the Council contains a small inaccuracy at Henwick Park in the top right of the site. A digital terrain model has now been used to identify the correct positioning of the 95-metre AOD contour. It should be noted that elsewhere, the digital terrain model and contour data align.</p> <p>For clarification and factual accuracy, the Council therefore proposes a further modification to the landscape buffer on the indicative Henwick Park map to accurately reflect the 95-metre AOD contour, and the extent of the gap between settlements identified in policy DM2.</p> <p>This will also necessitate a further consequential modification to MM3 and the settlement boundary shown on the Policies Map under PMC4 to accurately</p>

Respondent	Summary of Main Issues	Council response
	<p>□ <i>Developments on the edge of defined settlements are generally expected to secure a net density of 30 dwellings per hectare outside of the AONB, and 20 dwellings per hectare within the AONB...</i></p> <p>Should the Council consider that the site is located within Thatcham (i.e. within the settlement boundary) where a net density of at least 35 dwellings per hectare is applicable, Croudace would argue that devising a scheme which meets this policy requirement could result in the overdevelopment of the site, as advised through the aforementioned pre-application discussions. It is therefore suggested that the policy requirement should reference 'approximately' 35 dph rather than 'at least' 35 dph to allow site specific flexibility.</p>	<p>reflect the 95-metre AOD contour and policy DM2. This is shown in Annex A below.</p> <p>The other issues raised have previously been considered and discussed as part of the Examination. No further changes are proposed to the LPR.</p>
Nexus obo Pangbourne Beavers	<p>Policy SP1 establishes the overarching spatial strategy for West Berkshire and was discussed at length during the examination hearing sessions.</p> <p>MM3 proposes to make some relatively limited amendments to the policy wording and, on the whole, we take no issue with these changes. Indeed, we support the Council's confirmation that the references in Policy SP1 to how the development of land within and outside the identified settlement boundaries will be treated in policy terms, will have regard to the amended settlement boundaries now proposed as a consequence of these Modifications. These Proposals Map Changes include, by way of example, a change to the settlement boundary at Pangbourne to reflect the allocation of Land North of Pangbourne Hill (MM57 and illustrated on the Proposed Changes to the Policies Map [PMC3]). Whilst we agree with these changes in principle, and support the allocation of Land North of Pangbourne Hill, we consider that:</p>	<p>Comments noted. The issues raised have previously been considered and discussed as part of the Examination. No further changes are proposed to the LPR.</p>

Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>• the wording of Policy SP1 (as modified) relevant to density is contrary to the Council’s own over-arching objective in this regard (although it is easily rectified); and</li> <li>• the revised settlement boundaries as referenced in MM3, and specifically that proposed at Pangbourne to reflect the allocation of Land North of Pangbourne Hill as shown at PMC3), is not effective or justified and should be amended (albeit that this is again very easily rectified). We expand upon these two issues below.</li> </ul> <p><b>Density:</b> MM3 proposed to amend the sixth paragraph of Policy SP1 to clarify further the general policy approach to residential density. This amended sixth paragraph starts by establishing that the Council’s overarching objective in relation to density is to make <i>‘optimum use of land’</i> and to achieve <i>‘high quality design’</i>. We agree that these are important objectives. In the context of this overarching objective in relation to density, Policy SP1 subsequently identifies minimum net residential densities within the settlements of Newbury, Thatcham, Purley on Thames and Calcot. It similarly identifies minimum net densities in the centres of Hungerford, Pangbourne and Theale. On the edge of settlements, Policy SP1 (as amended by MM3) states that densities should be 30 dwellings per hectare (“dph”) outside the AONB / National Landscape, and 20 dph within it. Given the specific overarching objective identified in Policy SP1 / MM3 i.e. to make optimum use of land and achieve high quality design, and to ensure internal consistency within the policy itself (noting that in all other cases the densities referenced are, rightly in our view, expressed as minima), we consider that the references to 30dph and 20dph on the edge of defined settlements, as referenced in the third bullet point of the policy, should (like the references in bullet points 1 and 2) be expressed as minimum net densities.</p>	



Respondent	Summary of Main Issues	Council response
	<p><b>Amended Pangbourne Settlement Boundary:</b> To reflect the proposed allocation of Land North of Pangbourne Hill for approximately 25 homes (MM57), the Council proposes to do two things: to identify that allocation on the Proposals Map (see PMC15), and to make a consequent change to the settlement boundary at Pangbourne (see PMC3). We fully support the allocation of this site for development as set out in MM57 and PMC15. We also support the consequential need to amend the settlement boundary at Pangbourne (noting that Policy SP1 confirms the fundamentally different policy basis upon which development within settlement boundaries should be assessed relative to that outside settlement boundaries). However, the revised settlement boundary at Pangbourne (PM3) creates an unnecessary conflict with both the terms of the allocation of Land North of Pangbourne Hill (see MM57) and the site allocation as proposed to be identified (PMC3), and this could undermine the effectiveness of the site allocation policy. It should additionally be noted that an indicative plan showing the site allocation is proposed to be included within the Local Plan itself (Annex G of the Proposed Modifications document). For ease of reference, and to identify our concern more clearly we set out below the Pangbourne settlement boundary as proposed to be amended (PMC3) and the indicative site allocation plan included at Annex G of the Modifications document. As can be seen, the indicative site allocation plan (Annex G) shows the boundary of the allocation in red, a significant landscape buffer hatched in green, and the indicative area for residential development as white land within the allocation. MM57 is clear that the site allocation map at Annex G is 'indicative' i.e. it (rightly and consistently with other proposed</p>	

Respondent	Summary of Main Issues	Council response
	<p>allocations) allows for a degree of flexibility at the planning application stage.</p> <p><b>PMC3 Annex G:</b> However, in defining the new settlement boundary at Pangbourne in PMC3, rather than following the 'Site Boundary' of the allocation as shown at Annex G, the Council instead proposes to follow the indicative eastern boundary for the landscape buffer. Basing what would be a definitive settlement boundary for Pangbourne on an indicative boundary between a landscape buffer and residential development, creates an inherent and unnecessary potential conflict that undermines the effectiveness (and therefore soundness) of the allocation policy. To illustrate the concern, an application proposal for 25 homes i.e. in accordance with the approximate quantum identified in MM57), and that met all of the other policy criteria, could, depending on the approach to design / housing mix / open space provision etc..., have a small element of that development (part of a house, part of road or driveway, or a play area, for example) that extends slightly further west than shown on the map at Annex G of the Modifications document. In doing so, however, it would still accord with Annex G given that this diagram is indicative. However, if the settlement boundary is drawn as proposed in PMC3, such an approach would result in a small amount of that development being located outside the settlement boundary. Given the policy of development restraint outside of settlement boundaries, this policy conflict would then need to be wrestled with by Officers / Members at the development management stage. This lack of clarity is, however, wholly avoidable with a very simple change to the Policies Map (PMC3). If the revised settlement boundary is drawn in a way that is consistent with the red line 'Site Boundary' a shown at Annex G (and on the plan at PMC15), clarity and consistency</p>	

Respondent	Summary of Main Issues	Council response
	<p>would be achieved whilst, importantly, not undermining the Council’s clear intentions for the site, noting that the site allocation policy (MM57) is clear that:</p> <ul style="list-style-type: none"> <li>• housing numbers must be limited to approximately 25 homes; and</li> <li>• development must take place in a form that is consistent with the indicative plan at Annex G of the Modifications document i.e. with built development on the eastern lower parts of the site and a significant landscape buffer to the west. MM57 criterion f) is also clear that housing must be limited to the lower slopes on the eastern side of the site with a landscape buffer to the west.</li> </ul> <p>This simply but important amendment would avoid an unnecessary complication / delay at the development management stage, thereby ensuring that the Plan is effective, whilst in no way ‘watering down’ the restrictive elements of the policy as set out in detail in MM57. Such a change is necessary to ensure compliance with paragraph 16d) of the Framework that requires that Local Plans should be “...clearly written and unambiguous, so it is evident how a decision maker should react to development”.</p> <p>Policy SP1 should be updated to:</p> <ul style="list-style-type: none"> <li>• Amend the sixth bullet point of paragraph 6 (as modified by MM3) to state that: “Developments on the edge of defined settlements are generally expected to secure a net density of <b>at least</b> 30 dwellings per hectare outside of the AONB, and <b>at least</b> 20 dwellings per hectare within the AONB.”</li> </ul> <p>The Proposals Map (PMC3) should consequently be amended to:</p> <ul style="list-style-type: none"> <li>• establish the revised settlement boundary for Pangbourne in a way that is consistent with the ‘Site Boundary’ for Land North of Pangbourne Hill as shown on the plan at Annex G of the Modifications document (and PMC15).</li> </ul>	

Respondent	Summary of Main Issues	Council response
Jane Parkin	<b>Chieveley settlement boundary:</b> Supports the proposed change set out in PMC1	Support noted
Paula Saunderson	<p>MM3 includes in the 6<sup>th</sup> paragraph of policy SP1 the wording <i>“in making optimum use of land and achieving high quality design”</i>. This is hard to justify because the Council does not have any guide or codes to ensure quality design. Nor does the Council have a SPD for residential / mixed sites, or LDO for the Designated Employment Areas.</p> <p>No equivalent of the National Guide or National Design Code in the Plan. These documents should be used to guide decisions on applications in the absence of locally produced design guides or codes. Paragraph 4.17 should be strengthened through the inclusion of the wording <i>‘via National Design Guide (2019) and Nation Model Design Code (2021) as amended or local equivalent adopted Guide and Code’</i>.</p> <p>Policy SP1 states that <i>‘density on individual sites will vary according to their location and context, size of developable area and site specific issues such as shape and access:....Within Newbury, Thatcham, Tilehurst, Purley on Thames, and Calcot’</i></p> <p>The exclusion of brownfield sites in Newbury from the Plan will mean that it will be difficult to control or direct the overall densities of developments in Newbury town centre. There is already an oversupply of flatted developments, with more forthcoming.</p> <p>The 7<sup>th</sup> paragraph of policy SP1 comments that <i>“developments are expected to secure a net density of at least 35 dwellings per hectare with densities of at least 70 dwellings per hectare in town centres and for flatted developments along main transport routes and close to transport nodes.”</i></p> <p>The omission of brownfield sites from the Plan means that there are windfall proposals for flatted developments of over 160 per</p>	<p>Comments noted. The Plan needs to be read and interpreted as a whole, and all policies should be viewed together and not in isolation in the preparation and consideration of planning applications. This is made clear in paragraph 1.6 of the <a href="#">submitted LPR (CD1)</a>.</p> <p>The issues raised have previously been considered and discussed as part of the Examination. No further changes are proposed to the LPR.</p>

Respondent	Summary of Main Issues	Council response
	<p>hectare in multi-storey buildings (8 storeys). There is no tall buildings policy nor build-to-rent policy – had the Kennet Centre been included as an allocation within the Plan, then these would have also been included within the Plan.</p> <p>There is no masterplan SPD nor development plan document to provide a detailed regeneration strategy for the Kennet Centre. The site should have been an allocation within the Plan. Development proposals for the Kennet Centre were recently refused, with an appeal and possible alternative scheme forthcoming.</p>	
Pro Vision obo Wasing Estate	<p><b>Settlement boundaries:</b> We note the amendments to the settlement boundaries referenced in the fourth paragraph of the policy and while we have no specific objections to those amendments, we remain concerned that the spatial strategy and settlement hierarchy will not provide adequate opportunity for smaller, sustainable, rural villages which are deemed to fall below the service village level, to grow and prosper. The strategy does not therefore promote sustainable rural communities. This is inconsistent with the NPPF. We consider that the settlement boundaries of Aldermaston Wharf and Brimpton should have also been amended to include allocations which are appropriate to deliver housing opportunities to meet local needs in these villages as outlined in our Regulations 19 representations and Hearings/ Matter 3 Statement.</p> <p>We object to the narrow focus of the new text inserted under ‘Eastern Area’ which identifies the focus for housing development to be within the Eastern “<i>Urban</i>” Area “<i>through existing commitments, allocated sites and regeneration and change in the existing built up area</i>”. This is an example of how the current strategy fails to adequately consider and provide for the housing</p>	<p>Comments noted. The issues raised have previously been considered and discussed as part of the Examination.</p> <p>No further changes are proposed to the LPR.</p>

Respondent	Summary of Main Issues	Council response
	<p>need and growth for the rural areas/ smaller villages and their communities where they fall below the service village level.</p> <p><i>Support (part)</i></p> <p><b>Densities:</b> We support the updated text in paragraph 6 which states “In making optimum use of land and achieving high quality design, density on individual sites will vary according to location and context, size of developable area and site-specific issue an access”.</p> <p>In summary, it remains the Wasing Estates strong view that this Local Plan fails to recognise the needs of rural communities and fails to plan to support sustainable growth in these areas. This will inevitably lead to a continual decline of local services in these areas and will make it increasingly difficult for rural businesses to attract and retain staff due to the lack of housing opportunities.</p>	
Prosper Infinity Ltd	<p>With regards the inclusion of Colthrop Industrial Estate within the settlement boundary, we wholly support the representation made by Thatcham Town Council. The documentation for the Examination 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) 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 wish to particularly highlight the need to include Newbury Leisure Park within the settlement boundary as it’s unarguably previously developed land, and is situated adjacent to the settlement boundary and already consists of residential property within the site (Moorstream Cottage).</p>	<p>Comments noted. The issues raised have previously been considered and discussed as part of the Examination. Newbury Leisure Park was discussed at the Examination Hearing Session on 2 October 2024.</p> <p>As part of the preparation of the LPR, a review of the district’s settlement boundaries was undertaken and this is set out within the Settlement Boundary Review Background Paper (<a href="#">SET9</a>). Newbury Leisure Park was not identified as being</p>

Respondent	Summary of Main Issues	Council response
	<p>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. The Settlement Boundary for Thatcham should be expanded, to include the area of the Newbury Leisure Park. This is a site which has a disused leisure complex and separate, detached residential dwellings (Moorstream Cottage) built on it since 1970s.</p> <p>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”</p> <p>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...”</p> <p>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</p>	<p>recommended for inclusion within the settlement boundary because it did not meet the criteria for inclusion.</p> <p>No further changes are proposed to the LPR.</p>

Respondent	Summary of Main Issues	Council response
	<p>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.”</p> <p>“Specific issues to be considered on a site-by-site basis:  ... Employment and leisure use located on the edge of settlements will be considered according to their scale, functionality, visual and physical relationship to the settlement ...”</p> <p>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. It does not mention existing residential dwellings on it (Moorstream Cottage). 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.</p> <p>There is no evidence in the report that the consultants considered the nature and status of the Newbury Leisure Park. For settlement boundary reviews over 40 years, the exclusion of Newbury Leisure Park within the settlement boundary has been erroneous, and yet the previous LDP identified this as a leisure facility for Newbury and Thatcham. It was an error that it was not provided to be within scope of this study. 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.</p> <p>We also note that the garden centre adjacent to the A4/Tull Way roundabout, which is site THA12 is within the settlement boundary,</p>	

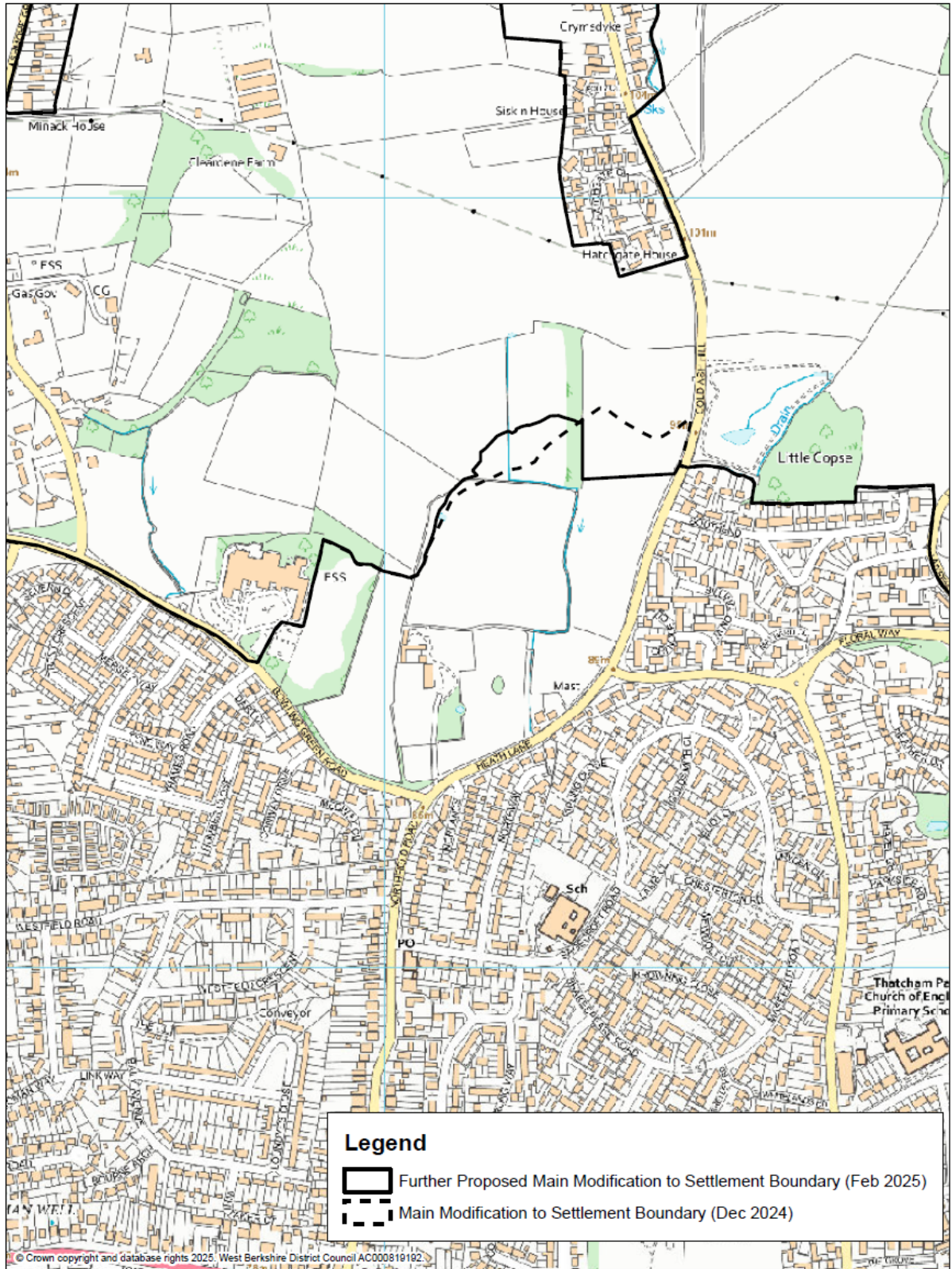


Respondent	Summary of Main Issues	Council response
	<p>despite being outside of the current residential area of the town and immediately adjacent to the gap between Thatcham and Newbury defined by Policy DM2 and the Policies Map (both before and after the proposed amendment).</p> <p>The Inspector has 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. The plan trajectory fails to meet its target for Housing, and Newbury Leisure Park is immediately deliverable and achievable within 18 months. It seems inconceivable that Newbury Leisure Park would not be allocated for upto 100 homes as it is previously developed land and would be sustainable on Lower Way, a residential road. As was discussed during Examination, the current use for the site as a leisure park has not been financially viable for several years. The site is therefore previously developed land. It follows that the case for including Newbury Leisure Park within the settlement boundary is stronger 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.</p>	

Respondent	Summary of Main Issues	Council response
Thakeham	<p><b>Densities:</b> Whilst Thakeham is supportive of densities varying across the Borough; it is important that densities of Sites make efficient use of land as set out in paragraph 129 of the NPPF and reflect the local area rather than following a prescriptive density requirement. The wording of the proposed modification should ensure flexibility and judgment on a site-by-site basis; therefore ensuring that efficient use of land is achieved, whilst reflecting the local character.</p> <p>Thakeham therefore proposes the following amendments.  <i>Developments on the edge of defined settlements are generally expected to secure a net density of <b>approximately 30 dwellings per hectare outside of the AONB, and approximately 20 dwellings per hectare within the AONB. Densities should reflect the local character and make efficient use of land.</b></i></p>	<p>Comments noted. The issues raised have previously been considered and discussed as part of the Examination.</p> <p>The Plan needs to be read and interpreted as a whole, and all policies should be viewed together and not in isolation in the preparation and consideration of planning applications. This is made clear in paragraph 1.6 of the <a href="#">submitted LPR (CD1)</a>.</p> <p>No further changes are proposed to the LPR.</p>
TOWN obo Pincents Lane	<p><b>Tilehurst settlement boundary:</b> The proposed Main Modification is necessary in order to facilitate the allocation of new sites including TIL13, land to the east of Pincents Lane which are vital in order to render the Plan sound.</p>	Support noted
Walsingham Planning obo Colthrop Village Consortium	<p><b>Thatcham settlement boundary:</b> The inclusion of the Colthrop Industrial Estate within the Thatcham settlement boundary is supported.</p>	Support noted

**ANNEX A**

**Proposed Further Change to the Thatcham Settlement Boundary under PMC4**



Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM4	19	Policy SP2 AONB	5

Respondent	Summary of Main Issues	Council response
Natural England	Natural England welcome MM4 to Policy SP2 to amend the policy by adding a new second paragraph as follows: <i>“Development in the setting of the AONB will be required to have regard to the interrelationship with the AONB and its landscape character and special qualities. Proposals will be required to be sensitively located and designed to avoid or minimise any adverse impacts on the AONB.”</i> We encourage your authority to apply the requirements of this policy to SP17.	Support noted
Thatcham Town Council David Bridle	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	Comments noted. The Council refers to its response to the same comments made under the SA/SEA. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.

Respondent	Summary of Main Issues	Council response
	<p>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.</p>	
Chris Avery	<p>The Inspector's report highlighted weaknesses in the plan's approach to the AONB status requiring the amendment of Policy SP2 and RSA17. The consequent amendments to RSA17 makes no mention of maintaining the settlement boundary. I am aware that outline planning has been granted with respect to this area and that it differs considerably from the original outline in the plan. In particular, while the plan proposes what is essentially "infill" along East Lane, in accordance with the existing settlement boundary, the outline planning consent represents a considerable departure from the settlement boundary, yet another breach of the AONB designation. It</p>	<p>Comments noted. The Council refers to its response to the same comments made under the MM59. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further</p>

Respondent	Summary of Main Issues	Council response
	<p>is clear that, from the outset, the council has failed to consider and properly apply the ANOB designation when putting forward this site as suitable for housing development. It is also clear that, when they did so, it was without any actual consideration of the practicalities of building houses here and, very probably, without anyone actually visiting the site. The amendments to RSA17 suggest an attempt to fix what was, from the very beginning, a flawed proposal. It is entirely unclear what the justification is for departing from the AONB designation and essentially undermining the protected village character of Chieveley for what, in the overall context of the LP, is a small number of dwellings. The proposal to designate this area for housing should be withdrawn.</p>	<p>changes are proposed to the LPR.</p>
Thakeham	<p>Thakeham supports the additional second paragraph within Policy SP2 which confirms that development within the North Wessex Downs National Landscape (AONB) must have regard to the interrelationship with the AONB and its landscape character and special qualities. This aligns with national policy, which looks to ensure that where development occurs within the AONB, it is sensitively located and is designed to avoid or minimise any adverse impacts on the AONB.</p>	<p>Support noted</p>

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM5	19-20	Supporting text to policy SP2	10

Respondent	Summary of Main Issues	Council response
Natural England	Supports the addition of the text after paragraph 4.24 in relation to the setting of the North Wessex Downs National Landscape (AONB). Encourages the Council to apply the requirements to policy SP17.	Support noted
Hungerford Town Council	Supports the reference to Neighbourhood Plans to clarify the exceptional circumstances necessary for any allocation of a major development in the National Landscape.	Support noted
Thatcham Town Council David Bridle	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."	Comments noted. The Council refers to its response to the same comments made under the SA/SEA. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.

Respondent	Summary of Main Issues	Council response
	<p>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.</p>	
Chris Avery	<p>The Inspector’s report highlighted weaknesses in the plan’s approach to the AONB status requiring the amendment of Policy SP2 and RSA17. The consequent amendments to RSA17 makes no mention of maintaining the settlement boundary. I am aware that outline planning has been granted with respect to this area and that it differs considerably from the original outline in the plan. In particular, while the plan proposes what is essentially “infill” along East Lane, in accordance with the existing settlement boundary, the outline planning consent represents a considerable departure from the settlement boundary, yet another breach of the AONB designation. It is clear that, from the outset, the council has failed to consider and properly apply the ANOB designation when putting forward this site as suitable for housing development. It is also clear that,</p>	<p>Comments noted. The Council refers to its response to the same comments made under the MM59.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>



Respondent	Summary of Main Issues	Council response
	<p>when they did so, it was without any actual consideration of the practicalities of building houses here and, very probably, without anyone actually visiting the site. The amendments to RSA17 suggest an attempt to fix what was, from the very beginning, a flawed proposal. It is entirely unclear what the justification is for departing from the AONB designation and essentially undermining the protected village character of Chieveley for what, in the overall context of the LP, is a small number of dwellings. The proposal to designate this area for housing should be withdrawn.</p>	
Paula Saunderson	<p>Sir, whilst one assumes these words relate to NDPs within the Natural Landscapes I am not sure whether these 2 Principles are repeated elsewhere for our <b>Urban Areas</b>, so please can we make sure they are. Villages in the Natural Landscape do not necessarily have the Parish Council or Volunteer Resources to produce a Neighbourhood Development Plan so I think this is an unjust Statement.</p> <p>Due to the Confusion that currently exists over Site Allocation within NDPs we need to ensure we are Very Clear going forward.</p> <p>In all the mentions for NDPs in various places under various Policies I believe there could be confusion over the Terms Strategic Site and Major Sites. We need a clear Definition of what can be included or excluded within an NDP for the various Settlement Hierarchy types of Villages and Urban Areas. A simple Table in one of the Policies would make this clearer. There is an awful lot of repetition on NDP Policy so, given the importance, may be there should be One Policy on this substantial Matter Arising?</p> <p>Currently every Site that comes forward for Newbury is forced to be a WINDFALL SITE, and the exclusion of these Sites forces a sort of Greenfields approach to assure a Land Supply that is not under Windfall?</p>	<p>Comments noted.</p> <p>The issues raised have previously been considered and discussed as part of the Examination and will be considered again as part of the preparation of the next Local Plan. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

Respondent	Summary of Main Issues	Council response
	<p>This Greenfields Approach is not currently affecting our Natural Landscapes however, as pressure to increase dwellings increases, so will the pressures to build on our Green Farmlands in the Natural Landscapes and abutting the Natural Landscapes. I can foresee a scenario where a Natural Landscape puts forward a desired Housing Number like the National Parks do and says where these would be best located to support Growth In Rural Employment. In fact, I don't know why this does not currently seem to happen?</p> <p>In the future, assuming more Sites in National Landscape Villages is allowed and planned for around Employment and Growth, having huge unplanned Windfalls from Major Sites in Urban Areas could possibly lead to over supply overall?</p> <p>As happened in the October Sessions 4 Greenfield Sites were added in when the PDL of Kennet Centre/Eagle Quarter and Land at 20 - 28A Pound Street, Newbury (Jewsons Yard) 23/02782/FULMAJ decided in Sept 2024, would have provided near the numbers required with far more realistic expectation of delivering within 5 years.</p>	
Bell Cornwell obo Central Corporation (WHM) Ltd	It is contested that the Council has not demonstrated the exceptional circumstances which justify allocating the sites identified in the LPR within the AONB. As there are alternative sites outside of the AONB such as RSA10 that should be considered first.	Comments noted. The issues raised have previously been considered and discussed as part of the Examination. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.
Neame Sutton obo Donnington New Homes	Donnington New Homes supports the insertion of the proposed new paragraphs, which recognise that sites that meet the requirements of the	Support noted

Respondent	Summary of Main Issues	Council response
	allocation in Neighbourhood Plans will be considered in accordance and consistent with the development plan and national policy.	
Nexus obo Pangbourne Beavers	<p>We support the amendments in MM5 that, further to discussions during the examination hearing sessions, insert additional wording into the supporting text to Policy SP2 to make it clear that:</p> <ul style="list-style-type: none"> <li>• the Local Plan Review process confirms that the Council has demonstrated that exceptional circumstances exist in the context of West Berkshire to justify the allocation of sites for housing within the AONB; and</li> <li>• accordingly, proposals that meet the requirements of the relevant site allocation policies (and any other relevant policies) are deemed to accord with the development plan and national policy.</li> </ul> <p>MM5 makes it clear, in a way that is consistent with national guidance (paragraph 16 (d) of the Framework 2024) that requires policies to be clearly written and unambiguous so it is evident how a decision maker should react to development proposals, that the necessary exceptional circumstances have been demonstrated as part of the Local Plan Review process to justify the allocation of sites in the AONB area for housing and, accordingly, that this is not a test that needs to be applied again at the development management stage.</p>	Support noted
Thakeham	<p>Thakeham supports the proposed modification and the clarification it provides that the allocation of a site through a Neighbourhood Plan provides the exceptional circumstances necessary to allow permission within the North Wessex Downs National Landscape (AONB). The proposed supporting text also confirms that applications that meet the requirements of the allocation and the policies within the development plan relevant to its determination, would be seen in accordance with the development plan and consistent with national policy. This policy therefore ensures that exceptional circumstances does not need to be justified through an application on an allocated site.</p>	Support noted

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM6	21-22	Policy SP3 Settlement hierarchy	5

Respondent	Summary of Main Issues	Council response
AWE & MOD	<p>AWE plc (and AWE plc on behalf of the Ministry of Defence (MOD)) welcomes the clarity of the amendments which the Inspector has included in the modifications.</p> <p>AWE and MOD accept that it is necessary to read and apply the plan as a whole. AWE and MOD, however, are mindful of first: the current formal Office for Nuclear Regulation (ONR) position in respect of the adequacy of the AWE Off Site Emergency Plan (OSEP) and their land use planning policy position on development which increases the population within the Detailed Emergency Planning Zone and secondly that as recent appeal decisions have demonstrated it is important to take into account the potential cumulative impact of smaller scale developments and not just the impact of one development in isolation.</p> <p>The impacts of cumulative development may not always be immediately apparent, and it is not possible to evidence a tipping point where an OSEP which is adequate becomes inadequate. If such evidence of impact of one development on AWE's operations were to exist, the threat to AWE's operations would have already materialised and it is imperative to avoid reaching this point given the national and international importance and irreplaceable nature of the AWE sites.</p> <p>Cumulative development, by whatever means (except for the purposes of development of the AWE sites and facilities themselves), within a DEPZ leads to a rise in population within the DEPZ and a proportionate increase in the consequence should a radiation emergency occur.</p> <p>AWE and MOD are concerned that the importance of policy SP4 and its application to ALL policies and proposed development within the DEPZ should be restated where policies could lead to an increase in residential</p>	<p>Comments noted. The Plan should be read and interpreted as a whole. This is made clear in paragraph 1.6 of the <u>submitted LPR (CD1)</u>.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

Respondent	Summary of Main Issues	Council response
	<p>or non-residential population or activity. This should avoid any confusion and to avoid any suggestion that a proposal that complies with these policies but not SP4 is otherwise compliant with the plan as a whole such that a decision to grant planning permission is in accordance with the development plan. This could undermine the effectiveness of SP4 in protecting the current and future operations at AWE and public safety and therefore raises soundness concerns. AWE and MOD suggest that this soundness issue could easily be resolved by including the following text within the overall policy</p> <p><i>“Any strategic / non-strategic sites for housing and economic development proposed through other policies and / or neighbourhood plans which are located within AWE’s DEPZs, must comply fully with policy SP4 whether or not they are located within Urban Areas, Rural Service Centres and Service Villages”.</i></p>	
Paula Saunderson	<p>This Local Plan Review would be more in line with the NPPF and more meaningful if it included Key Redevelopment Sites for Newbury that have been under discussion for years and now feel like huge Gaps in this LPR 2023-2041. As identified above Non-Allocation is forcing higher Windfall Rates and lack of proper Town Planning. These sorts of Major Sites are not forced into Neighbourhood Plans by other LPAs. The Newbury NDP has made slow progress to date – not surprising given the confusion- and it has within it the Assumption it will be a NON-Allocating Plan. I contend given the desire to increase the Densification of this Major Town the word exceptional should be removed as it should be the norm to Allocate Key Non-Strategic Major Town and Urban Sites, either within an LPA Wide Local Plan (such as this LPR) or within an NDP.</p>	<p>Comments noted. The issues raised have previously been considered and discussed as part of the Examination and will be considered again as part of the preparation of the next Local Plan. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

Respondent	Summary of Main Issues	Council response
Pro Vision obo CALA Homes	<p>We support the amendment to the policy text to clarify that site allocations can come through “the LPR and/or neighbourhood plans”. We support proposed new paragraph that explains that site allocations in neighbourhood plans under this LPR “must be located either within and/or adjoining the settlement boundaries of Urban Areas, Rural Service Centres and Service Villages”. This is consistent with MM18.</p>	Support noted
Pro Vision obo Wasing Estate	<p>The main modifications to this policy do not address our previous concerns that the policy fails to correctly categorise and recognise Aldermaston Wharf as a Service Village, thus rendering housing sites available for development in Aldermaston Wharf to be unsustainable and ruled out for allocation before they have even been considered. Our objections to this were discussed in detail in our Regulation 19 and Hearings/ Matters Statement 3. Aldermaston Wharf, and Brimpton both benefit from some services and facilities, as recognised by the Council in their evidence base, making it incorrect that these settlements are categorised as ‘unsustainable’.</p> <p>The settlement hierarchy continues to fail to adequately support provision for much needed housing in the District’s rural towns and villages. The level of development which the plan permits in Aldermaston Wharf and Brimpton, both of which are classed as smaller settlements and fall “below the hierarchy” is not sufficient to support the growth required to ensure these villages remain sustainable.</p> <p>Our clients land at BRIM1: Land East of Manor Farm, Brimpton and BRIM2: Land west of Manor Farm, Brimpton along with ALD5: Land west of Basingstoke Road, Aldermaston Wharf are available and suitable for residential development and their development would be consistent with the NPPF. The settlement boundaries of Aldermaston Wharf and Brimpton could be extended to include these sites enabling sustainable growth to these villages. Further details are set out in our Regulation 19 representations and Hearing Statement/Matters.</p>	<p>Comments noted.</p> <p>The issues raised have previously been considered and discussed as part of the Examination and will be considered again as part of the preparation of the next Local Plan. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

Respondent	Summary of Main Issues	Council response
	<p>We object to the text inserted which identifies that Neighbourhood Plans can only allocate nonstrategic sites for development where they are “<i>within and/or adjoining the settlement boundaries of Urban Areas, Rural Service Centres or Service Villages</i>”. This continues to preclude smaller villages like Aldermaston Wharf and Brimpton from identifying sustainable opportunities for growth to support the local housing need should a neighbourhood plan come forward in these areas. This paragraph should be amended to say “<u><i>within and/ or adjoining settlement boundaries where it can be demonstrated that the site would contribute to meeting local needs and the achievement of sustainable development</i></u>” thus deleting the reference to Urban Areas, Rural Service Centres and Service Villages.</p>	
Thakeham	<p>Thakeham support the inclusion of the new paragraph at the end of Policy SP3 as it helps promote that Neighbourhood Plans can allocate non-strategic sites for development that are located either within and/or adjoining settlement boundaries; as the push for Neighbourhood Plans to allocate residential development will help ensure that the Council meets its housing need. The clarification that Neighbourhood Plans cannot allocate strategic sites is also beneficial as larger strategic sites require additional consideration and more detailed examination such as that Local Plans are put through. Ensuring Neighbourhood Plans do not allocate strategic sites also ensures that the Neighbourhood Plan-making process can proceed at a quicker rate as larger sites have the potential to delay the process due to the additional evidence base required; which can also be costly for qualifying bodies.</p>	Support noted

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM7	22	Supporting text to policy SP3	4

Respondent	Summary of Main Issues	Council response
Hungerford Town Council	<p>Query the statement that non-strategic allocations within a settlement boundary do not count towards the dwelling numbers, which is notably problematic for settlements within the National Landscape. The difficulty with this approach is that the only way to meet the housing number is through extending the settlement boundary when there may well be suitable brown field sites, which should be given the highest priority since they are generally more sustainable. In the National Landscape minimising development into green fields is important.</p> <p>Suggest that the wording of MM7 para 4.34 is changed to: <u>'Non-strategic residential allocations within Neighbourhood Plans situated within defined settlement boundaries, except those in the National Landscape with more than 5 dwellings, will not count towards meeting the housing requirement figure in policy SP12.'</u></p> <p>The second sentence should be deleted.</p> <p>On a related matter, the Reg 16 Hungerford Neighbourhood Plan proposes to allocate two sites and to amend the settlement boundary to encompass these allocations. The extract from the policy map (<i>attached to representation</i>) shows the allocations HUN12 &amp; HUN13 within the extended settlement boundary. The proposed new paragraph after para 4.34, could effectively mean that the allocations are not strategic and are within the settlement boundary, therefore the 55 dwelling requirement for Hungerford is not being met.</p> <p>Therefore, it is suggested that either: (i) the wording should be clarified in the Local Plan to make clear that a NP can amend the</p>	<p>Comments noted. The issues raised have previously been considered and discussed as part of the Examination.</p> <p>In regard to the related matter, the Plan should be read and interpreted as a whole. The NDP would be following the approach set out in Appendix 2 of the LPR relating to settlement boundaries. This makes clear that a settlement boundary would be redrawn as a consequence of a site allocation not the other way around.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>



Respondent	Summary of Main Issues	Council response
	settlement boundary once allocations have been made; or (ii) a response provided by the Local Plan Inspector so that the NP Examiner could, if needed, suggest that the settlement boundary is amended to exclude these site allocations.	
Newbury Town Council	<p>Newbury Town Council opposes this amendment, Newbury Town Council is concerned about the amount of Windfall Developments coming forward (Kennet Centre, Bond Street, Pound Street) as the Local Planning Authority is not allowing the local plan to include sites within the Newbury Settlement Boundary. The NPPF makes no mention of the words 'Settlement Boundary' so this cannot be considered as a key approach as it is not supported by Evidence from other Local Plans at Reg 18 Stage and beyond.</p> <p>NTC would like to see all developments within the 'Newbury Settlement' be counted towards the housing requirement figure. Had the Eagle Quarter been granted planning this would have added 427 properties that would not have been added to the housing target.</p>	<p>Comments noted. The issues raised have previously been considered and discussed as part of the Examination and will be considered again as part of the preparation of the next Local Plan. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
Paula Saunderson	<p>A very confusing Modification. Unless I have mis-understood the thrust of this Modification I fundamentally disagree with this Modification. Every other LPA we have studied has a Planning Presumption in favour of Development and Re- development within Settlement Boundaries – it is the norm. However, they certainly allocate Key Sites within Town Settlement Boundaries and Include their Housing Numbers in 5- &amp; 15-Year Supply Numbers. Why would they not do this? Settlement Boundaries can be a false Boundary that is easily moved by LPAs with doubtful consultation. It seems to be a bit of a red herring to place so much importance on Not Allocating Sites within the main NPPF Plan Making vehicle called a Local Plan?</p>	<p>Comments noted. The issues raised have previously been considered and discussed as part of the Examination and will be considered again as part of the preparation of the next Local Plan. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

Respondent	Summary of Main Issues	Council response
	<p>The other Local Plans we have studied at Reg 19, or this Stage of Examination would not wish to Exclude Major Redevelopment Sites within their Towns from their Housing Numbers? Forcing up Windfall Rates is surely not what the spirit of a Local Plan is about? Other LPAs are very happy to have these Sites in their plans and their Numbers counted for almost certain delivery, to ensure that proper holistic Town Planning is taking place, and each Area/Zone has appropriate Planning Policy in place, along with Quality Design and Density parameters that can be supported by Infrastructure which is included and costed in the Infrastructure Delivery Plan?</p>	
Pro Vision obo CALA Homes	<p>Support for new paragraph 4.34, which explains that any residential allocations with neighbourhood plans, where they are within adopted settlement boundaries, will not count towards the housing requirement as they already have a presumption in favour of development.</p>	Support noted

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM8	23	Policy SP4 AWE Aldermaston and Burghfield	5

Respondent	Summary of Main Issues	Council response
AWE / MOD	<ul style="list-style-type: none"> <li>• Strongly support the principle of policy SP4 and its intention to ensure the effective management of development located within the DEPZ for AWE Aldermaston and AWE Burghfield.</li> <li>• Welcomes the inclusion of a clear statement within SP4 that development within the DEPZ is likely to be refused planning permission where the ONR advise against the proposed development.</li> <li>• Consider further strengthening of SP4, together with other policies, is required to ensure that its application, as intended, provides adequate protection to the current and future operations at AWE and public safety. This arises as a consequence of: <ul style="list-style-type: none"> <li>- mandatory housing targets in the revised NPPF Dec 2024 together with changes to para 11 and the presumption in favour of sustainable development. The MOD acknowledges these changes but considers that these changes should not result in any change to the inappropriateness of increasing the population within the DEPZ's;</li> <li>- Since the hearing sessions and the publication of the Inspector's interim findings, both Reading Borough Council and Wokingham Borough Council have published Reg19 Local Plans. It is considered that with a relatively minor addition to SP4 would be possible to achieve clarity and consistency across all three Local Plans;</li> <li>- Accept the plan must be read as a whole, however AWE and MOD are mindful of the ONR position regarding the adequacy of the OSEP and their position on increase in population within the DEPZ, along with recent appeal decisions highlighting the need to take into</li> </ul> </li> </ul>	<p>Comments noted. It is important to note that the Plan needs to be read and interpreted as a whole, and all policies should be viewed together and not in isolation in the preparation and consideration of planning applications. This is made clear in paragraph 1.6 of the <a href="#">submitted LPR (CD1)</a>.</p> <p>Each development proposal will be considered on its merits and the supporting text to policy SP4 makes clear that the Council will monitor committed and future development proposals in partnership with neighbouring councils, those agencies with duties under REPPiR, and the ONR to understand the impact on the OSEP and the operation of AWE.</p> <p>The issues raised have previously been considered and discussed as part of the Examination. The representation</p>

Respondent	Summary of Main Issues	Council response
	<p>account the potential cumulative impact of smaller scale developments, rather than the impact of one development in isolation. Cumulative development within the DEPZ leads to a rise in population and a proportionate increase in the consequence should a radiation emergency occur.</p> <ul style="list-style-type: none"> <li>• Consider an additional and more specific requirement and criteria should be inserted into the policy relating to any development proposals which could lead to ANY increase in population within the DEPZ. The inclusion of the suggested amendments will avoid any confusion and suggestion that policy SP4 covers all types of development and not only relates to any proposed larger scale residential development, and also that SP4 is a relevant consideration in determining the application of the ‘presumption in favour of sustainable development’.</li> <li>• The following amendments are suggested (inclusions as underlined): <ul style="list-style-type: none"> <li>- <i>“Development proposals within the land use planning consultation zones that <u>will lead to any increase in residential or non-residential population and / or pose unacceptable risk to the operation of the AWE Off-Site Emergency Plan (OSEP) and/or adversely affect the defence related operation or capability of the AWE sites will be refused planning permission.</u>”</i></li> <li>- <i>“<u>The ONR and AWE / MOD will also be consulted for any development proposals within the DEPZ which would lead to any increase in population or activity (including working or visiting population]</u>”</i></li> </ul> </li> </ul>	<p>does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
Office for Nuclear Regulation (ONR)	<ul style="list-style-type: none"> <li>• ONR supports the soundness of the overall plan as it relates to its approach towards not allocating residential sites in the Detailed Emergency Planning Zone (“DEPZ”) of AWE Burghfield (“AWE(B”).</li> </ul>	Comments noted.

Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>• Additionally, ONR supports the modification to SP4 and the supporting text.</li> <li>• ONR currently judges the OSEP for AWE(B)'s DEPZ to be stretched, which poses challenges for accommodating new development in the area covered by the OSEP.</li> </ul>	
Joe Atkinson	<ul style="list-style-type: none"> <li>• The proposed MM seeks to allow AWE to control development within WBC by controlling increase in population but allows for AWE to continue to thrive and expand, effectively granting AWE a monopoly on all forms of development within the area, allowing them to object to everything and devalue property within the DEPZ to enable them to purchase local land at a reduced rate.</li> <li>• Previous policy highlighted that only ONR could object to applications, to propose to allow a profit making business to control development within its local areas creates an unfair advantage to one business.</li> <li>• No justification from either AWE, ONR or WBC to seek a housing moratorium, and whilst the word 'moratorium' is not stated, there is nothing in the policy wording that allows future applicants to provide acceptable mitigation solutions.</li> <li>• A very dangerously worded policy for the benefit of one business – if AWE don't want it, then it simply will get refused and no reason will be required to support a refusal.</li> <li>• With the increase in housing numbers WBC is in no position to justify such a restrictive policy, which effectively limits where they can or cannot plan for housing, schools, infrastructure etc for any locations that are unfortunate to be included in the expanded DEPZ.</li> <li>• This policy would take away the Council's ability to plan for the future, as AWE will control and restrict.</li> <li>• A public enquiry at The Hollies in Burghfield Common has recently been granted permission within the DEPZ – appeal decision attached to representation with some extracts quoted.</li> </ul>	<p>Comments noted. The purpose of policy SP4 is to ensure development within the ONR consultation zones surrounding the AWE sites is managed in the interests of public safety, and to ensure that any proposed developments do not adversely affect the defence related operation or capability of AWE.</p> <p>The issues raised have previously been considered and discussed as part of the Examination. The Council's response to Q11.6 in <a href="#">WS11/1</a> sets out the approach taken to allocating sites within the AWE DEPZ and provides background to this approach.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with</p>

Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>• Previous policy CS8 provided differing rings of risk and gives clear direction to future applicants and decision makers on what can and cannot be supported – it did not seek an overall blanket ban on new development.</li> <li>• The wording of the policy is to restrict additional residents within the DEPZ but there is no base figure to work with. The figures are overstated by WBC and the OSEP is based on false information, leading to additional pressure on the OSEP which in turn means ONR is concerned that the OSEP will fail due to the number of potential residents living in the DEPZ.</li> <li>• For the policy to be legally compliant and sound there would need to be a base figure to work to. If WBC DEPZ is working on a maximum number of dwellings this needs to be stated in the policy, similar to that of the AONB policies.</li> <li>• Nothing in the new NPPF that advises that Council's can effectively seek housing moratoriums in large areas with no justification, especially if the Council in question is struggling to meet the local plan figures pre 495 per annum. With the new housing figures from government WBC would have a significant housing shortage problem if this restrictive policy is allowed.</li> <li>• The policy wording is not positively prepared, as it is a negatively worded policy that effectively hands planning control within the DEPZ to AWE plc.</li> </ul>	<p>the Proposed Main Modification. No further changes are proposed to the LPR.</p>
Pro Vision obo Hope and Clay Construction Ltd	<ul style="list-style-type: none"> <li>• We have consistently argued for significant modification to this policy so that it did not have the effect of being a moratorium on development.</li> <li>• We support the amendments to the policy text in so far as they clarify that the LPR will consult the ONR as the main advisor on development proposals in the DEPZ.</li> <li>• We welcome the encouragement in the supporting text for developers to seek pre-application advice. The policy therefore, now clarifies that,</li> </ul>	<p>Comments noted. The issues raised have previously been considered and discussed as part of the Examination. The Council's response to Q11.6 in <a href="#">WS11/1</a> sets out the approach taken to allocating sites within</p>

Respondent	Summary of Main Issues	Council response
	<p>at least in principle, there is not a moratorium or embargo on development, but that the ONR will need to be satisfied that the redevelopment would not pose an unacceptable risk.</p> <ul style="list-style-type: none"> <li>• The ONR website cites that their view will be informed by the LPA emergency planners who are responsible for preparing the OSEP. We remain concerned that in practice SP4 will obstruct sustainable development if the LPA emergency planning team cannot provide reassurance to ONR for whatever reason.</li> <li>• The Hollies appeal, and other appeal decisions, have established that the risk posed by AWE to the DEPZ is very low and the likelihood of an incident occurring is low.</li> <li>• At the hearing sessions in June the ONR representative clarified that it was not as straightforward as avoiding any population change in the DEPZ and that they were less concerned about changes in the non-residential population.</li> <li>• Policy SP4 and SP20 should be modified so that Easter Park is reinstated as a DEA and the site ALD6 Easter Park is allocated to allow for sustainable growth of Hope and Clay in the future. Planning permission would still be required in consultation with ONR and against policy SP4.</li> <li>• Clarification through the examination that the policy is not designed to be an embargo is helpful, we are concerned it will be in practice, and this is a threat to the long-term prosperity of many businesses in the DEPZ.</li> <li>• Remain concerned that decisions to delete the DEA at Easter Park were made in the context of uncertainty about the policy position with the DEPZ. Assume this decision was linked to the decision to deallocate the expansion land (site ALD6).</li> <li>• The SA prejudices the prospect of development at Easter Park, simply because of its location in the DEPZ.</li> </ul>	<p>the AWE DEPZ and provides background to this approach. The Employment Background Paper (<a href="#">EMP5</a>) also outlines the Council's approach to reviewing existing Protected Employment Areas (to be renamed Designated Employment Areas (DEA) through the LPR), as well as the identification of new DEA.</p> <p>With regard to the comment on the SA, see Council response to representations made in relation to the SA/SEA.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>• Removal of the DEA status is inconsistent with the modified SP4 and the status of Youngs Industrial Estate.</li> <li>• Despite the significant modifications, the spatial strategy regarding AWE and employment allocations has not been justified and requires further modifications to be sound.</li> </ul>	
Woolf Bond Planning Ltd	<ul style="list-style-type: none"> <li>• The Council has included a blanket restriction on further development around the AWE facilities at Aldermaston and Burghfield.</li> <li>• The following factors indicate an unsound Plan: <ul style="list-style-type: none"> <li>- No consideration of differences in approach to definition of Urgent Protective Area (UPA) zones between the two facilities operated by AWE – the Consequences Report (CR) prepared for the AWE facilities at Aldermaston and Burghfield both detail the approach to identifying where the advocated measure to achieve the 3mSv reduction on dose should radioactive material be released. In both instances the advocated measure is to shelter and this therefore informs the definition of the UPA. However, from the information within the CR it is clear that shelter is not feasible around Aldermaston given the minimal time in order for this to occur due to the proximity of residents. Around Burghfield only people between 1,800m and 3,160m from the site would have the opportunity to shelter, nevertheless the CR does indicate that there is scope for sheltering as an action.</li> <li>- In the context of the currently defined DEPZ, no consideration of whether the boundary adequately accords with the guidance on REPPiR, especially on not including more people than necessary – the REPPiR Guidance is clear that any expansion of the DEPZ beyond the minimum UPA must take account of the potential harm and stress for the affected people alongside the burden on emergency services that this imposes. Whilst the blue light services may be able to accommodate this, had the DEPZ been focused</li> </ul> </li> </ul>	<p>Comments noted. Under the REPPiR 2019 legislation, the Council is required to determine Detailed Emergency Planning Zones (DEPZ) around the two AWE sites. There is a legal process in place in order to allow the DEPZ to be determined which is clearly set out in the legislation and its Approved Code of Practice (ACoP). The Council followed the above legal process, determining the DEPZ's in 2020, and in accordance with statutory requirements undertook a review in 2023.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>



Respondent	Summary of Main Issues	Council response
	<p>solely on the UPA, this additional pressure on blue light services together with harm and stress to the affected residents would be avoided. Reducing the DEPZ so that it is only focused on the UPA both reduces the pressure on blue light services and also means that residents in the areas are not subject to unnecessary harm or stress.</p> <ul style="list-style-type: none"> <li>- No review of different approaches for defining Detailed Emergency Planning Zones (DEPZ) around nuclear facilities across the UK – the approaches of other authorities to defining a DEPZ around nuclear sites, including where those extend across urban area is also relevant in determining consistency, for example around Portsmouth, Southampton and Plymouth. The approaches of these authorities is clear that existing communities can be sub-divided by a DEPZ, especially where this limits stress and harm on residents immediately outside of the UPA. For this reason, the other locations have tightly defined DEPZ – the same should occur for AWE Burghfield.</li> <li>• The above indicates that there has and continues to be scope accommodate additional development within the area surround AWE and a reduction in the extent of the DEPZ so it is solely focused on the UPA would remove the pressure and concerns arising from other residents living in the expanded area.</li> <li>• Significant revisions to the policy are essential to address matters of soundness.</li> </ul>	

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM9	23-25	Supporting text to policy SP4 AWE Aldermaston and Burghfield	2

Respondent	Summary of Main Issues	Council response
Office for Nuclear Regulation (ONR)	<ul style="list-style-type: none"> <li>• ONR supports the soundness of the overall plan as it relates to its approach towards not allocating residential sites in the Detailed Emergency Planning Zone (“DEPZ”) of AWE Burghfield (“AWE(B)”).</li> <li>• Additionally, ONR supports the modification to SP4 and the supporting text.</li> <li>• ONR currently judges the OSEP for AWE(B)’s DEPZ to be stretched, which poses challenges for accommodating new development in the area covered by the OSEP.</li> </ul>	Comments noted.
Pro Vision obo Hope and Clay Construction Ltd	<ul style="list-style-type: none"> <li>• We have consistently argued for significant modification to this policy so that it did not have the effect of being a moratorium on development.</li> <li>• We support the amendments to the policy text in so far as they clarify that the LPR will consult the ONR as the main advisor on development proposals in the DEPZ.</li> <li>• We welcome the encouragement in the supporting text for developers to seek pre-application advice. The policy therefore, now clarifies that, at least in principle, there is not a moratorium or embargo on development, but that the ONR will need to be satisfied that the redevelopment would not pose an unacceptable risk.</li> <li>• The ONR website cites that their view will be informed by the LPA emergency planners who are responsible for preparing the OSEP. We remain concerned that in practice SP4 will obstruct</li> </ul>	Comments noted. The issues raised have previously been considered and discussed as part of the Examination. The Council’s response to Q11.6 in <a href="#">WS11/1</a> sets out the approach taken to allocating sites within the AWE DEPZ and provides background to this approach. The Employment Background Paper ( <a href="#">EMP5</a> ) also outlines the Council’s approach to reviewing existing Protected Employment Areas (to be renamed Designated Employment Areas (DEA) through the LPR), as well as the identification of new DEA.

Respondent	Summary of Main Issues	Council response
	<p>sustainable development if the LPA emergency planning team cannot provide reassurance to ONR for whatever reason.</p> <ul style="list-style-type: none"> <li>• The Hollies appeal, and other appeal decisions, have established that the risk posed by AWE to the DEPZ is very low and the likelihood of an incident occurring is low.</li> <li>• At the hearing sessions in June the ONR representative clarified that it was not as straightforward as avoiding any population change in the DEPZ and that they were less concerned about changes in the non-residential population.</li> <li>• Policy SP4 and SP20 should be modified so that Easter Park is reinstated as a DEA and the site ALD6 Easter Park is allocated to allow for sustainable growth of Hope and Clay in the future. Planning permission would still be required in consultation with ONR and against policy SP4.</li> <li>• Clarification through the examination that the policy is not designed to be an embargo is helpful, we are concerned it will be in practice, and this is a threat to the long-term prosperity of many businesses in the DEPZ.</li> <li>• Remain concerned that decisions to delete the DEA at Easter Park were made in the context of uncertainty about the policy position with the DEPZ. Assume this decision was linked to the decision to deallocate the expansion land (site ALD6).</li> <li>• The SA prejudices the prospect of development at Easter Park, simply because of its location in the DEPZ.</li> <li>• Removal of the DEA status is inconsistent with the modified SP4 and the status of Youngs Industrial Estate.</li> <li>• Despite the significant modifications, the spatial strategy regarding AWE and employment allocations has not been justified and requires further modifications to be sound.</li> </ul>	<p>With regard to the comment on the SA, see Council response to representations made in relation to the SA/SEA.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM10	28-30	Policy SP6 Flood Risk	5

Respondent	Summary of Main Issues	Council response
Thames Water	Support MM10	Support noted.
Pang Valley Flood Forum	<p>I understand from SP5/MM10 it is required that the developer will produce a surface water drainage strategy to deal with runoff from the site which will not exacerbate existing flood risk in Thatcham. In principle this is fairly standard stuff except that the only way that the strategy can truly be compliant is by creating a separate drainage route through to the Kennet...for which there is currently no provision I assume.</p> <p>On site SuDS will maximise on reducing peak discharge to the existing 'green field' rate of discharge through storage systems with hopefully soakage facilities where possible. However, this does not address the increased volume of run off which will be stored and released after the storm. Recent experience shows us that storms can come in fairly quick succession, as has been the case over the past couple of weeks with Storms Darragh, Eowyn and Herminia. If the flood storage facilities are already full from the previous storm then flooding will result in Thatcham.</p> <p>The recently constructed flood storage facilities along the foot of the hills to the north of Thatcham are designed to protect against a repeat of the 2007 event, if the green field slopes above these facilities are developed then there will no longer be any natural soakage into the underlying geology. This soakage ability cannot be replicated in small areas of concentrated soakage...hence the increase in volume of runoff. The available capacity in the surface water sewer and culverted watercourse system through Thatcham</p>	<p>Comments noted. The Lead Local Flood Authority (LLFA) has been consulted throughout the preparation of the LPR and its supporting evidence, including the Strategic Flood Risk Assessment (<a href="#">WAT2a – WAT3e</a>) and the Housing and Economic Land Availability Assessment, <a href="#">SIT4a – SIT4e</a>). No requirement for a new drainage route to the River Kennet has been identified as being required.</p> <p>The requirement for a Surface Water Drainage Strategy has been included following the recommendation in the SFRA Level 1 Addendum – Cumulative Impacts Assessment (CIA, <a href="#">WAT2r</a>).</p> <p>The CIA does not indicate that a new a new drainage route is required. It does suggest that developer contributions could be</p>

Respondent	Summary of Main Issues	Council response
	<p>and on to the River Kennet is used up by the recently completed Surface Water Management Plan...the increased volume of runoff from proposed new development cannot be taken into this system without increasing flood risk in Thatcham. The proposed development is therefore not deliverable unless a new route is found to take surface water away to the River Kennet. If a proposed development is undeliverable within the required performance criteria then it cannot be approved.</p> <p>If the development is approved then, without a new drainage route to the River Kennet, the surface water drainage strategy will ultimately be a fudge necessitated by the need to deliver the scheme and this certainly will not be sustainable.</p>	<p>used if needed towards wider flood alleviation works. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
Olivia Baily MP	<p>Commitment to ensure that surface water drainage in new developments is managed and does not drain to foul sewars noted.</p>	<p>Comment noted.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
Councillor Chris Read	<p>There is insufficient independent evidence to demonstrate that the significant surface water drainage issues that will be caused by SP17 on a slope facing all one way through the town of Thatcham will be dealt with without another 2007 style flooding disaster.</p> <p>Development should not start without an independent study for the necessary culverts through Thatcham to the Kennet, the downstream impact for the Kennet to Reading, and the necessary infrastructure actually built. Existing flood control (storage) will be insufficient to store the considerable issues of increased ground water levels in late autumn and winter, increased back to back</p>	<p>Comments noted.</p> <p>The site specific policy for North East Thatcham (SP17) includes the requirement for development proposals for the site to be supported by a Flood Risk Assessment which must take account of the Thatcham Surface Water Management Plan and set out adequate flood mitigation</p>

Respondent	Summary of Main Issues	Council response
	storms and significant surface water drainage this huge development will cause.	<p>measures to ensure there is no detrimental flood risk on Thatcham (see MM24, pp.63-65). MM24 also requires surface water drainage management approaches that could deliver net gain for Thatcham town, including the use of on-site SuDS. In addition, existing flood alleviation measures on the site must be retained, protected, and enhanced.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
Paula Saunderson	Support MM10	Support noted.

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM11	30-32	Supporting text to policy SP6 Flood Risk	3

Respondent	Summary of Main Issues	Council response
Olivia Bailey MP	Commitment to ensure that surface water drainage in new developments is managed and does not drain to foul sewars noted.	Comment noted. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.
Councillor Chris Read	Strategies must not be led by the developer but must be independently consulted and analysed. Full reports but be pushed by the council before final plans are submitted in order not to leave a legacy of remedial risk, works and cost.	Comments noted. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.
Paula Sanderson	<ul style="list-style-type: none"> <li>MM11 should be strengthened through the inclusion after para 5.24 of the wording <i>“and/or are likely to be impacted by local groundwaters as mapped in the Strategic Flood Risk Assessment”</i>.</li> <li>Grampian Conditions should be used where flood risk and drainage assets cannot be delivered in advance of occupation, and for phasing.</li> </ul>	Comments noted. The requirements included within the Cumulative Impact Assessment are incorporated into policy SP12. It is not considered that any further changes are required. Grampian Conditions are used at the planning application stage. <a href="#">MM34</a> amends the first paragraph of policy SP24 (Infrastructure Requirements and Delivery) to include text that makes clear that development will be required to ensure the timely and coordinated delivery of necessary infrastructure having regard to the latest version of the

Respondent	Summary of Main Issues	Council response
		<p>Council's Infrastructure Delivery Plan (IDP), through proportionate financial contributions and / or on-site provision. Where necessary, the phasing of development will be linked to infrastructure provision.</p> <p>It is important to note that the Plan needs to be read and interpreted as a whole, and all policies should be viewed together and not in isolation in the preparation and consideration of planning applications. This is made clear in paragraph 1.6 of the <a href="#">submitted LPR (CD1)</a>.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>



<b>Ref</b>	<b>Page</b>	<b>Policy/Paragraph of submitted LPR</b>	<b>No of responses</b>
<b>MM12</b>	<b>34</b>	<b>Supporting text to policy SP7</b>	<b>1</b>

<b>Respondent</b>	<b>Summary of Main Issues</b>	<b>Council response</b>
Paula Saunderson	The title of the policy should be changed to 'Achieving Quality Design' which fits with chapter 12 of the NPPF Chapter 12. The second paragraph of the policy should be changed to read 'National Design Guide (2019) & National Model Design Code (2021)' so that it reflects the wording in the NPPF and makes the default position clearer.	Comments noted. They do not relate specifically to the Proposed Main Modifications. No further changes are proposed to the LPR.

<b>Ref</b>	<b>Page</b>	<b>Policy/Paragraph of submitted LPR</b>	<b>No of responses</b>
<b>MM13</b>	<b>37-38</b>	<b>Policy SP9 Historic environment</b>	<b>1</b>

<b>Respondent</b>	<b>Summary of Main Issues</b>	<b>Council response</b>
Historic England	Support	Support noted

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM14	38-41	Supporting text to policy SP9	3

Respondent	Summary of Main Issues	Council response
Historic England	Support	Support noted
Newbury Town Council	The changes to paragraph 5.45 creates a vagueness as to who is responsible for the identification and management of local heritage assets and non-designated heritage assets.	Comments noted. It would be misleading to state the Council is solely responsible for identifying assets as non-designated heritage assets. There are several processes through which non-designated heritage assets may be identified. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.
Berkshire Gardens Trust	We fully support Policy SP9 and welcome the separation of this policy on the historic landscape from Policy SP8 on Landscape Character which, although interlinked, are governed by different sections of the NPPF and need to address different concerns. We are also very pleased to see both Policy DM11 and DM12. However, we are concerned about the wording at the beginning of DM12 i.e: Proposals for development that could affect designed landscapes identified on the 'Register of Historic Parks and Gardens of Special Historic Interest in England' (Registered Parks and Gardens) will be required	Support noted. The other comments are noted. The Plan should be read and interpreted as a whole. The wording of the policy is in accordance with other DM policies relating to the historic environment. The representation does not raise any issues which

Respondent	Summary of Main Issues	Council response
	<p>to be sensitively designed and clearly demonstrate that great weight has been given to the conservation and significance of the asset and its setting in accordance with Policy SP9. By placing the requirement to meet SP9 at the end, the wording weakens the policy for these most important assets. We would like to see this part of the policy revised to: <i>'Proposals for development that could affect designed landscapes identified on the 'Register of Historic Parks and Gardens of Special Historic Interest in England' (Registered Parks and Gardens) and/or their settings will be required to be in accordance with Policy SP9. Where acceptable under SP9, proposals for development will be required to demonstrate a clear understanding of the significance of the asset and/or its setting, alongside an assessment of the potential impact of the proposal on that significance and should be undertaken in a sympathetic manner using highest quality design.'</i></p> <p>We would very much like to see a list of locally listed non-designated historic parks and gardens within the District. We note that the WBDC HER records do not classify the type of asset, for example whether it be a 'park or garden' or 'building'. Nor is there a comprehensive list within the Local Plan which includes a random selection under paras 10.99 and 10.100. Where possible, within our limited resources of volunteers, we will do what we can to provide further information on non-designated historic parks and gardens but we would very much welcome a commitment from the Council to build on the current HER record, as befits the importance of WB Heritage Assets and their settings in the western half of the former Royal County of Berkshire.</p>	<p>would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p> <p>The Council very much welcomes the commitment and support from the BGT to further informing and building on the current HER record.</p>

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM15	42	Policy SP10 Green Infrastructure	2

Respondent	Summary of Main Issues	Council response
Berkshire Gardens Trust	There is clearly a strong inter-relationship between Historic parks and gardens and the GI of the District and we are pleased to see this recognised in SP10 under the supporting text. We are also pleased to see item j) in the list of criteria but would like to see an additional criterion on the lines of: Protect and enhance the historic significance of the parks and designed landscapes and their individual heritage assets and help to improve understanding of their historic significance.	Support noted. Other comments noted. The Plan should be read and interpreted as a whole. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.
Paula Saunderson	I very much support this addition and would like to see the official term for Buffer Zones used. Those around SSSI assets mentioned within the Amendment, are known as Impact Risk Zones (as can be found on DEFRA MAGIC Maps) The SPD promised under our existing Plan (Policy CS18) seems to have been deleted from the latest published version of the LDS dated March 2024. It was re-promised for delivery by now, via a Public Question to the Executive. It is a great shame we do not have our Green & Blue Infrastructure Framework and Mapping in place for inclusion in the Evidence Base for this LPR. It desperately needs Mapping and typologies understood. We are missing out on opportunities by not having this Framework Mapped, and the continued isolation of our Wooded Lands continues without consideration by Developments on Greenfields. The wider work on Nature Recovery Networks must be hampered by not having our GBI Framework and Mapping and it appears that the Mapping Facility within the Natural England Green Infrastructure Framework may not be totally accurate	Support noted. Other comments noted. The Council is developing its approach to GI as part of its review of its Environment Strategy which will be considered by the Executive later in the year. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.

<b>Respondent</b>	<b>Summary of Main Issues</b>	<b>Council response</b>
	for West Berks. I would like to see Reference to the Natural England Green Infrastructure Framework lifted as a point in the Blue Box and somewhere and within the Supporting Text a mention of the NE Access to Green Space Standards which WBC has not mapped and often does not consider or make clear when assessing the Windfall Sites.	

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM16	45-46	Policy SP11 Biodiversity & Geodiversity	0

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM17	49	Supporting text to policy SP11	3

Respondent	Summary of Main Issues	Council response
Paula Saunderson	Support for having a strong BNG Policy and the production of a mapped /Blue Infrastructure Framework to facilitate the understanding of Biodiversity and Habitats. There needs to be work on Nature Recovery Networks so they can be in place quickly, especially for our Woodlands isolated by development and those that will lose open fields between them. Nature likes to forage and does not like being constrained and not being able to travel around to find food and a home - just like Humans.	Support noted.
Swifts Local Network: Swifts & Planning Group	Not sound or effective as latest NPPF additions not included, ie. NPPF December 2024 Paragraph 187 (d) (page 54) which states <i>"planning policies should incorporate features which support priority or threatened species such as swifts, bats and hedgehogs"</i> . Please add: <i>"Incorporate features which support priority or threatened species such as swifts, bats and hedgehogs."</i>	Comments noted. The <a href="#">December 2024 NPPF</a> sets out transitional arrangements within Annex 1. Annex 1 is clear that policies in the revised NPPF will only apply for the purpose of examining plans, where those plans reach regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (pre-submission) stage on or after 12 March 2025. Plans that reach pre-submission consultation on or before this date will be examined under the relevant previous version of the Framework in accordance with the above arrangements. As the Local Plan Review (LPR) was



Respondent	Summary of Main Issues	Council response
		<p>submitted to the Secretary of State on 31 March 2023 it is being examined under the relevant previous version of the NPPF which was published in 2021.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
Ian Watson	<p>Whilst the importance of the Kennet SSSI is noted in both the Local Plan Review and Schedule of Proposed Main Modifications, there is little mention of the compulsory measures required to maintain the SSSI status through protection from pollution, increased nutrient inputs or the impact of construction work.</p> <p>The Plan notes that the two Kennet SACs will need protection, but the measures indicated are more aspirational than required. The Plan needs strengthening to ensure that developments do not adversely affect the SACs.</p> <p>The allocation at Lower Way in Thatcham requires an Ecological Impact Assessment to be conducted, but the Plan does not say who is responsible for carrying this out, nor does it say what powers the Council could use to enforce any findings from the EIA and ensure that there is no adverse impact on the Kennet SSSI.</p>	<p>Comments noted. They do not relate specifically to the Proposed Main Modifications.</p> <p>Ecological Impact Assessments will be required at the planning application stage, and it is the responsibility of the applicant to prepare these.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM18	51	Policy SP12 Housing Delivery	10

Respondent	Summary of Main Issues	Council response
Berkshire, Oxfordshire and Buckinghamshire Integrated Care Board (BOB ICB)	Housing requirement over the Plan period noted. No objections subject to appropriate healthcare mitigation including but not limited to the provision of new GP facilities or expanding the capacity of existing GP facilities by expanding or reconfiguring the existing premises, must be secured in any forthcoming new housing development schemes to ensure adequate healthcare services can be provided to serve new residents.	Comments noted. <a href="#">MM34</a> amends the first paragraph of policy SP24 to include text that makes clear that development will be required to ensure the timely and coordinated delivery of necessary infrastructure having regard to the latest version of the Council's Infrastructure Delivery Plan (IDP), through proportionate financial contributions and/or on-site provision. Where necessary, the phasing of development will be linked to infrastructure provision. The NHS BOB ICB is consulted as part of updates to the IDP. It is important to note that the Plan needs to be read and interpreted as a whole, and all policies should be viewed together and not in isolation in the preparation and consideration of planning applications. This is made clear in paragraph 1.6 of the <a href="#">submitted LPR (CD1)</a> . The representation does not raise any issues which would prevent the Council from proceeding in

Respondent	Summary of Main Issues	Council response
		accordance with the Proposed Main Modification. No further changes are proposed to the LPR.
Paula Saunderson	<p>There are known previously developed sites within the settlement boundary of Newbury which should be allocated within the Plan, and doing so negates the need to include additional greenfield allocations:</p> <ul style="list-style-type: none"> <li>• NEW1: Bond Riverside</li> <li>• NEW2: Land south of Phoenix Centre,</li> <li>• NEW3: Kennet Centre</li> <li>• NEW7: Former Magistrates Court, Mill Lane</li> <li>• Land at 20-28A Pound Street (Former Jewson's Site)</li> <li>• Land east of Newbury College</li> <li>• Stirling Gardens Phase 2</li> </ul> <p>These sites will instead come forward as windfall, which undermines the Local Plan process, is not good town planning, nor is it conducive to good design.</p> <p>Unclear whether the windfall allowance of 140 dwellings a year for small sites or all windfalls.</p> <p>Reduction in numbers at Newbury Racecourse not reflected in the housing trajectory.No housing requirement has been identified for the Newbury Neighbourhood Plan, despite there being a need for housing in Newbury. This, combined with the failure to allocate sites within the settlement boundary of Newbury, and there being no zoning, no quality design guide or Code will lead to exceptions to policy.</p>	<p>Comments noted.</p> <p>The issues raised have previously been considered and discussed as part of the Examination and will be considered again as part of the preparation of the next Local Plan.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
Joe Atkinson	The housing requirement over the Plan period will fall short of the Government's figure to provide 1,057 dwellings per year in West Berkshire (19,026 over the Plan period). The Plan cannot	Comments noted. The transitional arrangements make it clear there is no requirement to revisit the housing requirement at this point in time.

Respondent	Summary of Main Issues	Council response
	be modified to achieve the additional dwellings and should be withdrawn.	The other issues raised will be considered as part of the preparation of the next Local Plan. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.
Bell Cornwell obo Central Corporation (WHM) Ltd	<p>The housing requirement should be reviewed in light of the December 2024 NPPF and subsequent changes to the standard method. Reading's housing need, and possibly that in other nearby districts, may change and there could be unmet needs.</p> <p>Whilst the transitional arrangements of the NPPF apply to West Berkshire, the increased Local Housing Need to 1,070 dwellings per year means every opportunity should be taken to increase housing numbers and densities.</p>	Comments noted. The transitional arrangements make it clear there is no requirement to revisit the housing requirement at this point in time. The other issues raised will be considered as part of the preparation of the next Local Plan. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.
Gleeson Land	No reasonable prospect that 9,493 dwellings will be built in the Plan period due to the over reliance on two retained allocations, one new allocation, and a broad location for growth at Newbury. Risk of the Council being unable to demonstrate a five-year housing land supply beyond year 5, and more medium sized sites are required in line with paragraph 70 of the NPPF.	Comments noted. The housing land supply was discussed under Matter 7 on both 5 June and 2 October 2024. The updated housing trajectory is included within Annex N of the Schedule of Proposed Main Modifications. This shows that the Council has sufficient supply to

Respondent	Summary of Main Issues	Council response
	<p>The buffer in the housing supply is 223 units (2.4%) – this represents 0.43 years of supply. Good practice to include a larger buffer, and additional sites should therefore be allocated. Under the revised standard method, West Berkshire’s housing local housing need is significantly higher. Despite the transitional arrangements in the NPPF, it would be prudent for the Council to build-in additional delivery now to avoid a step-change scenario in the next local plan review.</p> <p>Man’s Hill in Burghfield Common (HELAA site ref BUR9), which could accommodate up to 300 homes, should be allocated. It can be and be built out within the first five years of the Plan.</p>	<p>meet the housing requirement. The other issues raised will be considered as part of the preparation of the next Local Plan. The site at Man’s Hill in Burghfield Common was assessed as being unsuitable for allocation, and the reasons for this are set out within the Council’s response to the Inspector’s Action Point 29 – see <a href="#">EXAM32</a>.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
Neame Sutton obo Donnington New Homes	Support for 55 dwellings in Hungerford, particularly given its status in the settlement hierarchy as a Rural Service Centre.	Support noted.
Nexus obo Pangbourne Beavers	Support the changes proposed in MM12.	Support noted.
Pro Vision obo CALA Homes	Support for expression of housing requirement as a minimum.	<p>Comments noted.</p> <p>For clarity and consistency with national policy (<i>PPG ID:68-031 and 032</i>) in relation to the calculation of the 5 year requirement and taking account of under and oversupply since the start of the plan period</p>

Respondent	Summary of Main Issues	Council response
		<p>a further modification is proposed to the first paragraph of SP12 as follows:  <i>'Provision will be made for <u>at least 9,270</u> <del>8,721 to 9,146</del> net additional homes in West Berkshire for the period 1 April <del>2023</del> 2022 to 31 March <del>2041</del> 2039; <del>513 to 538</del> <u>an minimum average housing requirement of 515 dwellings per annum. The target figure of 538 dwellings per annum does not constitute a ceiling or cap to development.'</u></i></p> <p>In light of the above proposed modification, a consequential change is proposed to the supporting text of SP12 after paragraph 6.8 as follows:  <i>'<u>Policy SP12 expresses the housing requirement as a minimum of 515 dwellings per annum.'</u></i></p>
<p>Pro Vision obo Wasing Estate</p>	<p>Minimum provision housing target is too low to deliver the minimum local housing need over the Plan period, and there is a need for a buffer.</p> <p>Over reliance on fewer larger sites in Newbury and Thatcham, and the Plan fails to meet the housing needs of the rural communities.</p>	<p>Comments noted. The housing land supply was discussed under Matter 7 on both 5 June and 2 October 2024. The updated housing trajectory is included within Annex N of the Schedule of Proposed Main Modifications. This shows that the Council has sufficient supply to</p>

Respondent	Summary of Main Issues	Council response
	<p>Further site allocations are required, such as BRIM1 Land East of Manor Farm and BRIM2 Land West of Manor Farm, both of which are in Brimpton and are suitable and available.</p> <p>Support for expression of housing requirement as a minimum.</p>	<p>meet the housing requirement. The two sites referred to were assessed as being unsuitable for allocation, and the reasons for this are set out within the Council's response to the Inspector's Action Point 29 – see <a href="#">EXAM32</a>.</p> <p>In respect of the comments made on expression of housing requirement as a minimum, see comments above to Pro Vision obo CALA Homes.</p>
Thakeham Homes	<p>Support MM18, however to ensure neighbourhood plans deliver a supply of homes that can help the Council achieve its minimum housing requirement, further changes are needed to policy SP12. The changes should set out that all forthcoming neighbourhood plans should include residential allocations, whilst the housing requirement figure supplied to Qualifying Bodies should be expressed as a minimum figure.</p>	<p>Comments noted. It is not a statutory requirement for neighbourhood plans to include site allocations. The housing requirement figure for those areas that are preparing neighbourhood plans with site allocations are expressed as 'approximately'.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM19	51-54	Supporting text to policy SP12 Housing Delivery	10

Respondent	Summary of Main Issues	Council response
Newbury Town Council	Table 2 Housing Supply 1 April 2023- 31 March 2041. The Sandford Park figures are lower than what is on this table.	Comments noted. The Council's housing trajectory covers the period 2023/24 to 2040/41. During the examination hearing sessions, the Inspector was clear that the housing trajectory should have a fixed reference point which is based on comprehensive information about planning permissions as at 1 April 2023. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.
Paula Saunderson	Examples should be given of what is meant by communal accommodation. The use of the PPG's term 'addressing the needs of different groups of people' might be more useful than communal accommodation as the Planning Use Classes could change.  Up-to-date study required on C2 use class accommodation and extra-care housing.	Comments noted. The supporting text at paragraph 6.17 already gives an indication of what is meant by the C2 use class. The Updated Housing Needs Evidence ( <a href="#">HOU5</a> ) study has considered specialist housing needs (including that which falls within the C2 use class) and is the most up-to-date evidence. Policy DM19 of the



Respondent	Summary of Main Issues	Council response
	<p>Approach taken by the Council of not allocating within settlement boundaries should be removed. Previously developed land should be the priority for development. The Kennet Centre and London Road Industrial Site should be included as allocations.</p>	<p>LPR has regard to specialised housing. The other issues raised have previously been considered and discussed as part of the Examination and will be considered again as part of the preparation of the next Local Plan. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
Joe Atkinson	<p>The housing requirement over the Plan period will fall short of the Government's figure to provide 1,057 dwellings per year in West Berkshire (19,026 over the Plan period). The Plan cannot be modified to achieve the additional dwellings and should be withdrawn.</p>	<p>Comments noted. The transitional arrangements make it clear there is no requirement to revisit the housing requirement at this point in time. The other issues raised will be considered as part of the preparation of the next Local Plan. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
Bell Cornwell obo Central Corporation (WHM) Ltd	<p>The situation around Reading's unmet housing need should be reviewed now that the local housing need has increased under the revised standard method from 878 to 1,028 dwellings a year.</p>	<p>Comments noted. The transitional arrangements make it clear there is no requirement to revisit the housing</p>

Respondent	Summary of Main Issues	Council response
		<p>requirement at this point in time. The other issues raised will be considered as part of the preparation of the next Local Plan. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
Gleeson Land	<p>No reasonable prospect that 3,195 dwellings will be delivered within the first five years of the Plan, and Man's Hill in Burghfield Common should be allocated.</p> <p>The phasing of the 15 new allocations appears arbitrary as they all commence in year 3. It assumes that all planning applications would be submitted, assessed at the same time, which is highly improbable. Lichfield's Start to Finish suggests a total lead-in time from validation to first dwelling completion of 3.8 years for sites of 50-99 units, and 6 years for 100-499 units. A four-year period for smaller sites would seem more accurate as this would take into account possible appeals, land sale completions, or construction delays.</p> <p>The draft housing requirement only meets 48% of the new local housing need (1,070 dwellings), and from July 2026 a 6-year supply needs to be demonstrated in line with paragraph 78c of the December 2024 NPPF. It would be prudent of the Council to build-in additional delivery to avoid a supply deficit from July 2026.</p> <p>Poor practice to include windfall allowance from year 1, as most sites that come forward are likely to have permission and will</p>	<p>Comments noted. The housing land supply was discussed under Matter 7 on both 5 June and 2 October 2024. The updated housing trajectory is included within Annex N of the Schedule of Proposed Main Modifications. This shows that the Council has sufficient supply to meet the housing requirement. The transitional arrangements make it clear there is no requirement to revisit the housing requirement at this point in time.</p> <p>The site at Man's Hill in Burghfield Common was assessed as being unsuitable for allocation, and the reasons for this are set out within the Council's response to the Inspector's Action Point 29 – see <a href="#">EXAM32</a>.</p>

Respondent	Summary of Main Issues	Council response
	<p>have already been captured as commitments. The allowance should commence from year 4, which is the approach taken by Hart, Horsham, East Hampshire, and Welwyn Hatfield</p>	<p>The Council's housing trajectory covers the period 2023/24 to 2040/41. During the examination hearing sessions, the Inspector was clear that the housing trajectory should have a fixed reference point which is based on comprehensive information about planning permissions as at 1 April 2023. No windfall allowance is made within the first three years so as to avoid double counting with any commitments. No further changes are proposed to the LPR.</p>
<p>Neame Sutton obo Donnington New Homes</p>	<p>Support for the insertion of paragraphs that recognise sites which meets the requirements of the allocation of neighbourhood plans will be considered in accordance and consistent with the development plan and national policy.</p>	<p>Support noted.</p>
<p>Pro Vision obo CALA Homes</p>	<p>Support for the inclusion of the word 'approximately' in front of the housing requirement for Hungerford, and also for the addition after paragraph 6.8 that expresses the housing requirement for the LPR as a 'minimum'. Housing requirement unsound for Hungerford as it is not justified by evidence, which appears to have emerged from confusion about the status of extant housing site HSA18 which is complete and meets the needs from the previous Plan period. Plan fails to support rural towns and villages. Objection to the status and contingency added to policy SP12 in the event neighbourhood plans do not deliver the housing requirement. It is unclear what is meant by "identifying</p>	<p>Comments noted. The matters raised within the representation were discussed at the hearing sessions on 9 May 2024 (Matter 3.4). Further information is also set out within the Council's Written Statement for Matter 3 (<a href="#">WS3/1</a>). The progress of neighbourhood plans will be made through the Authority Monitoring Report which is published annually.</p>

Respondent	Summary of Main Issues	Council response
	<p>opportunities” or how the Council can be expected to react in such circumstances. Identifying issues alone does not remedy an issue with meeting the housing requirement. More precision required, particularly in the policy itself, similar to policy H4 of the South Oxfordshire Local Plan.</p> <p>Support for expression of housing requirement as a minimum.</p>	<p>In respect of the comments made on the expression of the housing requirement as a minimum, The Council refers to its response to MM18 where the same comments have been made.</p> <p>No further changes are proposed to the LPR.</p>
Pro Vision obo Wasing Estate	<p>Minimum provision housing target is too low to adequately meet the local housing need.</p> <p>Support for expression of housing requirement as a minimum.</p>	<p>Comments noted. The transitional arrangements make it clear there is no requirement to revisit the housing requirement at this point in time.</p> <p>In respect of the comments made on the expression of the housing requirement as a minimum, The Council refers to its response to MM18 where the same comments have been made.</p>
Thakeham Homes	Support MM19.	Support noted.
Walsingham Planning obo Colthrop Village Consortium	<p>Paragraph 23b of the December 2024 NPPF requires local planning authorities to commence work on a new local plan if the housing requirement in the plan to be adopted meets less than 80% of the local housing need (as calculated using the revised standard method). This is to address the shortfall in housing need.</p> <p>The supporting text should reference the need for an immediate review to deal with the shortfall in housing in the District.</p>	<p>Comments noted. The transitional arrangements make it clear there is no requirement to revisit the housing requirement at this point in time.</p> <p>No further changes are proposed to the LPR.</p>

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM20	55	Policy SP13 Sites Allocated for Residential & Mixed-Use Development in Newbury and Thatcham	1

Respondent	Summary of Main Issues	Council response
Paula Saunderson	Disagrees that sites in the settlement boundary should not be allocated. Kennet Centre and the London Road Industrial Estate in Newbury should be allocated.	Comments noted. The issues raised have previously been considered and discussed as part of the Examination and will be considered again as part of the preparation of the next Local Plan. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.

<b>Ref</b>	<b>Page</b>	<b>Policy/Paragraph of submitted LPR</b>	<b>No of responses</b>
<b>MM21</b>	<b>57</b>	<b>Policy SP14 Sites Allocated for Residential &amp; Mixed-Use Development in the Eastern Area</b>	<b>0</b>

<b>Ref</b>	<b>Page</b>	<b>Policy/Paragraph of submitted LPR</b>	<b>No of responses</b>
<b>MM22</b>	<b>55</b>	<b>Policy SP15 Sites Allocated for Residential &amp; Mixed-Use Development in Newbury and Thatcham</b>	<b>1</b>

<b>Respondent</b>	<b>Summary of Main Issues</b>	<b>Council response</b>
Pro Vision obo CALA Homes	Support MM22	Support noted.

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM23 PMC6	60-61	Policy SP16 Sandleford	4

Respondent	Summary of Main Issues	Council responses
Berkshire Oxfordshire & Buckinghamshire Integrated Care Board (BOB ICB)	<p>Object. Several changes proposed to accurately reflect relevant up to date information, including that in planning permissions and applications.</p> <p>Whilst the proposed policy does not specifically set out the healthcare mitigation the policy sets out that the Council will be supportive of proposals which have regard, and positively respond to the Sandleford Park SPD. The SPD sets out a proposed extension to Falkland Surgery to serve any new population from the site.</p> <p>Following discussions with the Council regarding the modification of the planning obligation relating to Sandleford Park East and the outline planning application at Sandleford Park West, the ICB is requesting to allow the developer contributions towards Falklands Surgery improvement or other Primary Healthcare facilities in the vicinity of the development to allow some flexibility in delivering GP services in the local area.</p> <p>As the IDP does not provide the proposed primary care mitigation in Sandleford Park and there is an absence of relevant wording in the policy to reflect this change, the ICB considers that the Policy should be amended to accurately reflect up to date information, and reflects the Inspector's AP27.</p> <p>Object to the MM, unless the following wording is added to the policy:</p> <p><i>'Developer contributions towards the improvements to the Falklands Surgery or other Primary Healthcare facilities in the local</i></p>	<p>Comments noted. <a href="#">MM34</a> amends the first paragraph of policy SP24 (Infrastructure Requirements and Delivery) to include text that makes clear that development will be required to ensure the timely and coordinated delivery of necessary infrastructure having regard to the latest version of the Council's Infrastructure Delivery Plan (IDP), through proportionate financial contributions and / or on-site provision. Where necessary, the phasing of development will be linked to infrastructure provision.</p> <p>The NHS BOB ICB is consulted as part of updates to the IDP. It is important to note that the Plan needs to be read and interpreted as a whole, and all policies should be viewed together and not in isolation in the preparation and consideration of planning applications. This is</p>



Respondent	Summary of Main Issues	Council responses
	<i>area vicinity of the Development to serve the site. Developers should engage with and the developer contributions should be agreed with the NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board or such appropriate body.'</i>	made clear in paragraph 1.6 of the <a href="#">submitted LPR (CD1)</a> . The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.
Newbury Town Council	Paragraph 6, should make it specific that the 40% affordable housing figure is across all housing types (flats, houses, size) and tenures.	Comments noted. As the policy will need to be read in conjunction with Policy SP19, which is specifically cross-referenced as a Main Modification as part of SP16, which sets out the housing mix it is not considered necessary to amend Policy SP16 further.
White Peak Planning obo Bloor Homes Ltd (Sandleford Park East)	Confirm that the representations made to the emerging Local Plan, prior to and including the examination, continue to be their considered position in respect of all matters.	Comments noted.
White Peak Planning obo Bloor Homes Ltd (Land south of Gorse Covert)	Confirm that the representations made to the emerging Local Plan, prior to and including the examination, continue to be their considered position in respect of all matters.	Comments noted.

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM24	62	Supporting text to Policy SP16 Sandlesford Park	4

Respondent	Summary of Main Issues	Council response
Councillor Chris Read	Concern that the Vision document was not part of consultation or agreement with the residents of Bucklebury or Thatcham, and was not independently undertaken. The vision was developer led. Development should not start unless independent studies are completed.	Comments noted. The Vision ( <a href="#">SET3a</a> ) was produced in line with the NPPF and the guidance in the Planning Practice Guidance (PPG). The PPG did not anticipate that visions would require evidence in addition to that already produced to support the plan. Nevertheless, the Vision was undertaken in consultation with the public and with town and parish councils, which included workshops as well as a digital engagement exercise. Further information is set out within Appendix 1 ( <a href="#">SET3b</a> ) and Appendix 2 ( <a href="#">SET3c</a> ). No further changes are proposed to the LPR.
White Peak Planning obo Bloor Homes Ltd (Sandlesford Park East)	Confirm that the representations made to the emerging Local Plan, prior to and including the examination, continue to be their considered position in respect of all matters.	Comments noted.
White Peak Planning obo Bloor Homes Ltd (Land south of Gorse Covert)	Confirm that the representations made to the emerging Local Plan, prior to and including the examination, continue to be their considered position in respect of all matters.	Comments noted.
Walsingham Planning obo Colthrop Village Consortium	Support the inclusion of additional text to the end of paragraph 6.42 specifically listing the Strategic Vision 2050.	Comments noted.

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM25 PMC7	44	Policy SP17 North East Thatcham	67

Respondent	Summary of Main Issues	Council response
Historic England	<ul style="list-style-type: none"> <li>Support/do not raise any concern re MM25</li> </ul>	Support noted.
Natural England	<ul style="list-style-type: none"> <li>Landscape Sensitivity and Capacity Study 2021 advises the site as 'medium capacity' providing it has regard to the setting and form of existing settlement and the character and sensitivity of adjacent landscape character areas.</li> <li>Great weight should be given to the advice provided by the NWDNL Conservation Board.</li> <li>The application should be assessed carefully as to whether the proposed development would have a significant impact on or harm the statutory purpose.</li> <li>S245 (Protected Landscapes) of the LURA 2023 places a duty on LPAs when performing functions in relation to /affecting AONB seeking to further the statutory purpose of the area. This applies to proposals outside the designated area but impacting on its natural beauty.</li> <li>Character Areas – Area 8A (Hermitage Wooded Commons) Recognises varied land cover and priority habitats adding to the ecological importance and landscape interest in the area. Notes that there are areas of open access land (Bucklebury Common), that give the character area a high recreational value.</li> <li>Visual amenity – There are a number of viewpoints listed in the Landscape Sensitivity and Capacity study 2021, assessed as having a high value. Notes that there could be</li> </ul>	Comments noted. The Council has and will continue to consider the impacts of the proposed allocation on both the landscape character and the visual amenity of the AONB in accordance with policy SP2. The NWDNL's comments made at Reg19 have been taken into account in the Main Modification proposed to policy SP17. The LVIA will inform the preparation of the Masterplan SPD. The policy sets out specific requirements for GI and for the protection of the Ancient Woodland on the site. The requirement for the community park, and significant area of GI to the north of the site, to be retained in perpetuity, will act as a buffer between the site and the AONB, reducing any potential impact on the AONB itself. This area of GI will reduce the need for residents of the new development to travel to other locations for informal

Respondent	Summary of Main Issues	Council response
	<p>changes to the historical structure of the landscape, which could obstruct views towards the distant horizon.</p> <ul style="list-style-type: none"> <li>• Separate of settlements – the impact on revising the SB of Thatcham on the NWDPL should be considered. Welcome the inclusion within the MM to restrict development below the 95m AOB contour to confine build development to the lower slopes.</li> <li>• River Kennet SSSI – SuDS should be designed and installed in accordance with the CIRIA SuDS Manual (C753). Discharges will require extra treatment as it could discharge to environmentally protected site. An additional treatment component is required in the event of an unexpected pollution event or poor system performance.</li> <li>• GI – welcome inclusion of 50% GI. Buffer information is set out in SP6 and SP10 – advice provision of buffers is detailed within SP17 and included within the indicative GI at the site. Several ordinary watercourse run north/south across the site.</li> <li>• Acknowledge the band of GI/Country park acting as a buffer to the north. SP17 is well connected to the existing PROW network to the north. Need to consider the impact of additional recreational pressure on open access sites such as Bucklebury Common which contribute to the landscape character of the NWDNL.</li> <li>• Ancient Woodland – cannot be certain that proposals will avoid long-term gradual decline of habitat due to recreation, fly-tipping, noise disturbance and other degrading effects. Buffers should be reviewed to adequately address the direct/indirect effect of the development on Ancient Woodland. Consideration needs to be given to the following: fly tipping, edge effects, noise disturbance, anthropogenic</li> </ul>	<p>recreation/walking. The Masterplan SPD will include further details on the requirements for the GI, protection of Ancient Woodland and SuDS. The Council welcomes the involvement of Natural England in its preparation. As set out within the Council’s Written Statement to Matter 3 (<a href="#">WS3/1</a>), the Council notes the introduction of the LURA and proposes a minor modification (AM4.4) to the supporting text of policy SP2 to reflect that the Council has a duty to seek to further the primary purpose of the legislation. It is important to note that the Plan should be read and interpreted as a whole and all policies should be viewed together and not in isolation in the preparation and consideration of planning applications. This is made clear in paragraph 1.6 of the <a href="#">submitted LPR (CD1)</a>. The Council’s Written Statement to Matter 3 emphasises the clear endorsement from the NWD Council of Partners to both the overall landscape led approach being adopted and the approach taken to the consideration of major development.</p>

Respondent	Summary of Main Issues	Council response
	lighting, vegetation clearance, deadwood collection, pet predation, chemical effects, recruitment of non-native plants, increasing safety concerns, cumulative effect. NE have standing guidance for ancient woodland. SPD – would welcome involvement in its development.	The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.
National Highways	No objections to the proposed MMs	Comment noted.
Network Rail	Support the new wording of SP17 relating to Thatcham Level Crossing	Support noted.
Bucklebury Parish Council	<ul style="list-style-type: none"> <li>• MM does not provide a sound approach to the delivery of a comprehensive development. Bring about further ambiguity.</li> <li>• Welcome the removal of reference to the TSGS from the policy but is referred to as an evidence base document elsewhere.</li> <li>• WBC zoom meeting on 22<sup>nd</sup> Jan – to late to brief parishioners and for them to respond.</li> <li>• WBC has made it difficult for the public to meaningfully engage and be heard.</li> </ul> <p><b>Number</b></p> <ul style="list-style-type: none"> <li>• Increase in dwellings is unsound.</li> <li>• The need for the SPD is evidence that the decision to increase the numbers was made in haste at the end of the plan making process and lacks justification and evidence to be considered sound.</li> </ul> <p><b>Community Facilities</b></p> <ul style="list-style-type: none"> <li>• Removal of space requirements for community facilities being ambiguity and provides no assurance of what will be provided on the site. Removes a requirement that forms the basis of the scope for the Masterplan SPD.</li> </ul>	Comments noted. <b>Capacity of the site</b> - The Inspector identified in <a href="#">IN30</a> that the <a href="#">TSGS</a> (SIT2c) and evidence provided by the site promoter shows that the site has capacity for approximately 2,500 dwellings, along with the physical, social and green infrastructure proposed in SP17. He also noted that at 1,500 dwellings the site would not be consistent with national policy relating to the efficient use of land. Increasing the number of dwellings to 2,500 ensures best use is made of the site and that all infrastructure proposed by the policy can be delivered. The final northern boundary of the developable area of the site will be identified through the Masterplan SPD.

Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>• Healthcare provision processes are severely flawed and there is no certainty that provision will come forward or be viable. Removal of surgery floor area reflects this lack of certainty. Inclusion of feasibility work does not remedy the fundamental issue of soundness in what should be an infrastructure led development.</li> <li>• Feasibility studies (healthcare/school) should have been done before the submission of the plan.</li> <li>• No time frame for the feasibility work is set out within the policy/supporting text – assumed it is part of the SPD process. This should be confirmed in final wording of the plan.</li> <li>• Removal of space requirement for community indoor facility brings about significant ambiguity and concern on the form the development will take and is considered a retrograde step in soundness of the policy as a whole.</li> </ul> <p><b>GI</b></p> <ul style="list-style-type: none"> <li>• Increase in dwellings will put pressure on GI that could be delivered on the site. A vital part of the SPD process, but fundamental concerns remain about how GI will be delivered and maintained on site in a way which protects existing communities and provides sustainable development.</li> </ul> <p><b>Transport</b></p> <ul style="list-style-type: none"> <li>• Evidence base and assessments in relation to traffic impacts are fundamentally flawed.</li> <li>• Multiple access points across the site gives cause for concern. Access onto Harts Hill Road would give direct access through the site to Upper Bucklebury and would encourage directing of traffic through this route to avoid</li> </ul>	<p><b>Consultation/Public Engagement -</b>  Consultation has been carried out in line with the Council’s SCI. Alongside the MM consultation a virtual meeting was held for all town and parish councils on 22<sup>nd</sup> January 2025. It provided an overview of the development of the <a href="#">LPR</a> and its <a href="#">Examination</a> in particular, an overview of the <a href="#">Proposed Main Modifications consultation stage</a>, outlined the LPR next steps, provided an update on the recently published NPPF and its implications for the Local Plan and provided an opportunity for councillors to ask questions. 26 councillors attended and at the time the Council received positive feedback.</p> <p><b>Community infrastructure -</b>  Comments relating to the impact on the local area have been discussed previously as set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council’s <a href="#">Statement on Matter 4</a> (Q4.6) sets out its approach. The issues were also discussed at the hearing sessions and the Council’s response</p>

Respondent	Summary of Main Issues	Council response
	<p>congestion on the A4/Floral way and would be used to access the M4.</p> <ul style="list-style-type: none"> <li>• Indulges in wishful thinking over sustainable transport modes. Suggests residents will choose to cycle, walk or use infrequent bus services. Most residents will have no choice but to use their cars to commute to work or school run – especially if secondary/SEND provision is off site.</li> <li>• Development will result in hundreds of additional car journeys using Harts Hill Road but there are no planned improvements to roads surrounding the site.</li> <li>• Highway capacity in the vicinity of the site has not been addressed. SA appears to say SP17 will have a positive impact on road safety.</li> <li>• Contradiction between wording of the policy which requires adverse impacts to be minimised and scoring in the SA which states there are no such impacts.</li> </ul> <p><b>Sustainability</b></p> <ul style="list-style-type: none"> <li>• Removal of working relating to energy requirements from the policy is not considered effective or justified and creates ambiguity.</li> <li>• A planning application could come forward with an energy statement which seeks to meet min base level requirements.</li> <li>• Requirement of a COMP is vital given the constraints of the site. Irregular that despite known presence of below ground infrastructure that no work has been undertaken on the feasibility of development over/near to them and the potential impact on capacity of the site. Work should have been done in advance to look at overall capacity of the site.</li> </ul> <p><b>Biodiversity</b></p>	<p>to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>. The Council's <a href="#">Statement on Matter 4</a> sets out why the specific floor areas originally proposed have been removed. The Masterplan SPD will provide further details where appropriate. Feasibility work will form part of the SPD process, with further work required alongside any future planning application coming forward. Detailed planning for infrastructure facilities cannot take place until the final housing number, mix and housing type have been defined as this is required to inform what is needed.</p> <p><b>Transport</b> - The LPR is supported by a Transport Assessment (INF3 – 5). The <a href="#">Phase 2 TA</a> specifically considered the transport impact of the site. The TA identified that without mitigation there may be impacts on traffic flow around the NET site and sets out suggested mitigation that could be used. Further, more detailed TA work will be carried to support the development of the SPD and any future planning application on the site. This is standard practice for this</p>

Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>Biodiversity impacts of this site have been incorrectly assessed. Requirement for a biodiversity strategy will not remedy this issue. Biodiversity strategy would need to be carried out in advance of submission of an application and used to inform the masterplanning process.</li> </ul> <p><b>Landscape</b></p> <ul style="list-style-type: none"> <li>Significant concerns regarding the landscape impact at 1500 dwellings, let along 2500.</li> <li>Policy wording is clear an LVIA will inform the SPD - this must be an iterative and sequential process. the LVIA could indicate lower quantum of development to ensure the setting of the AONB is protected.</li> </ul> <p><b>Heritage</b></p> <ul style="list-style-type: none"> <li>Heritage impacts have not been assessed adequately. Consideration at application stage is not considered to be sound. These aspects must be taken into account during the masterplanning process. The policy should reflect this.</li> </ul> <p><b>Lighting</b></p> <ul style="list-style-type: none"> <li>Increased number of units will result in significantly worse light pollution. LVIA needs to take this into account and should inform the Masterplan SPD. It should not be left to the application. Policy should reflect this.</li> </ul> <p><b>Mineral Resources</b></p> <ul style="list-style-type: none"> <li>No comments</li> </ul> <p><b>Masterplanning and design code</b></p> <ul style="list-style-type: none"> <li>Requirement of Masterplan SPD is welcomed, is not considered to make the policy/plan sound.</li> <li>Masterplanning is considered vital to establish the true capacity of the site. Its inclusion reinforces the concern that</li> </ul>	<p>stage of the plan making process. The more access points there are to a site the better traffic moves through a site and the less impact there is on the surrounding roads. The access points shown on the proposed map are indicative, with the final access points to be determined through the Masterplan SPD.</p> <p><b>Sustainability</b> - The energy requirements have been removed as outlined in <a href="#">EXAM42</a> because they are set out elsewhere in policy SP5. The Plan needs to be read and interpreted as a whole.</p> <p><b>Biodiversity</b> - The Council considers it has undertaken the necessary work required at this stage of the plan making process. This is set out in its <a href="#">Statement on Matter 4</a>. It is clear that further more detailed ecological work is required to accompany a planning application.</p> <p><b>Landscape</b> - The Council has and will continue to consider the impacts of the proposed allocation on both the landscape character and the visual amenity of the AONB in accordance with policy SP2. The LVIA will inform</p>



Respondent	Summary of Main Issues	Council response
	<p>there is a lack of evidence base underpinning the allocation. MM does not remedy the objections raised on that basis.</p> <ul style="list-style-type: none"> <li>• Collaboration with parish councils, the community and other stakeholders is welcomed, but with no scope/framework for discussions this does not offer any confirmation as to how the masterplanning will be undertaken if fundamental concerns about the process/outputs are raised.</li> <li>• Consistent failure to consult with local groups as part of the LPR eg. Parish Council meeting on 22<sup>nd</sup> Jan. Does not offer comfort that the Council will seek to constructively engage with parish councils during prep of masterplan.</li> </ul> <p><b>Indicative site map</b></p> <ul style="list-style-type: none"> <li>• Access onto Harts Hill Road is not considered necessary or justified. There is no requirement to show indicative access points in the plan attached to the policy until further work is undertaken.</li> <li>• Plan shows indicative GI buffer which cannot be confirmed until the masterplanning process has been undertaken.</li> <li>• No buffer provided around areas of ancient woodland or heritage assets.</li> </ul>	<p>the preparation of the Masterplan SPD.</p> <p><b>Heritage</b> - The Council considers it has undertaken the necessary work required at this stage of the plan making process. This is set out in its <a href="#">Statement on Matter 4</a> and <a href="#">PQ49 of EXAM2</a> (page 102). Further more detailed work is required to accompany a planning application. Historic England considers the approach taken is sound.</p> <p><b>Lighting</b> - Principles relating to lighting will be set out in the Masterplan SPD.</p> <p><b>Masterplanning &amp; Design Code</b> - This was discussed at the hearing sessions and the Inspector asked that additional work by undertaken by the Council on this issue. The work has been published in the Examination Library at <a href="#">EXAM 52</a>. The scope of the Masterplan SPD is expected to include all of the topic areas set out in SP17 and will be underpinned by further technical studies as appropriate. Stakeholders and members of the public will have the opportunity to engage with the SPD</p>

Respondent	Summary of Main Issues	Council response
		<p>process following the adoption of the LPR.</p> <p><b>Indicative Site Map</b> - The proposed map is indicative and the final location of access points and the extent of the GI will be determined through the Masterplan SPD, based on further technical studies. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
Newbury Town Council	<p>Transport</p> <ul style="list-style-type: none"> <li>• Need to divert traffic way from Newbury Town Centre and current pinch points such as Robin Hood Roundabout (a4/A339)</li> </ul>	<p>Comments noted. The LPR is supported by a Transport Assessment (INF3 – 5). The <a href="#">Phase 2 TA</a> specifically considered the transport impact of the site. The TA identified that without mitigation there may be impacts on traffic flow around the NET site and sets out suggested mitigation that could be used. Further, more detailed TA work will be carried to support the development of the SPD and any future planning application on the site. This is standard practice for this stage of the plan making process. No further changes are proposed to the LPR.</p>

Respondent	Summary of Main Issues	Council response
<p>Thatcham Town Council</p> <p>David Bridle</p>	<ul style="list-style-type: none"> <li>• WB Vision should be deleted because it shows the NET area as an area of future growth – which is contradicted by the GI to be retained in perpetuity. It does not confirm that Thatcham is a sustainable location for development, it takes this as its starting point. – should be referred to in SP1 rather than SP17.</li> <li>• No evidence in the TSGS that this is the most sustainable approach to development of NET – the amendments to the policy do not follow its recommendations.</li> </ul> <p>Secondary and SEND provision</p> <ul style="list-style-type: none"> <li>• Concerned the MM does not ensure the provision for secondary/SEND will be viable. Use of the phrase ‘informed by’ is inadequate.</li> <li>• A free-standing secondary school is not viable at any scale of development. Therefore, likely to need to be provided in partnership with an existing provider. Suggest amendment which includes reference to DfE guidance and agreement of any partner needed for its delivery.</li> </ul> <p>Community indoor facilities</p> <ul style="list-style-type: none"> <li>• Deletion of floor area means it is unclear what will be provided – needs to be more specific</li> </ul> <p>Long term security of GI</p> <ul style="list-style-type: none"> <li>• Current MM does not provide much assurance of the long term security of the GI and Country Park. Request amendment that it is secured through legal agreement.</li> </ul> <p>Housing Numbers</p> <p>SA should have considered 1760 dwellings, as this is the number to be completed within the plan period.</p>	<p>Comments noted.</p> <p>The West Berkshire Vision provides the long-term context for the two strategic sites proposed within the LPR, Sandleford Park and North East Thatcham, in accordance with the requirements of the NPPF. See Council response to EXAM 2 <a href="#">PQ13</a> (Pg 19) and the Council’s <a href="#">matter 4 statement Q4.1</a>.</p> <p>The TSGS forms part of the evidence base for the proposed allocation. It demonstrates that the site can deliver up to approximately 2,500 dwellings, with the associated infrastructure required by SP17.</p> <p>Comments relating to the impact on the local area have been discussed previously as set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The issues were also discussed at the hearing sessions and the Council’s response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>. Feasibility work being carried out to inform the SPD will determine the most suitable solution to Secondary and SEND provision.</p>

Respondent	Summary of Main Issues	Council response
		<p>The Council's <a href="#">Statement on Matter 4</a> sets out why the specific floor areas originally proposed have been removed. The Masterplan SPD will provide further details where appropriate. Feasibility work will form part of the SPD process, with further work required alongside any future planning application coming forward. Detailed planning for infrastructure facilities cannot take place until the final housing number, mix and housing type have been defined as this is required to inform what is needed.</p> <p>The GI and long term security of the community park will be secured via a S106 agreement at the planning application stage.</p> <p>Allocation of the site for 1760 was not considered a reasonable alternative as this would not make best use of the site's capacity as required by the NPPF. No further changes are proposed to the LPR.</p>
Berkshire Oxfordshire & Buckinghamshire Integrated Care Board (BOB ICB)	<ul style="list-style-type: none"> <li>• Recent report published highlights the need to primary care estates to be financially and operationally viable.</li> <li>• Does not object to revised number of dwellings, as long as appropriate healthcare mitigation is secured.</li> <li>• The ICB generally supports MM25 in relation to primary care.</li> </ul>	<p>Comments noted. The MM was agreed by the ICB – see response to <a href="#">IN15 - 26</a>. <a href="#">MM34</a> amends the first paragraph of policy SP24 (Infrastructure</p>

Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>○ Supports the removal of the 450sqm requirement previously proposed.</li> <li>● There are ongoing national GP workforce issues and currently a financial intervention and special measures are in place from NHS England towards the ICB. Not directly related to planning, but would have implications to the provision of new GP facilities and commissioning of GP services.</li> <li>● New facilities need to be neutral or de-minimis rent.</li> <li>● GP providers need to be able to operate new facilities provided in new developments without prejudicing the services they provide to existing patients.</li> <li>● The ICB considers the proposed modification working generates a risk of uncertainty of securing onsite healthcare provision. Funding and delivery arrangements should be included in the policy. In a similar way to the school provision – should be a consistent approach.</li> <li>● The ICB's preferred options would be a 'turnkey' facility to be build by the applicant and delivered to the ICB at nil cost instead of land provision and a developer contribution. The rent value should be generally in line with the existing premises for a certain period before doing a dull market rental review. To ensure de minimis or neutral rent implications to the ICB as GPs are funded by the ICB through rent reimbursement.</li> <li>● Although the site would only need to provide for it's impact, this would not be operationally or financially viable.</li> <li>● The ICB feasibility study indicates the required size of the facility which is agreed by the Council and is included in the proposed modification.</li> </ul>	<p>Requirements and Delivery) to include text that makes clear that development will be required to ensure the timely and coordinated delivery of necessary infrastructure having regard to the latest version of the Council's Infrastructure Delivery Plan (IDP), through proportionate financial contributions and / or on-site provision. Where necessary, the phasing of development will be linked to infrastructure provision.</p> <p>It is important to note that the Plan needs to be read and interpreted as a whole, and all policies should be viewed together and not in isolation in the preparation and consideration of planning applications. This is made clear in paragraph 1.6 of the <a href="#">submitted LPR (CD1)</a>.</p> <p>Stakeholders and members of the public will have the opportunity to engage with the SPD process following the adoption of the LPR. The Council welcomes the involvement of BOB ICB in its preparation.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in</p>

Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>• The ICB raises concerns about the deliverability of the healthcare provision.</li> <li>• In the absence of details of funding arrangements the ICB assumed that the build costs would be met by the applicant through S106, CIL and/or other potential fundings from the Practice. Although the ICB does not object to allocate CIL funding towards healthcare, there is currently no formal CIL agreement between the Council and the ICB.</li> <li>• The ICB is willing to discuss the delivery of onsite health care with the developers as it is a substantial social benefits to both new and existing communities.</li> <li>• Contrary to NPPF, plan would not meet the tests of soundness in terms of effectiveness. Policy should be further modified to say: <i>Primary healthcare provision and associated infrastructure, which is operationally and financially viable. A turnkey facility to be provided and delivered by the applicant to the NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board (BOB-ICB) or other such appropriate body, the size of the provision should take 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;</i></li> </ul>	<p>accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
Burdwood Surgery	<ul style="list-style-type: none"> <li>• The surgery is already beyond full capacity</li> <li>• Would not bid to operate a branch site within Thatcham (uneconomical and not best practice)</li> <li>• Must be appropriate health care provision for additional dwellings.</li> </ul>	<p>Comments noted. The estimated floor area required is very helpful to inform the preparation of the Masterplan SPD. Discussions between the Council, landowners, ICB and the Burdwood Surgery will need to take place as part of that</p>

Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>• Could relocate to new facilities in development if assistance was given. Existing facility would be sold/exchanged for the new facility.</li> <li>• Looking at a 30yr health care planning horizon</li> <li>• Worked with the ICB and healthcare estate requirement modelling has been produced for the needs of NET.</li> <li>• A new facility would facilitate an enlarged steam that would fit within the policy direction for more preventative care and care in the community. This would offer significant community benefits both to existing patients and new ones.</li> <li>• A new facility should be min approx. 1200sqm (1050sqm also referred to) potentially across 2 floors as this works successfully currently. Additional space would allow currently undelivered services to be delivered (eg. stop smoking, alcohol dependency, Citizen’s Advice, mental health clinics, physiotherapy, group consultations).</li> </ul> <p>A new facility could encompass the NHS Green Practice zero emissions goal which is consistent with the plan proposals for NET.</p>	<p>work. The Council welcomes the involvement of the Surgery in its preparation.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
Thames Regional Flood and Coastal Committee	<p>Pg 51 – mention of existing flood alleviation schemes but not planned ones. Should reference surface water management schemes planned for the area inc. East Thatcham. These should be considered by comprehensive flood risk assessments when planning development in the area.</p>	<p>Comments noted. The supporting text of SP17 does refer to the Thatcham Surface Water Management Plan and the need for it to be considered in the FRA for the site. No further changes are proposed to the LPR.</p>
The Woodland Trust	<p>Supports MM25 and new wording that requires buffers to ancient woodland. Support revised wording on GI strategy.</p>	<p>Support noted</p>
Dawn Adams	<ul style="list-style-type: none"> <li>• Building on greenfield land – loss of agricultural land. Crops are a haven for wildlife.</li> <li>• Would be more like a town, chance definition of a village.</li> </ul>	<p>Comments noted. Comments relating to the principle of the development and the potential impact on the local</p>

Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>• Need green open spaces to enjoy.</li> <li>• Proposal is worrying, unsettling and heartbreaking.</li> </ul> <p>Infrastructure</p> <ul style="list-style-type: none"> <li>• Pressure on existing infrastructure – GP, Dentist, hospital, emergency services.</li> </ul> <p>Highway</p> <ul style="list-style-type: none"> <li>• A4 already slow moving.</li> <li>• Impact on country lanes with no pavements or street lighting which are used for local village access. – use as a rat run to avoid A4, especially if there are issues on the A4.</li> </ul> <p>Environmental Health</p> <ul style="list-style-type: none"> <li>• Impacts on air quality, noise</li> </ul> <p>Flooding</p> <ul style="list-style-type: none"> <li>• Loss of green space to soak up water. Potential to experience 2007 floods again.</li> <li>• A4 already floods when it rains and reduces it to one lane.</li> </ul> <p>Utilities</p> <ul style="list-style-type: none"> <li>• Few properties on mains gas, reliance on oil</li> <li>• Power cuts are common.</li> <li>• Impacts on water supply</li> <li>• Inadequate sewage capacity in surrounding villages.</li> <li>• Refuse collections going from 2 weekly to 3 weekly – the service is already stretched without additional population</li> </ul>	<p>area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>. Please also see the Council's response to Bucklebury Parish Council above.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
Paul Adams	<p>Transport</p> <ul style="list-style-type: none"> <li>• Already congestion</li> <li>• Traffic surveys were carried out during Covid lockdown therefore unsound and disingenuous</li> <li>• Increase in traffic and pollution and road safety on Hart Hill Road and into Upper Bucklebury</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the</p>



Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>• New priority junctions are proposed in the TA but no details of where or how many.</li> <li>• Do not understand the need for car park – provide location for anti-social behaviour. Requiring a car park acknowledges increase in car use</li> <li>• Increased car use will make it more dangerous to walk/cycle in the area</li> </ul> <p>Health Care</p> <ul style="list-style-type: none"> <li>• Already long waits to see GP or dentist.</li> <li>• No Health Impact Assessment has been carried out.</li> <li>• No plans (just words) for increasing infrastructure to GP/dentists. Increasing problems of how to get access to them</li> <li>• Environment - Impact on biodiversity and wildlife</li> <li>• Water - Already unauthorised releases of sewage into rivers after heavy rail. More homes will make this worse.</li> </ul> <p>Other</p> <ul style="list-style-type: none"> <li>• Greenfield site – reports suggest that there will be a positive sustainability impact – suggest this is disingenuous/a lie</li> <li>• Main motivator seems to be financial. Previous proposal at Siege Cross rejected due to urbanisation and lack of infrastructure – this is going ahead without consideration of that decision</li> <li>• Gap between Newbury and Thatcham is already narrow. Will end up with urban sprawl and massive conurbation of West Berkshire.</li> <li>• There are suitable brownfield sites such as Colthrop, which would assist with a bridge over the level crossing but has been turned down.</li> </ul>	<p>Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>.</p> <p>Please also see the Council's response to Bucklebury Parish Council above.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

Respondent	Summary of Main Issues	Council response
Jennifer and Richard Ainsworth	<ul style="list-style-type: none"> <li>• Loss of Agricultural land for producing food.</li> <li>• No indication of how the increase in dwellings will be accommodated – assume it will need to come closer to Upper Bucklebury.</li> <li>• Effectively a settlement the size of Hungerford is being provided without concrete agreement to provide facilities that are needed to serve it.</li> <li>• Highways assessment has ignored significant increase in highways impact when 1500 movements are harmful</li> <li>• Chapel Row already experiences speeding vehicles and high density traffic when there are road works on the A4.</li> <li>• Road safety concerns for Chapel Row – a number of accidents, but no action taken.</li> <li>• Harts Hill will become a rat run for access to M4 J12 and 13. Narrow roads not suitable for volumes of traffic.</li> <li>• Ambiguity around delivery of community infrastructure for education and health.</li> <li>• Existing facilities are full.</li> <li>• If provided off site, vehicle movements will increase.</li> <li>• No evidence that relevant approvals and finance can be provided.</li> <li>• Masterplanning process - Many areas left for the masterplanning process (mitigation, impact, delivery, design).</li> <li>• Consultation process - Unsatisfactory how WBC has engaged with parish Councils around MMs – invite to event 7 days notices. No PC councillors were permitted to attend in person – they are the people elected by the community to put forward our views.</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>.</p> <p>Please also see the Council's response to Bucklebury Parish Council above.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>• Biodiversity - Ecology surveys/evidence is incorrect and outdated to support 1,500 dwellings. No updates done.</li> <li>• AONB - Significant impact on the AONB/NL</li> <li>• SA - Lack of update to assessment of impacts in the SA relating to the increase in dwellings.</li> </ul>	
Kirsty Anderson	<ul style="list-style-type: none"> <li>• Thatcham's infrastructure is already under strain (roads, railway station, GP, schools, pharmacies, sewage system, shops, parking)</li> <li>• Unclear how council expects to manage increased traffic.</li> <li>• Already long queues at the station in the morning.</li> <li>• Scale of development it too large for the town to handle</li> </ul>	<p>Comments noted. Comments relating to the principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>. Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.</p>
A Brand	<ul style="list-style-type: none"> <li>• Unreasonable to build this amount of housing in one town.</li> <li>• Plan will devastate the area for residents and wildlife.</li> </ul>	<p>Comments noted. Comments relating to the principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation</p>

Respondent	Summary of Main Issues	Council response
		<p>Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>. Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.</p>
John Brims	<ul style="list-style-type: none"> <li>• Overriding premise that all issues can be resolved through mitigation or developer contribution, and infrastructure will be put in place to support the development</li> <li>• Infrastructure is rarely put in place and therefore, will not be provided.</li> <li>• Flooding will not be addressed until there is a flooding event – must be considered seriously before development starts.</li> <li>• Lack of foresight in development plan – there will be another catastrophic flooding event in Thatcham at some point – global warming impacts</li> <li>• New dwellings should be placed further away from the AONB.</li> <li>• Not considering what will meet longer-term requirements for people.</li> <li>• Development should only be of a size that can be supported by what is possible.</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>.</p>

Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>• Need to look at the infrastructure required for Newbury and Thatcham as a whole</li> </ul>	<p>Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.</p>
Allison Butcher	<ul style="list-style-type: none"> <li>• Appalled by the increase in number of dwellings.</li> <li>• Previous comments made still stand.</li> <li>• Negative traffic impact, particularly on Harts Hill</li> <li>• Does not state where the additional dwellings will be accommodated – assumption is they will be closer up to Upper Bucklebury</li> <li>• Little clarity around the delivery of infrastructure (education and health facilities)</li> <li>• Engagement with PCs has been shocking – short notice given for a meeting at the end of the consultation and no PC councillors permitted to attend in person. Lack of transparency is shameful.</li> <li>• Biodiversity hard – ecology surveys and evidence base incorrect and outdated in support of 1500 dwellings. No updates made.</li> <li>• Inevitable impact on the AONB</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>.</p> <p>Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.</p>
Liz Butcher	<p>Highways</p> <ul style="list-style-type: none"> <li>• 1500 dwellings was found to be harmful, 2500 will increase this impact further.</li> <li>• Access onto harts Hill will mean more traffic through the narrow lanes to nearby villages.</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the</p>

Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>• A339 to Basingstoke has little improvement planned, and no improvements to A4.</li> </ul> <p>Infrastructure</p> <ul style="list-style-type: none"> <li>• Unclear how infrastructure will be delivered – schools, surgeries.</li> <li>• If delivered away from the site will mean more car journeys.</li> <li>• Developer does not appear to be helping to fund schools and health facilities</li> <li>• Water/sewage provision insufficient</li> </ul> <p>Biodiversity</p> <ul style="list-style-type: none"> <li>• Ecology surveys incorrect and insufficient for 1,500 dwellings, and not been updated for extra 1,000.</li> <li>• Pressure will be put on local environment and wildlife sites by encroachment from human activity.</li> </ul> <p>AONB</p> <ul style="list-style-type: none"> <li>• Significant impact on the AONB</li> </ul> <p>Flooding</p> <ul style="list-style-type: none"> <li>• Flood risk is a significant concern for Thatcham residents</li> </ul> <p>Alternatives</p> <ul style="list-style-type: none"> <li>• Use of brownfield/grey belt land should be used.</li> </ul>	<p>Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>.</p> <p>Policy SP1 makes clear that the Council's strategy seeks to make effective use of brownfield land. Further greenfield allocations are however still needed. There is no grey belt in West Berkshire as there is no designated Green Belt. Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.</p>
Alan Carmichael	<ul style="list-style-type: none"> <li>• Plan contradicts government plan to build new homes on brown/grey areas of land.</li> <li>• Identify these sites and encourage old footpaths/bridleways to be reinstated or created so all residents can enjoy shrinking resource – biodiversity, open space, wildlife, ancient woodland, flora.</li> <li>• Build on already destroyed urban land and retain open space and wonderful countryside.</li> </ul>	<p>Comments noted. Policy SP1 makes clear that the Council's strategy seeks to make effective use of brownfield land. Further greenfield allocations are however still needed. There is no grey belt in West Berkshire as there is no designated Green Belt.</p>

Respondent	Summary of Main Issues	Council response
		Comments related to Rights of Way will be fed into the SPD process. No further changes are proposed to the LPR.
Steve Davies	<ul style="list-style-type: none"> <li>• Increase the population by at least 10%</li> <li>• Would like to see a booklet that gives a thorough description of what will be built, what standards, changes to infrastructure, environment. Should be distributed to all residents and be invited to raise any issues. Lack of transparency in current process.</li> <li>• Increased congestion</li> <li>• Roads struggle to come at the moment</li> <li>• No clarity/certainty on replacement of level crossing</li> <li>• Existing by-pass no longer fit for purpose</li> <li>• Estate roads need to support electric vehicles (charging points and increased weight/separation requirements).</li> <li>• Loss of habitat and biodiversity</li> <li>• It is AONB without the designation.</li> <li>• Impact on air quality</li> <li>• Can Thames Water supply the houses without using the attenuation basins as a Lambourn Meadows?</li> <li>• Schools, medical facilities, other public services already over stretched.</li> <li>• No guarantees of any new schools</li> <li>• What are the plans for expansion of the town centre?</li> <li>• Development is not in keeping with the character of our community. Scale and design are out of place and will negatively impact on aesthetic/social fabric of the area</li> <li>• Open spaces and green areas are valued and will be lost</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>.</p> <p>Please also see the Council's response to Bucklebury Parish Council above.</p> <p>No further changes are proposed to the LPR.</p>

Respondent	Summary of Main Issues	Council response
Annette Dickens	<ul style="list-style-type: none"> <li>• SP17 is riven with ambiguities and statements on sustainability unsupported by evidence</li> <li>• GI in Perpetuity needs to be strengthened with a binding legal agreement</li> <li>• Ecology/biodiversity impact lack supporting details</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>.</p> <p>Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.</p>
Barry Dickens	<ul style="list-style-type: none"> <li>• No assessment made of the impact on rural roads.</li> <li>• Will increase car travel especially if facilities are off site.</li> <li>• No planned improvements to the A4/Floral Way which is often congested at peak times.</li> <li>• Impact on Harts Hill – traffic and road safety.</li> <li>• Unsound – not positively prepared or effective</li> <li>• No reference to who will maintain the GI.</li> <li>• No assessment of where the additional dwellings will go – will reduce the GI provision.</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The</p>



Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>• What account has been taken for community infrastructure land requirements and other buffers etc. Likely to be insufficient land for the additional housing.</li> <li>• GI needs a strong level definition</li> </ul> <p>Unsound – not positively prepared or effective.</p>	<p>issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>.</p> <p>Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.</p>
Antonia Elliott	<ul style="list-style-type: none"> <li>• No indication of how increase in dwellings will be accommodated – dwellings will come closer to Upper Bucklebury</li> </ul> <p>Highways</p> <ul style="list-style-type: none"> <li>• Significant impact on highways</li> <li>• 1500 dwellings already had a detrimental impact.</li> <li>• Access onto Harts Hill will result in rat running through Upper Bucklebury to M4 J12 and 13.</li> <li>• Floral way is already congested, was supposed to be a residential road but is use as a bypass</li> </ul> <p>Infrastructure</p> <ul style="list-style-type: none"> <li>• Ambiguity around the provision of community infrastructure (education/health facilities)</li> <li>• Facilities off-site would result in increased car journeys.</li> </ul> <p>Masterplanning</p> <ul style="list-style-type: none"> <li>• Mitigation, impact, delivery and design are all being left to the masterplanning process.</li> <li>• WBC has provided little reassurance on how this process will be managed.</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>.</p> <p>Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.</p>

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	<ul style="list-style-type: none"> <li>• EA flood risk map shows new development at high risk of flooding</li> <li>• Concerns over flood risk and surface water drainage following 2007 flood event.</li> <li>• Air pollution will have impact on habitats in the area</li> <li>• Soil pollution – no evidence soil quality will be maintained or improved which will impact on wildlife</li> <li>• Concerns about WBC engagement with Parish Council – meeting only had 7 days notice and no parish councillor could attend in person</li> </ul>	
David Fittall	<ul style="list-style-type: none"> <li>• Short coming of 1500 dwellings proposal surprised to see this increased</li> <li>• Shortage of housing is the result of policy choice made by successive governments. Did not need to happen in this way to result in broken undemocratic system where residents views are held in contempt by politicians and bureaucrats</li> <li>• Local roads already congested</li> <li>• Traffic modelling not fit for purpose</li> <li>• Harts Hill/Floral way already queues.</li> <li>• Roads cannot cope</li> <li>• Harts Hill / Upper Bucklebury will become a rat run</li> <li>• Community infrastructure needs to be confirmed before approval</li> <li>• No confidence WBC will handle this given the lack of respect to BPC with short notice meetings and not allowing BPC reps to attend the meeting</li> <li>• Concerns over impact on Biodiversity and AONB</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>.</p> <p>Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.</p>

Respondent	Summary of Main Issues	Council response
<p>Roger Frankum</p>	<ul style="list-style-type: none"> <li>• Need additional housing but 2500 dwellings in one place is not the answer.</li> </ul> <p>Highways</p> <ul style="list-style-type: none"> <li>• Roads are very busy and likely to be inadequate</li> <li>• Already a rat run through Bradfield Southend and Upper Bucklebury for people avoiding the A4</li> <li>• Pressure on Cold Ash as route to A34.</li> <li>• Thatcham station too far to walk, and has limited parking</li> </ul> <p>Flooding</p> <ul style="list-style-type: none"> <li>• Already flooding issues</li> <li>• Drainage and sewerage systems cannot cope with storms.</li> <li>• A4 floods after heavy rain – will be worse with 250 houses and their driveways.</li> </ul> <p>Infrastructure</p> <ul style="list-style-type: none"> <li>• Education facilities are full (Kennet) and cannot be expanded. New facilities would be needed to be built in time.</li> </ul> <p>Biodiversity</p> <ul style="list-style-type: none"> <li>• Bucklebury Common is a SSSI – likely to be attractive to new residents and their dogs which would impact ground nesting birds.</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>. Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.</p>
<p>Wynne Frankum</p>	<p>Highways</p> <ul style="list-style-type: none"> <li>• A4 is already congested.</li> <li>• Majority of roads north/south are rural and not built to accommodate additional traffic.</li> <li>• Noticeable increase in traffic using Upper Bucklebury in recent years – presumably as an alternative to the A4</li> </ul> <p>Ecology</p>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The</p>

Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>• Ecology survey and evidence base is incorrect an outdated to support 1,500 dwellings. No updates made to support 2,500.</li> <li>• Loss of habitat is a serious national issue.</li> <li>• Impact on ancient woodland and Bucklebury Common with additional visitor numbers</li> </ul> <p>Masterplanning</p> <ul style="list-style-type: none"> <li>• Many details left to masterplanning process, which little assurance form WBC on how this will be carried out.</li> <li>• Thatcham has seen a number of large developments in last 50 years, without significance infrastructure improvements – difficult to see how this could be comfortably absorbed into the existing town without detailed and costed infrastructure plan.</li> </ul>	<p>issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>.</p> <p>Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.</p>
Bernice Gray	<ul style="list-style-type: none"> <li>• Concern infrastructure won't be put in place to serve a larger community.</li> <li>• Concerns around schools, doctors and dentists</li> <li>• Increase in traffic, especially around the level crossing</li> </ul>	<p>Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>.</p>

Respondent	Summary of Main Issues	Council response
		Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.
Robert Hadley	<ul style="list-style-type: none"> <li>• Thatcham and surrounding villages are already overdeveloped</li> <li>• To much housing planned for greenfield/countryside to deal with illegal migration.</li> </ul> <p>Highways</p> <ul style="list-style-type: none"> <li>• A4 cannot cope – traffic diverts through villages when there is an issue.</li> </ul> <p>Infrastructure</p> <ul style="list-style-type: none"> <li>• Infrastructure cannot cope</li> <li>• Local schools, doctors, dentists, hospitals are overcrowded.</li> <li>• RBH not going to get it's planned expansion until 2035.</li> </ul> <p>Agricultural land</p> <ul style="list-style-type: none"> <li>• Loss of prime agricultural land needed for food production.</li> </ul> <p>Ecology / Biodiversity</p> <ul style="list-style-type: none"> <li>• Loss of habitat for wild animals</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>.</p> <p>Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.</p>
Simon Hannam	<ul style="list-style-type: none"> <li>• No consideration of how the additional showing will be accommodated – assumed they will be build closer to Upper Bucklebury</li> </ul> <p>Highways</p> <ul style="list-style-type: none"> <li>• Negative impact on road network, especially Harts hill. Rat running to M4 will increase</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the</p>

Respondent	Summary of Main Issues	Council response
	<p>Infrastructure</p> <ul style="list-style-type: none"> <li>No clarity around the delivery of education/health facilities.</li> </ul> <p>Biodiversity</p> <ul style="list-style-type: none"> <li>BPC showed ecology surveys and evidence were incorrect and outdated for 1500 dwellings, not updated for 2500</li> </ul> <p>Landscape</p> <ul style="list-style-type: none"> <li>Impact on AONB inevitable</li> </ul> <p>Consultation</p> <ul style="list-style-type: none"> <li>Engagement with PC is shocking – short notice meeting, no Councillors permitted to attend in person</li> <li>Lack of transparency</li> </ul>	<p>Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>.</p> <p>Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.</p>
Glen Higgins	<ul style="list-style-type: none"> <li>No indication of how the increase in dwellings will be accommodated</li> <li>Other sites are available to reduce reliance on NET, grey belt and brownfield land there are several around Thatcham that could be considered.</li> </ul> <p>Highways</p> <ul style="list-style-type: none"> <li>1500 dwellings already had a detrimental impact.</li> <li>Access onto Harts Hill will result in rat running through Upper Bucklebury to M4 J12 and 13.</li> <li>Little improvement planned for A339 to Basingstoke and no improvements for the A4 which is often gridlocked</li> </ul> <p>Infrastructure</p> <ul style="list-style-type: none"> <li>Ambiguity around the provision of community infrastructure (education/health facilities)</li> <li>Developer does not appear to be helping to fund schools and health facilities – need some commitment from the developer</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>.</p>

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	<ul style="list-style-type: none"> <li>• Facilities off-site would result in increased car journeys.</li> </ul> <p>Landscape</p> <ul style="list-style-type: none"> <li>• AONB will be impacted</li> </ul> <p>Flooding</p> <ul style="list-style-type: none"> <li>• Flood risk in Thatcham is a great concern</li> <li>• Water and sewage infrastructure is insufficient</li> </ul>	<p>Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.</p>
Emma Hillen	<ul style="list-style-type: none"> <li>• Insufficient sewage treatment capacity in the area</li> <li>• Loss of greenbelt between rural villages and Thatcham</li> <li>• vacant industrial units could be used to make homes</li> <li>• Floral Way already congested – new estate will use it as a rat run</li> <li>• 2500 is too many, half would be reasonable</li> <li>• Lack of infrastructure (school, doctors, hospitals)</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>.</p> <p>Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.</p>
Eric Lloyd	<ul style="list-style-type: none"> <li>• Inappropriate to dump such a large development in green-field location. Will have signifnat impacts on Thatcham and the neighbouring villages in AONB</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been</p>

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	<ul style="list-style-type: none"> <li>• No one wants the development, the whole process is undemocratic.</li> <li>• Understood that the Dunston Park and Thatcham Relief Road would be the boundary for any future Green Belt development northwards</li> <li>• Additional dwellings may be convenient, indiscriminately allocated to meeting government or WBC targets</li> <li>• Majority of residents do not wish to see any housing in this area as it will destroy the rural nature and quiet atmosphere of the AONB right next to Bucklebury Common.</li> <li>• Concerned about wider implications likely to result from an apparent planned over provision of housing which puts pressure on the Council to unreasonably allocated development to greenfield land in a sensitive area.</li> <li>• Development of farming land which neither warrants nor should expected ally allocation of housing due to the steep gradient and viability from A4/Thatcham/Kennet Valley below will be a permanent eye sore in the landscape.</li> <li>• Housing numbers should be based on local need for each area, not a broad numbers game mandated form central government.</li> <li>• LA has duty of care to concentrate location of housing on brownfield/semi brownfield sites or in less prominent, less controversial sensitive non AONB locations.</li> <li>• Floral Way was built to take pressure of A4, will require extensive up-grading to cope with additional traffic. Floral Way/Hart Hill roundabout will be constantly grid locked</li> <li>• Use of Harts Hill as an access to the site will exacerbate traffic congestion problems on a dangerous, steep and windy road</li> </ul>	<p>discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>.</p> <p>Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.</p>



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	<ul style="list-style-type: none"> <li>• Traffic surveys must take into account of Harts Hill as a shortcut for traffic to Reading and to the A34/M4 to avoid the congestion on the A4</li> <li>• Broad Lane/The Avenue is a rat run with traffic travelling at 50/60mph alongside Bucklebury Common – road safety concerns for walkers, cycles and the adjacent designated quiet lanes. Will get worse with additional traffic.</li> <li>• Lack of parking around Thatcham Town Centre and at the station</li> <li>• Level crossing causes safety issues and traffic around the station. Will get worse with additional traffic. A solution for the level crossing is required now.</li> <li>• A third party independent review of infrastructure is required.</li> </ul>	
Nancy Massy-Collier	<ul style="list-style-type: none"> <li>• Town is already struggling to cope and provide basic service and infrastructure.</li> <li>• Is current need for housing this extensive?</li> <li>• Concerns of joining up Newbury and Reading along the A4.</li> <li>• Destruction of countryside</li> <li>• Loss of amenity</li> <li>• Flood risk increase</li> <li>• Loss of food production capacity</li> <li>• Reduction in green space between Thatcham and Reading</li> <li>• Police do not have sufficient resources in local teams.</li> <li>• Increase population will increase levels of crime</li> <li>• Lack of medical facilities (GP/Hospital). RBH improvements delayed.</li> <li>• Sewage system at capacity. Development should not start until TW increase capacity.</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>.</p>

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	<ul style="list-style-type: none"> <li>• Water supply capacity to new dwellings also needs to be increased. Is the water expected to come from the River Thames.</li> <li>• What facilities will be provided in terms of retail and leisure? Needs to consider all ages groups and be in place before other development begins.</li> <li>• What consideration has been given to providing places of worship?</li> <li>• Concerns about access onto Harts Hill, will result in rat running through nearby villages. Harts Hill was not designed to take heavy traffic and cannot be improved.</li> <li>• Consider setting up a local property bond, funding generated locally should have some community control over what is built and could fund much needed social housing.</li> </ul>	<p>Thatcham Town Council is in the process of developing a Neighbourhood Plan. Town and parish council's with a made Neighbourhood Plan receive 25% of CIL receipts for the relevant Neighbourhood Area. This money can be used to fund community facilities.</p> <p>Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.</p>
Prue Matchwick	<p>Brownfield sites must be available which would not impact on the AONB</p> <ul style="list-style-type: none"> <li>• Harts Hill will be compromised – barely a 2 lane road as it is. No space for pavements/bike lane.</li> <li>• A339 to Basingstoke has little improvement plans, nothing for A4.</li> <li>• Lack of bridge over railway line is one of the biggest problems for Thatcham.</li> <li>• Where are extra schools, doctor's surgeries going to go? Need to be in reach of houses or result in more car journeys</li> <li>• Sewage provision is insufficient – when will this be sorted?</li> <li>• Significant harm will be caused</li> <li>• Ecological surveys and evidence is incorrect and insufficient for 1500 dwellings and has not been updated.</li> <li>• Impact on wildlife sites by human activity</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>.</p>

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		Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.
Belinda Matthewman	<ul style="list-style-type: none"> <li>• No indication of how increase in dwellings will be accommodated – dwellings will come closer to Upper Bucklebury</li> <li>• Significant impact on highways</li> <li>• 1500 dwellings already had a detrimental impact.</li> <li>• Access onto Harts Hill will result in rat running through Upper Bucklebury to M4 J12 and 13.</li> <li>• Floral way is already congested, was supposed to be a residential road but is use as a bypass</li> <li>• Ambiguity around the provision of community infrastructure (education/health facilities)</li> <li>• Facilities off-site would result in increased car journeys.</li> <li>• Mitigation, impact, delivery and design are all being left to the masterplanning process.</li> <li>• WBC has provided little reassurance on how this process will be managed.</li> <li>• EA flood risk map shows new development at high risk of flooding</li> <li>• Concerns over flood risk and surface water drainage following 2007 flood event.</li> <li>• Air pollution will have impact on habitats in the area</li> <li>• Soil pollution – no evidence soil quality will be maintained or improved which will impact on wildlife</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>.</p> <p>Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.</p>

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	<ul style="list-style-type: none"> <li>Concerns about WBC engagement with Parish Council – meeting only had 7 days notice and no parish councillor could attend in person</li> </ul>	
Neil McCullen	<ul style="list-style-type: none"> <li>Infrastructure issues need to be addressed in the first phase of any development (School places, sewerage, Doctor/Dentist, Road Capacity and type</li> <li>Homes for first time buyers and young facilities.</li> <li>Some developments should be given over to local SME builders, rather than large corporate builders.</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>.</p> <p>Please also see the Council's response to Bucklebury Parish Council above.</p> <p>Who develops a site is a commercial decision of the landowner, of which the Council has no involvement.</p> <p>No further changes are proposed to the LPR.</p>
Stephanie Molloy	<ul style="list-style-type: none"> <li>Agreement needs to be made as to the total number of dwellings on the plot and the delivery of infrastructure (schools, primary healthcare, indoor sports and community</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact</p>

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	<p>uses). These need to be in place as new homes are being built as there is no space in Thatcham to assume an increase in population of this size</p> <ul style="list-style-type: none"> <li>• Surface water drainage strategy will be required</li> <li>• Agree 40% affordable housing and 3% self/custom build</li> <li>• All buildings should incorporate the highest energy efficient, environmental and safeguarding standards.</li> <li>• All buildings should have solar panels and batteries as standard</li> <li>• ICB need to be involved in primary healthcare provision, but needs to be paid for by developer</li> <li>• Biodiversity and wildlife corridors will be destroyed</li> <li>• Ancient woodland needs to be preserved with buffers and no build zones</li> <li>• In perpetuity needs a legal definition agreed by the public in Thatcham and Upper Bucklebury and the AONB</li> </ul>	<p>on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>. Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.</p>
Katharine Montague-Johnstone	<ul style="list-style-type: none"> <li>• Loss of agricultural land</li> <li>• Next to AONB</li> <li>• Land liable to flooding</li> <li>• Local schools unable to cope with additional pupils – resulting in people driving to schools</li> <li>• GP at capacity as is the local hospital. New doctor's surgery will be full as soon as it opens.</li> <li>• Unable to find NHS dentist that can take on new patients</li> <li>• Water and sewage systems are already stretched – could result in pollution getting into the water courses</li> <li>• Domestic rubbish will increase with no plan as to how to manage this – already struggling to remove increase in load</li> <li>• Inadequate public transport</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's</p>

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	<ul style="list-style-type: none"> <li>• Traffic congestion already occurs</li> <li>• impact on local villages used as rat runs to avoid congestion on the A4.</li> <li>• Rural roads already have frequent accidents due to excessive speed, traffic incidents and collisions with animals</li> <li>• Parking is already a problem in Thatcham, especially at the station.</li> <li>• Result in habitat loss</li> <li>• Light pollution in rural areas</li> <li>• Increase in air pollution</li> </ul>	<p>response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>.</p> <p>Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.</p>
Emanuela Morando	<ul style="list-style-type: none"> <li>• Traffic impact will make the area unsafe</li> <li>• Road network unsuitable to manage further traffic</li> <li>• Impact on landscape</li> <li>• Impact on local wildlife</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>.</p> <p>Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.</p>

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Sue Morgan	<ul style="list-style-type: none"> <li>• More than 1000 is too many houses to be feasible or sustainable.</li> <li>• No indication of how the increase will be accommodated – assume further up the hill towards Upper Bucklebury.</li> </ul> <p>Infrastructure</p> <ul style="list-style-type: none"> <li>• Ambiguity around delivery of community infrastructure (education, health care)</li> <li>• Off site would result in more car journeys</li> </ul> <p>Biodiversity</p> <ul style="list-style-type: none"> <li>• BPC proved ecology survey and evidence base were incorrect and outdated for 1500 dwellings and have not been updated.</li> </ul> <p>Landscape</p> <ul style="list-style-type: none"> <li>• Impact on AONB</li> </ul> <p>Consultation</p> <ul style="list-style-type: none"> <li>• Concerns about engagement with PC – meeting just 7 days notices, no Councillors permitted to attend the meeting.</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>.</p> <p>Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.</p>
Michael Morrison	<p>Sewage (SA App 5)</p> <ul style="list-style-type: none"> <li>• No building can start until it is confirmed there is adequate capacity to handle sewage.</li> <li>• The extra capacity required for the development will not be available for the foreseeable future</li> <li>• No indication that TW have been asked about the ability to process sewage from the site.</li> </ul> <p>Transport</p> <ul style="list-style-type: none"> <li>• Unrealistic to expect people to walk/cycle to the station</li> <li>• No mention of any upgrades to the road network</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The</p>

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	<ul style="list-style-type: none"> <li>• Need new bridge over railway</li> <li>• Clearly a need for substantial changes to the surrounding roads for 2500 dwellings</li> </ul> <p>Gaps</p> <ul style="list-style-type: none"> <li>• Will remove the gap between Thatcham and upper Bucklebury. Other settlement have Strategic gaps retained to ensure urban sprawl doesn't happen. Henwick is in the same situation.</li> </ul> <p>GI (Main mods 2.12)</p> <ul style="list-style-type: none"> <li>• No details relating to 'retained in perpetuity'. Without precise working the green areas could be used for further development.</li> <li>• Area in setting of AONB therefore, this is most important.</li> </ul> <p>MM 3.5</p> <ul style="list-style-type: none"> <li>• Further consideration or analysis are mentioned – a lot of essential details are missing and have not properly been considered. Substantial work needed for building can start</li> <li>• Detailed traffic survey and copies of letter to/from TW would be a start.</li> </ul>	<p>issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>.</p> <p>Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.</p>
David and Emily Mumby	<ul style="list-style-type: none"> <li>• Infrastructure cannot cope - Inadequate doctors, no parking at station, schools. Traffic impact in Bucklebury.</li> <li>• Impact on environment, wildlife, countryside.</li> <li>• Better solution to building more homes, scale down development. Corrupt dev. Being rushed through planning.</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the</p>



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		<p>hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>.</p> <p>Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.</p>
Damian Musker	<ul style="list-style-type: none"> <li>• No indication of how increased dwellings will be accommodated, assuming will come closer to Upper Bucklebury</li> <li>• Highways impact was severe at 1500 dwellings.</li> <li>• Harts Hill access will result in rat running through villages.</li> <li>• Ambiguity around delivery of community infrastructure (education, health care) if off site will increase traffic movements.</li> <li>• Biodiversity – BPC shows ecology surveys and evidence was incorrect and outdated for 1500 dwellings, has not been updated.</li> <li>• Impact on AONB</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>.</p> <p>Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.</p>

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<p>Carol Newby</p> <p>David Newby</p>	<ul style="list-style-type: none"> <li>• Increase in dwellings will put pressure on amount and type of GI</li> <li>• Needs to be delivered in a way that protects the existing communities and proves sustainable development</li> <li>• Detailed plan, inc. management in perpetuity and legal agreement is required.</li> <li>• Increase pressure on AONB a lower number of dwellings would protect the AONB</li> <li>• Community park linking Thatcham to AONB will increase pressure on AONB</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>.</p> <p>Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.</p>
<p>Calliope Orfanos</p>	<ul style="list-style-type: none"> <li>• Seems rushed and convenient proposal made by WBC</li> <li>• Focus on increasing development with little care as to the impact.</li> <li>• WBC not done enough to ensure residents can respond – not aware of meeting where a representative came to discuss proposals with residents and parish councillors</li> <li>• No evidence 1000+ dwellings are needed on greenfield site.</li> <li>• Not clear where the additional dwellings will be located within the development boundary without further encroachment on rural environment and designated open space.</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The</p>

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	<ul style="list-style-type: none"> <li>• Not clearly demonstrated how provision of infrastructure will be met in advance of need and in a timely and coordinated way.</li> <li>• Little recognition of impact of more development on existing overs stretched services in Thatcham.</li> <li>• Mitigation measures are unclear and presented as a wish list</li> <li>• Inadequate consideration of use of designated play or community venues for young people.</li> <li>• Town centre and Thatcham facilities would be impacted</li> <li>• Demands and impact not recognised. Harts Hill is hazardous and heavily used as if Floral Way. Floral way is already congested.</li> <li>• Routes are hazardous</li> <li>• Increased traffic to A4, railway or school will amplify the risks.</li> <li>• Need for paths and routes to highways needs to be emphasised and put in place before dwellings</li> <li>• New secondary school is even more essential but not clear how this will be done.</li> <li>• Need clear proposals in place before house construction begins.</li> <li>• Off site would result in more children needing transport</li> <li>• Little information of service provision. Demand cannot be met by already overstretched services.</li> <li>• New facility with safe access required.</li> <li>• Not viable until approved with ICB – little reference to this.</li> <li>• High flood risk is not addressed. Is there a SWMP in place or is this left to developers?</li> <li>• Development needs to get BNG. Not sure how this will be achieved or monitored.</li> </ul>	<p>issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>.</p> <p>Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.</p>

Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>Previously flawed information has not been updated to support additional dwellings.</li> <li>Odd that this is funded by the applicant</li> <li>Lack of clarity about skeleton infrastructure needed before development takes place.</li> </ul>	
John Parascandolo	<ul style="list-style-type: none"> <li>Could be accommodated in other development in West Berkshire eg. Town Centre buildings.</li> </ul> <p>Highways</p> <ul style="list-style-type: none"> <li>Highways impact already significant at 1500 dwellings</li> <li>Harts Hill access will mean a potential rat run through Upper Bucklebury to M4 and the Common</li> </ul> <p>Infrastructure</p> <ul style="list-style-type: none"> <li>Ambiguity around delivery of community infrastructure (Education/Health)</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>.</p> <p>Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.</p>
Powell Family	<ul style="list-style-type: none"> <li>Negative impact on Upper Bucklebury and goes against the 'Bucklebury Vision'</li> <li>2500 dwellings is disproportionate in the area where there is AONB and flood plains.</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the</p>

Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>• Should have been reviewed post Covid when demographics and working patterns have change – who will come and live in these houses</li> <li>• Reducing birthrates means local primary schools are not filling their classes – more likely that schools will not get built.</li> <li>• Not clear when new facilities will appear – need to be built first.</li> <li>• Additional pressure on station parking – facilities are not adequate.</li> <li>• Footpath would link new development to Upper Bucklebury (Long Grove to Colthrop). Already seen increased footfall since pandemic. Will Long Grove residents be expected to continue to repair and maintain their road for non-parishioners?</li> <li>• No consideration of traffic on village roads</li> <li>• Harts Hill is dangerous especially in winter months</li> <li>• A4/Floral Way become congested at peak times leading to rat running through the village.</li> <li>• Impacts on air quality and safety for children walking to school</li> <li>• Development is creeping up the hill towards Upper Bucklebury – loss of identity, peace, tranquillity and security of the Common</li> <li>• Detrimental effect on Bucklebury Common ancient woodland, meadows and wildlife</li> <li>• Details of this should be included on how BNG will be achieved.</li> <li>• Loss of agricultural land – hard to see how BNG can be provided.</li> </ul>	<p>Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>.</p> <p>Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.</p>

Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>• Why is the country park needed? As a gap between ‘us’ and ‘them’</li> <li>• A piece of land that is too difficult and expensive to build on</li> <li>• Would like to know what it will look like</li> <li>• Gradient to seep for informal recreation.</li> <li>• How will it be managed/maintained in the long term.</li> <li>• Protection seems unclear – more detail and commitment is needed.</li> </ul>	
Councillor Chris Read	<ul style="list-style-type: none"> <li>• Not positively prepared - does not provide a strategy for SP17</li> <li>• Not justified – does not consider reasonable alternatives – no other strategic site presented. Not based on proportionate evidence.</li> <li>• Is not a sustainable development to increase Thatcham by 25% with the hope that the necessary services and infrastructure will appear (Education, health, traffic management, flood alleviation, sewage, water)</li> <li>• Evidence that the Council did not complete all suitable feasibility studies and plan was submitted in a rush without necessary oversight from senior planning officer.</li> <li>• Cost of reverse engineering and damage caused will be significant</li> <li>• Support comments submitted by BPC.</li> </ul> <p>Consultation process</p> <ul style="list-style-type: none"> <li>• Concerned by lack of willingness to engage the public. Should have been a public meeting on the consultation. Only Parish Councillors invited and close to end of the consultation.</li> </ul> <p>Water environment</p>	<p>Comments noted.</p> <p><b>Spatial strategy, principle of the development and the potential impact on the local area</b> - these issues have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council’s <a href="#">Statement on Matter 4</a> sets out the approach it has taken. A number of alternatives were considered, as set out in the Council’s response to <a href="#">PQ21 of EXAM 2</a> (pg 42-44) and in the <a href="#">SA/SEA</a> (pg 25). The SA/SEA is an iterative process, carried out on a consistent basis across all alternatives being considered. The Council considers that all of the necessary work at this stage of the plan making process . Where further work is required to accompany the</p>

Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>• Sewage works is at capacity. No development should start until new strategic sewage work is built</li> <li>• Water issues in upper Bucklebury, relay on pumping station at bottom of Harts Hill – frequently breaks. All necessary remedial and upgrade work need to be completed before development goes ahead.</li> </ul> <p>Infrastructure</p> <ul style="list-style-type: none"> <li>• Kennet school is oversubscribed (pupils in West Thatcham have to go to Trinity). If no increase in capacity at Kennet an impact study on transport to Theale Green, Downs or Hurst must be carried out. HTST costs and feasibility must be produced and budgetary impact presented to WBC.</li> </ul> <p>Highways</p> <ul style="list-style-type: none"> <li>• Impact on Brimpton Road/A4 junction needs to be considered – alternate route to Thatcham Level crossing.</li> <li>• Impact on new police logistics hub being built on Migham Marsh</li> <li>• Insufficient evidence in the plan that the necessary parking and security of increased use of vans will be made available to new residents. Will residents be expected to find whatever space they can to complete their jobs/business</li> </ul>	<p>planning application, then this is set out within the policy.</p> <p>The issues were also discussed at the hearing sessions in May, June and October last year and the Council’s response to the additional work requested by the Inspector is set out in <u>EXAM42</u>.</p> <p><b>Completion of feasibility studies -</b> The Council considers that all of the necessary work at this stage of the plan making process. Where further work is required to accompany the planning application, then this is set out within the policy.</p> <p><b>Increase in numbers, transport, consultation, healthcare -</b> See the Council’s response to Bucklebury Parish Council above.</p> <p><b>Infrastructure, education, flood risk, sewage, and water -</b> These matters were discussed at the hearing sessions for Matter 4 held on 21 and 22 May 2024. The Council also refers to its Written Statement for Matter 4 (WS4/1) and its response to the Inspector’s Action Points contained within EXAM42.</p> <p>In respect of the timing of the delivery of infrastructure, MM34 amends the</p>

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		<p>first paragraph of policy SP24 (Infrastructure Requirements and Delivery) to include text that makes clear that development will be required to ensure the timely and coordinated delivery of necessary infrastructure having regard to the latest version of the Council's Infrastructure Delivery Plan (IDP), through proportionate financial contributions and / or on-site provision. Where necessary, the phasing of development will be linked to infrastructure provision.</p> <p><b>Parking</b> - Policy DM44 has regard to parking and states that parking provision in association with development will be required to ensure that all modes have the facilities that they require. In respect of non-residential parking, policy DM44 comments that the level of vehicular parking will be judged on a case by case basis.</p> <p><b>Rights of Way</b> - As set out within the Council's response to the Inspector's Action Points contained within EXAM42, MM25 requires a Public Rights of Way Strategy.</p>



Respondent	Summary of Main Issues	Council response
		Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.
Ben Seth	<p>Support BPC comments</p> <p>Education</p> <ul style="list-style-type: none"> <li>• Feasibility study should be carried out in advance of the plan.</li> <li>• Should be min requirement to provide a new secondary school and SEND on site. <ul style="list-style-type: none"> <li>○ Kennet at capacity with a waiting list</li> <li>○ New houses will bring in additional children (at least 716 children needing primary and secondary provision)</li> </ul> </li> <li>• Other schools in West Berkshire cannot absorb children from Thatcham.</li> <li>• Little reassurance in the policy that a secondary school will be provided.</li> <li>• To be sound the modification must ensure that provision of secondary and SEND is viable for the development.</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>.</p> <p>Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.</p>
Cara Shearn	<ul style="list-style-type: none"> <li>• Excess traffic</li> <li>• Reduced biodiversity</li> <li>• AONB</li> <li>• Lack of clarity on physical area houses will be built on and how education and health needs will be catered for.</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the</p>

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		<p>Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>.</p> <p>Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.</p>
Craig Smith	<ul style="list-style-type: none"> <li>• Proposals rushed through</li> <li>• Don't account for UK gov's direction of the use of brownfield land</li> <li>• Ecological claims are falsified</li> <li>• Local infrastructure ill considered and lack credibility</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>.</p>

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		Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.
Norma Smyth	No proper detailed evidence-based documentation for the proposed changes and the enormity of such development at NET	Comments noted. Comments relating to the principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 ( <a href="#">Reg18</a> ) and <a href="#">Reg 19</a> . The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a> . Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.
Bernie Southgate	<ul style="list-style-type: none"> <li>• No indication of how the increased number of dwellings will be accommodated, assuming it will need to come closer to Upper Bucklebury.</li> <li>• Significant highways impact at 1,500 dwellings.</li> <li>• Harts Hill is hazardous.</li> <li>• Bikes are often ridden or pushed up Harts Hill</li> </ul>	Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1

Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>• Access onto Harts Hill will encourage its use a rat run to M4 J12/13 and the Common</li> <li>• Ambiguity around delivery of infrastructure (education/healthcare)</li> <li>• Off site provision would result in additional traffic journeys.</li> <li>• Doctors surgery would be needed before any potential patients move to the site. No capacity in surrounding surgeries.</li> <li>• Significant concern over potential harm to biodiversity resulting from the development.</li> <li>• Ecology surveys and evidence was incorrect and haven't been updated for the additional dwellings.</li> <li>• Impact on the setting of the AONB.</li> <li>• Concern over water supply. Harts Hill road is often closed while TW repair sewage pipes.</li> <li>• Assessment required as to the quality of supply. Poor record of discharge needs to be guaranteed</li> <li>• Flooding and groundwater may be a problem</li> <li>• Flood alleviation infrastructure was built before the development was proposed.</li> <li>• Many areas (mitigation, impact, delivery, design) are left to the masterplanning process. Little reassurance from WBC as to how this will be carried out.</li> <li>• Concerns as to how WBC has engaged with PCs as part of the consultation – short notice meeting, no PC councillors permitted to attend the meeting in person.</li> </ul>	<p>and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>.</p> <p>Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.</p>
David Southgate	<p>Unsound against the 4 tests</p> <ul style="list-style-type: none"> <li>• The modifications set out more uncertainty around the delivery of infrastructure.</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact</p>

Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>• Council has failed to consult local groups as part of the local plan – meeting in Jan. Gives no comfort the masterplan will be any different.</li> <li>• Requirement for Masterplan SPD is welcome, but not considered this makes the policy sound.</li> <li>• Requirements for the masterplan to be adopted prior to submission of application is evidence of the allocation being made in haste. Lacking justification and evidence.</li> <li>• Vital to establish the true capacity of the site.</li> <li>• Principle of collaboration with parish councils, the community and other stakeholders is welcome, but no scope or framework for this there is little comfort as to how the masterplanning process will be undertaken and what the outcomes will be in fundamental concerns are raised.</li> <li>• No indication of what will happen should the SPD not be adopted within 12 months of the adoption of the LPR if significant objections remain.</li> <li>• Opportunity for consultation with parishioners in local council public meeting was refused. Engagement with parish Councils was last min, making it very difficult for the public to meaningfully engage</li> <li>• Provision of healthcare is severely flawed, and there is no certainty the form of provision that might come forward on the site or the viability of the provision. Removal of size requirements reflects this lack of certainty.</li> <li>• Inclusion of feasibility work does not remedy the fundamental issue of soundness in the approach.</li> <li>• Secondary and SEND provision is also subject to a feasibility study.</li> </ul>	<p>on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>.</p> <p><a href="#">PMC4</a> sets out the modification to the settlement boundary at Thatcham to exclude the site from the settlement boundary. Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.</p>

Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>• If this work has been done in advance of submission of the plan there would be no need for them now.</li> <li>• Proposed amendments introduce ambiguity on the type, amount and location of the community benefits.</li> <li>• Suggestion that infrastructure can be [provided off site is not considered to be justified and would lead to significant impacts for the wider community and new residents.</li> <li>• Increased pressure on GI that can be delivered with increased dwellings.</li> <li>• Clearly a vital part of the Masterplan SPD process</li> <li>• Concerns remain as to how GI will be delivered in a way that protects the existing communities and provides sustainable development.</li> <li>• GI buffer cannot be confirmed until the master planning process has been undertaken.</li> <li>• No buffer made around the areas of ancient woodland or heritage assets.</li> <li>• Traffic impacts were a key concern for 1500 dwellings, will be exacerbated at 2500 dwellings.</li> <li>• Evidence base and assessments are fundamentally flawed</li> <li>• Requirements for multiple access points is a concern, especially access onto Harts Hill Road, which gives a direct route through to Upper Bucklebury and encourage traffic to use it.</li> <li>• Wishful thinking that people will walk/cycle rather than use cars for work/school run. Most residents have no choice but to use cars.</li> <li>• No planned road improvements to routes surrounding the site.</li> </ul>	

Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>• Highway capacity is not addressed. SA says there will be a positive impact on road safety, which cannot be true. – policy requires adverse impacts to be minimised and SA says there are no such impacts.</li> <li>• Access onto Harts Hill is not necessary or justified and would result in significant highway impacts.</li> <li>• No requirement to show indicative access points within the policy.</li> <li>• Removal of energy requirements leaves significant ambiguity around the form of development that will be created.</li> <li>• Allows a planning application to come forward which just meets the minimum base level requirements resulting in poor quality development.</li> <li>• No consideration of the underground infrastructure and the impact on the capacity of the site. Should have been done in advance of allocation.</li> <li>• Assessment of harm is fundamentally incorrect.</li> <li>• Work undertaken in relation to the baseline is not robust, reliable or up to date.</li> <li>• Requirements for a biodiversity strategy will not remedy this.</li> <li>• Biodiversity strategy needs to come out in advance of the submission of an application and inform the masterplanning process.</li> <li>• Impact on the sensitivity of the AONB has not been taken into account.</li> <li>• LVIA will inform masterplan SPD, this must be an iterative process which will impact on the timescales, especially is LVIA indicates a lower quantum of development in the setting of the AONB.</li> </ul>	

Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>• Light pollution could be significant. Need to be considered by LVIA – needs to be included in policy.</li> <li>• Settlement boundary drawn around the whole site, meaning the GI remains in the settlement boundary.</li> <li>• SB cannot be altered by the masterplanning process, therefore, cannot consider designation of gap between Thatcham and Upper Bucklebury until next plan review.</li> <li>• No certainty – the requirement for a gap should be made clear in the wording of SP17.</li> <li>• Increased risk from flooding</li> <li>• SuDS should be considered as part of the Masterplan SPD and this should be reflected in the supporting text</li> </ul>	
<p>Finola Southgate</p> <p>Janet Wild</p>	<ul style="list-style-type: none"> <li>• No indication of where additional dwellings will be accommodated – assumed to be closer to Upper Bucklebury</li> <li>• Significant highway impact at 1500 dwellings.</li> <li>• Access onto Harts Hill will result in rat running through Upper Bucklebury to A4 J12/12 and the common</li> <li>• Ambiguity around delivery of community infrastructure (Education/health)</li> <li>• Off site infrastructure would result in more traffic movements</li> <li>• Many areas left to masterplanning (mitigation, impact, delivery, design) and little reassurance as to how this will be carried out.</li> <li>• Poor engagement – 7 working days notice of meeting, no councillors permitted to attend in person</li> <li>• Impact on biodiversity. PBC showed ecology surveys and evidence base were incorrect and outdated for 1500d dwellings. No updates.</li> <li>• Impact on AONB</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>.</p> <p>Please also see the Council's response to Bucklebury Parish</p>



Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>No updates to SA as a result of increased dwellings.</li> </ul>	Council above. No further changes are proposed to the LPR.
Phil Teal	<p>Object to increase in number from 1,500 to 2,500.</p> <ul style="list-style-type: none"> <li>Recent road works on A4 resulted in more traffic going through upper Bucklebury. Development should be seen as making this the norm.</li> <li>Already queues at Floral way in Peak times trying to access the a4.</li> <li>No footpath on Burdens Heath and the Ridge.</li> <li>All construction traffic would have to use the A4 resulting in significance congestion and increasing pollution</li> <li>Construction at Theale resulting in delay at J12 of M4. Likely to be worse with the NET dev.</li> <li>Has detailed traffic analysis been carried out?</li> <li>Independent traffic plan should be put in place and all recommendations instigated before works are allowed to commence.</li> <li>Thatcham sewage works already at capacity cannot cope with storm conditions.</li> <li>No work should commence until the sewage treatment works has been updated and assurance is obtained from independent consultants that there is storm water capacity.</li> <li>Water running down Harts Hill during heavy rains is considerable – results in flooding of the Floral Way/Harts Hill roundabout.</li> <li>Schools and health care facilities are at capacity.</li> <li>Developer states that provision of funding for additional facilities is not viable unless 2500 dwellings constructed and half are occupied.</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>.</p> <p>Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.</p>

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	<ul style="list-style-type: none"> <li>• Will put strain on existing services – provision needs to be in place before occupation.</li> <li>• Funding should come from the developer to not increase financial burdens on existing communities.</li> </ul>	
Serena Watts	<ul style="list-style-type: none"> <li>• No indication of how the increase in dwellings will be accommodated</li> <li>• Other sites are available to reduce reliance on NET – particularly lower quality grey belt/brownfield sites.</li> <li>• 1500 dwellings was found to have a harmful impact on highways, 2500 will be worse.</li> <li>• Access onto Harts Hill will mean traffic coming through the villages to the M4 J12 and J13</li> <li>• Rural roads do not have pavements etc.</li> <li>• Little improvements to A339 to Basingstoke route and no improvements for the A4 which is often gridlocked.</li> <li>• Not clear how community infrastructure will be delivered (Schools, surgeries)</li> <li>• If infrastructure is off site will result in more traffic and car journeys.</li> <li>• The developer does not appear to be helping to fund schools and health facilities.</li> <li>• Concern over potential harm to biodiversity.</li> <li>• Ecology surveys were incorrect and insufficient for 1500 dwellings, and have not been updated.</li> <li>• Pressure will be put on the local environment and wildlife sites.</li> <li>• Setting of the AONB will be impacted.</li> <li>• Flood risk in Thatcham is concern</li> <li>• Water and sewage infrastructure is insufficient</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>.</p> <p>Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.</p>

Respondent	Summary of Main Issues	Council response
Peter Weedon	<ul style="list-style-type: none"> <li>• Serious and irreversible impact on Upper Bucklebury</li> <li>• Noise and light pollution will increase</li> <li>• Loss of gap between Thatcham and Upper Bucklebury</li> <li>• Traffic increase through Upper Bucklebury – use of Harts Hill as a rat run. Harts Hill unsuitable for additional traffic.</li> <li>• Loss of ancient woodland and wildlife habitat which is a buffer between Thatcham and Upper Bucklebury</li> <li>• Unable to accommodate increase in units if developers remain committed to provision of open space and buffer zones.</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>.</p> <p>Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.</p>
Paul Weston	<ul style="list-style-type: none"> <li>• Development will exacerbate noise, light and environmental pollution in the surrounding area inc. AONB</li> <li>• 2500 dwellings would be an overdevelopment of the area</li> <li>• More appropriate sites elsewhere in West Berkshire</li> <li>• Lack of provision for sustainable transport links</li> <li>• No provision for road widening except on the site</li> <li>• Significant increases in traffic through Upper Bucklebury – not sustainable development</li> <li>• SP17 conflicts with national policy particularly concerning landscape character and impact on AONB</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The</p>

Respondent	Summary of Main Issues	Council response
		<p>issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>.</p> <p>Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.</p>
Steve Woodrow	<ul style="list-style-type: none"> <li>• Dismay at amount of housing planned for Thatcham without consideration of necessary infrastructure.</li> <li>• Bridge over the railway line is needed</li> <li>• New secondary school and doctors surgery is needed</li> <li>• If not provided will add to overcrowding issues and reduced quality of services.</li> </ul>	<p>Comments noted. Comments relating to the principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>.</p> <p>Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.</p>

Respondent	Summary of Main Issues	Council response
Georgina Woods	<ul style="list-style-type: none"> <li>• Increase in houses from 1500 to 2500 seems to be excessive</li> <li>• Is not clear how this increase will be accommodated – development will have to come closer up to Upper Bucklebury blurring the boundary between Thatcham and Upper Bucklebury.</li> <li>• There should be a clear boundary between the two settlements.</li> <li>• Access on to Harts Hill will increase traffic on the rural roads resulting in rat running to M4 J12 and 13</li> <li>• No suggestion of new roads to ease the problem.</li> <li>• Need to know WBC are aware of this and have a plan to mitigate it.</li> <li>• Ecology reports have not been updated to take account of the higher numbers.</li> <li>• No certainty there will not be harm to the biodiversity or AONB</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>.</p> <p>Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.</p>
Lichfields obo North East Thatcham Partnership	<ul style="list-style-type: none"> <li>• Support clarification in 1<sup>st</sup> para relating to meeting the needs of the development.</li> <li>• Support increase in homes to approximately 2500. Will ensure greater overall positive impact on sustainability as identified through the SA/SEA</li> <li>• Further clarification is required for some elements of SP17. <ul style="list-style-type: none"> <li>○ Final number of dwellings to be determined through the Masterplan - In reality the build out for the site mean the final number should be determined by the approved planning permission and reserved matters</li> </ul> </li> </ul>	<p>Comments noted.</p> <p>Relevant figure and paragraph numbers will be updated for adoption. Other formatting issues will be updated for adoption, including providing a header for the indicative site map.</p> <p>The site map is indicative, with the final extent of the GI to be determined through the Masterplan SPD.</p>

Respondent	Summary of Main Issues	Council response
	<p>approvals when detailed layouts are produced. Wording should be changed to 'informed' rather than 'determined'</p> <ul style="list-style-type: none"> <li>○ Feasibility work for ICG – not clear whether this will be required, wording should include 'if required'</li> <li>○ GI – Bullet points referred to map fig.x The correct reference must be added.</li> <li>○ Unclear what purpose the map at Annex C services. If included text references should say that it is indicative, because the precise nature/extent of GI need to be informed by technical studies (LVIA/Masterplanning). Map is not consistent with the evidence base as it is defined by a contour line and an interpretation of on-site constraints rather than being informed by any further work required by the policy and the SPD.</li> <li>○ Flooding – first sentence should not be bullet pointed . The second sentence should be the first bullet pointed item.</li> </ul> <ul style="list-style-type: none"> <li>● Support the deletion of the original NET map – it was too prescriptive.</li> <li>● Propose the new map calls the GI buffer 'Indicative GI Buffer' to avoid suggestion that this is the southern extent of the GI. Although the map is labelled indicative it still could be interpreted by the community as suggesting a specific line which is inconsistent with the intention of SP17.</li> <li>● New map has no title, suggest it should be labelled as 'North East Thatcham Indicative Map'.</li> </ul>	<p>However, the TSGS refers to a contour line below which development should take place, which has been used to illustrate the area of GI for the map. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
Prosper Infinity Ltd	<ul style="list-style-type: none"> <li>● Support comments made by Thatcham Town Council</li> <li>● SA on quantum of development is flawed.</li> <li>● Trajectory predicts 1760 dwellings within plan period.</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact</p>

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	<ul style="list-style-type: none"> <li>Alternative brownfield sites are available and capable of delivering within the plan period.</li> </ul>	<p>on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>.</p> <p>Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.</p>

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM26	53	Policy SP17 North East Thatcham	39

Respondent	Summary of Main Issues	Council response
Historic England	Encourage the plan to integrate the outstanding working agreed in Exam 13 as supporting text to Policy SP17 – potentially as a new paragraph – relate key guidance on what is expected from a Historic environment Strategy – helpful guidance rather than soundness issue	Comments noted. The Council proposes to include this information in the Masterplan SPD.
Natural England	<ul style="list-style-type: none"> <li>• Landscape Sensitivity and Capacity Study 2021 advises the site as ‘medium capacity’ providing it has regard to the setting and form of existing settlement and the character and sensitivity of adjacent landscape character areas.</li> <li>• Great weight should be given to the advice provided by the NWDNL Conservation Board.</li> <li>• The application should be assessed carefully as to whether the proposed development would have a significant impact on or harm the statutory purpose.</li> <li>• S245 (Protected Landscapes) of the LURA 2023 places a duty on LPAs when performing functions in relation to /affecting AONB seeking to further the statutory purpose of the area. This applies to proposals outside the designated area but impacting on its natural beauty.</li> <li>• Character Areas – Area 8A (Hermitage Wooded Commons) Recognises varied land cover and priority habitats adding to the ecological importance and landscape interest in the area. Notes that there are areas of open access land (Bucklebury Common), that give the character area a high recreational value.</li> </ul>	<p>Comments noted. The Council has and will continue to consider the impacts of the proposed allocation on both the landscape character and the visual amenity of the AONB in accordance with policy SP2. The NWDNL’s comments made at Reg 19 have been taken into account in the Main Modification proposed to policy SP17. The LVIA will inform the preparation of the Masterplan SPD.</p> <p>The policy sets out specific requirements for GI and for the protection of the Ancient Woodland on the site. The requirement for the community park, and significant area of GI to the north of the site, to be retained in perpetuity, will act as</p>



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	<ul style="list-style-type: none"> <li>• Visual amenity – There are a number of viewpoints listed in the Landscape Sensitivity and Capacity study 2021, assessed as having a high value. Notes that there could be changes to the historical structure of the landscape, which could obstruct views towards the distant horizon.</li> <li>• Separate of settlements – the impact on revising the SB of Thatcham on the NWDPL should be considered. Welcome the inclusion within the MM to restrict development below the 95m AOB contour to confine build development to the lower slopes.</li> <li>• River Kennet SSSI – SuDS should be designed and installed in accordance with the CIRIA SuDS Manual (C753). Discharges will require extra treatment as it could discharge to environmentally protected site. An additional treatment component is required in the event of an unexpected pollution event or poor system performance.</li> <li>• GI – welcome inclusion of 50% GI. Buffer information is set out in SP6 and SP10 – advice provision of buffers is detailed within SP17 and included within the indicative GI at the site. Several ordinary watercourse run north/south across the site.</li> <li>• Acknowledge the band of GI/Country park acting as a buffer to the north. SP17 is well connected to the existing PROW network to the north. Need to consider the impact of additional recreational pressure on open access sites such as Bucklebury Common which contribute to the landscape character of the NWDNL.</li> <li>• Ancient Woodland – cannot be certain that proposals will avoid long-term gradual decline of habitat due to recreation, fly-tipping, noise disturbance and other degrading effects. Buffers should be reviewed to adequately address the direct/indirect effect of the development on Ancient Woodland. Consideration</li> </ul>	<p>a buffer between the site and the AONB, reducing any potential impact on the AONB itself. This area of GI will reduce the need for residents of the new development to travel to other locations for informal recreation/walking. The Masterplan SPD will include further details on the requirements for the GI, protection of Ancient Woodland and SuDS. The Council welcomes the involvement of Natural England in its preparation.</p> <p>As set out within the Council's Written Statement to Matter 3 (<a href="#">WS3/1</a>), the Council notes the introduction of the LURA and proposes a minor modification (AM4.4) to the supporting text of policy SP2 to reflect that the Council has a duty to seek to further the primary purpose of the legislation. It is important to note that the Plan should be read and interpreted as a whole and all policies should be viewed together and not in isolation in the</p>

Respondent	Summary of Main Issues	Council response
	<p>needs to be given to the following: fly tipping, edge effects, noise disturbance, anthropogenic lighting, vegetation clearance, deadwood collection, pet predation, chemical effects, recruitment of non-native plants, increasing safety concerns, cumulative effect. NE have standing guidance for ancient woodland.</p> <p>SPD – would welcome involvement in its development.</p>	<p>preparation and consideration of planning applications. This is made clear in paragraph 1.6 of the <a href="#">submitted LPR (CD1)</a>. The Council's Written Statement to Matter 3 emphasises the clear endorsement from the North Wessex Downs Council of Partners to both the overall landscape led approach being adopted and the approach taken to the consideration of major development.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
Network Rail	Support the new wording of SP17 relating to Thatcham Level Crossing	Support noted.
Berkshire Oxfordshire & Buckinghamshire Integrated Care Board (BOB ICB)	<ul style="list-style-type: none"> <li>• Welcomes MM26 to the supporting text as it now includes a paragraph on healthcare provision. Other infrastructure includes details around funding in the supporting text, so it would be reasonable for there to be a consistent approach for healthcare.</li> <li>• Object to the proposed modification unless the supporting text is revised as below: <i>Primary healthcare facilities should be provided, with associated car parking and landscaping, which is operationally and financially</i></li> </ul>	<p>Comments noted. The MM was agreed by the ICB – see response to <a href="#">IN15 - 26</a>. <a href="#">MM34</a> amends the first paragraph of policy SP24 (Infrastructure Requirements and Delivery) to include text that makes clear that development will be required to</p>

Respondent	Summary of Main Issues	Council response
	<p><i>viable and take into account the feasibility study commissioned by the NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board (BOB-ICB). The applicant is expected to provide an onsite “turnkey” healthcare facility in collaboration with the BOB-ICB. The facility should provide room sizes that comply with the Department of Health Building Note 11-01 (or any successor documents). While 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, any proposed rental value of the facility will be generally in line with the existing rental value of the existing premise for a certain period before doing a full market rental review.</i></p> <p><i>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 other 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.</i></p>	<p>ensure the timely and coordinated delivery of necessary infrastructure having regard to the latest version of the Council’s Infrastructure Delivery Plan (IDP), through proportionate financial contributions and / or on-site provision. Where necessary, the phasing of development will be linked to infrastructure provision. It is important to note that the Plan needs to be read and interpreted as a whole, and all policies should be viewed together and not in isolation in the preparation and consideration of planning applications. This is made clear in paragraph 1.6 of the <a href="#">submitted LPR (CD1)</a>.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
Bucklebury Parish Council	<ul style="list-style-type: none"> <li>• Remain concerned that TSGS is still referenced. Does not provide a reliable starting point for masterplanning. References should be removed.</li> </ul>	Comments noted. The Thatcham Strategic Growth Study (TSGS) forms part of the evidence base

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	<ul style="list-style-type: none"> <li>• Site map should not show access points onto Harts Hill until further work has been carried out relating to access points.</li> <li>• Do not consider it is possible to set aside 50% of the site for GI with an increase in housing.</li> <li>• Concern as to how the GI will be managed and maintained in perpetuity – no reference made to management responsibility.</li> <li>• GI doesn't reflect the true constraints of the site. Not considered justified for the extent of the GI to be illustrated in the wording of the policy until LVIA has been carried out.</li> <li>• SB approach is not sound. SB drawn around the entire site would mean the GI remains in the SB. SB cannot be altered by masterplanning process, therefore, consideration of designated hap can only be controlled as part of next plan review. Provides no certainty for residents of Upper Bucklebury. Requirements for a gap should be made clear in the policy.</li> <li>• Type, amount and location of community benefits are now ambiguous. Suggestion that infrastructure could be provided off-site is not justified and would lead to impacts on the wider community and new residents of any future community.</li> <li>• Education feasibility study does not include timings for such an exercise. Needs more detail.</li> <li>• Suggestion that healthcare could be provided off site is not justified would result in significant impacts on the wider community.</li> <li>• Increasing flood risk is a concern for local residents. SuDS should be considered as part of the Masterplan SPD process. Text should be updated to reflect this requirement.</li> <li>• No work has been carried out in relation to the oil and gas pipelines. Given the constraints this is not appropriate to control</li> </ul>	<p>for the strategic allocation in Thatcham.</p> <p>The site map is indicative and the final location of access points and the extent of the GI will be determined through the SPD, based on further technical studies.</p> <p>The Inspector identified in <a href="#">IN30</a> that the <a href="#">TSGS</a> (SIT2c) and evidence provided by the site promoter shows that the site has capacity for approximately 2,500 dwellings, along with the physical, social and green infrastructure proposed in SP17. He also noted that at 1,500 dwellings the site would not be consistent with national policy relating to the efficient use of land. Increasing the number of dwellings to 2,500 ensures best use is made of the site and that all infrastructure proposed by the policy can be delivered. The final northern boundary of the developable area of the site will be identified through the Masterplan SPD. The GI and long term security of the Community Park will be</p>

Respondent	Summary of Main Issues	Council response
	<p>at application stage. The actual constraints must form part of the masterplanning process.</p> <ul style="list-style-type: none"> <li>• References to the TSGS are not considered justified and should be removed.</li> <li>• SPD to be adopted within 12 months of adoption of LPR, however no indication as to what would happen if the process takes longer or there are significant objections from the local community, council, third parties or consultees.</li> </ul>	<p>secured via a S106 agreement, which is common place for this type of provision.</p> <p>The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>. <a href="#">PMC4</a> sets out the modification to the settlement boundary at Thatcham to exclude the site from the settlement boundary. The Council's <a href="#">Statement on Matter 4</a> sets out why the specific floor areas originally proposed have been removed. The Masterplan SPD will provide further details where appropriate. Feasibility work will form part of the SPD process, with further work required alongside any future planning application coming forward. Detailed planning for infrastructure facilities cannot take place until the final housing number, mix and housing type have been defined as this is required to inform what is needed.</p>

Respondent	Summary of Main Issues	Council response
		<p>The education feasibility work will be carried out to inform the SPD. The MM does not suggest that the health care facility will be provided off site. The location of the facility will depend on the discussions with the ICB. It is currently anticipated that this will be an on-site facility.</p> <p>The TSGS does take into account the presence of below ground infrastructure when identifying the capacity of the site.</p> <p>The Council is clear that it is its intention that the Masterplan SPD will be adopted within 12 months of adoption of the LPR and that it will be produced as part of a Planning Performance Agreement (PPA).</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
Jennifer and Richard Ainsworth	<ul style="list-style-type: none"> <li>• Loss of Agricultural land for producing food.</li> </ul>	Comments noted. Comments relating to the spatial strategy, principle of the development and

Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>• No indication of how the increase in dwellings will be accommodated – assume it will need to come closer to Upper Bucklebury.</li> <li>• Effectively a settlement the size of Hungerford is being provided without concrete agreement to provide facilities that are needed to serve it.</li> <li>• Highways assessment has ignored significant increase in highways impact when 1500 movements are harmful</li> <li>• Chapel Row already experiences speeding vehicles and high density traffic when there are road works on the A4.</li> <li>• Road safety concerns for Chapel Row – a number of accidents, but no action taken.</li> <li>• Harts Hill will become a rat run for access to M4 J12 and 13. Narrow roads not suitable for volumes of traffic.</li> <li>• Ambiguity around delivery of community infrastructure for education and health.</li> <li>• Existing facilities are full.</li> <li>• If provided off site, vehicle movements will increase.</li> <li>• No evidence that relevant approvals and finance can be provided.</li> <li>• Many areas left for the masterplanning process (mitigation, impact, delivery, design).</li> <li>• Unsatisfactory how WBC has engaged with parish Councils around MMs – invite to event 7 days notices. No PC councillors were permitted to attend in person – they are the people elected by the community to put forward our views.</li> <li>• Ecology surveys/evidence is incorrect and outdated to support 1,500 dwellings. No updates done.</li> <li>• Significant impact on the AONB/NL</li> </ul>	<p>the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>.</p> <p>Please also see the Council's response to Bucklebury Parish Council above.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>Lack of update to assessment of impacts in the SA relating to the increase in dwellings.</li> </ul>	
Kirsty Anderson	<ul style="list-style-type: none"> <li>Thatcham's infrastructure is already under strain (roads, railway station, GP, schools, pharmacies, sewage system, shops, parking)</li> <li>Unclear how council expects to manage increased traffic.</li> <li>Already long queues at the station in the morning.</li> <li>Scale of development it too large for the town to handle</li> </ul>	<p>Comments noted. Comments relating to the principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>.</p> <p>Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.</p>
John Brims	<ul style="list-style-type: none"> <li>Overriding premise that all issues can be resolved through mitigation or developer contribution, and infrastructure will be put in place to support the development</li> <li>Infrastructure is rarely put in place and therefore, will not be provided.</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed</p>



Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>• Flooding will not be addressed until there is a flooding event – must be considered seriously before development starts.</li> <li>• Lack of foresight in development plan – there will be another catastrophic flooding event in Thatcham at some point – global warming impacts</li> <li>• New dwellings should be placed further away from the AONB.</li> <li>• Not considering what will meet longer-term requirements for people.</li> <li>• Development should only be of a size that can be supported by what is possible.</li> <li>• Need to look at the infrastructure required for Newbury and Thatcham as a whole</li> </ul>	<p>previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>. Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.</p>
Antonia Elliott	<ul style="list-style-type: none"> <li>• No indication of how increase in dwellings will be accommodated – dwellings will come closer to Upper Bucklebury</li> <li>• Significant impact on highways</li> <li>• 1500 dwellings already had a detrimental impact.</li> <li>• Access onto Harts Hill will result in rat running through Upper Bucklebury to M4 J12 and 13.</li> <li>• Floral way is already congested, was supposed to be a residential road but is use as a bypass</li> <li>• Ambiguity around the provision of community infrastructure (education/health facilities)</li> <li>• Facilities off-site would result in increased car journeys.</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues</p>

Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>• Mitigation, impact, delivery and design are all being left to the masterplanning process.</li> <li>• WBC has provided little reassurance on how this process will be managed.</li> <li>• EA flood risk map shows new development at high risk of flooding</li> <li>• Concerns over flood risk and surface water drainage following 2007 flood event.</li> <li>• Air pollution will have impact on habitats in the area</li> <li>• Soil pollution – no evidence soil quality will be maintained or improved which will impact on wildlife</li> <li>• Concerns about WBC engagement with Parish Council – meeting only had 7 days notice and no parish councillor could attend in person</li> </ul>	<p>were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>. Please also see the Council's response to Bucklebury Parish Council above.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
David Fittall	<ul style="list-style-type: none"> <li>• Short coming of 1500 dwellings proposal surprised to see this increased</li> <li>• Shortage of housing is the result of policy choice made by successive governments. Did not need to happen in this way to result in broken undemocratic system where residents views are held in contempt by politicians and bureaucrats</li> </ul> <p>Highways</p> <ul style="list-style-type: none"> <li>• Local roads already congested</li> <li>• Traffic modelling not fit for purpose</li> <li>• Harts Hill/Floral way already queues.</li> <li>• Roads cannot cope</li> <li>• Harts Hill / Upper Bucklebury will become a rat run</li> </ul> <p>Infrastructure</p>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June</p>

Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>• Community infrastructure needs to be confirmed before approval</li> </ul> <p>Consultation</p> <ul style="list-style-type: none"> <li>• No confidence WBC will handle this given the lack of respect to BPC with short notice meetings and not allowing BPC reps to attend the meeting</li> </ul> <p>Biodiversity</p> <ul style="list-style-type: none"> <li>• Concerns over impact on Biodiversity and AONB</li> </ul>	<p>and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>. Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.</p>
Roger Frankum	<ul style="list-style-type: none"> <li>• Need additional housing but 2500 dwellings in one place is not the answer.</li> </ul> <p>Highways</p> <ul style="list-style-type: none"> <li>• Roads are very busy and likely to be inadequate</li> <li>• Already a rat run through Bradfield Southend and Upper Bucklebury for people avoiding the A4</li> <li>• Pressure on Cold Ash as route to A34.</li> <li>• Thatcham station too far to walk, and has limited parking</li> </ul> <p>Flooding</p> <ul style="list-style-type: none"> <li>• Already flooding issues</li> <li>• Drainage and sewerage systems cannot cope with storms.</li> <li>• A4 floods after heavy rain – will be worse with 250 houses and their driveways.</li> </ul> <p>Infrastructure</p> <ul style="list-style-type: none"> <li>• Education facilities are full (Kennet) and cannot be expanded. New facilities would be needed to be built in time.</li> </ul> <p>Biodiversity</p> <ul style="list-style-type: none"> <li>• Bucklebury Common is a SSSI – likely to be attractive to new residents and their dogs which would impact ground nesting birds.</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>. Please also see the Council's response to Bucklebury Parish Council above. No further</p>

Respondent	Summary of Main Issues	Council response
		changes are proposed to the LPR.
Wynne Frankum	<p>Highways</p> <ul style="list-style-type: none"> <li>• A4 is already congested.</li> <li>• Majority of roads north/south are rural and not built to accommodate additional traffic.</li> <li>• Noticeable increase in traffic using Upper Bucklebury in recent years – presumably as an alternative to the A4</li> </ul> <p>Ecology</p> <ul style="list-style-type: none"> <li>• Ecology survey and evidence base is incorrect an outdated to support 1,500 dwellings. No updates made to support 2,500.</li> <li>• Loss of habitat is a serious national issue.</li> <li>• Impact on ancient woodland and Bucklebury Common with additional visitor numbers</li> </ul> <p>Masterplanning</p> <ul style="list-style-type: none"> <li>• Many details left to masterplanning process, which little assurance from WBC on how this will be carried out.</li> <li>• Thatcham has seen a number of large developments in last 50 years, without significant infrastructure improvements – difficult to see how this could be comfortably absorbed into the existing town without detailed and costed infrastructure plan.</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>. Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.</p>
Simon Hannam	<ul style="list-style-type: none"> <li>• No consideration of how the additional showing will be accommodated – assumed they will be build closer to Upper Bucklebury</li> </ul> <p>Highways</p>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed</p>

Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>• Negative impact on road network, especially Harts hill. Rat running to M4 will increase</li> </ul> <p>Infrastructure</p> <ul style="list-style-type: none"> <li>• No clarity around the delivery of education/health facilities.</li> </ul> <p>Biodiversity</p> <ul style="list-style-type: none"> <li>• BPC showed ecology surveys and evidence were incorrect and outdated for 1500 dwellings, not updated for 2500</li> </ul> <p>Landscape</p> <ul style="list-style-type: none"> <li>• Impact on AONB inevitable</li> </ul> <p>Consultation</p> <ul style="list-style-type: none"> <li>• Engagement with PC is shocking – short notice meeting, no Councillors permitted to attend in person</li> <li>• Lack of transparency</li> </ul>	<p>previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>. Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.</p>
Glen Higgins	<ul style="list-style-type: none"> <li>• No indication of how the increase in dwellings will be accommodated</li> <li>• Other sites are available to reduce reliance on NET, grey belt and brownfield land there are several around Thatcham that could be considered.</li> </ul> <p>Highways</p> <ul style="list-style-type: none"> <li>• 1500 dwellings already had a detrimental impact.</li> <li>• Access onto Harts Hill will result in rat running through Upper Bucklebury to M4 J12 and 13.</li> <li>• Little improvement planned for A339 to Basingstoke and no improvements for the A4 which is often gridlocked</li> </ul> <p>Infrastructure</p>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues</p>

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	<ul style="list-style-type: none"> <li>• Ambiguity around the provision of community infrastructure (education/health facilities)</li> <li>• Developer does not appear to be helping to fund schools and health facilities – need some commitment from the developer</li> <li>• Facilities off-site would result in increased car journeys.</li> </ul> <p>Landscape</p> <ul style="list-style-type: none"> <li>• AONB will be impacted</li> </ul> <p>Flooding</p> <ul style="list-style-type: none"> <li>• Flood risk in Thatcham is a great concern</li> <li>• Water and sewage infrastructure is insufficient</li> </ul>	<p>were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>. Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.</p>
Eric Lloyd	<ul style="list-style-type: none"> <li>• Inappropriate to dump such a large development in green-field location. Will have significant impacts on Thatcham and the neighbouring villages in AONB</li> <li>• No one wants the development, the whole process is undemocratic.</li> <li>• Understood that the Dunston Park and Thatcham Relief Road would be the boundary for any future Green Belt development northwards</li> <li>• Additional dwellings may be convenient, indiscriminately allocated to meeting government or WBC targets</li> <li>• Majority of residents do not wish to see any housing in this area as it will destroy the rural nature and quiet atmosphere of the AONB right next to Bucklebury Common.</li> <li>• Concerned about wider implications likely to result from an apparent planned over provision of housing which puts pressure on the Council to unreasonably allocate development to greenfield land in a sensitive area.</li> <li>• Development of farming land which neither warrants nor should be expected allow allocation of housing due to the steep gradient</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>.</p>

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	<p>and viability from A4/Thatcham/Kennet Valley below will be a permanent eye sore in the landscape.</p> <ul style="list-style-type: none"> <li>• Housing numbers should be based on local need for each area, not a broad numbers game mandated from central government.</li> <li>• LA has duty of care to concentrate location of housing on brownfield/semi brownfield sites or in less prominent, less controversial sensitive non AONB locations.</li> <li>• Floral Way was built to take pressure of A4, will require extensive up-grading to cope with additional traffic. Floral Way/Hart Hill roundabout will be constantly grid locked</li> <li>• Use of Harts Hill as an access to the site will exacerbate traffic congestion problems on a dangerous, steep and windy road</li> <li>• Traffic surveys must take into account of Harts Hill as a shortcut for traffic to Reading and to the A34/M4 to avoid the congestion on the A4</li> <li>• Broad Lane/The Avenue is a rat run with traffic travelling at 50/60mph alongside Bucklebury Common – road safety concerns for walkers, cycles and the adjacent designated quiet lanes. Will get worse with additional traffic.</li> <li>• Lack of parking around Thatcham Town Centre and at the station</li> <li>• Level crossing causes safety issues and traffic around the station. Will get worse with additional traffic. A solution for the level crossing is required now.</li> <li>• A third party independent review of infrastructure is required.</li> </ul>	<p>Please also see the Council's response to Bucklebury Parish Council above.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
Nancy Massy-Collier	<ul style="list-style-type: none"> <li>• Town is already struggling to cope and provide basic service and infrastructure.</li> <li>• Is current need for housing this extensive?</li> <li>• Concerns of joining up Newbury and Reading along the A4.</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed</p>

Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>• Destruction of countryside</li> <li>• Loss of amenity</li> <li>• Flood risk increase</li> <li>• Loss of food production capacity</li> <li>• Reduction in green space between Thatcham and Reading</li> <li>• Police do not have sufficient resources in local teams.</li> <li>• Increase population will increase levels of crime</li> <li>• Lack of medical facilities (GP/Hospital). RBH improvements delayed.</li> <li>• Sewage system at capacity. Development should not start until TW increase capacity.</li> <li>• Water supply capacity to new dwellings also needs to be increased. Is the water expected to come from the River Thames.</li> <li>• What facilities will be provided in terms of retail and leisure? Needs to consider all ages groups and be in place before other development begins.</li> <li>• What consideration has been given to providing places of worship?</li> <li>• Concerns about access onto Harts Hill, will result in rat running through nearby villages. Harts Hill was not designed to take heavy traffic and cannot be improved.</li> <li>• Consider setting up a local property bond, funding generated locally should have some community control over what is built and could fund much needed social housing.</li> </ul>	<p>previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>. Thatcham Town Council is in the process of developing a Neighbourhood Plan. Town and parish council's with a made Neighbourhood Plan receive 25% of CIL receipts for the relevant Neighbourhood Area. This money can be used to fund community facilities.</p> <p>Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.</p>
Prue Matchwick	Brownfield sites must be available which would not impact on the AONB Highways	Comments noted. Comments relating to the spatial strategy, principle of the development and



Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>• Harts Hill will be compromised – barely a 2 lane road as it is. No space for pavements/bike lane.</li> <li>• A339 to Basingstoke has little improvement plans, nothing for A4.</li> <li>• Lack of bridge over railway line is one of the biggest problems for Thatcham.</li> </ul> <p>Infrastructure</p> <ul style="list-style-type: none"> <li>• Where are extra schools, doctor's surgeries going to go? Need to be in reach of houses or result in more car journeys</li> <li>• Sewage provision is insufficient – when will this be sorted?</li> </ul> <p>Biodiversity</p> <ul style="list-style-type: none"> <li>• Significant harm will be caused</li> <li>• Ecological surveys and evidence is incorrect and insufficient for 1500 dwellings and has not been updated.</li> <li>• Impact on wildlife sites by human activity</li> </ul>	<p>the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>. Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.</p>
Belinda Matthewman	<ul style="list-style-type: none"> <li>• No indication of how increase in dwellings will be accommodated – dwellings will come closer to Upper Bucklebury</li> <li>• Significant impact on highways</li> <li>• 1500 dwellings already had a detrimental impact.</li> <li>• Access onto Harts Hill will result in rat running through Upper Bucklebury to M4 J12 and 13.</li> <li>• Floral way is already congested, was supposed to be a residential road but is use as a bypass</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement</a></p>

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	<ul style="list-style-type: none"> <li>• Ambiguity around the provision of community infrastructure (education/health facilities)</li> <li>• Facilities off-site would result in increased car journeys.</li> <li>• Mitigation, impact, delivery and design are all being left to the masterplanning process.</li> <li>• WBC has provided little reassurance on how this process will be managed.</li> <li>• EA flood risk map shows new development at high risk of flooding</li> <li>• Concerns over flood risk and surface water drainage following 2007 flood event.</li> <li>• Air pollution will have impact on habitats in the area</li> <li>• Soil pollution – no evidence soil quality will be maintained or improved which will impact on wildlife</li> <li>• Concerns about WBC engagement with Parish Council – meeting only had 7 days notice and no parish councillor could attend in person</li> </ul>	<p><a href="#">on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>. Please also see the Council's response to Bucklebury Parish Council above.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
Stephanie Molloy	<ul style="list-style-type: none"> <li>• In Perpetuity needs a legal definition and to be agreed by the public</li> </ul>	<p>Comment noted. The GI and long term security of the Community Park will be secured via a S106 agreement, which is common place for this type of provision.</p>
Emanuela Morando	<ul style="list-style-type: none"> <li>• Traffic impact will make the area unsafe</li> <li>• Road network unsuitable to manage further traffic</li> <li>• Impact on landscape</li> <li>• Impact on local wildlife</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the</p>

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		Statement of Consultation Appendix 1 and 2 ( <a href="#">Reg18</a> ) and <a href="#">Reg 19</a> . The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a> . Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.
Sue Morgan	<ul style="list-style-type: none"> <li>• More than 1000 is to many houses to be feasible or sustainable.</li> <li>• No indication of how the increase will be accommodated – assume further up the hill towards Upper Bucklebury.</li> </ul> <p>Infrastructure</p> <ul style="list-style-type: none"> <li>• Ambiguity around delivery of community infrastructure (education, health care)</li> <li>• Off site would result in more car journeys</li> </ul> <p>Biodiversity</p> <ul style="list-style-type: none"> <li>• BPC proved ecology survey and evidence base were incorrect and outdated for 1500 dwellings and have not been updated.</li> </ul> <p>Landscape</p> <ul style="list-style-type: none"> <li>• Impact on AONB</li> </ul> <p>Consultation</p>	Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 ( <a href="#">Reg18</a> ) and <a href="#">Reg 19</a> . The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June

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	<ul style="list-style-type: none"> <li>Concerns about engagement with PC – meeting just 7 days notices, no Councillors permitted to attend the meeting.</li> </ul>	<p>and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>. Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.</p>
Michael Morrison	<p>Sewage (SA App 5)</p> <ul style="list-style-type: none"> <li>No building can start until it is confirmed there is adequate capacity to handle sewage.</li> <li>The extra capacity required for the development will not be available for the foreseeable future</li> <li>No indication that TW have been asked about the ability to process sewage from the site.</li> </ul> <p>Transport</p> <ul style="list-style-type: none"> <li>Unrealistic to expect people to walk/cycle to the station</li> <li>No mention of any upgrades to the road network</li> <li>Need new bridge over railway</li> <li>Clearly a need for substantial changes to the surrounding roads for 2500 dwellings</li> </ul> <p>Gaps</p> <ul style="list-style-type: none"> <li>Will remove the gap between Thatcham and upper Bucklebury. Other settlement have Strategic gaps retained to ensure urban sprawl doesn't happen. Henwick is in the same situation.</li> </ul> <p>GI (Main mods 2.12)</p> <ul style="list-style-type: none"> <li>No details relating to 'retained in perpetuity'. Without precise working the green areas could be used for further development.</li> <li>Area in setting of AONB therefore, this is most important.</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>. Please also see the Council's response to Bucklebury Parish Council above. No further</p>

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	<p>MM 3.5</p> <ul style="list-style-type: none"> <li>• Further consideration or analysis are mentioned – a lot of essential details are missing and have not properly been considered. Substantial work needed for building can start</li> <li>• Detailed traffic survey and copies of letter to/from TW would be a start.</li> </ul>	<p>changes are proposed to the LPR.</p>
Damian Musker	<ul style="list-style-type: none"> <li>• No indication of how increased dwellings will be accommodated, assuming will come closer to Upper Bucklebury</li> <li>• Highways impact was severe at 1500 dwellings.</li> <li>• Harts Hill access will result in rat running through villages.</li> <li>• Ambiguity around delivery of community infrastructure (education, health care) if off site will increase traffic movements.</li> <li>• Biodiversity – BPC shows ecology surveys and evidence was incorrect and outdated for 1500 dwellings, has not been updated.</li> <li>• Impact on AONB</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>. Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.</p>

Respondent	Summary of Main Issues	Council response
Calliope Orfanos	<ul style="list-style-type: none"> <li>• Seems rushed and convenient proposal made by WBC</li> <li>• Focus on increasing development with little care as to the impact.</li> <li>• WBC not done enough to ensure residents can respond – not aware of meeting where a representative came to discuss proposals with residents and parish councillors</li> <li>• No evidence 1000+ dwellings are needed on greenfield site.</li> <li>• Not clear where the additional dwellings will be located within the development boundary without further encroachment on rural environment and designated open space.</li> <li>• Not clearly demonstrated how provision of infrastructure will be met in advance of need and in a timely and coordinated way.</li> <li>• Little recognition of impact of more development on existing overs stretched services in Thatcham.</li> <li>• Mitigation measures are unclear and presented as a wish list</li> <li>• Inadequate consideration of use of designated play or community venues for young people.</li> <li>• Town centre and Thatcham facilities would be impacted</li> <li>• Demands and impact not recognised. Harts Hill is hazardous and heavily used as if Floral Way. Floral way is already congested.</li> <li>• Routes are hazardous</li> <li>• Increased traffic to A4, railway or school will amplify the risks.</li> <li>• Need for paths and routes to highways needs to be emphasised and put in place before dwellings</li> <li>• New secondary school is even more essential but not clear how this will be done.</li> <li>• Need clear proposals in place before house construction begins.</li> <li>• Off site would result in more children needing transport</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>. Please also see the Council's response to Bucklebury Parish Council above.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

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	<ul style="list-style-type: none"> <li>• Little information of service provision. Demand cannot be met by already overstretched services.</li> <li>• New facility with safe access required.</li> <li>• Not viable until approved with ICB – little reference to this.</li> <li>• High flood risk is not addressed. Is there a SWMP in place or is this left to developers?</li> <li>• Development needs to get BNG. Not sure how this will be achieved or monitored.</li> <li>• Previously flawed information has not been updated to support additional dwellings.</li> <li>• Odd that this is funded by the applicant</li> <li>• Lack of clarity about skeleton infrastructure needed before development takes place.</li> </ul>	
John Parascandolo	<ul style="list-style-type: none"> <li>• Could be accommodated in other development in West Berkshire eg. Town Centre buildings.</li> </ul> <p>Highways</p> <ul style="list-style-type: none"> <li>• Highways impact already significant at 1500 dwellings</li> <li>• Harts Hill access will mean a potential rat run through Upper Bucklebury to M4 and the Common</li> </ul> <p>Infrastructure</p> <ul style="list-style-type: none"> <li>• Ambiguity around delivery of community infrastructure (Education/Health)</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the</p>

Respondent	Summary of Main Issues	Council response
		additional work requested by the Inspector is set out in <a href="#">EXAM42</a> . Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.
Powell Family	<ul style="list-style-type: none"> <li>• Negative impact on Upper Bucklebury and goes against the 'Bucklebury Vision'</li> <li>• 2500 dwellings is disproportionate in the area where there is AONB and flood plains.</li> <li>• Should have been reviewed post Covid when demographics and working patterns have change – who will come and live in these houses</li> <li>• Reducing birthrates means local primary schools are not filling their classes – more likely that schools will not get built.</li> <li>• Not clear when new facilities will appear – need to be built first.</li> <li>• Additional pressure on station parking – facilities are not adequate.</li> <li>• Footpath would link new development to Upper Bucklebury (Long Grove to Colthrop). Already seen increased footfall since pandemic. Will Long Grove residents be expected to continue to repair and maintain their road for non-parishioners?</li> <li>• No consideration of traffic on village roads</li> <li>• Harts Hill is dangerous especially in winter months</li> <li>• A4/Floral Way become congested at peak times leading to rat running through the village.</li> <li>• Impacts on air quality and safety for children walking to school</li> </ul>	Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 ( <a href="#">Reg18</a> ) and <a href="#">Reg 19</a> . The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a> . Please also see the Council's response to Bucklebury Parish Council above. The representation does not raise any issues which would prevent



Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>• Development is creeping up the hill towards Upper Bucklebury – loss of identity, peace, tranquillity and security of the Common</li> <li>• Detrimental effect on Bucklebury Common ancient woodland, meadows and wildlife</li> <li>• Details of this should be included on how BNG will be achieved.</li> <li>• Loss of agricultural land – hard to see how BNG can be provided.</li> <li>• Why is the country needed? As a gap between ‘us’ and ‘them’</li> <li>• A piece of land that is too difficult and expensive to build on</li> <li>• Would like to know what it will look like</li> <li>• Gradient to seep for informal recreation.</li> <li>• How will it be managed/maintained in the long term.</li> <li>• Protection seems unclear – more detail and commitment is needed.</li> </ul>	<p>the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
Councillor Chris Read	<ul style="list-style-type: none"> <li>• GI must be marked outside of the settlement boundary. SB should be tight to the proposed upper boundary of the housing.</li> </ul>	<p>Comments noted. <a href="#">PMC4</a> sets out the modification to the settlement boundary at Thatcham to exclude the site from the settlement boundary.</p>
Ben Seth	<p>Support BPC comments</p> <p>Education</p> <ul style="list-style-type: none"> <li>• Feasibility study should be carried out in advance of the plan.</li> <li>• Should be min requirement to provide a new secondary school and SEND on site. <ul style="list-style-type: none"> <li>○ Kennet at capacity with a waiting list</li> <li>○ New houses will bring in additional children (at least 716 children needing primary and secondary provision)</li> </ul> </li> <li>• Other schools in West Berkshire cannot absorb children from Thatcham.</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council’s <a href="#">Statement on Matter 4</a> sets out the</p>

Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>• Little reassurance in the policy that a secondary school will be provided.</li> <li>• To be sound the modification must ensure that provision of secondary and SEND is viable for the development.</li> </ul>	<p>approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>. Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.</p>
Cara Shearn	<ul style="list-style-type: none"> <li>• Excess traffic</li> <li>• Reduced biodiversity</li> <li>• AONB</li> <li>• Lack of clarity on physical area houses will be built on and how education and health needs will be catered for.</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>.</p>

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		Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.
Craig Smith	<ul style="list-style-type: none"> <li>• Proposals rushed through</li> <li>• Don't account for UK gov's direction of the use of brownfield land</li> <li>• Ecological claims are falsified</li> <li>• Local infrastructure ill considered and lack credibility</li> </ul>	Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 ( <a href="#">Reg18</a> ) and <a href="#">Reg 19</a> . The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a> . Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.
Norma Smyth	No proper detailed evidence-based documentation for the proposed changes and the enormity of such development at NET	Comments noted. Comments relating to the principle of the

Respondent	Summary of Main Issues	Council response
		<p>development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>.</p> <p>Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.</p>
Bernie Southgate	<ul style="list-style-type: none"> <li>• No indication of how the increased number of dwellings will be accommodated, assuming it will need to come closer to Upper Bucklebury.</li> </ul> <p>Highways</p> <ul style="list-style-type: none"> <li>• Significant highways impact at 1,500 dwellings.</li> <li>• Harts Hill is hazardous.</li> <li>• Bikes are often ridden or pushed up Harts Hill</li> <li>• Access onto Harts Hill will encourage its use a rat run to M4 J12/13 and the Common</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and</p>

Respondent	Summary of Main Issues	Council response
	<p>Infrastructure</p> <ul style="list-style-type: none"> <li>Ambiguity around delivery of infrastructure (education/healthcare)</li> <li>Off site provision would result in additional traffic journeys.</li> <li>Doctors surgery would be needed before any potential patients move to the site. No capacity in surrounding surgeries.</li> </ul> <p>Biodiversity</p> <ul style="list-style-type: none"> <li>Significant concern over potential harm to biodiversity resulting from the development.</li> <li>Ecology surveys and evidence was incorrect and haven't been updated for the additional dwellings.</li> </ul> <p>Landscape</p> <ul style="list-style-type: none"> <li>Impact on the setting of the AONB.</li> </ul> <p>Utilities</p> <ul style="list-style-type: none"> <li>Concern over water supply. Harts Hill road is often closed while TW repair sewage pipes.</li> <li>Assessment required as to the quality of supply. Poor record of discharge needs to be guaranteed</li> </ul> <p>Flooding</p> <ul style="list-style-type: none"> <li>Flooding and groundwater may be a problem</li> <li>Flood alleviation infrastructure was built before the development was proposed.</li> </ul> <p>Masterplanning</p> <ul style="list-style-type: none"> <li>Many areas (mitigation, impact, delivery, design) are left to the masterplanning process. Little reassurance from WBC as to how this will be carried out.</li> <li>Concerns as to how WBC has engaged with PCs as part of the consultation – short notice meeting, no PC councillors permitted to attend the meeting in person.</li> </ul>	<p><a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>. Please also see the Council's response to Bucklebury Parish Council above.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

Respondent	Summary of Main Issues	Council response
David Southgate	<p>Unsound against the 4 tests</p> <ul style="list-style-type: none"> <li>• The modifications set out more uncertainty around the delivery of infrastructure.</li> <li>• Council has failed to consult local groups as part of the local plan – meeting in Jan. Gives no comfort the masterplan will be any different.</li> </ul> <p>Masterplan</p> <ul style="list-style-type: none"> <li>• Requirement for Masterplan SPD is welcome, but not considered this makes the policy sound.</li> <li>• Requirements for the masterplan to be adopted prior to submission of application is evidence of the allocation being made in haste. Lacking justification and evidence.</li> <li>• Vital to establish the true capacity of the site.</li> <li>• Principle of collaboration with parish councils, the community and other stakeholders is welcome, but no scope or framework for this there is little comfort as to how the masterplanning process will be undertaken and what the outcomes will be in fundamental concerns are raised.</li> <li>• No indication of what will happen should the SPD not be adopted within 12 months of the adoption of the LPR if significant objections remain.</li> </ul> <p>Consultation</p> <ul style="list-style-type: none"> <li>• Opportunity for consultation with parishioners in local council public meeting was refused. Engagement with parish Councils was last min, making it very difficult for the public to meaningfully engage</li> </ul> <p>Infrastructure</p> <ul style="list-style-type: none"> <li>• Provision of healthcare is severely flawed, and there is no certainty the form of provision that might come forward on the</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>. <a href="#">PMC4</a> sets out the modification to the settlement boundary at Thatcham to exclude the site from the settlement boundary. Please also see the Council's response to Bucklebury Parish Council above.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further</p>

Respondent	Summary of Main Issues	Council response
	<p>site or the viability of the provision. Removal of size requirements reflects this lack of certainty.</p> <ul style="list-style-type: none"> <li>• Inclusion of feasibility work does not remedy the fundamental issue of soundness in the approach.</li> <li>• Secondary and SEND provision is also subject to a feasibility study.</li> <li>• If this work has been done in advance of submission of the plan there would be no need for them now.</li> <li>• Proposed amendments introduce ambiguity on the type, amount and location of the community benefits.</li> <li>• Suggestion that infrastructure can be [provided off site is not considered to be justified and would lead to significant impacts for the wider community and new residents.</li> </ul> <p>GI</p> <ul style="list-style-type: none"> <li>• Increased pressure on GI that can be delivered with increased dwellings.</li> <li>• Clearly a vital part of the Masterplan SPD process</li> <li>• Concerns remain as to how GI will be delivered in a way that protects the existing communities and provides sustainable development.</li> <li>• GI buffer cannot be confirmed until the master planning process has been undertaken.</li> <li>• No buffer made around the areas of ancient woodland or heritage assets.</li> </ul> <p>Highways</p> <ul style="list-style-type: none"> <li>• Traffic impacts were a key concern for 1500 dwellings, will be exacerbated at 2500 dwellings.</li> <li>• Evidence base and assessments are fundamentally flawed</li> </ul>	<p>changes are proposed to the LPR.</p>

Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>• Requirements for multiple access points is a concern, especially access onto Harts Hill Road, which gives a direct route through to Upper Bucklebury and encourage traffic to use it.</li> <li>• Wishful thinking that people will walk/cycle rather than use cars for work/school run. Most residents have no choice but to use cars.</li> <li>• No planned road improvements to routes surrounding the site.</li> <li>• Highway capacity is not addressed. SA says there will be a positive impact on road safety, which cannot be true. – policy requires adverse impacts to be minimised and SA says there are no such impacts.</li> <li>• Access onto Harts Hill is not necessary or justified and would result in significant highway impacts.</li> <li>• No requirement to show indicative access points within the policy.</li> </ul> <p>Energy</p> <ul style="list-style-type: none"> <li>• Removal of energy requirements leaves significant ambiguity around the form of development that will be created.</li> <li>• Allows a planning application to come forward which just meets the minimum base level requirements resulting in poor quality development.</li> <li>• No consideration of the underground infrastructure and the impact on the capacity of the site. Should have been done in advance of allocation.</li> </ul> <p>Biodiversity</p> <ul style="list-style-type: none"> <li>• Assessment of harm is fundamentally incorrect.</li> <li>• Work undertaken in relation to the baseline is not robust, reliable or up to date.</li> <li>• Requirements for a biodiversity strategy will not remedy this.</li> </ul>	



Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>• Biodiversity strategy needs to come out in advance of the submission of an application and inform the masterplanning process.</li> </ul> <p>Landscape</p> <ul style="list-style-type: none"> <li>• Impact on the sensitivity of the AONB has not been taken into account.</li> <li>• LVIA will inform masterplan SPD, this must be an iterative process which will impact on the timescales, especially is LVIA indicates a lower quantum of development in the setting of the AONB.</li> <li>• Light pollution could be significant. Need to be considered by LVIA – needs to be included in policy.</li> </ul> <p>Settlement Boundary</p> <ul style="list-style-type: none"> <li>• Drawn around the whole site, meaning the GI remains in the settlement boundary.</li> <li>• SB cannot be altered by the masterplanning process, therefore, cannot consider designation of gap between Thatcham and Upper Bucklebury until next plan review.</li> <li>• No certainty – the requirement for a gap should be made clear in the wording of SP17.</li> </ul> <p>Flooding</p> <ul style="list-style-type: none"> <li>• Increased risk from flooding</li> <li>• SuDS should be considered as part of the Masterplan SPD and this should be reflected in the supporting text</li> </ul>	
<p>Finola Southgate</p> <p>Janet Wild</p>	<ul style="list-style-type: none"> <li>• No indication of where additional dwellings will be accommodated – assumed to be closer to Upper Bucklebury</li> <li>• Significant highway impact at 1500 dwellings.</li> <li>• Access onto Harts Hill will result in rat running through Upper Bucklebury to A4 J12/12 and the common</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the</p>

Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>• Ambiguity around delivery of community infrastructure (Education/health)</li> <li>• Off site infrastructure would result in more traffic movements</li> <li>• Many areas left to masterplanning (mitigation, impact, delivery, design) and little reassurance as to how this will be carried out.</li> <li>• Poor engagement – 7 working days notice of meeting, no councillors permitted to attend in person</li> <li>• Impact on biodiversity. PBC showed ecology surveys and evidence base were incorrect and outdated for 1500d dwellings. No updates.</li> <li>• Impact on AONB</li> <li>• No updates to SA as a result of increased dwellings.</li> </ul>	<p>Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>. Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.</p>
Serena Watts	<ul style="list-style-type: none"> <li>• No indication of how the increase in dwellings will be accommodated</li> <li>• Other sites are available to reduce reliance on NET – particularly lower quality grey belt/brownfield sites.</li> </ul> <p>Highways</p> <ul style="list-style-type: none"> <li>• 1500 dwellings was found to have a harmful impact on highways, 2500 will be worse.</li> <li>• Access onto Harts Hill will mean traffic coming through the villages to the M4 J12 and J13</li> <li>• Rural roads do not have pavements etc.</li> <li>• Little improvements to A339 to Basingstoke route and no improvements for the A4 which is often gridlocked.</li> </ul> <p>Infrastructure</p>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the</p>

Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>• Not clear how community infrastructure will be delivered (Schools, surgeries)</li> <li>• If infrastructure is off site will result in more traffic and car journeys.</li> <li>• The developer does not appear to be helping to fund schools and health facilities.</li> </ul> <p>Biodiversity</p> <ul style="list-style-type: none"> <li>• Concern over potential harm to biodiversity.</li> <li>• Ecology surveys were incorrect and insufficient for 1500 dwellings, and have not been updated.</li> <li>• Pressure will be put on the local environment and wildlife sites.</li> </ul> <p>Landscape</p> <ul style="list-style-type: none"> <li>• Setting of the AONB will be impacted.</li> </ul> <p>Flooding</p> <ul style="list-style-type: none"> <li>• Flood risk in Thatcham is concern</li> <li>• Water and sewage infrastructure is insufficient</li> </ul>	<p>hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a>. Please also see the Council's response to Bucklebury Parish Council above.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
Peter Weedon	<ul style="list-style-type: none"> <li>• Serious and irreversible impact on Upper Bucklebury</li> <li>• Noise and light pollution will increase</li> <li>• Loss of gap between Thatcham and Upper Bucklebury</li> <li>• Traffic increase through Upper Bucklebury – use of Harts Hill as a rat run. Harts Hill unsuitable for additional traffic.</li> <li>• Loss of ancient woodland and wildlife habitat which is a buffer between Thatcham and Upper Bucklebury</li> <li>• Unable to accommodate increase in units if developers remain committed to provision of open space and buffer zones.</li> </ul>	<p>Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 (<a href="#">Reg18</a>) and <a href="#">Reg 19</a>. The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June</p>

Respondent	Summary of Main Issues	Council response
		and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a> . Please also see the Council's response to Bucklebury Parish Council above. No further changes are proposed to the LPR.
Georgina Woods	<ul style="list-style-type: none"> <li>• Increase in houses from 1500 to 2500 seems to be excessive</li> <li>• Is not clear how this increase will be accommodated – development will have to come closer up to Upper Bucklebury blurring the boundary between Thatcham and Upper Bucklebury.</li> <li>• There should be a clear boundary between the two settlements.</li> </ul> <p>Highways</p> <ul style="list-style-type: none"> <li>• Access on to Harts Hill will increase traffic on the rural roads resulting in rat running to M4 J12 and 13</li> <li>• No suggestion of new roads to ease the problem.</li> <li>• Need to know WBC are aware of this and have a plan to mitigate it.</li> </ul> <p>Biodiversity</p> <ul style="list-style-type: none"> <li>• Ecology reports have not been updated to take account of the higher numbers.</li> <li>• No certainty there will not be harm to the biodiversity or AONB</li> </ul>	Comments noted. Comments relating to the spatial strategy, principle of the development and the potential impact on the local area have been discussed previously as part of the Examination. This is set out in the Statement of Consultation Appendix 1 and 2 ( <a href="#">Reg18</a> ) and <a href="#">Reg 19</a> . The Council's <a href="#">Statement on Matter 4</a> sets out the approach it has taken. The issues were also discussed at the hearing sessions in May, June and October last year and the Council's response to the additional work requested by the Inspector is set out in <a href="#">EXAM42</a> . Please also see the Council's response to Bucklebury Parish Council above. No further

Respondent	Summary of Main Issues	Council response
		changes are proposed to the LPR.
Lichfields obo North East Thatcham Partnership (NEPT)	<p>MAP</p> <ul style="list-style-type: none"> <li>• Clarification as to paragraph numbers is required</li> <li>• Figure references need to be updated</li> <li>• It is inappropriate to define the boundary of the GI even if it is referred to as indicative.</li> <li>• It is overly prescriptive to cite specific contour lines in the supporting text of the policy as exact form of development, open space, and other infrastructure will be determined by technical studies. Reference to the contour line creates ambiguity and lack of clarity for the community.</li> <li>• Support inclusion of 6<sup>th</sup> para after 6.61. Request to meet the needs of the development ensures compliance with NPPF para 58.</li> <li>• 7<sup>th</sup> para after 6.61 should be amended to state ‘if required’ in relation to further feasibility work form the ICB</li> <li>• Support para 6.63. timescale is important to ensure timely delivery of infrastructure and hosing at NET</li> </ul>	<p>Comments noted. Relevant figure and paragraph numbers will be updated for adoption.</p> <p>The site map is indicative, with the final extent of the GI to be determined through the Masterplan SPD. However, the TSGS refers to a contour line below which development should take place, which has been used to illustrate the area of GI for the map.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM27	28-30	Policy SP18 Housing Type and Mix	2

Respondent	Summary of Main Issues	Council response
Paula Saunderson	<p>Support for MM27, but it should be strengthened by the inclusion of wording around adaptations in bathrooms and kitchens, and dementia friendly housing.</p> <p>Housing mix should be monitored (ie. flats and houses) as estate agents are commenting that the supply of flats outstrips demand. There are 400 flats with windfall permission and a large number proposed for the Kennet Centre, and there is a risk of there being vacant housing or people forced into the wrong type of accommodation.</p>	<p>Comments noted. Policy SP18 includes the requirement for dwellings to be accessible and adaptable in accordance with Building Regulations M4(2). As set out within the Council's Written Statement (<a href="#">WS8/1</a>), the Updated Housing Needs Evidence (<a href="#">HOU5</a>), which is the most up-to-date evidence, establishes the mix of housing and this has been taken into account in policy SP18. No further changes are proposed to the LPR.</p>
Planning Bureau obo McCarthy Stone & Churchill	<p>The deletion of the words '<u>unless evidence clearly demonstrates that this would make the scheme unviable</u>' at the end of sentence 2 is contrary to paragraphs 16 (points b and d) of the NPPF. This does not provide flexibility with respect to being able to show lack of viability and would make schemes difficult to deliver and make the policy approach ambiguous. M4 (2) and M4 (3) in particular, have a cost implication and may serve to reduce the number of dwellings and further reduce the viability of a scheme and flexibility therefore needs to be provided. Although a cost has been included in the Whole Plan Viability Assessment Update (Dixon Searle, 2022) of £155.50 per sq.m, this may be an underestimation of the true cost and it has also not taken account of the fact that additional floorspace is needed to meet M4 (3) standards. Flexibility regarding viability associated with the M4 (3) requirement therefore needs to remain and the sentence should not be deleted.</p>	<p>Comments noted. The policy does provide flexibility in that it states that "the Council will take account of...and/or whether it would render development unviable in determining whether these requirements should apply."</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM28	70	Policy SP19 Affordable Housing	5

Respondent	Summary of Main Issues	Council response
Paula Saunderson	More social housing required to enable families to get onto the housing ladder. Limited existing stock of social housing. The whole stock should not be handed over to one housing association so that it has a monopoly in the area.	Comments noted. The ownership of the affordable housing stock is not a planning policy matter. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.
Neame Sutton obo Donnington New Homes	The policy should accurately reflect national policy and guidance, and it should therefore not apply a blanket approach to all areas.	Comments noted. The comments raised within the response repeat those within Written Statement <a href="#">WS8/7</a> . MM19 amends the second paragraph of the policy so there is no longer a blanket requirement for affordable housing on sites of between five and nine dwellings. Instead, it will only be sought in areas designated as rural under Section 157(1) of the Housing Act 1985 on development sites of between five and nine dwellings.

Respondent	Summary of Main Issues	Council response
		The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.
Planning Bureau obo McCarthy Stone & Churchill	<p>Cross-reference made to Matter 8 hearing statement (<a href="#">WS8/11</a>). No justification or evidence to support the review mechanism. The Plan should include an exemption from the review mechanism for single-phased developments to assist the delivery of older persons housing and SME's who are acknowledged to be struggling with viability of developments. For a large or multi-phase development which will be delivered over a long period it makes sense to check whether the scheme's viability has changed with market movements.</p> <p>For a small single phased site, the Planning Inspectorate have repeatedly noted that review mechanisms are unnecessary. An example of this is within appeal decision reference APP/C4235/W/120/3256972 dated 1st April 2021 whereby the Inspector noted in paragraph 17 that <i>'as the development would almost certainly be completed in a single phase with an estimated build time of 12-18 months, it is not the sort of large multi-phased scheme where stronger arguments for a review/clawback mechanism may otherwise exist'</i>.</p> <p>Inspector's Report to the Examination into the East Riding of Yorkshire Local Plan update includes the introduction of additional text with regard to the review mechanism and has been introduced in order to ensure the approach to review mechanisms is justified</p>	<p>Comments noted.</p> <p>This matter was discussed at the Examination Hearing session on 5 June 2024, which was followed by the Inspector's Action Point AP34 (b) which is contained within <a href="#">IN26</a>. MM28 was prepared in response to Action Point AP34 (b).</p> <p>Main Modification (MM87) has already been proposed to the supporting text of policy DM19 (Specialised Housing) at paragraph 11.17. Additional text has been inserted to explain that "...Proposals for specialist housing will be considered on their own merits having regard to whether the proposal falls within Class C2 or Class C3 of the of the Use Classes Order. This will depend upon factors such as the level of personal care offered; the</p>



Respondent	Summary of Main Issues	Council response
	<p>and effective. Similar wording could be introduced to the LPR, ie. Plan.  <i>'A review of viability will be carried out on a case by case basis based on the potential timescale of the development. A review is likely to be justified for large schemes or those with multiple phases delivered over a long time'.</i></p> <p>Reference within the ninth paragraph to C2 and C3 is unnecessary and could create confusion because no definition is provided as to what form of older persons housing falls within which use class. The Viability Assessment Update, Dixon Searle, Autumn 2022 (VIA1a) recognised the lower viability of older person's housing and advocates that sheltered housing should also be subject to flexibility in a similar way that extra-care housing is addressed. The Assessment suggests in paragraph 3.2.28 that if more flexibility was built into the scope of policy SP19, then this may assist in respect of any viability issues.</p> <p>Referencing C2 and C3 without providing a definition could make the policy ambiguous contrary paragraph 16 of the NPPF. Recommended that the wording 'having regard to whether it falls within Class C2 or C3' is removed from the Main Modifications so that it reads:  <i>'Proposals will therefore be considered <del>having regard to whether it falls within Class C2 or Class C3</del> depending on the level of care and scale of communal facilities provided.....'</i></p>	<p>type of accommodation and level of communal space and facilities. Pre-application advice should be sought if clarification is needed as to whether a development is likely to constitute a specialist care housing provision."</p> <p>The LPR should be read and interpreted as a whole, and all policies considered together. The proposed text to the ninth paragraph of SP19 is clear that the provision of affordable housing may be difficult to achieve.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
Ridgepoint Homes	Support for the affordable housing tenure split.	Support noted
Thakeham	Support for MM28	Support noted

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM29	70	Supporting text to policy SP19 Affordable Housing	4

Respondent	Summary of Main Issues	Council response
Newbury Town Council	Disagree with setting the limits at 10 or more dwellings for the provision of affordable housing and this should be in line with the rest of West Berkshire. The majority of developments within the Newbury settlement boundary comprise of less than 10 dwellings.	Comments noted. As explained within the Council's Written Statement to Matter 8 ( <a href="#">WS8/1</a> ), the affordable housing requirements are justified by up-to-date evidence relating to need and viability, which takes account of national planning policy and guidance. MM28 removes the blanket requirement for affordable housing on sites of between five and nine dwellings except in areas designated as rural under Section 157(1) of the Housing Act 1985. This Main Modification is required to ensure that policy SP19 complies with national policy. No further changes are proposed to the LPR.
Karen Wilkinson- Flood	The proposed allocation at Pincents Lane should be removed. Government making threats if local planning authorities do not include more housing, ie. Inspectors being instructed to throw out plans. Inclusion of the Pincents Lane allocation was kneejerk reaction to this.	Comments noted. The matters raised do not relate to MM29. MM45 has regard to the new allocation proposed on Land at Pincents Lane, Tilehurst and the issues raised will be

Respondent	Summary of Main Issues	Council response
	<p>Pincents Lane is not previously developed land. Additional time should have been taken to identify suitable additional sites which revitalise smaller communities. Previous planning applications refused for the site.</p> <p>No consideration of the structural integrity of the Grade II Pincents Manor either now or in the future.</p> <p>Limited community involvement. Key objective of the planning system is for greater and more effective community involvement, and the Statement of Community Involvement is clear about this, and the way in which community involvement should take place. Those without internet access will not have their voices heard. There should have been leaflet-drops to raise awareness.</p> <p>No mention of hedgehogs, which are a protected species, within wildlife studies. Development at Pincents Lane will result in their loss. Development will impact upon flora and fauna.</p>	<p>considered in the Council's response to that MM.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
Planning Bureau obo McCarthy Stone & Churchill	See MM28	Comment noted. Please see the Council's response under MM28
Ridgepoint Homes	Support for MM29	Support noted.

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM30 PMC8 PMC9	73	Policy SP20 Strategic approach to employment land	6

Respondent	Summary of Main Issues	Council response
AWE/MOD	<ul style="list-style-type: none"> <li>• Welcomes clarity of the amendments, in particular the revision to the boundary to Youngs Industrial Estate – PMC8.</li> <li>• Accept the plan must be read as a whole, however are mindful of the ONR position regarding the adequacy of the OSEP and their position on increase in population within the DEPZ, along with recent appeal decisions highlighting the need to take into account the potential cumulative impact of smaller scale developments, rather than the impact of one development in isolation.</li> <li>• AWE and MOD are concerned that the importance of policy SP4 and its application to ALL policies and proposed development within the DEPZ should be restated where policies could lead to an increase in residential or non-residential population or activity. This is to avoid the suggestion that a proposal that complies with other policies in the LPR but not SP4 is otherwise compliant with the plan as a whole. This could undermine the effectiveness of SP4 and therefore raises soundness concerns.</li> <li>• Suggest additional text is added to the policy as follows: <u>'Any development proposal located within the DEPZ for AWE sites, including on an existing DEA, within a settlement boundary or neighbourhood plan, countryside or</u></li> </ul>	<p>Comments noted. Each development proposal will be considered on its merits and the supporting text to policy SP4 makes clear that the Council will monitor committed and future development proposals in partnership with neighbouring councils, those agencies with duties under REPPiR, and the ONR to understand the impact on the OSEP and the operation of AWE.</p> <p>It is important to note that the Plan needs to be read and interpreted as a whole, and all policies should be viewed together and not in isolation in the preparation and consideration of planning applications. This is made clear in paragraph 1.6 of the <a href="#">submitted LPR (CD1)</a>.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main</p>

Respondent	Summary of Main Issues	Council response
	<u>previously developed land must comply fully with policy SP4'.</u>	Modification. No further changes are proposed to the LPR.
Paula Saunderson	<ul style="list-style-type: none"> <li>The only DEA that has an LDO to guide its design is Greenham Business Park, so all the others are open to non-restricted PDR and any type of built form in terms of design as there are no Design Guides and Model Design Code.</li> <li>Why is it OK to allocate Employment Sites within settlement boundaries and not residential ones?</li> </ul>	<p>Comments noted. Policies within the development plan will guide future development proposals in terms of design quality, for example policy SP7 of LPR.</p> <p>With regard to site allocations, the same approach has been taken to the allocation of both residential and employment sites within settlement boundaries.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
Pegasus Group obo Walkers Logistics	<ul style="list-style-type: none"> <li>Support MM30 as it now includes the employment requirement across the District - a minimum of 57,531sqm of offices space and a minimum of 98,196sqm of industrial space.</li> <li>Concern with the detailed boundaries as amended in Annex L of EXAM62 and also Appendix P of EXAM63. The approved layout plan for the site (attached to representation) shows that to the north of the site some landscaping will be removed and there is an area of reinforced grass and permeable paving.</li> </ul>	<p>Comments noted. The issues raised have previously been considered and discussed as part of the Examination. The Council refer to <a href="#">EXAM44</a> and its response to the Inspector's Action Point AP68 in <a href="#">IN27</a> regarding Membury Industrial Estate. The Council do not consider it appropriate to amend the policy (ESA2) beyond that set out in the proposed Main Modification (MM69).</p>

Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>• With regard to the submitted wording of ESA2, Walkers reiterate concerns (previously covered in Hearing Statements) relating to aligning the policy requirements with the implemented planning permission at the Walkers site (allocated site ESA2). These suggested changes are: <ul style="list-style-type: none"> <li>- E(ii) - comments relating the buffer need to be updated to reflect the taxiing access to the airfield.</li> <li>- E(iii) – this needs to be removed as the height of the buildings in the planning permission exceeds the height of the trees to the west.</li> <li>- E(v) – this need deleting as it is unclear how HGV access into the site could have a ‘rural character’. It needs to be a functional and safe access.</li> </ul> </li> <li>• As planning permission has now been implemented, this needs to be reflected within the Proposals Map and policy ESA2.</li> <li>• The main issue is that the Council have not sought to add in any further allocations to meet the minimum floorspace figures in MM30.</li> <li>• Failure to deliver the minimum employment needs has not been included in the updated SA – the assessment of policy SP20 fails to reflect on the alternative scenario advanced by the Council where somewhere between 40-60% of the identified needs fail to be planned for.</li> <li>• Walkers confirm that their wider land holding to the west of allocation ESA2 remain available and should be identified by the Inspector as an employment allocation through a MM to the Plan.</li> <li>• The Inspector needs to make further MM to identify further sites to ensure that sufficient sites are identified to foster</li> </ul>	<p>The Council has positively sought opportunities to meet the employment requirements and sets out in its response to Q11.6 (<a href="#">WS11/1</a>) that all of the available and suitable sites for industrial and/or storage and distribution development are allocated in the Plan, and WS11/1 sets out the background to this. It also outlines that the supporting text to policy SP20 the Council recognises the Plan is unable to make provision to meet the District’s industrial requirements in full over the plan period. The Employment Background Paper (<a href="#">EMP5</a>) highlights in Table 3 that the LPR allocates sufficient land to meet 14.6ha (10 years worth) of the 24.5ha of industrial land required, amounting 58,400sqm of floorspace. Given the shortfall in the later part of the plan period, the Council has committed to reassess this matter again through a review in the first five years of the Plan.</p> <p>With regard to the SA/SEA, this issue was discussed at the hearing sessions on 8<sup>th</sup> May. See Council response to representations made in relation to the SA/SEA.</p>

Respondent	Summary of Main Issues	Council response
	the sustainable economic growth advocated by the Council.	The assessment of landscape sensitivity and capacity of the wider site (14.5ha) ( <a href="#">LAN7a</a> ) concludes that development across the whole of the site (to the west of the allocation ESA2) would be inappropriate. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.
Pro Vision obo Hope and Clay Construction Ltd	<ul style="list-style-type: none"> <li>• See comments on MM8 and MM9 in regard to business within the DEPZ.</li> <li>• Easter Park was identified as a DEA in the Regulation 18 Plan, as recommended in the ELR (EMP3) but this status was removed because of its location in the latest DEPZ. This is inconsistent with Young's Industrial Estate, also in Aldermaston DEPZ, which remains a DEA, whereby there is a presumption in favour of employment development (albeit the expansion land has been omitted under MM30).</li> <li>• Easter Park is also justified as being a DEA and the LPR should be modified further to include Easter Park as a DEA.</li> <li>• The decision to delete allocation of site ALD6 should be reviewed as it has not been justified.</li> </ul>	Comments noted. The issues raised have previously been considered and discussed as part of the Examination. The Council's response to Q11.6 in <a href="#">WS11/1</a> sets out the approach taken to allocating sites within the AWE DEPZ and provides background to this approach. The Employment Background Paper ( <a href="#">EMP5</a> ) also outlines the Council's approach to reviewing existing Protected Employment Areas (to be renamed Designated Employment Areas (DEA) through the LPR), as well as the identification of new DEA. The representation does not raise any issues which would prevent the Council from proceeding in

Respondent	Summary of Main Issues	Council response
		accordance with the Proposed Main Modification. No further changes are proposed to the LPR.
Pro Vision obo Wasing Estate	<ul style="list-style-type: none"> <li>• Support the increase in the floorspace requirement for additional office and industrial floorspace across the plan period.</li> <li>• Remain concerned that no further site allocations for additional office and industrial floorspace have been made to the plan despite the significant shortfall against the identified need.</li> <li>• Larkwhistle Farm, Brimpton Common (BRIM3) is available and suitable for office and/or industrial use – see Reg. 19 representations and Examination Hearing Statements.</li> <li>• The MM to the policy does not address these concerns on the lack of site allocations to meet identified need; additional allocations are necessary and therefore the plan remains unsound.</li> </ul>	<p>Comments noted. The Council has positively sought opportunities to meet the employment requirements and sets out in its response to Q11.6 (<a href="#">WS11/1</a>) that all of the available and suitable sites for industrial and/or storage and distribution development are allocated in the Plan, and WS11/1 sets out the background to this. It also outlines that the supporting text to policy SP20 the Council recognises the Plan is unable to make provision to meet the District's industrial requirements in full over the plan period. The Employment Background Paper (<a href="#">EMP5</a>) highlights in Table 3 that the LPR allocates sufficient land to meet 14.6ha (10 years worth) of the 24.5ha of industrial land required, amounting 58,400sqm of floorspace. Given the shortfall in the later part of the plan period, the Council has committed to reassess this matter again through a review in the first five years of the Plan.</p> <p>The representation does not raise any issues which would prevent the</p>



Respondent	Summary of Main Issues	Council response
		Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.
Stantec obo Copas Brothers (Farms) Ltd	<ul style="list-style-type: none"> <li>• Support the MM.</li> <li>• However, continue to have concerns that policy SP20 does not meet the identified needs and therefore the LPR is unsound.</li> </ul> <p><u>Meeting the identified needs/requirement:</u></p> <ul style="list-style-type: none"> <li>• Identified shortfall for industrial space is c.40% of the identified need.</li> <li>• MM30 (and MM31 and MM67) do not go far enough to address soundness issues and therefore is not effective because it will not deliver enough development to meet the identified employment need over the plan period.</li> </ul> <p><u>Promoting sustainable development:</u></p> <ul style="list-style-type: none"> <li>• The NPPF asserts the role of the planning system is to contribute to the achievement of sustainable development and requires policies at para 82 to set criteria, or identify, strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period. The LPR falls short.</li> <li>• The increase in housing supply to meet housing requirements further emphasises the important of also meeting employment needs.</li> <li>• Delaying meeting the employment needs until a review of the plan is not a sound approach to achieving sustainable development.</li> </ul> <p><u>National Government – Plan for Change:</u></p>	<p>Comments noted. The Council has positively sought opportunities to meet the employment requirements and sets out in its response to Q11.6 (<a href="#">WS11/1</a>) that all of the available and suitable sites for industrial and/or storage and distribution development are allocated in the Plan, and WS11/1 sets out the background to this. It also outlines that the supporting text to policy SP20 the Council recognises the Plan is unable to make provision to meet the District’s industrial requirements in full over the plan period. The Employment Background Paper (<a href="#">EMP5</a>) highlights in Table 3 that the LPR allocates sufficient land to meet 14.6ha (10 years worth) of the 24.5ha of industrial land required, amounting 58,400sqm of floorspace. Given the shortfall in the later part of the plan period, the Council has committed to reassess this matter again through a review in the first five years of the Plan.</p>

Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>• Government position on getting up-to-date plans in place and the significant importance behind supporting the economy.</li> <li>• Despite transitional arrangements for the LPR Examination substantial weight should be placed on the need to support economic growth and productivity and the shortfall in employment land supply is evidently inconsistent with national policy.</li> <li>• Overall, SP20 does not seek to meet the identified employment needs, it does not take an appropriate strategy to identify sufficient sites, will not deliver over the plan period and will not support the delivery of sustainable development, and is inconsistent with national policy.</li> <li>• It is considered the LPR should identify additional employment land supply to meet identified employment needs.</li> <li>• As set out previously, it is considered that Land adjacent to Beenham Industrial Estate, Beenham (BEEN 11) could support the Council in meeting their employment needs and therefore the site should be included in the table set out at supporting text 8.3 (MM67) and included as its own site allocation for 20,000sqm approx. floorspace and uses E/B2/B8 and the Policies Map should be updated accordingly.</li> </ul>	<p>The assessment of landscape sensitivity and capacity of the site (<a href="#">LAN8p</a> and <a href="#">LAN8q</a>) concludes that the site is not suitable for development.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM31	73 – 75	Supporting text to policy SP20 Strategic approach to employment land	4

Respondent	Summary of Main Issues	Council response
Newbury Town Council	Paragraph 7.10 – this can be addressed as part of the Newbury Town Council's Neighbourhood Development Plan	Comments noted. No further changes are proposed to the LPR.
Paula Saunderson	<p>Reference to para 7.10 of supporting text:</p> <ul style="list-style-type: none"> <li>Any references to the old name for LRIE should be removed as it has been Bond Riverside for some time. Wider Designated Employment Area is London Road Estates DEA.</li> <li>The proposed Additional Modification (AMA4.1) to include the word 'industrial' must not happen as everyone locally thinks of London Road Industrial Estate as the land solely owned by WBDC.</li> <li>A new red line map for Bond Riverside within the DEA is required, without the public open space.</li> <li>A more recent decision by the Exec. In May 2024 resolved to close down the Bond Riverside Programme and merge elements of the programmes in with the Newbury Town Centre Masterplan programme.</li> <li>An SPD was promised for Bond Riverside and this has never materialised and is not in the LDS. LPR to be clear on the position of Bond Riverside and whether production of an SPD will be included in the LDS.</li> <li>There is no LDO for the wider DEA – should the production of one be added to the LDS? Should any PDR be restricted?</li> <li>In the absence of a LDO, clarification needs to be sought on whether future planning applications that come forward within</li> </ul>	<p>Comments noted.</p> <p>Most of the Bond Riverside site sits within a Designated Employment Area (DEA) and therefore future development within this area would be considered against policy DM32.</p> <p>A geographical representation of the DEA is available on the Policies Map. It is clear on the Policies Map and within the supporting text to policy SP20 that the football ground (along with the wider public open space adjacent to the canal) is not within the DEA. The Council is developing its approach to Bond Riverside as part of the Newbury Town Centre Masterplan programme.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed</p>

Respondent	Summary of Main Issues	Council response
	<p>the DEA with dwellings in them are acceptable as policy DM32 leave this open to interpretation.</p> <ul style="list-style-type: none"> <li>• Registered Brownfield Sites to be added to the Policies Map for information as this will show clearly where a DEA has a brownfield site within it, whether they are all standalone outside DEAs and whether they are within or outside settlement boundaries.</li> <li>• First paragraph needs changing as follows: ‘It is important to note that the London Road ESTATES DEA includes the Council owned Bond Riverside Plots, and the adjoining Riverpark Industrial Estate but excludes the <u>Public Open Space which currently includes a Football Ground. (The WBC Public Open Space is bigger than the Football Ground).</u></li> <li>• On GIS maps all the DEA shows as in Floodplain 2, and a significant area is included under Flood risk 3A plus Climate Change – if none of this is made clear, the area will be subject to windfall applications, and in the absence of a bigger picture FRA this will be regrettable.</li> </ul>	Main Modification. No further changes are proposed to the LPR.
Pro Vision obo Wasing Estate	MM considered unsound, but representation supports the increase in the plan period from 2039 to 2041, and clarification of the definition of use classes.	Comments noted.
Stantec obo Copas Brothers (Farms) Ltd	<ul style="list-style-type: none"> <li>• Given the identified shortfall in supply, MM31 does not go far enough to address soundness issues and therefore is not effective because it will not deliver enough development to meet the identified employment need over the plan period.</li> <li>• It is considered the LPR should identify additional employment land supply to meet identified employment needs.</li> <li>• As set out previously, it is considered that Land adjacent to Beenham Industrial Estate, Beenham (BEEN 11) could</li> </ul>	Comments noted. The Council has positively sought opportunities to meet the employment requirements and sets out in its response to Q11.6 ( <a href="#">WS11/1</a> ) that all of the available and suitable sites for industrial and/or storage and distribution development are allocated in the Plan, and WS11/1

Respondent	Summary of Main Issues	Council response
	<p>support the Council in meeting their employment needs and therefore the site should be included in the table set out at supporting text 8.3 (MM67) and included as its own site allocation for 20,000sqm approx. floorspace and uses E/B2/B8 and the Policies Map should be updated accordingly.</p>	<p>sets out the background to this. It also outlines that the supporting text to policy SP20 the Council recognises the Plan is unable to make provision to meet the District's industrial requirements in full over the plan period. The Employment Background Paper (<a href="#">EMP5</a>) highlights in Table 3 that the LPR allocates sufficient land to meet 14.6ha (10 years worth) of the 24.5ha of industrial land required, amounting 58,400sqm of floorspace. Given the shortfall in the later part of the plan period, the Council has committed to reassess this matter again through a review in the first five years of the Plan. The assessment of landscape sensitivity and capacity of the site (<a href="#">LAN8p</a> and <a href="#">LAN8q</a>) concludes that the site is not suitable for development. No further changes are proposed to the LPR.</p>

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM32	77	Policy SP21 Sites Allocated for Employment Land	1

Respondent	Summary of Main Issues	Council response
Pro Vision obo Wasing Estate	<ul style="list-style-type: none"> <li>Support the deletion of policy SP21 which removes unnecessary duplication.</li> <li>The MM does not address comments made at Regulation 19 and in Hearing Statements for Matters 1, 2, 3 and 11 regarding the Plan not allocating sufficient employment land to meet needs, and therefore the Plan remains unsound.</li> </ul>	Comments noted. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM33 PMC10	79	Policy SP22 Town and District Centres	2

Respondent	Summary of Main Issues	Council response
Newbury Town Council	<ul style="list-style-type: none"> <li>Object to the changes shown in the Map (PMC10), the Market Place must be kept as a primary shopping area.</li> <li>We would like to see the east side of the Market Place retained as a Primary Shopping Area up until the traffic lights at the junction with Bear Street and Cheap Street.</li> </ul>	<p>Comments noted. The Council refers to <a href="#">EXAM40</a> and its response to the Inspector's Action Point AP71 in <a href="#">IN27</a> regarding the Newbury Town Centre Primary Shopping Area. This issue was discussed at the hearing sessions in June and arose in response to representations made to the examination. The majority of units along the east side of the Kennet Centre are no longer in retail use. No further changes are proposed to the LPR.</p>
Paula Saunderson	<ul style="list-style-type: none"> <li>As the Kennet Centre/Eagle Quarter Site has been removed from this Plan it is not clear why these Boundaries are being changed? I have referred this to Newbury Town Council for comment within their response to this MM Consultation. I do not understand what else within the Plan would trigger this Modification.</li> </ul>	<p>Comments noted. The Council refers to <a href="#">EXAM40</a> and its response to the Inspector's Action Point AP71 in <a href="#">IN27</a> regarding the Newbury Town Centre Primary Shopping Area. This issue was discussed at the hearing sessions in June and arose in response to representations made to the examination. The majority of units along the east side of the Kennet Centre are no longer in retail use. No further changes are proposed to the LPR.</p>

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM34	83	Policy SP24 Infrastructure	2

Respondent	Summary of Main Issues	Council response
Holybrook Parish Council	<p>The LPR allocates sites for housing and economic development; however, there is a lack of detailed planning for the necessary infrastructure to support these developments. Over recent years, significant development has occurred within the district without a corresponding enhancement of infrastructure. The current plan does not adequately address the need for improved transportation, healthcare, education and other essential services to support both existing residents and new developments. Without a robust infrastructure plan, further development will only worsen the strain on already overburdened services, leading to a decline in the quality of life for residents. Offering CIL payments is not enough for infrastructure such as doctors' surgeries – there are not enough doctors.</p> <p>Whilst Community Infrastructure Levy is a useful resource for the community in which development is taking place, it is concerning that areas surrounding and affected by large-scale developments do not receive a proportions of CIL funds to mitigate the impacts of such projects on their communities. This lack of funding places an undue burden on these communities, which must cope with increased pressure on local services and infrastructure without corresponding financial support. A more equitable distribution of CIL funds is necessary to ensure that all communities benefit from development and can address the associated challenges effectively.</p>	<p>Comments noted. They do not relate specifically to the Proposed Main Modifications. The Plan is supported by the Infrastructure Delivery Plan (IDP). MM34 is clear that development will be required to ensure the timely and coordinated delivery of necessary infrastructure having regard to the latest version of the Council's IDP, through proportionate financial contributions and / or on-site provision. Where necessary, the phasing of development will be linked to infrastructure provision. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
Paula Saunderson	<p>Much missing from the IDP. The other points I have made in relation to the non-allocation of sites within the settlement boundary and high windfall rates are very pertinent to production of an IDP.</p> <p>IDPs are often presented as Spreadsheets.</p>	<p>Comments noted. The Plan is supported by the Infrastructure Delivery Plan (IDP), and this will be subject to regular updates.</p>



Respondent	Summary of Main Issues	Council response
		<p>Both allocated and unallocated developments will need to be subject to planning permission, and development proposals will need to comply with the policies within the development plan (which includes the LPR).</p> <p>MM34 is clear that development will be required to ensure the timely and coordinated delivery of necessary infrastructure having regard to the latest version of the Council's IDP, through proportionate financial contributions and / or on-site provision. Where necessary, the phasing of development will be linked to infrastructure provision. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

<b>Ref</b>	<b>Page</b>	<b>Policy/Paragraph of submitted LPR</b>	<b>No of responses</b>
<b>MM35</b>	<b>85</b>	<b>Paragraph 8.2</b>	<b>1</b>

<b>Respondent</b>	<b>Summary of Main Issues</b>	<b>Council response</b>
Paula Saunderson	No comment	Noted.

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM36	85	After Para 8.2 Sites allocated: Newbury and Thatcham	7

Respondent	Summary of Main Issues	Council response
Cold Ash Parish Council	<p>Object to the significant shift in the overall strategy for the LPR. Extending the Plan period is a significant step away from Reg 18 and Reg 19, and impacts the community in terms of housing numbers, the location of new development, and the provision of supporting infrastructure.</p> <p>Lack of consultation is contrary to national policy, and alternative approaches should be considered, eg. maintaining the Plan end of 2029 and committing to an immediate review – this was the approach taken with the Tunbridge Wells Local Plan.</p> <p>Two sites within Cold Ash Parish (Henwick Park and Land east of the Regency Park Hotel). These were previously assessed by the Parish Council and WBC and ruled out. Little evidence to demonstrate how they have been reassessed and why they are now deliverable. The original site assessments have not been updated.</p> <p>No consideration of potential new sites that might have come forward since the last HELAA assessment. Lack of consideration of reasonable alternatives.</p> <p>The adopted Cold Ash Neighbourhood Plan (NP) has been ignored. Site assessment work was carried out as part of the preparation of the NP, and both Henwick Park and Land east of the Regency Park Hotel were ruled out. These two sites were not considered as strategic by WBC as confirmed in the SA/SEA. The allocation of the sites as strategic by WBC undermines the neighbourhood plan. The Parish Council would</p>	<p>Comments noted.</p> <p>The main issues raised are the same as those raised under MM42. Please see the Council's response to MM42.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

Respondent	Summary of Main Issues	Council response
	<p>prefer to review their NDP to enable the community to be fully engaged in the process.</p> <p>No reason why WBC could not identify broad locations for development as opposed to identifying specific sites for allocation.</p> <p>CA12 extends into the buffer zone which has been identified in the NDP following on from the West Berkshire Appropriate Countryside Designation Study (November 2022), which was prepared by WBDC to inform the identification of green gaps between settlements to restrict coalescence.</p>	
Newbury Town Council	Figure of 1,500 dwellings for Sandleford Park questioned.	<p>Comment noted. During the examination hearing sessions, the Inspector was clear that the housing trajectory should have a fixed reference point which is based on comprehensive information about planning permissions as at 1 April 2023. At 1 April 2023, Sandleford Park did not have planning permission and the figure of 1,500 reflects the number of dwellings that the site is allocated for (in the adopted Core Strategy). No further changes are proposed to the LPR.</p>
Paula Saunderson	<p>Over reliance on development within settlement boundaries which is not an approach commonly taken by other local planning authorities. There would be greater certainty for developers, infrastructure providers, and the community if sites within the settlement boundary were allocated.</p>	<p>Comments noted.</p> <p>The issues raised have previously been considered and discussed as part of the Examination and will be considered again as part of the preparation of the next Local Plan.</p>

Respondent	Summary of Main Issues	Council response
		No further changes are proposed to the LPR.
Nexus obo Croudace Homes	Support for MM36. Henwick Park is deliverable as evidenced through the forthcoming full planning application.	Support noted.
Prosper Infinity Ltd	<p>The sites identified are on greenfield or greenbelt land, and / or outside the settlement boundary. The Council are aware of sites that are previously developed, such as Newbury Leisure Park. The site meets the criteria to be included on the Council's Brownfield Land Register, and Permission in Principle should be granted.</p> <p>The methodology of assessing sites is flawed for the following reasons:</p> <ul style="list-style-type: none"> <li>• There is no reference to gap policy within the NPPF.</li> <li>• WBC officers recognise that the site should have always been included within the settlement boundary since its original development over 50 years ago. This administrative error excluded it from the scope of the Countryside Designation study, and because there was no public consultation, the error was not highlighted for inclusion.</li> <li>• The Inspector quoted several legal cases where government directive has been that the whole plot of land cannot be discounted for planning permission, but the Council can stipulate that areas within Flood Zone 1 and 2 could be developed within guidelines.</li> <li>• Angela Rayner MP parliamentary statement on 30 July 2024 commented that the first port of call for development should be brownfield land.</li> </ul>	<p>Comments noted.</p> <p>Newbury Leisure Park (THA21) was not taken forward as an allocation, and the reasons for this are set out within the Council's response to AP29 (<a href="#">EXAM32</a>).</p> <p>Newbury Leisure Park was also discussed at the Examination Hearing Session on 2 October 2024. The Appropriate Countryside Designation Study (<a href="#">SET2</a>) explains the national policy relevant to the study.</p> <p>As part of the preparation of the LPR, a review of the district's settlement boundaries was undertaken and this is set out within the Settlement Boundary Review Background Paper (<a href="#">SET9</a>).</p> <p>Newbury Leisure Park was not identified as being recommended for inclusion within the settlement boundary because it did not meet the criteria for inclusion.</p> <p>National planning policy has for some time placed an emphasis on</p>

Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>The non-inclusion of Newbury Leisure Park could be considered discriminatory due to the landowners' race and colour.</li> </ul>	<p>optimising the use of previously developed land, and the spatial strategy as set out in SP1 echoes this. However just because a site is previously developed, does not necessarily mean it is suitable for development or a particular type of development.</p> <p>Less than 10% of the total site area lies within Flood Zone 1 which is at low risk of flooding. The site is being promoted for a residential use, and in the NPPF's flood risk vulnerability classification this is a 'more vulnerable' use. The NPPF is clear that development should be directed away from areas at the highest risk. There are other suitable sites which are not at risk of flooding.</p> <p>Newbury Leisure Park has not been included as an allocation because it is unsuitable. No further changes are proposed to the LPR.</p>
Rolfe Judd obo Planned Holdings	Support for MM36. The site has the scope to deliver more than 45 dwellings	Support noted.
Rolfe Judd obo Regency Homes	Support for MM36. The site has the scope to deliver more than 45 dwellings	Support noted.

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM37	85	Policy RSA1 Newbury College, Newbury	2

Respondent	Summary of Main Issues	Council response
Environment Agency	<p>We have reviewed the Schedule of Proposed Additional (minor) Modifications (AM) and find that some EA comments agreed with the LPA in the agreed in the Statement of Common Ground (SoCG) with the Environment Agency have not been included in the proposed additional modifications. We are unclear if these comments have been or would be considered and included in the adopted plan.</p> <p>We note modifications suggested for polices in Chapter 8 <i>Non-Strategic Site allocations: Our Place Based Approach</i>, which the LPA agreed to include in the local plan (as we agreed with the LPA in the SoCG – attached to rep) has not been included.</p>	<p>Comments noted. The AM seeks to amend the criterion relating to the archaeological assessment.</p> <p>The SoCG with the Environment Agency (<u>EXAM24</u>) proposes a Main Modification for RSA1. This is in relation to the need for an integrated water supply and drainage strategy.</p> <p>The topic of water resources and waste water (Policy DM7) were discussed in week 3 of the hearing sessions, and this in part related to the proposed changes to reference to the phasing of development. During the discussion, several participants commented that it is not within the power of the developer to demonstrate that there is adequate water supply and waste/foul water treatment and disposal capacity, with the statutory duty instead being on water and sewerage providers. It was also noted that criterion (c) of the policy repeated to some extent criterion (a).</p> <p>Following the session, the Inspector asked the Council to amend the policy, as contained in <u>IN26</u> (see AP40 on pages 3-4). The supporting text to policy DM7 at paragraph 10.71 is clear that early engagement with Thames Water is necessary to ensure that development is aligned with existing capacity to serve the development or that the required upgrades to the water supply network, wastewater infrastructure, sewage treatment upgrades are constructed prior to the</p>

Respondent	Summary of Main Issues	Council response
		<p>occupation of new developments. Policy SP24 of the LPR has regard to infrastructure requirements and delivery. A Main Modification (<u>MM34</u>) has been proposed to the policy which requires the timely and coordinated delivery of necessary infrastructure, having regard to the latest version of the Council's Infrastructure Delivery Plan, through proportionate financial contributions and/or on-site provision. Where necessary, the phasing of development will be linked to infrastructure provision.</p> <p>It is important to note that the Plan needs to be read and interpreted as a whole, and all policies should be viewed together and not in isolation in the preparation and consideration of planning applications. As set out within the Council's response to AP40 (see <u>EXAM39</u>), where a water company is concerned that a new development may impact upon their service to customers or the environment, they may request the local planning authority impose a Grampian planning condition, whereby the planning permission cannot be implemented until a third-party secures the necessary upgrading or contributions.</p> <p>The Council has consulted further with the Environment Agency and can confirm the Agency is content with approach being taken and has no objections to the Proposed Main Modifications. It has however proposed a further modification to policy RSA1 to refer to the need for a Flood Risk Assessment. Whilst this has not been raised before either as part of the Regulation 19 response or discussed in the SoCG a criterion would be</p>



Respondent	Summary of Main Issues	Council response
		<p>consistent with other site allocation policies. The Council therefore proposes a further modification to the policy to add another criterion as follows:  <u>'The scheme will be supported by a Flood Risk Assessment which will advise on any appropriate mitigation measures'</u>.</p>
Paula Saunderson	<p>As the criterion which is proposed to be deleted has been added to the SP policy it is agreed that it is not necessary within each site allocation, providing there is assurance that the mechanisms exist to undertake the provision of proper forward looking, planned and budgeted Water Infrastructure Assets.</p> <p>Major Sites have not been included within Settlement Boundaries that come forward as windfall as Thames Water are not a statutory consultee for sites outside the LPR.</p>	<p>Comments noted.</p> <p>The topic of water resources and waste water (Policy DM7) were discussed at the Examination Hearing Session on 6<sup>th</sup> June 2024. During the discussion, several participants commented that it is not within the power of the developer to demonstrate that there is adequate water supply and waste/foul water treatment and disposal capacity, with the statutory duty instead being on water and sewerage providers. It was also noted that criterion (c) of the policy repeated to some extent criterion (a).</p> <p>Following the session, the Inspector asked the Council to amend the policy, as set out in <a href="#">IN26</a> (AP40). Policy DM7 is proposed for modification (MM78) to highlight that the identified need for the development or expansion of water supply or wastewater facilities is an important material consideration in the consideration of planning applications. Phasing conditions may be imposed on planning applications where upgrades are required and where there are capacity constraints. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM38	87	Policy RSA2 Bath Road, Speen	2

Respondent	Summary of Main Issues	Council response
Environment Agency	<p>We have reviewed the Schedule of Proposed Additional (minor) Modifications (AM) and find that some EA comments agreed with the LPA in the agreed in the Statement of Common Ground (SoCG) with the Environment Agency have not been included in the proposed additional modifications. We are unclear if these comments have been or would be considered and included in the adopted plan.</p> <p>We note modifications suggested for polices in Chapter 8 <i>Non-Strategic Site allocations: Our Place Based Approach</i>, which the LPA agreed to include in the local plan (as we agreed with the LPA in the SoCG – attached to rep) has not been included.</p>	<p>Comments noted. The AM seeks to amend the criterion relating to the archaeological assessment.</p> <p>The (SoCG with the Environment Agency (<a href="#">EXAM24</a>) proposes two Main Modification for RSA2. The first relates to the insertion of the criterion for the integrated water supply and drainage strategy. The second relates to the need for a Flood Risk Assessment.</p> <p>The topic of water resources and waste water (Policy DM7) were discussed in week 3 of the hearing sessions, and this in part related to the proposed changes to reference to the phasing of development. During the discussion, several participants commented that it is not within the power of the developer to demonstrate that there is adequate water supply and waste/foul water treatment and disposal capacity, with the statutory duty instead being on water and sewerage providers. It was also noted that criterion (c) of the policy repeated to some extent criterion (a).</p> <p>Following the session, the Inspector asked the Council to amend the policy, as contained in <a href="#">IN26</a> (see AP40 on pages 3-4). The supporting text to policy DM7 at paragraph 10.71 is clear that early engagement with Thames Water is necessary to ensure that development is aligned with existing capacity to serve the development or that the required upgrades to the water supply network, wastewater infrastructure, sewage treatment upgrades are constructed prior to the occupation of new developments. Policy SP24 of</p>

Respondent	Summary of Main Issues	Council response
		<p>the LPR has regard to infrastructure requirements and delivery. A Main Modification (<a href="#">MM34</a>) has been proposed to the policy which requires the timely and coordinated delivery of necessary infrastructure, having regard to the latest version of the Council's Infrastructure Delivery Plan, through proportionate financial contributions and/or on-site provision. Where necessary, the phasing of development will be linked to infrastructure provision.</p> <p>It is important to note that the Plan needs to be read and interpreted as a whole, and all policies should be viewed together and not in isolation in the preparation and consideration of planning applications. As set out within the Council's response to AP40 (see <a href="#">EXAM39</a>), where a water company is concerned that a new development may impact upon their service to customers or the environment, they may request the local planning authority impose a Grampian planning condition, whereby the planning permission cannot be implemented until a third-party secures the necessary upgrading or contributions.</p> <p>The Council has consulted further with the Environment Agency and can confirm the Agency is content with the approach being taken.</p> <p>The Council also refers to its response under MM78 (policy DM7).</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
Historic England	Support and do not raise any soundness or legal compliance concerns.	Comments noted.

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM39	89	Policy RSA3 Coley Farm, Newbury	1

Respondent	Summary of Main Issues	Council response
Environment Agency	<p>We have reviewed the Schedule of Proposed Additional (minor) Modifications (AM) and find that some EA comments agreed with the LPA in the agreed in the Statement of Common Ground (SOCG) with the Environment Agency have not been included in the proposed additional modifications. We are unclear if these comments have been or would be considered and included in the adopted plan.</p> <p>We note modifications suggested for polices in Chapter 8 <i>Non-Strategic Site allocations: Our Place Based Approach</i>, which the LPA agreed to include in the local plan (as we agreed with the LPA in the SoCG – attached to rep) has not been included.</p> <p>Note that the site was previously identified as to be removed from the LPR.</p>	<p>Comments noted. No AMs are proposed for Policy RSA3. Whilst the SoCG with the Environment Agency (<u>EXAM24</u>) did note that the site was proposed to be removed from the LPR it is now being retained. The Main Modification relates to the deletion of the criterion for the integrated water supply and drainage strategy.</p> <p>The Council refers to its response under MM38 (policy RSA2). The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM40	91	Policy RSA4 Greenham Road, Newbury	1

Respondent	Summary of Main Issues	Council response
Environment Agency	<p>We have reviewed the Schedule of Proposed Additional (minor) Modifications (AM) and find that some EA comments agreed with the LPA in the agreed in the Statement of Common Ground (SoCG) with the Environment Agency have not been included in the proposed additional modifications. We are unclear if these comments have been or would be considered and included in the adopted plan.</p> <p>We note modifications suggested for polices in Chapter 8 <i>Non-Strategic Site allocations: Our Place Based Approach</i>, which the LPA agreed to include in the local plan (as we agreed with the LPA in the SoCG - attached) has not been included.</p> <p>Note that the site was previously identified as to be removed from the LPR.</p>	<p>Comments noted. No AMs are proposed for Policy RSA4. Whilst the SoCG with the Environment Agency (<u>EXAM24</u>) did note that the site was proposed to be removed from the LPR it is now being retained. The Main Modification relates to the deletion of the criterion for the integrated water supply and drainage strategy.</p> <p>The Council refers to its response under MM38 (policy RSA2). The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM41	93	Policy RSA5 Lower Way, Thatcham	1

Respondent	Summary of Main Issues	Council response
Environment Agency	<p>We have reviewed the Schedule of Proposed Additional (minor) Modifications (AM) and find that some EA comments agreed with the LPA in the agreed in the Statement of Common Ground (SoCG) with the Environment Agency have not been included in the proposed additional modifications. We are unclear if these comments have been or would be considered and included in the adopted plan.</p> <p>We note modifications suggested for polices in Chapter 8 <i>Non-Strategic Site allocations: Our Place Based Approach</i>, which the LPA agreed to include in the local plan (as we agreed with the LPA in the SoCG – attached to rep) has not been included.</p>	<p>Comments noted. The AM seeks to amend the criterion relating to the archaeological assessment. The Statement of Common Ground (SoCG) with the Environment Agency (<u>EXAM24</u>) proposes a Main Modification for RSA5. This relates to the need for an integrated water supply and drainage strategy. The Council refers to its response under MM38 (policy RSA2). The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM42 PMC12	n/a	New RSA policy – Land at Henwick Park	16

Respondent	Summary of Main Issues	Council response
Berkshire Oxfordshire and Buckinghamshire Integrated Care Board (BOB ICB)	<p>Objection to MM42 because it does not set out any requirements of providing necessary primary care mitigations. Without this, the Plan would likely to fail to meet the test of soundness in terms of being consistent with national policy.</p> <p>To overcome the objection, the following wording must be included within the policy:  <i>Developer contributions should be sought to support primary care estates facilities improvement in the local area which will serve the development. The applicant should engage with the NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board (BOB-ICB) or such appropriate body regarding the mitigation details.</i></p>	<p>Comments noted. <a href="#">MM34</a> amends the first paragraph of policy SP24 (Infrastructure Requirements and Delivery) to include text that makes clear that development will be required to ensure the timely and coordinated delivery of necessary infrastructure having regard to the latest version of the Council's Infrastructure Delivery Plan (IDP), through proportionate financial contributions and / or on-site provision. Where necessary, the phasing of development will be linked to infrastructure provision.</p> <p>The NHS Buckinghamshire, Oxfordshire and Berkshire Integrated Care Board is consulted as part of updates to the IDP.</p> <p>It is important to note that the Plan needs to be read and interpreted as a whole, and all policies should be viewed together and not in isolation in the preparation and consideration of planning applications. This is made clear in paragraph 1.6 of the <a href="#">submitted LPR (CD1)</a>. No further changes are proposed to the LPR.</p>
Cold Ash Parish Council	<p>Object to the significant shift in the overall strategy for the LPR. Extending the Plan period is a significant step away from Reg 18 and Reg 19, and impacts the community in terms of housing numbers, the location of new development, and the provision of supporting infrastructure.</p>	<p>Comments noted. The issues raised have previously been considered and discussed as part of the Examination.</p> <p><u>Housing supply</u></p> <p>At the point that the LPR was submitted for independent examination on 31 March 2023, the Council could demonstrate a housing supply across</p>

Respondent	Summary of Main Issues	Council response
	<p>Lack of consultation is contrary to national policy, and alternative approaches should be considered, eg. Retaining the original trajectory and committing to an immediate review – this was the approach taken with the Tunbridge Wells Local Plan.</p> <p>Two sites within Cold Ash Parish (Henwick Park and Land east of the Regency Park Hotel). These were previously assessed by the Parish Council and WBC and ruled out. Little evidence to demonstrate how they have been reassessed and why they are now deliverable. The original site assessments have not been updated.</p> <p>No consideration of potential new sites that might have come forward since the last HELAA assessment. Lack of consideration of reasonable alternatives.</p> <p>The adopted Cold Ash Neighbourhood Plan (NP) has been ignored. Site assessment work was carried out as part of the preparation of the NP, and both Henwick Park and Land east of the Regency Park Hotel were ruled out. These two sites were not considered as strategic by WBC as confirmed in the SA/SEA. The allocation of the sites as strategic by WBC undermines the neighbourhood plan. The Parish Council would prefer to review their NDP to enable the community to be fully engaged in the process. No reason why WBC could not identify broad locations for development as opposed to identifying specific sites for allocation.</p> <p>CA12 extends into the buffer zone which has been identified in the NDP following on from the West Berkshire Appropriate Countryside Designation Study (November 2022), which was prepared by WBDC to inform the</p>	<p>the Plan period to meet the housing requirement. This accorded with the NPPF requirement for the strategic policies in a Local Plan to identify a sufficient supply of sites.</p> <p>The Inspector's Preliminary Question 19 (<a href="#">IN2</a>) stated that whilst the Plan period is 15 years from adoption, it does not cover the full financial years post adoption. The NPPF requires the strategic policies of a Local Plan to look ahead over a minimum 15-year period from adoption.</p> <p>The Council's response to PQ19 (<a href="#">EXAM2.1</a>) proposed a Main Modification to add the additional required years to the plan period (this also took into account the delay to the start of the hearing sessions). As the Plan is now likely to be adopted in 2025, the plan period is proposed to be extended to 2040/41. A consequence of this is that a further proposed modification is required to add an extra two years' provision to the housing requirement. Extending the Plan period by a further two years impacts upon the housing supply, with a shortfall identified.</p> <p><u>Identification of other sites</u></p> <p>The Inspector's Action Point 14 (<a href="#">IN14</a>) requested the Council to clarify whether the information currently available to the examination indicates whether there are any sites suitable and available for residential development within the Plan.</p> <p>The Inspector's post-hearing letter (<a href="#">IN30</a>) identified a shortfall in the housing supply to 2041, and through a further Action Point (<a href="#">AP77</a>), the Inspector asked the Council to propose modifications to identify additional</p>



Respondent	Summary of Main Issues	Council response
	<p>identification of green gaps between settlements to restrict coalescence.</p>	<p>deliverable sites and/or broad locations. The Council’s response is set out within <a href="#">EXAM53.1</a> and <a href="#">EXAM53A</a>. The Council’s response to AP14 (see <a href="#">EXAM26</a>) sets out the additional information used to identify those sites that are suitable and available for residential development, ie.:</p> <ul style="list-style-type: none"> <li>• <b>HELAA:</b> for CA12, the HELAA concluded that the site was ‘potentially deliverable’ in part. CA17 was assessed as being ‘potentially deliverable’.</li> <li>• <b>Stage 2, Thatcham Strategic Growth Study:</b> this concluded that an allocation on the sites presents an opportunity to add additional housing units if required.</li> <li>• <b>Regulation 19 response from Nexus:</b> this confirmed that the site is available. The glossary of the July 2021 NPPF (which the Local Plan Review is being examined against) is clear that for a site to be considered as deliverable for development, it must amongst other things be available for development. The response from Nexus confirmed that the site was available.</li> <li>• <b>Information provided at the examination:</b> During the examination, the promoter of CA17 confirmed the site was available.</li> </ul> <p>The Council proposed a broad location for growth to the north of Newbury within its response to AP77 (<a href="#">EXAM53.1</a>), however the Inspector’s Action Points from the October 2024 hearing sessions (<a href="#">IN37</a>) requested that the Council amend the housing trajectory to remove reference to this.</p> <p><u>The LPR and the Cold Ash NDP</u></p>

Respondent	Summary of Main Issues	Council response
		<p>Whilst CA12 and CA17 are located within Cold Ash Parish, they relate to the settlement of Thatcham and have been considered on that basis. The SA/SEA considered the spatial distribution of development across the District. One of the options taken forward was a focus on Thatcham. This would focus a strategic site in the Thatcham area, with a number of smaller sites across the rest of the District. The Core Strategy limited growth in Thatcham due to the rapid expansion that had taken place in the town over recent years. This was to allow a period of consolidation, ensuring the infrastructure and town centre facilities could be upgraded to meet the demands of the existing population.</p> <p>In reviewing the vision for Thatcham for the LPR the Council commissioned the Thatcham Strategic Growth Study (SIT2b). The study identifies that strategic development would be required in Thatcham to support service provision and regeneration. Five groups of sites were identified as potential options for a strategic site (which included Henwick, Land at the Regency Hotel, and The Creek), and North East Thatcham (THA20) was considered the reasonable alternative for allocation. Henwick was considered to be too small on its own to be of a strategic nature as it would not be able to provide the level of infrastructure required. Email correspondence with the Cold Ash NDP Steering Group in 2020 explained that sites CA12, CA16 (The Creek) and CA17 would be considered through the LPR.</p>

Respondent	Summary of Main Issues	Council response
		<p>Policy CAP1 of the NDP has regard to the location of development, and it seeks to locate development within the settlement boundaries defined in Figure 6 in the NDP. The settlement boundaries are being reviewed as part of the LPR. The settlement boundary review criteria (which is included within Appendix 2 of the LPR) identifies that boundaries will include residential sites allocated through the LPR and neighbourhood plans.</p> <p>Criterion 2e of policy CAP1 also states that <i>“development proposals outside the settlement boundaries will only be supported where it is on sites allocated for those uses in the West Berkshire Housing Site Allocations Development Plan or its successor.”</i></p> <p>The LPR will supersede on its adoption the current Local Plan which comprises of the Core Strategy, Housing Site Allocations DPD, and the West Berkshire Local Plan 1991-2006 (Saved Policies 2007).</p> <p>Paragraph 30 of the July 2021 NPPF states: <i>“Once a neighbourhood plan has been brought into force, the policies it contains take precedence over existing non-strategic policies in a local plan covering the neighbourhood area, where they are in conflict; <u>unless they are superseded by strategic or non-strategic policies that are adopted subsequently.</u>” [our emphasis].</i></p> <p>Upon adoption of the LPR, should any policies contained within the NDP conflict with the policies in the LPR, then the policies within the LPR will take precedence.</p>

Respondent	Summary of Main Issues	Council response
		The consultation on the Main Modifications provides the opportunity for representations to be made, and the Inspector will consider these before issuing his final report. No further changes are proposed to the LPR.
Historic England	Support MM42.	Support noted.
Thatcham Town Council  David Bridle	<p>The current wording of MM42 does not provide much assurance of the long-term security of the green infrastructure and country park. Criterion (ii) of the policy should be amended as follows:</p> <p><i>(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. <u>This shall be secured and retained in perpetuity through a legal agreement, and which will be retained outside the settlement boundary for Thatcham;</u></i></p> <p>The SA/SEA does not demonstrate that the site is capable of the delivery of sustainable development in accordance with the NPPF:</p> <ul style="list-style-type: none"> <li>• Development will increase emissions which contribute to climate change.</li> <li>• Policy is silent on affordable housing.</li> <li>• Policy does nothing to preclude against good design.</li> <li>• Policy does not address crime or anti-social behaviour.</li> <li>• Development will not improve access to education – the site is within the catchment of St. Marks Primary School in Cold Ash (2km away) and Downs Secondary School in Compton (13km away).</li> <li>• Policy does not address accidents or safety. The route from the site to the primary school in Cold Ash is dangerous.</li> </ul>	<p>Comments noted.</p> <p>The landscape buffer and its long-term security will be secured via a S106 agreement, which is common place for this type of provision.</p> <p>The Council disagrees that the SA/SEA fails to demonstrate that the site is capable of the delivery of sustainable development.</p> <p>It is important to note that the Plan needs to be read and interpreted as a whole, and all policies should be viewed together and not in isolation in the preparation and consideration of planning applications. This is made clear in paragraph 1.6 of the <u>submitted LPR (CD1)</u></p> <p>The other issues raised have previously been considered and discussed as part of the Examination. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>• Development will have a negative impact on biodiversity, and the green infrastructure and public open space provided is unlikely to be sufficient to offset this.</li> <li>• The site is within the setting of the National Landscape, and the assessment must show a negative impact.</li> <li>• Increase in abstraction to provide water for the site could be detrimental to the chalk aquifers of the Kennet Valley.</li> <li>• Criterion (k) of the policy is no better than the minimum required by policy SP5.</li> <li>• The policy does not encourage employment opportunities.</li> </ul>	
Carmen Dodgson	<p>Cold Ash village will be more prone to flooding with continued development.</p> <p>Village identity of Cold Ash will be impacted, and this will devalue homes and alter the lifestyle of those who chose Cold Ash because of its village identity.</p> <p>Lack of consultation.</p> <p>Lack of infrastructure within Cold Ash village to cope with the development.</p> <p>The green belt and AONB should be protected.</p>	<p>Comments noted. The issues raised have previously been considered and discussed as part of the Examination. The site is adjacent to the settlement of Thatcham, and not Cold Ash. Within the settlement hierarchy, Thatcham is identified as an Urban Area. Urban Areas will be the prime focus for housing and economic development because of their good levels of facilities, services and accessibility.</p> <p>Although there is no Green Belt in West Berkshire, as set out within Appendix 4 of the HELAA (<a href="#">SIT4e</a>), a 2015 Landscape Capacity Assessment <a href="#">LAN5g</a>. (in which the site had the ref THA011) concluded that development could be accommodated on part of the site without harm to the AONB subject to the inclusion of mitigation measures. No further changes are proposed to the LPR.</p>

Respondent	Summary of Main Issues	Council response
H E Gomor	<p>Infrastructure inadequate.</p> <p>There will be an increase in traffic using Heath Land and Cold Ash village.</p> <p>Schools, dentists and GP surgeries already under pressure, and will not be able to cope with the additional population.</p> <p>The site is greenfield and should therefore be farmed.</p> <p>All brownfield sites should be developed first.</p> <p>More Council houses need to be built.</p>	<p>Comments noted. The issues raised have previously been considered and discussed as part of the Examination.</p> <p>As part of the assessment of the site for the Council's Housing and Economic Land Availability Assessment (<a href="#">SIT4e</a>), the Council's Highways Team did not identify any impacts on local highway capacity.</p> <p>Policy SP24 of the LPR has regard to infrastructure requirements and delivery. A Main Modification (<a href="#">MM34</a>) has been proposed to the policy which requires the timely and coordinated delivery of necessary infrastructure, having regard to the latest version of the Council's Infrastructure Delivery Plan, through proportionate financial contributions and/or on-site provision. Where necessary, the phasing of development will be linked to infrastructure provision.</p> <p>Paragraph 4.20 of the supporting text to policy SP1 (Spatial Strategy) of the LPR makes it clear that whilst the strategy seeks to make effective use of brownfield land, further greenfield allocations are still required.</p> <p>Affordable housing will need to be provided in line with the requirements set out in policy SP19 of the LPR.</p> <p>The Council does not have its own stock of housing.</p> <p>No further changes are proposed to the LPR.</p>
Ian Goodwin	<p>The site is important to the natural drainage of Cold Ash Hill. The underground flows, from the hill of Cold Ash, flow into an aquifer under those fields. Whilst the area could be drained to enable development, it would result in a large volume water being received into the River Kennet during heavy rain periods. During the last three storms, there were over 10 flood warnings in the surrounding area.</p>	<p>Comments noted. All new developments must include sustainable drainage measures, and development must be avoided on areas that are at risk of surface water flooding. Drainage and flood attenuation works are included in the Infrastructure Delivery Plan.</p> <p>The site specific policy for the site includes a requirement (criterion i) for development proposals to</p>

Respondent	Summary of Main Issues	Council response
	<p>The 225mm dia Foul Sewer Main (FSM) in Cold Ash Hill, is already running over its design capacity. Adding a large number of houses into a already over loading FSM will cause more sewage out flows into properties.</p>	<p>be supported by a Flood Risk Assessment (FRA). The FRA will need to take account of the Thatcham Surface Water Management Plan and set out adequate flood mitigation measures to ensure there is no detrimental flood risk, and how flood alleviation measures already present on the site will be protected, retained, and enhanced.</p> <p>MM78 is proposed to policy DM7 which requires the application of phasing conditions where upgrades to water supply and waste water are required to ensure necessary infrastructure upgrades are delivered ahead of occupation. No further changes are proposed to the LPR.</p>
Alastair Guy and Victoria Lees	<p>Building on the site is not justified, and brownfield land should be developed as a priority.</p> <p>Previous attempts to develop the green space between Ashmore Green, Henwick and Cold Ash specifically Henwick Park as it has been referred to, have been rejected and have received very strong opposition from numerous local residents.</p> <p>Development should not jeopardise the flood alleviation schemes by building above them.</p>	<p>Comments noted. The site was subject to an outline planning application in 2015 (15/01949/OUTMAJ) for 265 dwellings. This was later revised down to 225 dwellings. The application was allowed at appeal (appeal ref: APP/WO340/W/16/3144193); however, it was recovered for determination by the Secretary of State who dismissed the appeal and refused planning permission on the grounds that the Council could demonstrate a five year housing land supply.</p> <p>The site specific policy for the site includes a requirement (criterion i) for development proposals to be supported by a Flood Risk Assessment (FRA). The FRA will need to take account of the Thatcham Surface Water Management Plan and set out adequate flood mitigation measures to ensure there is no detrimental flood risk, and how flood alleviation measures already present on the site will be protected, retained, and</p>

Respondent	Summary of Main Issues	Council response
		enhanced. No further changes are proposed to the LPR.
Councillor Chris Read	As requested at the hearing sessions, policy SP17 (Green Infrastructure) should state that <i>“Green Infrastructure marked on map shall be secured and retained in perpetuity through a legal agreement under trust or common universal access for the people of Thatcham, Bucklebury &amp; all residents of West Berkshire without restraint or charge.”</i>	Comments noted. See response to Thatcham Town Council above.
Paula Saunderson	The allocation should be removed and replaced with the following three sites: <ul style="list-style-type: none"> <li>• Kennet Centre, Newbury (317 dwellings)</li> <li>• Land east of Newbury College, Monks Lane, Newbury (75 dwellings, 70 C2 beds, and supermarket)</li> <li>• Land at 20 - 28A Pound Street, Newbury (69 dwellings).</li> </ul>	Comments noted. The issues raised have previously been considered and discussed as part of the Examination and will be considered again as part of the preparation of the next Local Plan. No further changes are proposed to the LPR.
Steve Woodrow	No consideration of infrastructure – schools and GP surgeries at capacity and a bridge over the railway line is required.	Comments noted. Policy SP24 of the LPR has regard to infrastructure requirements and delivery. A Main Modification ( <a href="#">MM34</a> ) has been proposed to the policy which requires the timely and coordinated delivery of necessary infrastructure, having regard to the latest version of the Council’s Infrastructure Delivery Plan, through proportionate financial contributions and/or on-site provision. Where necessary, the phasing of development will be linked to infrastructure provision. No further changes are proposed to the LPR.
Nexus obo Croudace Homes	Support for inclusion of Henwick Park as an allocation. Detailed technical work for a full application indicates that the site has potential to deliver 236 dwellings, rather than 225 dwellings. The policy should be amended to reflect this.	Comments and support for allocation noted. The housing requirement for the site is expressed as an approximate number. It will be at the planning application stage that the exact number will be determined. Transport related issues in relation to criterion d were discussed at the hearing session on 2 October.

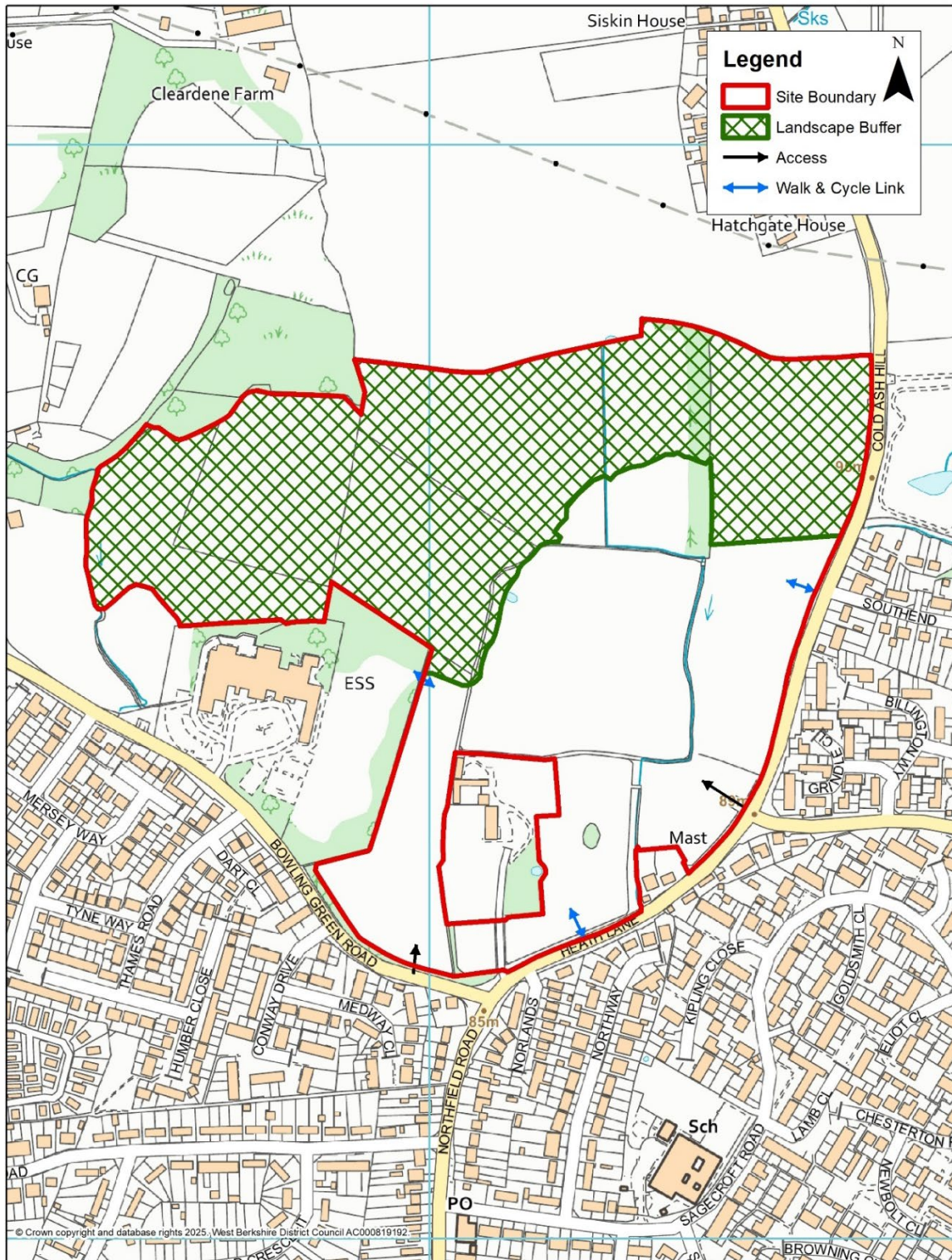


Respondent	Summary of Main Issues	Council response
	<p>The settlement boundary should be amended to accurately reflect the proposed development area of the forthcoming application.</p> <p>Reference to the VISSIM Model in criterion (d) should be removed, and the Council previously agreed to this. The Council may change the model used over the lifetime of the Plan, and given the status of the site as a draft allocation, it should be included within the Local Plan modelling evidence base and its impact considered within the cumulative approach alongside the necessary infrastructure that would be outlined in the Infrastructure Delivery Plan.</p> <p>Following work as part of a forthcoming full planning application, the promoter has confirmed that numerous technical studies required by the policy have been prepared, and that the policy criteria will be fulfilled.</p>	<p>Criterion (f) (i) of the policy requires that no development must take place above the 95-metre AOD contour. The map included within Annex D of the Schedule of Proposed Main Modifications shows the landscape buffer which has been drawn around the 95-metre AOD contour. It has come to the Council's attention that its contour data contains a small inaccuracy at Henwick Park in the top right of the site. A digital terrain model has now been used to identify the correct positioning of the 95-metre AOD contour. It should be noted that elsewhere, the digital terrain model and contour data align.</p> <p>For clarification and factual accuracy, the Council therefore proposes the following further modifications to MM42 –</p> <ul style="list-style-type: none"> <li>• Amend the landscape buffer on the indicative Henwick Park map to accurately reflect the 95-metre AOD contour, and the extent of the gap between settlements identified in policy DM2 (as set out in Annex A below).</li> <li>• Amend criterion 'f' of the policy for clarity as follows: <i>'The scheme will comprise a development design and layout in line with policy SP7 and <b>policy DM2</b>, that will be further informed by a full detailed Landscape Visual Impact Assessment (LVIA), ...'</i></li> </ul> <p>The modifications will also necessitate a further consequential change under PMC4 to the settlement boundary shown on the Policies Map to accurately reflect the 95-metre AOD contour and policy DM2 as set out in the Council's response under MM3.</p>

Respondent	Summary of Main Issues	Council response
Prosper Infinity Ltd	<p>The sites identified are on greenfield or greenbelt land, and / or outside the settlement boundary. The Council are aware of sites that are previously developed, such as Newbury Leisure Park. The site meets the criteria to be included on the Council's Brownfield Land Register, and Permission in Principle should be granted.</p> <p>The methodology of assessing sites is flawed:</p> <ul style="list-style-type: none"> <li>• There is no reference to gap policy within the NPPF.</li> <li>• WBC officers recognise that the site should have always been included within the settlement boundary since its original development over 50 years ago. This administrative error excluded it from the scope of the Countryside Designation study, and because there was no public consultation, the error was not highlighted for inclusion.</li> <li>• The Inspector quoted several legal cases where government directive has been that the whole plot of land cannot be discounted for planning permission, but the Council can stipulate that areas within Flood Zone 1 and 2 could be developed within guidelines.</li> <li>• Angela Rayner MP parliamentary statement on 30 July 2024 commented that the first port of call for development should be brownfield land.</li> </ul> <p>The non-inclusion of Newbury Leisure Park could be considered discriminatory due to the landowners' race and colour.</p>	<p>Comments noted. Newbury Leisure Park (THA21) was not taken forward as an allocation, and the reasons for this are set out within the Council's response to AP29 (<a href="#">EXAM32</a>).</p> <p>Newbury Leisure Park was also discussed at the Examination Hearing Session on 2 October 2024. The Council refers to its response to MM36 where the same comments have been made.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
<p>Rolfe Judd obo Planned Holdings</p> <p>Rolfe Judd obo Regency Homes</p>	<p>It is noted in that both site allocations are CA17 (land east of Regency Park Hotel) and CA12 (Henwick Park) currently have the same policy reference "RSAX". It is anticipated and assumed that these policies will be renamed to give each site allocation their own specific policy reference.</p>	<p>Comments noted. Both sites will have their own policy reference. No further changes are proposed to the LPR.</p>

### Annex A

**Proposed Further Modification to MM42 – replacement of current indicative site map (set out in Annex D of the Schedule of Proposed Main Modifications – November 2024) with the indicative site map for Land at Henwick Park, Bowling Green Road, Thatcham shown below**



Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM43 PMC13	n/a	New RSA policy – east of the Regency Park Hotel	15

Respondent	Summary of Main Issues	Council response
Berkshire Oxfordshire and Buckinghamshire Integrated Care Board	<p>Objection to MM42 because it does not set out any requirements of providing necessary primary care mitigations. Without this, the Plan would likely to fail to meet the test of soundness in terms of being consistent with national policy.</p> <p>To overcome the objection, the following wording must be included within the policy:</p> <p><i>Developer contributions should be sought to support primary care estates facilities improvement in the local area which will serve the development. The applicant should engage with the NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board (BOB-ICB) or such appropriate body regarding the mitigation details.</i></p>	<p>Comments noted.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR. <a href="#">MM34</a> amends the first paragraph of policy SP24 to include text that makes clear that development will be required to ensure the timely and coordinated delivery of necessary infrastructure having regard to the latest version of the Council's Infrastructure Delivery Plan (IDP), through proportionate financial contributions and / or on-site provision. Where necessary, the phasing of development will be linked to infrastructure provision. The ICB is consulted as part of updates to the IDP.</p> <p>It is important to note that the Plan needs to be read and interpreted as a whole, and all policies should</p>

Respondent	Summary of Main Issues	Council response
		be viewed together and not in isolation in the preparation and consideration of planning applications. This is made clear in paragraph 1.6 of the <a href="#">submitted LPR (CD1)</a> .
Cold Ash Parish Council	<p>Object to the significant shift in the overall strategy for the LPR. Extending the Plan period is a significant step away from Reg 18 and Reg 19, and impacts the community in terms of housing numbers, the location of new development, and the provision of supporting infrastructure.</p> <p>Lack of consultation is contrary to national policy, and alternative approaches should be considered, eg. maintaining the Plan end of 2029 and committing to an immediate review – this was the approach taken with the Tunbridge Wells Local Plan.</p> <p>Two sites within Cold Ash Parish (Henwick Park and Land east of the Regency Park Hotel). These were previously assessed by the Parish Council and WBC and ruled out. Little evidence to demonstrate how they have been reassessed and why they are now deliverable. The original site assessments have not been updated.</p> <p>No consideration of potential new sites that might have come forward since the last Housing and Economic Land Availability Assessment (HELAA). Lack of consideration of reasonable alternatives.</p> <p>The adopted Cold Ash Neighbourhood Plan (NP) has been ignored. Site assessment work was carried out as part of the preparation of the NP, and both Henwick Park and Land east of the Regency Park Hotel were ruled out. These two sites were not considered as strategic by WBC as confirmed in the SA/SEA. The allocation of the sites as strategic by WBC undermines the neighbourhood plan. The Parish</p>	<p>Comments noted.</p> <p>The issues raised have previously been considered and discussed as part of the Examination. The Council also refers to its response to Cold Ash Parish Council under MM42.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

Respondent	Summary of Main Issues	Council response
	<p>Council would prefer to review their NDP to enable the community to be fully engaged in the process.</p> <p>No reason why WBC could not identify broad locations for development as opposed to identifying specific sites for allocation.</p> <p>There remains a question mark over the sites availability. Whilst it was available at the time the HELAA was prepared, WBC has contacted the promoter to confirm whether site is still available, and no response has been received.</p>	
Historic England	Support MM43.	Support noted.
<p>Thatcham Town Council</p> <p>David Bridle</p>	<p>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:</p> <p>CA17: ii. The balance of land in the north of the site to be retained as a landscape buffer. <b>This shall be secured and retained in perpetuity through a legal agreement</b>, and which will be retained outside the settlement boundary for Thatcham;</p> <p>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 assessment has been undertaken.</p>	<p>Comments noted.</p> <p>The landscape buffer and its long-term security will be secured via a S106 agreement, which is common place for this type of provision.</p> <p>The Council disagrees that the SA/SEA fails to demonstrate that the site is capable of the delivery of sustainable development.</p> <p>It is important to note that the Plan needs to be read and interpreted as a whole, and all policies should be viewed together and not in isolation in the preparation and consideration of planning applications. This is made clear in paragraph 1.6 of the <u>submitted LPR (CD1)</u></p> <p>The representation does not raise any issues which would prevent</p>

Respondent	Summary of Main Issues	Council response
		the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.
Carmen Dodgson	<p>Cold Ash village will be more prone to flooding with continued development.</p> <p>Village identity of Cold Ash will be impacted, and this will devalue homes and alter the lifestyle of those who chose Cold Ash because of its village identity.</p> <p>Lack of consultation.</p> <p>Lack of infrastructure within Cold Ash village to cope with the development.</p> <p>The green belt and AONB should be protected.</p>	<p>Comments noted. The issues raised have previously been considered and discussed as part of the Examination. The site is adjacent to the settlement of Thatcham, and not Cold Ash. Within the settlement hierarchy, Thatcham is identified as an Urban Area. Urban Areas will be the prime focus for housing and economic development because of their good levels of facilities, services and accessibility.</p> <p>Although there is no Green Belt in West Berkshire, as set out within Appendix 4 of the HELAA (<a href="#">SIT4e</a>), a 2015 Landscape Capacity Assessment <a href="#">LAN5g</a>. (in which the site had the ref THA011) concluded that development could be accommodated on part of the site without harm to the AONB subject to the inclusion of mitigation measures. No further changes are proposed to the LPR.</p>

Respondent	Summary of Main Issues	Council response
Ian Goodwin	<p>The site is important to the natural drainage of Cold Ash Hill. The underground flows, from the hill of Cold Ash, flow into an aquifer under those fields. Whilst the area could be drained to enable development, it would result in a large volume water being received into the River Kennet during heavy rain periods. During the last three storms, there were over 10 flood warnings in the surrounding area.</p> <p>The 225mm dia Foul Sewer Main (FSM) in Cold Ash Hill, is already running over its design capacity. Adding a large number of houses into a already over loading FSM will cause more sewage out flows into properties.</p>	<p>Comments noted. All new developments must include sustainable drainage measures, and development must be avoided on areas that are at risk of surface water flooding. Drainage and flood attenuation works are included in the Infrastructure Delivery Plan.</p> <p>The site specific policy for the site includes a requirement (criterion i) for development proposals to be supported by a Flood Risk Assessment (FRA). The FRA will need to take account of the Thatcham Surface Water Management Plan and set out adequate flood mitigation measures to ensure there is no detrimental flood risk, and how flood alleviation measures already present on the site will be protected, retained, and enhanced.</p> <p>A Main Modification (MM78) is proposed to policy DM7 (Water Resources and Waste Water) which requires the application of phasing conditions where upgrades to water supply and waste water are required to</p>



Respondent	Summary of Main Issues	Council response
		ensure necessary infrastructure upgrades are delivered ahead of occupation. No further changes are proposed to the LPR.
Sheena Harper	<p>Allocation is a knee-jerk reaction to central Government policy, rather than a plan developed in the best interest of the population. Cold Ash NDP has been ignored.</p> <p>Object to the site as an allocation.</p>	Comments noted. The issues raised have previously been considered and discussed as part of the Examination. No further changes are proposed to the LPR.
Alastair Guy and Victoria Lees	<p>Building on the site is not justified, and brownfield land should be developed as a priority. Previous attempts to develop the green space between Ashmore Green, Henwick and Cold Ash specifically Henwick Park as it has been referred to, have been rejected and have received very strong opposition from numerous local residents. Development should not jeopardise the flood alleviation schemes by building above them.</p>	<p>Comments noted. The site was subject to an outline planning application in 2015 (15/01949/OUTMAJ) for 265 dwellings. This was later revised down to 225 dwellings. The application was allowed at appeal (appeal ref: APP/WO340/W/16/3144193); however, it was recovered for determination by the Secretary of State who dismissed the appeal and refused planning permission on the grounds that the Council could demonstrate a five year housing land supply. The site specific policy for the site includes a requirement (criterion i) for development proposals to be supported by a Flood Risk Assessment (FRA). The FRA will</p>

Respondent	Summary of Main Issues	Council response
		need to take account of the Thatcham Surface Water Management Plan and set out adequate flood mitigation measures to ensure there is no detrimental flood risk, and how flood alleviation measures already present on the site will be protected, retained, and enhanced. No further changes are proposed to the LPR.
Councillor Chris Read	As requested at the hearing sessions, policy SP17 (Green Infrastructure) should state that <i>“Green Infrastructure marked on map shall be secured and retained in perpetuity through a legal agreement under trust or common universal access for the people of Thatcham, Bucklebury and all residents of West Berkshire without restraint or charge.”</i>	Comments noted. See response to Thatcham Town Council above.
Paula Saunderson	<p>The allocation should be removed and replaced with the following three sites:</p> <ul style="list-style-type: none"> <li>• Kennet Centre, Newbury (317 dwellings)</li> <li>• Land east of Newbury College, Monks Lane, Newbury (75 dwellings, 70 C2 beds, and supermarket)</li> <li>• Land at 20 - 28A Pound Street, Newbury (69 dwellings).</li> </ul>	Comments noted. The issues raised have previously been considered and discussed as part of the Examination and will be considered again as part of the preparation of the next Local Plan. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.

Respondent	Summary of Main Issues	Council response
Steve Woodrow	No consideration of infrastructure – schools and GP surgeries at capacity and a bridge over the railway line is required.	Comments noted. Policy SP24 of the LPR has regard to infrastructure requirements and delivery. A Main Modification ( <a href="#">MM34</a> ) has been proposed to the policy which requires the timely and coordinated delivery of necessary infrastructure, having regard to the latest version of the Council's Infrastructure Delivery Plan, through proportionate financial contributions and/or on-site provision. Where necessary, the phasing of development will be linked to infrastructure provision. No further changes are proposed to the LPR.
Prosper Infinity Ltd	<p>The sites identified are on greenfield or greenbelt land, and / or outside the settlement boundary. The Council are aware of sites that are previously developed, such as Newbury Leisure Park.</p> <p>The site meets the criteria to be included on the Council's Brownfield Land Register, and Permission in Principle should be granted.</p> <p>The methodology of assessing sites is flawed for the following reasons:</p> <ul style="list-style-type: none"> <li>• There is no reference to gap policy within the NPPF.</li> <li>• WBC officers recognise that the site should have always been included within the settlement boundary since its original development over 50 years ago. This administrative error excluded it from the scope of the Countryside Designation study, and because there was no public consultation, the error was not highlighted for inclusion.</li> </ul>	<p>Comments noted. Newbury Leisure Park (THA21) was not taken forward as an allocation, and the reasons for this are set out within the Council's response to AP29 (<a href="#">EXAM32</a>).</p> <p>Newbury Leisure Park was also discussed at the Examination Hearing Session on 2 October 2024. The Council refers to its response to MM36 where the same comments have been made.</p>

Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>• The Inspector quoted several legal cases where government directive has been that the whole plot of land cannot be discounted for planning permission, but the Council can stipulate that areas within Flood Zone 1 and 2 could be developed within guidelines.</li> <li>• Angela Rayner MP parliamentary statement on 30 July 2024 commented that the first port of call for development should be brownfield land.</li> </ul> <p>The non-inclusion of Newbury Leisure Park could be considered discriminatory due to the landowners' race and colour.</p>	<p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
<p>Rolfe Judd obo Planned Holdings</p> <p>Rolfe Judd obo Regency Homes</p>	<p>It is noted in that both site allocations are CA17 (land east of Regency Park Hotel) and CA12 (Henwick Park) currently have the same policy reference "RSAX". It is anticipated and assumed that these policies will be renamed to give each site allocation their own specific policy reference.</p> <p>Support for MM43.</p> <p>The site is capable of delivering a minimum of 45 dwellings. It is welcomed that a specific limit of dwellings to be provided on site has not been set, and that there is still an opportunity for further dwellings to be provided onsite if they meet the other policy requirements set out in RSAX.</p> <p>The scale and size of the landscape buffer suggested in the site plan requires further scrutiny and investigation, particularly if Henwick Park comes forward with or at a similar time to this site. It is possible that a smaller landscape buffer could be sufficient.</p> <p>On review of the current database of designated heritage assets, none are registered within or are in close proximity to the site, and the necessity for a Heritage Impact Assessment is questioned.</p>	<p>Comments noted. The policy for the allocation in criterion (f) requires that the site is developed in accordance with the 2015 Landscape Capacity Assessment (<a href="#">LAN5g</a>), and that development will be informed by a Landscape and Visual Impact Assessment. The inclusion within criterion (g) of the policy for a Heritage Impact Assessment was included at the advice of the Council's Archaeology Team.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM44	95	New paras before Policy RSA6 Sites allocated: Eastern Area	11

Respondent	Summary of Main Issues	Council response
AWE & MOD	<p>Welcomes the clarity of the amendments. AWE and MOD are concerned that the importance of policy SP4 and its application to ALL policies and proposed development within the DEPZ should be restated where policies could lead to an increase in residential or non residential population or activity. This should avoid any confusion and to avoid any suggestion that a proposal that complies with these policies but not SP4 is otherwise compliant with the plan as a whole such that a decision to grant planning permission is in accordance with the development plan. This could undermine the effectiveness of SP4 in protecting the current and future operations at AWE and public safety and therefore raises soundness concerns. AWE and MOD suggest that this soundness issue could easily be resolved by including the following text:</p> <p><b>1.</b> In the last sentence of the proposed paragraph 8.5: <i>“Given the constraints in this spatial area the LPR does not propose any strategic allocations, but non-strategic allocations are proposed on the edge of existing settlements as set out below. <u>Any development proposal within the Detailed Emergency Planning Zone for AWE must comply fully with policy SP4</u>”.</i></p> <p><b>2.</b> In the last sentence of the proposed paragraph 8.6: <i>“The allocation of the site for eight permanent pitches was not considered to have an impact upon the emergency plan <u>as it would not lead to an increase in residential population. It is therefore compliant with policy SP4.</u>”</i></p>	<p>Comments noted. Policy SP4 of the Plan sets out the requirements in relation to the AWE. The Plan needs to be read and interpreted as a whole, and all policies should be viewed together and not in isolation in the preparation and consideration of planning applications. This is made clear in paragraph 1.6 of the <a href="#">submitted LPR (CD1)</a></p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

Respondent	Summary of Main Issues	Council response
	<p><b>3.</b> Insert at the end of paragraph 8.8: “...<i>in accordance with policy SP4</i>”</p>	
<p>Anne Booth John Booth</p>	<p>Land at Pincents Lane should be removed from MM44 because development of the site would reduce wildlife habitats and public access to green spaces, have an adverse visual impact, and will increase traffic on the M4, A4 and in central Reading and Tilehurst.</p>	<p>Comments noted. The matters raised within the representations are the same as those made under MM45. Please refer to the Council’s responses to the main issues raised under MM45.</p>
<p>Fiona Lawrie</p>	<p>Land at Pincents Lane should be removed from MM44. Reasonable alternatives have not been considered, and there is a lack of evidence behind the allocation. The site has previously been subject to planning applications, eg. 22/01295/FULD. The decision taker ought to have, when considering a materially similar proposal to have regard to the principal of consistency regard to the principal of consistency – failure to have due regard to a material consideration is a ground to have a decision be made unsound. The site should not be considered until the traffic impacts of a permitted care home have been assessed.</p>	<p>Comments noted. The matters raised within the representations are the same as those made under MM45. Please refer to the Council’s responses to the main issues raised under MM45.</p>
<p>David &amp; Sonia Ludford</p>	<p>Land at Pincents Lane should be removed from MM44. Previous planning applications have been refused, and this shows the site is not acceptable for development. The Secretary of State also previously ruled development would be unsuitable. The site is a strategic gap which separates Tilehurst and Calcot from Theale. Development would erode this gap and be out of character with the natural environment and rural character. The site provides green space and recreational amenity for the local community of Tilehurst and Calcot. The site has been earmarked as Local Green Space. The site forms an important wildlife corridor, and development will have a negative impact. The</p>	<p>Comments noted. The matters raised within the representations are the same as those made under MM45. Please refer to the Council’s responses to the main issues raised under MM45.</p>

Respondent	Summary of Main Issues	Council response
	site has inadequate and inappropriate road access, and development would generate additional traffic on congested roads. Greater consideration is needed of sites around Newbury.	
Karen Wilkinson-Flood	<p>The proposed allocation on land at Pincents Lane should be removed. Government making threats if local planning authorities do not include more housing, ie. Inspectors being instructed to throw out plans. Inclusion of the Pincents Lane allocation was kneejerk reaction to this.</p> <p>Pincents Lane is not previously developed land. Additional time should have been taken to identify suitable additional sites which revitalise smaller communities. Previous planning applications refused for the site. No consideration of the structural integrity of the Grade II Pincents Manor either now or in the future. Limited community involvement. Key objective of the planning system is for greater and more effective community involvement, and the Statement of Community Involvement is clear about this, and the way in which community involvement should take place. Those without internet access will not have their voices heard. There should have been leaflet-drops to raise awareness. No mention of hedgehogs, which are a protected species, within wildlife studies. Development at Pincents Lane will result in their loss. Development will impact upon flora and fauna.</p>	The matters raised within the representations are the same as those made under MM45. Please refer to the Council's responses to the main issues raised under MM45.
Alison May	Proposals include development within the Detailed Emergency Planning Zones for AWE Aldermaston (RSA24) and AWE Burghfield (RSA12). Development at these sites will increase the population and compromise the health and safety of existing communities whilst undermining the operational integrity of the AWE establishments	Comments noted. As set out within paragraph 8.7, land adjoining Pondhouse Farm (which is allocated within the DEPZ of AWE Burghfield) was granted outline planning permission in December 2019. When the DEPZ was reconsidered in 2020, the 100

Respondent	Summary of Main Issues	Council response
		<p>units proposed were included in the detailed calculations undertaken by Emergency Planning.</p> <p>In respect of RSA24, planning permission for the conversion of 8 transit pitches to 8 permanent pitches was granted in 2022. But as it is effectively a like for like replacement in terms of the population, there would be no increase in population to affect the off-site emergency plan, and therefore no objection from emergency planning/ONR. Furthermore, the use of the allocated part of the site for permanent pitches is preferred by emergency planners compared to transit pitches as transit users may not be as wary as permanent residents of AWE and any associated risks. There will be a site specific emergency plan for the permanent pitches, again, of benefit to the permanent residents on site. No further changes are proposed to the LPR.</p>
Bell Cornwell obo Central Corporation (WHM) Ltd	Development potential at RSA10 should be higher. Retaining the reduced capacity of 40 dwellings contradicts the proposed density	Comments noted.



Respondent	Summary of Main Issues	Council response
	<p>requirements in this area detailed in SP1. An area that, albeit close to the AONB, does not complement it due to intervening development and infrastructure of the road network and pylons etc and extant permission for a hotel.</p> <p>It is not justified to seek alternative new sites such as Pincents Lane which has a series of issues, unlike RSA10:</p> <ul style="list-style-type: none"> <li>• Pincents Lane is a narrow road, and the main point of access is adjacent the Grade II Listed manor house. The emergency access will be challenging to deliver.</li> <li>• The SA/SEA notes that further traffic modelling is being carried out, and the results are awaited. No certainty that the new homes can be delivered.</li> <li>• TIL13 has a neutral impact on the environment, yet RSA10 has a positive effect.</li> <li>• Areas at risk of surface water flooding which could impact upon the delivery of the site. Part of Pincents Lane at risk of surface water flooding. RSA10 does not have this risk.</li> </ul> <p>Site is in multiple ownership, unlike RSA10.</p>	<p>The development potential of RSA10 was discussed at the hearing session for Matter 6 held on 4 June 2024. As set out within paragraph 1.146 of the Council's Written Statement to Matter 6 (<a href="#">WS6/1</a>), the development potential was identified using the Council's density Pattern Book Approach. The need to avoid any development of Flood Zone 2 and the need to minimise the impact on the landscape character reduces the potential developable area and capacity of the site. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
Prosper Infinity Ltd	<p>The sites identified are on greenfield or greenbelt land, and / or outside the settlement boundary. The Council are aware of sites that are previously developed, such as Newbury Leisure Park. The site meets the criteria to be included on the Council's Brownfield Land Register, and Permission in Principle should be granted.</p> <p>The methodology of assessing sites is flawed for the following reasons:</p> <ul style="list-style-type: none"> <li>• There is no reference to gap policy within the NPPF.</li> </ul>	<p>Comments noted. Newbury Leisure Park (THA21) was not taken forward as an allocation, and the reasons for this are set out within the Council's response to AP29 (<a href="#">EXAM32</a>). Newbury Leisure Park was also discussed at the Examination Hearing Session on 2 October</p>

Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>• WBC officers recognise that the site should have always been included within the settlement boundary since its original development over 50 years ago. This administrative error excluded it from the scope of the Countryside Designation study, and because there was no public consultation, the error was not highlighted for inclusion.</li> <li>• The Inspector quoted several legal cases where government directive has been that the whole plot of land cannot be discounted for planning permission, but the Council can stipulate that areas within Flood Zone 1 and 2 could be developed within guidelines.</li> <li>• Angela Rayner MP parliamentary statement on 30 July 2024 commented that the first port of call for development should be brownfield land.</li> </ul> <p>The non-inclusion of Newbury Leisure Park could be considered discriminatory due to the landowners' race and colour.</p>	<p>2024. The Council refers to its response to MM36 where the same comments have been made.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
TOWN obo Pincents Lane	Support for MM44, however an increase in dwellings numbers to 165 is proposed.	Support noted. The matter of an increased number of dwellings on the site is covered under MM45.
Henry Venners	<p>The allocation at Purley Rise (HSA11) has largely been built out. The layout of the site will suit the provision of 3-5 dwellings to the north east area of the land which is outside of the defined boundaries for HSA11.</p> <p>The Council has already consented development on this land (a new build stable) which confirms its acceptability for development.</p>	Comments noted. The principle and potential for any further development in this location would need to be considered as part of the next Local Plan. No further changes are proposed to the LPR.

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM45 PMC14	-	New RSA policy – Land at Pincents Lane, Tilehurst	140

Respondent	Summary of Main Issues	Council response
Berkshire, Oxfordshire and Buckinghamshire Integrated Care Board (BOB ICB)	<p>Developer contributions should be sought to support any primary care estates projects in the local area to allow additional clinical capacity to accommodate new population generated from this new site allocation.</p> <p>To overcome the objection, the following wording must be included within the policy:  <i>'Primary care mitigations should be sought to ensure there is adequate GP service in the local area to serve the development. Applicants should engage with the NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board (BOB-ICB) or such appropriate body regarding the mitigation details. A feasibility study should be carried out at the applicants' expenses to identify the mitigation measure to be secured in the development.'</i></p>	<p>Comments noted.</p> <p><a href="#">MM34</a> amends the first paragraph of policy SP24 to include text that makes clear that development will be required to ensure the timely and coordinated delivery of necessary infrastructure having regard to the latest version of the Council's Infrastructure Delivery Plan (IDP), through proportionate financial contributions and / or on-site provision. Where necessary, the phasing of development will be linked to infrastructure provision. The ICB is consulted as part of updates to the IDP. It is important to note that the Plan needs to be read and interpreted as a whole, and all policies should be viewed together and not in isolation in the preparation and consideration of planning applications. This is made clear in paragraph 1.6 of the <a href="#">submitted LPR (CD1)</a>.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

Respondent	Summary of Main Issues	Council response
Historic England	Support MM and do not raise any soundness or legal compliance concerns.	Support noted.
Holybrook Parish Council	<ul style="list-style-type: none"> <li>• Proposed changes to the Policies Map appear to expand the settlement boundary, which threatens the character of existing settlements and encroaches upon valuable green spaces.</li> <li>• Insufficient infrastructure to support recent and proposed developments. The Plan does not adequately address the need for improved transportation, healthcare, education and other essential services to support existing and future residents.</li> <li>• Inequitable distribution for CIL funds. A more equitable distribution of CIL funds is necessary to ensure that all communities benefit from development and can address the associated infrastructure challenges effectively.</li> <li>• Objections to Pincents Hill – concern that the site has been included in the Plan. It is one of the last open green spaces in Tilehurst, serving as a vital haven for wildlife and a cherished recreational area for residents. Previous attempts to develop the site have been rejected due to valid concerns. Development of the site has been consistency opposed by the local community. The proposed site appears to contravene planning polices, which prioritises new homes on PDL within settlement boundaries.</li> </ul>	<p>Comments noted. See Council response to MM3 relating to settlement boundaries. The other issues raised have previously been considered and discussed as part of the Examination. The Council refers to <a href="#">EXAM57</a> and its response to the Inspector’s Note <a href="#">IN32</a> regarding the proposed allocation at TIL13 Pincents Lane, Tilehurst.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
Natural England	<p>The site lies within the setting of the NWDN, therefore a scheme in accordance with the requirements set out in policy SP2 is encouraged.</p> <p>There are veteran trees present within the site and ancient woodland adjacent to it, therefore the authority is encouraged to</p>	Comments noted. The Council has and will continue to consider the impacts of the proposed allocation on both the landscape character and the visual amenity of the AONB in accordance with policy SP2. The proposed development parameters require

Respondent	Summary of Main Issues	Council response
	<p>consider the advice provided in relation to impacts on this irreplaceable habitat.</p> <p><a href="#">Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK (www.gov.uk)</a></p>	<p>development to be in accordance with policy SP2 and the Landscape Capacity Assessment for the site. The policy also requires development to be in line with policy SP7, informed by a full and detailed LVIA, and informed by a Tree Survey. It is important to note that the Plan needs to be read and interpreted as a whole, and all policies should be viewed together and not in isolation in the preparation and consideration of planning applications. This is made clear in paragraph 1.6 of the <a href="#">submitted LPR (CD1)</a>.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
Tilehurst Parish Council	<ul style="list-style-type: none"> <li>• All previous applications for housing developments at the site have been refused.</li> <li>• Over 3,000 individuals objected to the previous application, as did Holybrook and Theale Parish Councils, a petition opposing it was signed by 1,000 plus people, and the existing and two previous MPs have also objected.</li> <li>• There is no infrastructure (GP, dentist, etc) to support increased housing on the site</li> <li>• There is a general lack of children's services in the area.</li> <li>• There is only one road in/out of the site and it passes through a retail park which is often busy, particularly at weekends and bank holidays.</li> </ul>	<p>Comments noted. The issues raised have previously been considered and discussed as part of the Examination. The Council refers to <a href="#">EXAM57</a> and its response to the Inspector's Note <a href="#">IN32</a> regarding the proposed allocation at TIL13 Pincents Lane, Tilehurst.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>• An application to convert the former Pincents Manor Hotel into 50 extra care apartments has been approved and, once built, this will worsen the traffic and access further.</li> <li>• Warehouse and office units on Pincents Lane are increasingly busy, occupancy seems to have risen, and this too adds to access and traffic problems in the area.</li> <li>• Royal Berkshire Fire and Rescue Service has already raised concerns that access is not suitable for emergency vehicles, and there is a steep section of the lane which is prone to freeze in winter.</li> <li>• Residential development locally has already exacerbated existing traffic issues, and further proposed residential development will worsen the situation further.</li> <li>• Flood concerns raised in previous applications have not been addressed.</li> <li>• The above reasons and ongoing publicly expressed opposition from councillors of all three main parties make it unlikely that development of the site could be delivered quickly if at all.</li> </ul>	
<p>Lisa Akister  Rachael Akister  Angela Anderson  Peter Armstrong  Chris Atkins  Jane Baker  Paul Barnes  Caroline Basden  Nicola Beeney  Ian Bell  Sharon Bell</p>	<p><i>Representations of objection were received from 131 individual members of the public/local residents, including the local District Councillor. The main issues raised within these representations were wide ranging and recurring, and can be summarised as follows:</i></p> <p><b>Insufficient Infrastructure:</b> Most of the representations raised strong concern over the provision of local infrastructure such as schools, GP surgeries and dentists, as well as water resources and waste water. The representations outline that these services and facilities are currently oversubscribed and that adding further</p>	<p>Comments noted.</p> <p>The issues raised have previously been considered and discussed as part of the Examination.</p> <p>The Council refers to <a href="#">EXAM57</a> and its response to the Inspector’s Note <a href="#">IN32</a> regarding the proposed allocation at TIL13 Pincents Lane, Tilehurst.</p> <p>See Council response to MM3 for matters relating to settlement boundaries.</p>

Respondent	Summary of Main Issues	Council response
<p>Mark Betkowski Jordan Betteridge Clayton Billington Mike Bishop Stuart Boon Anne Booth John Booth Mary Boulos-Walsh Carol Brickley Jan Broady Sarah Broady Liam Carden Eileen Carr Linda Carver Abby Chenery Celestine Cheverton Alan Clapson Sarah Clarke Simon &amp; Christine Collard Charlotte Collen Simon Collen Simon &amp; Charlotte Collen Julie Connell Helen Cox Jayne Cox Charles Croal Anne &amp; Terry Davis Jean &amp; Peter Dillon Stephen &amp; Marlene Ellis Corey Emmens Roberts Graham England</p>	<p>pressure through more development will exacerbate the situation. There is already a lot of recent development in the local area, placing pressure on the road network and existing infrastructure. It was felt that the area is already over-populated and there are concerns that with the recent developments, at Dorking Way and the current development at Theale, the infrastructure is at breaking point. It was also commented that CIL funds are often spent in areas of the parish not affected by recent development, and a more equal distribution of CIL funds was required.</p> <p><b>Loss of biodiversity:</b> The representations expressed significant concern regarding the loss of a valued natural habitat, that will be destroyed should the site be developed for housing. Pincents Hill is home to a large variety of wildlife and plants; deer, badgers, foxes, birds, owls to name a few. The responses outlined that the site is a vital green corridor from the National Landscape (AONB) to Withy Copse and beyond, with the land to the west of Sulham Woods (SSSI) forming part of the valuable ecosystem in the area. Some comments related to the loss of trees, as well as the impact on TPO's and ancient woodland. It is seen by many that it is essential to preserve the habitat, to ensure there isn't a decline in the local biodiversity, and a detrimental impact on protected species. West Berkshire Council declared there to be a climate emergency, therefore this area should be designated 'open green space' and protected from development, some also commented that there should be a protection order placed on the site.</p> <p><b>Loss of informal green space:</b> Pincents Hill is described by many as a beautiful, well-loved and well-used space. Most of the representations express concern over the loss of public access to this green space, that is used regularly by the local community for</p>	<p>It is important to note that the Plan needs to be read and interpreted as a whole, and all policies should be viewed together and not in isolation in the preparation and consideration of planning applications. This is made clear in paragraph 1.6 of the <a href="#">submitted LPR (CD1)</a>.</p> <p>The Council also refers to its response in <a href="#">EXAM 26</a> to the Inspector's Action Point (AP) 14 in <a href="#">IN14</a> regarding site selection. This response is supplemented in <a href="#">EXAM32</a>.</p> <p>Paragraph 4.20 of the supporting text to policy SP1 (Spatial Strategy) of the LPR makes it clear that whilst the strategy seeks to make effective use of brownfield land, further greenfield allocations are still required.</p> <p>Throughout the plan-making process consultation has been carried out in accordance with the Council's Statement of Community Involvement (SCI). The consultation on the Main Modifications provides the opportunity for representations to be made, and the Inspector will consider these before issuing his final report.</p>

Respondent	Summary of Main Issues	Council response
Zofia Farmer Laura Fitchett Maurice Fleming Stan Gamester Florence Hallett Allan Harries Helen Hay Jennifer Hewitt Bridget Holloway Kevin Horne Liz Horne Resident J Steve Karlsen Caroline Kelly Lucia Kichenide Mr Lau Fiona Lawrie Tony Linden Jenny Lovegrove David & Sonia Ludford Christine MacKay Anna Magnusson Christine Manning Hannah Maulini Maria Maulini Tony Mc Ginn Ellen McManus-Fry Carol Muir Graham Muncer Marzena Murawska Yeng Ng	<p>recreation. It is seen as a green lung in suburban living, with many commenting that as well as use for recreation, the space provides a boost to mental health and wellbeing. The loss of the green space would be to the detriment of the local area and would result in the loss of quality of life for many. Some of the representations outlined that the strength of feeling from the local community towards the site and the value it holds has been underestimated. One representation highlighted that a recreational space within the proposed site (TIL13) is somewhat commendable but raised apprehension that this can be seen as a potential move for building on the existing recreation ground.</p> <p><b>Impact on landscape:</b> Concern was raised within the representations regarding the adverse impact that development will have on the National Landscape and across the wider area. It was highlighted that this is the last open land in Tilehurst, and many representations stated that the site still has all the criteria of a Strategic Gap, acting as a division of areas between Calcot, Tilehurst and Theale, preventing coalescence and allowing them to maintain their individual identity. Some of the comments referred to an increase in light pollution and intrusion on the National Landscape (AONB).</p> <p><b>Impact on the local highway network:</b> Considerable concern was raised about the impact of development on the local highway network, stating that the area is currently heavily congested and adding further pressure through more development would exacerbate the situation. Many of the representations detailed where and when this congestion takes place, and added that recent developments in the area, as well as the permission for a care home at Pincents Manor, will worsen the congestion further.</p>	<p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>



Respondent	Summary of Main Issues	Council response
Alan Ockenden Audrey Payne Dave Peacock Maxine L Pearson Emma Pottinger Eileen Prior IJ Rowberry James & Anne Rutherford Paula Saunderson Save Pincents Hill Group obo 30 individual representors Nik Skidmore Sharon Smith Neil & Rosalind Somerville Jo Spice Mr & Mrs C Stockley Cllr Clive Taylor Leanne Taylor Steve Taylor Fay Triggs Annmarie Tuttle Anne Vaughan Mr & Mrs Vian Paul Vought Jane Weller Diane White John & Gloria Whittaker Karen Wilkinson-Flood	<p>The comments also highlighted a concern relating to the potential of an access to the north (entrance at City Road) and how this would further increase traffic congestion on Langley Hill or even down Sulham Hill towards Pangbourne or Theale. It is felt this route would be used as a rat-run. As well as the impact on the highway network, the representations conveyed considerable concern regarding the adequacy of the access arrangements for the future residents, as well as emergency services. It as noted in detail that adequate access arrangements, that would comply with the necessary regulations, could not be achieved, thus highway safety was also a concern.</p> <p><b>Brown and grey land:</b> Some representations stated that better utilisation of brown and grey land was required, as actively encouraged by the Government, rather than developing greenfield sites for housing. It was noted that empty offices, at Arlington Business Park and elsewhere, should be used for additional housing. Revitalising current empty or dilapidated housing stock should also be considered before greenfield sites.</p> <p><b>Planning policy:</b> Some commented that the site is outside the settlement boundary and therefore contravenes the West Berkshire Core Strategy - more detailed points regarding the settlement boundary are set out under MM3. Comments were made in relation to the consistency with the policies in the NPPF for sustainable development and representations also outlined that the site is earmarked in the NDP as Local Green Space.</p> <p><b>Process of site selection/allocation:</b> It was outlined in the representation that there are other sites within West Berkshire that could make up the housing requirement, but these are being</p>	

Respondent	Summary of Main Issues	Council response
Helen Wyles Susanna Yau	<p>protected from development. The representations include quotes from a meeting of the Community Forum in September 2024 as evidence that the Leader of the Council and other Councillors themselves do not consider the Plan would be their first choice, especially in regard to the allocated sites. It is stated this is not an acceptable reason and is unsound, not positively prepared, justified, effective or consistent with national policy. Comments state West Berkshire Council is falling back on this site as an easy option rather than exploring other possibilities, and there is little evidence provided to demonstrate how this site is considered the most suitable piece of land for development. The representations seek the removal of the Pincents Lane site from the Plan, with one commenting that it should be replaced with the Kennet Centre, Newbury, Land east of Newbury College, Newbury and Land at 20-28a Pound Street Newbury.</p> <p><b>Democracy:</b> The majority of representations noted that proposals for development on this site have already been rejected a number of times before, for very good reasons which still remain. The site is clearly not acceptable and is only being included because the Council ran out of time to search for other sites. Previous proposals have had unprecedented levels of opposition and considering the site again for development shows little respect for local people and is very disappointing. Some feel the plans have not been thought through properly, and others comment there has been a failure of proper public consultation and question the democratic process.</p> <p><b>Other points of concern raised:</b></p> <ul style="list-style-type: none"> <li>• Noise impact from M4.</li> <li>• Increase pollution to the area.</li> </ul>	

Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>• Site close to a Grade II listed building.</li> <li>• Flood risk. The site is very wet, despite being on a hillside, and as such development would exacerbate flood risk.</li> <li>• Affordable housing - new developments are not affordable, especially not for first time buyers. Unlikely that the required affordable housing will be provided.</li> <li>• There appears to be disagreement between the Council and the developer as to the number of houses that should be developed. This along with other factors highlight a likely delay in delivery.</li> <li>• The land holds a lot of carbon that would be released once the ground is disturbed.</li> <li>• Devaluation of nearby properties</li> <li>• Development would impact on the social fabric of the community and reduce the attractiveness of the area for families and businesses.</li> </ul>	
Olivia Bailey, MP	<p>The NPPF 2024 states that in order to be considered sound, local plans need to take into account reasonable alternatives. The development of the West Berkshire Local Plan has been a bodged process, which reflects poorly on both the current administration and their immediate predecessors. There has been a failure to properly evaluate alternative, more suitable sites which meet the needs of current and future residents, and a missed opportunity to include more strategic sites. All that has happened is that previously disregarded sites have been added back into the plan at a late stage.</p> <p>Furthermore, paragraph 16.c of the National Planning Policy Framework (NPPF) states that plans should “be shaped by early, proportionate and effective engagement between plan- makers</p>	<p>Comments noted. See Council response to representation in General Comments section.</p> <p>The issues raised have previously been considered and discussed as part of the Examination. The Council refers to <a href="#">EXAM57</a> and its response to the Inspector’s Note <a href="#">IN32</a> regarding the proposed allocation at TIL13 Pincents Lane, Tilehurst.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the</p>

Respondent	Summary of Main Issues	Council response
	<p>and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;”. While significant consultation was carried out between 2018 and 2023, the Main Modifications, particularly in relation to the sites that have been included for housing, mean that what is currently proposed is materially different.</p> <p>In particular, I am concerned about the inclusion of the Land East of Pincents Lane as a proposed site for housing and I have been contacted by a large number of constituents also sharing their concerns. There have been multiple applications to develop this site over a number of years, all of which have been refused. Highway access to the site is limited and would be shared with the existing retail park and it is a well-used and well-loved green space.</p> <p>Moreover, Paragraph 11.a of the NPPF states “all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure;...”. This has historically not been the case with development on the fringe of Tilehurst, where there has been a lack of investment in infrastructure, which the inclusion of the Land East of Pincents Lane as a site for housing would further exacerbate.</p> <p>West Berkshire needs more housing, in particular affordable housing, aligned with the necessary infrastructure, to support local families and help grow our economy. In order to achieve this and deliver the ambition for West Berkshire to be a driver of growth within the UK economy, we need a sound plan.</p> <p>It is disappointing that West Berkshire Council, over two administrations have failed to deliver that ambition. Rather than identifying sites for new homes where they are needed, such as in our villages where families cannot afford to stay together, they</p>	<p>Proposed Main Modification. No further changes are proposed to the LPR.</p>

Respondent	Summary of Main Issues	Council response
	<p>have overseen a bodged process which first failed to deliver enough housing, and then rather than taking a strategic approach, sites previously deemed unsuitable have simply been added in at the last minute. Pincents Hill is the most egregious example of this.</p>	
Reading West Mid Berks Labour Party	<p>I am concerned about the limited nature of vehicular access to the proposed site at Pincents Lane. The site can only be accessed by the public from a narrow lane which leads down to the entrance of the Retail Park near to Junction 12 of the M4. This is already a busy stretch of road with many traffic hold ups, particularly at peak times and weekends. Currently, there are IKEA and Dunelm Mill which generate high volumes of traffic. Also feeding on to the A4 are the customers of Sainsburys, B &amp; M, McDonalds and the other businesses in the Retail Park. There are also high volumes of traffic in and out of Reading along the A4 causing many hold ups and congestion.</p>	<p>Comments noted. The issues raised have previously been considered and discussed as part of the Examination. The Council refer to <a href="#">EXAM57</a> and its response to the Inspector's Note <a href="#">IN32</a> regarding the proposed allocation at TIL13 Pincents Lane, Tilehurst.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
Prosper Infinity Ltd	<p>The Plan identifies sites on greenfield or greenbelt land, and / or outside the settlement boundary. The Council are aware of sites that are previously developed, such as Newbury Leisure Park. The site (Newbury Leisure Park) meets the criteria to be included on the Council's Brownfield Land Register, and Permission in Principle should be granted.</p> <p>The methodology of assessing sites is flawed for the following reasons:</p> <ul style="list-style-type: none"> <li>• There is no reference to gap policy within the NPPF.</li> <li>• WBC officers recognise that the site should have always been included within the settlement boundary since its original development over 50 years ago. This administrative error excluded it from the scope of the Countryside Designation</li> </ul>	<p>Comments noted. Newbury Leisure Park (THA21) was not taken forward as an allocation, and the reasons for this are set out within the Council's response to AP29 (<a href="#">EXAM32</a>).</p> <p>Newbury Leisure Park was also discussed at the Examination Hearing Session on 2 October 2024. The Council refers to its response to MM36 where the same comments have been made.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the</p>

Respondent	Summary of Main Issues	Council response
	<p>study, and because there was no public consultation, the error was not highlighted for inclusion.</p> <ul style="list-style-type: none"> <li>The Inspector quoted several legal cases where government directive has been that the whole plot of land cannot be discounted for planning permission, but the Council can stipulate that areas within Flood Zone 1 and 2 could be developed within guidelines.</li> <li>Angela Rayner MP parliamentary statement on 30 July 2024 commented that the first port of call for development should be brownfield land.</li> </ul> <p>The non-inclusion of Newbury Leisure Park could be considered discriminatory due to the landowners' race and colour.</p>	<p>Proposed Main Modification. No further changes are proposed to the LPR.</p>
TOWN obo Pincents Lane	<p>Support MM45.</p> <p>The new allocations and the increase of the allocation for NE Thatcham (policy SP17) are fundamental to ensuring soundness of the Plan.</p> <p>The opportunity should be taken to increase the allocation to 165 units. This would represent efficient use of land and would support the direction of travel set out by the Government under NPPF 2024.</p> <p>In developing the policy wording the Council accepted use of the Promoter's evidence base which demonstrates that 165 units can be accommodated at an appropriate density whilst not resulting in unacceptable impacts.</p> <p>The proposed change to the Policies Map is supported along with the detailed boundary as shown in Annex M to the Schedule of Proposed Changes. These are part of the essential changes required to ensure that the Plan is legally sound through the allocation of the land to the east of Pincents Lane.</p>	<p>Support noted.</p> <p>The issues raised have previously been considered and discussed as part of the Examination. The Council refers to <a href="#">FWS7/1</a> and its response to the Inspector's SQ7.17 in <a href="#">IN31</a> regarding TIL13 Pincents Lane, Tilehurst.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM46	95	Policy RSA6 Stonehams Farm, Long Lane, Tilehurst	1

Respondent	Summary of Main Issues	Council response
Environment Agency	<p>We have reviewed the Schedule of Proposed Additional (minor) Modifications (AM) and find that some EA comments agreed with the LPA in the agreed in the Statement of Common Ground (SoCG) with the Environment Agency have not been included in the proposed additional modifications. We are unclear if these comments have been or would be considered and included in the adopted plan.</p> <p>We note modifications suggested for polices in Chapter 8 <i>Non-Strategic Site allocations: Our Place Based Approach</i>, which the LPA agreed to include in the local plan (as we agreed with the LPA in the SoCG – attached to rep) has not been included.</p> <p>Note that the site was previously identified as to be removed from the LPR.</p>	<p>Comments noted. No AMs are proposed for Policy RSA6. Whilst the SoCG with the Environment Agency (<u>EXAM24</u>) did note that the site was proposed to be removed from the LPR it is now being retained. The Main Modification relates to the deletion of the criterion for the integrated water supply and drainage strategy.</p> <p>The Council refers to its response under MM38 (policy RSA2). The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM47	97	Policy RSA7 72 Purley Rise, Purley on Thames	1

Respondent	Summary of Main Issues	Council response
Environment Agency	<p>We have reviewed the Schedule of Proposed Additional (minor) Modifications (AM) and find that some EA comments agreed with the LPA in the agreed in the Statement of Common Ground (SoCG) with the Environment Agency have not been included in the proposed additional modifications. We are unclear if these comments have been or would be considered and included in the adopted plan.</p> <p>We note modifications suggested for polices in Chapter 8 <i>Non-Strategic Site allocations: Our Place Based Approach</i>, which the LPA agreed to include in the local plan (as we agreed with the LPA in the SoCG – attached to rep) has not been included.</p> <p>Note that the site was previously identified as to be removed from the LPR.</p>	<p>Comments noted. No AMs are proposed for Policy RSA7. Whilst the SoCG with the Environment Agency (<u>EXAM24</u>) did note that the site was proposed to be removed from the LPR it is now being retained. The Main Modification relates to the deletion of the criterion for the integrated water supply and drainage strategy.</p> <p>The Council refers to its response under MM38 (policy RSA2). The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>



Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM48	99	Policy RSA8 Land adjacent to Bath Road and Dorking Way, Calcot	1

Respondent	Summary of Main Issues	Council response
Environment Agency	<p>We have reviewed the Schedule of Proposed Additional (minor) Modifications (AM) and find that some EA comments agreed with the LPA in the agreed in the Statement of Common Ground (SoCG) with the Environment Agency have not been included in the proposed additional modifications. We are unclear if these comments have been or would be considered and included in the adopted plan.</p> <p>We note modifications suggested for polices in Chapter 8 <i>Non-Strategic Site allocations: Our Place Based Approach</i>, which the LPA agreed to include in the local plan (as we agreed with the LPA in the SoCG – attached to rep) has not been included.</p>	<p>Comments noted. No Additional Modifications are proposed for Policy RSA8.</p> <p>The Statement of Common Ground (SoCG) with the Environment Agency (<u>EXAM24</u>) proposes a Main Modification for RSA8. This relates to the need for an integrated water supply and drainage strategy.</p> <p>The Council refers to its response under MM38 (policy RSA2).</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM49	101	Policy RSA9 The Green, Theale	2

Respondent	Summary of Main Issues	Council response
Environment Agency	<p>We have reviewed the Schedule of Proposed Additional (minor) Modifications (AM) and find that some EA comments agreed with the LPA in the agreed in the Statement of Common Ground (SoCG) with the Environment Agency have not been included in the proposed additional modifications. We are unclear if these comments have been or would be considered and included in the adopted plan.</p> <p>We note modifications suggested for polices in Chapter 8 <i>Non-Strategic Site allocations: Our Place Based Approach</i>, which the LPA agreed to include in the local plan (as we agreed with the LPA in the SoCG – attached to rep) has not been included.</p>	<p>Comments noted. No AMs are proposed for RSA9.</p> <p>The Statement of Common Ground (SoCG) with the Environment Agency (<u>EXAM24</u>) proposes a Main Modification for RSA9. This relates to the need for an integrated water supply and drainage strategy.</p> <p>The Council refers to its response under MM38 (policy RSA2).</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
Historic England	Support and do not raise any soundness or legal compliance concerns.	Comments noted.

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM50	103	Policy RSA10 Whitehart Meadow, Theale	1

Respondent	Summary of Main Issues	Council response
Environment Agency	<p>We have reviewed the Schedule of Proposed Additional (minor) Modifications (AM) and find that some EA comments agreed with the LPA in the agreed in the Statement of Common Ground (SoCG) with the Environment Agency have not been included in the proposed additional modifications. We are unclear if these comments have been or would be considered and included in the adopted plan.</p> <p>We note modifications suggested for polices in Chapter 8 <i>Non-Strategic Site allocations: Our Place Based Approach</i>, which the LPA agreed to include in the local plan (as we agreed with the LPA in the SoCG – attached to rep) has not been included.</p>	<p>Comments noted. No AMs are proposed for RSA10.</p> <p>The SoCG with the Environment Agency (<u>EXAM24</u>) proposes a Main Modification for RSA10. This relates to the need for an integrated water supply and drainage strategy. The SoCG agreed that criterion m) of the LPR, as submitted, requires the development to be informed by an Ecological Impact Assessment.</p> <p>The Council refers to its response under MM38 (policy RSA2).</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM51	106	Policy RSA11 Former Theale Sewage Treatment Works, Theale	1

Respondent	Summary of Main Issues	Council response
Environment Agency	<p>We have reviewed the Schedule of Proposed Additional (minor) Modifications (AM) and find that some EA comments agreed with the LPA in the agreed in the Statement of Common Ground (SoCG) with the Environment Agency have not been included in the proposed additional modifications. We are unclear if these comments have been or would be considered and included in the adopted plan.</p> <p>We note modifications suggested for polices in Chapter 8 <i>Non-Strategic Site allocations: Our Place Based Approach</i>, which the LPA agreed to include in the local plan (as we agreed with the LPA in the SoCG – attached to rep) has not been included.</p>	<p>Comments noted. No AMs are proposed for RSA11.</p> <p>The SoCG with the Environment Agency (<u>EXAM24</u>) proposes a Main Modification for RSA11. This relates to the need for an integrated water supply and drainage strategy. The SoCG agreed that criterion m) of the LPR, as submitted, requires the development to be informed by an Ecological Impact Assessment.</p> <p>The Council refers to its response under MM38 (policy RSA2).</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM52	109	Policy RSA12 Land adjoining Pondhouse Farm, Clayhill Road, Burghfield Common	1

Respondent	Summary of Main Issues	Council response
Environment Agency	<p>We have reviewed the Schedule of Proposed Additional (minor) Modifications (AM) and find that some EA comments agreed with the LPA in the agreed in the Statement of Common Ground (SoCG) with the Environment Agency have not been included in the proposed additional modifications. We are unclear if these comments have been or would be considered and included in the adopted plan.</p> <p>We note modifications suggested for polices in Chapter 8 <i>Non-Strategic Site allocations: Our Place Based Approach</i>, which the LPA agreed to include in the local plan (as we agreed with the LPA in the SoCG – attached to rep) has not been included.</p> <p>Note that the site was previously identified as to be removed from the LPR.</p>	<p>Comments noted. No AMs are proposed for Policy RSA12. Whilst the SoCG with the Environment Agency (<u>EXAM24</u>) did note that the site was proposed to be removed from the LPR it is now being retained. The Main Modification relates to the deletion of the criterion for the integrated water supply and drainage strategy and the insertion of a protected species survey, as guided by the Environment Agency from the Reg19 representations. The Council refers to its response under MM38 (policy RSA2). The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM53	111	Policy RSA13 A4 Bath Road, Woolhampton	2

Respondent	Summary of Main Issues	Council response
Environment Agency	We have reviewed the Schedule of Proposed Additional (minor) Modifications (AM) and find that some EA comments agreed with the LPA in the agreed in the Statement of Common Ground (SoCG) with the Environment Agency have not been included in the proposed additional modifications. We are unclear if these comments have been or would be considered and included in the adopted plan. We note modifications suggested for polices in Chapter 8 <i>Non-Strategic Site allocations: Our Place Based Approach</i> , which the LPA agreed to include in the local plan (as we agreed with the LPA in the SoCG – attached to rep) has not been included.	Comments noted. An AM is proposed in relation to the archaeological assessment. The SoCG with the Environment Agency ( <a href="#">EXAM24</a> ) does not seek to agree a modification. The EA commented that the site is within SPZ3, and the Council noted that criterion f) of Policy DM7 manages development in relation to its impact on water quality, including SPZs. Thus, this has already been agreed between the Council and the EA. No further changes are proposed to the LPR. The Main Modification relates to the deletion of the criterion for the integrated water supply and drainage strategy. The Council refers to its response under MM38 (policy RSA2). No further changes are proposed to the LPR.
Stephanie Molloy	No infrastructure in place. No safe access to the A4, with no consultation on how this will be done. Two previous planning applications have been refused. Thus, there is nothing from the Council to say why this should proceed.	Comments noted. The issue of access was outlined in the Council's <a href="#">Written Statement 6</a> , in relation to Q6.27, paragraph 1.203. The planning applications referenced were not refused on highway safety grounds. No further changes are proposed to the LPR.

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM54	113	New paras before Policy RSA14 Sites allocated AONB	3

Respondent	Summary of Main Issues	Council response
Bell Cornwell obo Central Corporation (WHM) Ltd	Includes revised text to note that <i>“The special characteristics of the North Wessex Downs AONB mean that development will be modest”</i> yet the developments proposed in the AONB, particularly RSA18, is 3.5 times larger than RSA10. RSA10 was reduced by 60 dwellings on the grounds of its impact on the AONB, albeit not located within it. MM54 also introduces a further site (RSAX) within the AONB for 25 dwellings, which is unnecessary and could be accommodated in RSA10.	Comments noted. The development potential of RSA10 was discussed at the hearing session for Matter 6 held on 4 June 2024. The Inspector in his post-hearing letter ( <a href="#">IN30</a> ) identified a shortfall in the housing supply and requested in Action Point 77 that the Council propose modifications to the Plan to identify additional deliverable sites and/or developable sites and/or broad locations. The rationale behind the selection of the Land at Pangbourne Hill as an allocation is set out within the Council’s response to Action Point 77 (see <a href="#">EXAM53.1</a> ). The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.
JPPC obo Mr & Mrs Fenton	Objection to allocation at Pangbourne Hill. National planning policy resists against major development in National Landscapes. The developable area amounts to more than	Comments noted. The Inspector in his post-hearing letter ( <a href="#">IN30</a> ) identified a shortfall in the

Respondent	Summary of Main Issues	Council response
	<p>1ha, and the development potential is 25 dwellings. The site is in a visually sensitive part of the National Landscape. The HELAA concluded that the site was “not developable within the next 15 years”.</p> <p>Concerns around density and highway safety.</p>	<p>housing supply and requested in Action Point 77 that the Council propose modifications to the Plan to identify additional deliverable sites and/or developable sites and/or broad locations.</p> <p>The rationale behind the selection of the Land at Pangbourne Hill as an allocation is set out within the Council’s response to Action Point 77 (see <a href="#">EXAM53.1</a>).</p> <p>In response to the main issues raised, the Council refers to its response within paragraphs 1.54, 1.55, 1.56 and 1.57 of its Written Statement (<a href="#">FWS7/1</a>) for Matter 7.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
Nexus obo Pangbourne Beavers	<p>Support MM54 which identifies clearly the eleven sites within the North Wessex Downs National Landscape (AONB) that are allocated for housing in the Local Plan Review (as modified), noting that the Council has already confirmed that the exceptional circumstances to justify these allocations have already been demonstrated as part of the Local Plan Review process.</p>	<p>Support noted.</p>



Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM55	113	Policy RSA14 Land adjoining Lynch Lane, Lambourn	1

Respondent	Summary of Main Issues	Council response
Environment Agency	<p>We have reviewed the Schedule of Proposed Additional (minor) Modifications (AM) and find that some EA comments agreed with the LPA in the agreed in the Statement of Common Ground (SoCG) with the Environment Agency have not been included in the proposed additional modifications. We are unclear if these comments have been or would be considered and included in the adopted plan.</p> <p>We note modifications suggested for polices in Chapter 8 <i>Non-Strategic Site allocations: Our Place Based Approach</i>, which the LPA agreed to include in the local plan (as we agreed with the LPA in the SoCG – attached to rep) has not been included.</p>	<p>Comments noted. An AM is proposed in relation to the archaeological desk based assessment.</p> <p>The SoCG with the Environment Agency (<u>EXAM24</u>) proposes a MM for RSA14. This relates to the need for an integrated water supply and drainage strategy.</p> <p>The Council refers to its response under MM38 (policy RSA2).</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM56	115	Policy RSA15 Land at Newbury Road, Lambourn	1

Respondent	Summary of Main Issues	Council response
Environment Agency	<p>We have reviewed the Schedule of Proposed Additional (minor) Modifications (AM) and find that some EA comments agreed with the LPA in the agreed in the Statement of Common Ground (SoCG) with the Environment Agency have not been included in the proposed additional modifications. We are unclear if these comments have been or would be considered and included in the adopted plan.</p> <p>We note modifications suggested for polices in Chapter 8 <i>Non-Strategic Site allocations: Our Place Based Approach</i>, which the LPA agreed to include in the local plan (as we agreed with the LPA in the SoCG – attached to rep) has not been included.</p>	<p>Comments noted. An AM is proposed in relation to the archaeological desk based assessment.</p> <p>The SoCG with the Environment Agency (<u>EXAM24</u>) proposes a Main Modification for RSA15. This relates to the need for an integrated water supply and drainage strategy.</p> <p>The Council refers to its response under MM38 (policy RSA2). The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
<b>MM57 PMC15</b>	-	<b>New RSA Policy – Land north of Pangbourne Hill, Pangbourne</b>	<b>9</b>

Respondent	Summary of Main Issues	Council response
Historic England	Support and do not raise any soundness or legal compliance concerns.	Comments noted.
Natural England	The sites within the NWDNL, and therefore the scheme should be developed in accordance with the requirements set out in SP2, and reflect the findings of the Landscape sensitivity and capacity assessment (November 2020). This is regarding the location of development and planting. Landscape mitigation should be considered and informed by a LVIA.	Comments noted. The proposed allocation, including the extent of the developable area and landscape buffer has been developed in accordance with the Landscape Sensitivity and Capacity Assessment (LSCA). The site allocation requires the scheme to be developed in line with a LVIA, which would take account of the LSCA. It is important to note that the Plan needs to be read and interpreted as a whole, and all policies should be viewed together and not in isolation in the preparation and consideration of planning applications. This is made clear in paragraph 1.6 of the <a href="#">submitted LPR (CD1)</a> . The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed

Respondent	Summary of Main Issues	Council response
		Main Modification. No further changes are proposed to the LPR.
Berkshire Oxfordshire & Buckinghamshire Integrated Care Board (BOB ICB)	New population would have a material impact to the nearby GP practices. Developer contributions should be sought to support any primary care estates projects in the local area. The MM does not set out the requirements of providing necessary primary care mitigations, and is therefore unsound. Suggest wording.	<p>Comments noted. <a href="#">MM34</a> amends the first paragraph of policy SP24 (Infrastructure Requirements and Delivery) to include text that makes clear that development will be required to ensure the timely and coordinated delivery of necessary infrastructure having regard to the latest version of the Council's Infrastructure Delivery Plan (IDP), through proportionate financial contributions and / or on-site provision. Where necessary, the phasing of development will be linked to infrastructure provision. The NHS Buckinghamshire, Oxfordshire and Berkshire Integrated Care Board is consulted as part of updates to the IDP.</p> <p>It is important to note that the Plan needs to be read and interpreted as a whole, and all policies should be viewed together and not in isolation in the preparation and consideration of planning applications. This is made clear in paragraph 1.6 of</p>

Respondent	Summary of Main Issues	Council response
		the <a href="#">submitted LPR (CD1)</a> . No further changes are proposed to the LPR.
JPPC obo Mr and Mrs Fenton	<p>Proposed MM not legally compliant or sound, as not justified, effective, or consistent with national policy.</p> <p>The whole of Pangbourne lies within a National Landscape, with the reclassification from AONB aiming to make clearer. The NPPF outlines that planning policies should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes. Permission for major development should be refused other than in exceptional circumstances and where it is shown that the development is in the public interest.</p> <p>Object to the proposed strategic allocation.</p> <p>The HELAA included a detailed assessment of the suitability of sites. For PAN8 the following is noted:</p> <p>Landscape impact – refer to the Landscape Sensitivity and Capacity Assessment (LSCA) 2020, which concluded that the site is within an elevated location. The LCSA concluded that only the easternmost portion of the site would be less visually intrusive, whereas development on the more exposed open slopes would likely have a detrimental effect on the AONB, with development visible from the opposite side of the valley. Thus, of the 6ha reviewed, slightly more than 1ha was assessed as potentially suitable for development. The assessment identifies the overall developable area at 3.6ha, delivering up to 72 homes – it is not clear how this assessment was undertaken. The HELAA makes clear that the site was assessed as being ‘not developable within the next 15 years’.</p> <p>The site’s reassessment of the site is premised on the eastern portion being developable as this is not deemed to have an adverse landscape impact and that the Highway Authority has confirmed that a level of development on the site of approximately 25 dwellings</p>	<p>Comments noted. The issues raised have previously been considered and discussed as part of the Examination.</p> <p>The calculation of housing numbers and access/highways impact were discussed at the Examination Hearing Session on 2<sup>nd</sup> October 2024, following the Council’s Written Statement (<a href="#">SQ7.19</a>): The development potential of the site (criterion a) has been identified using the Council’s Density Pattern Book Study (<a href="#">SIT3</a>).</p> <p>The highways evidence was presented in Nexus Planning’s Written Statement (<a href="#">WS3/19</a>), which provided the examination with a pre-application response from the Council’s highways officer. This, along with direct input from the Council’s highways officer, guided the criteria relating to the highway impact of the development.</p> <p>The allocation enables part of the site to be developed for</p>

Respondent	Summary of Main Issues	Council response
	<p>would not have a harmful impact upon the local highway network. However, no information has been presented to explain why the Council has proposed the allocation based upon this number of units. Not all of the developable area will be suitable for development, due to on-site factors such as trees and woodland. The access road further increases land take as well as landscaped margins.</p> <p>The MM for SP1 introduces indicative densities for development in the AONB. The site to the south is around 20dph, though doesn't factor in the LEAP or car parking for the adjacent cemetery. The density of surrounding areas is around 7dph. Thus, the density proposed would be at odds with the prevailing density of development in the locality. Lower density has allowed large trees to be planted and mature. A higher density would mean landscaping to assimilate new buildings would be less likely. The sloping nature of the site and need for level access may require more engineered solutions. Note the idea of softening beyond the site but that will not soften views from the north or east, and will not allow development to assimilate particularly with tall roofs.</p> <p>The majority of Pangbourne is on low lying ground. The elevated position of the site means that providing streetlighting will extend the impact of Pangbourne into the AONB.</p> <p>Unclear upon what basis the local highway authority has revisited its previous assessment that Pangbourne Hill 'had generally reached its limits for development'. The development will add to congestion between the A340 and Pangbourne Hill. The development will add danger to the roundabout connecting the A340 with the A329. Junction with the A340 offers limited visibility aided only by a mirror. As this is an A road with all types of traffic the use of this junction cannot be classed as 'good access' in SP23 terms.</p> <p>Site forms part of the outline approval for the site at Pangbourne Hill to the south. The site PAN8 had a role to play in screening views of</p>	<p>residential purposes, with a proposed landscape buffer in acknowledgement of the visibility of the site and of the potential landscape impact.</p> <p>The development to the south was assessed on its own merits. Seeking to ensure it would create a soft edge, being on the edge of the existing built up area in an AONB, woodland and landscaping have been created to aid in softening the impact of development. The LVIA to be prepared for the proposed allocation would take such features into account, as well as the observations and recommendations of the LSCA. The proposed criteria require a low density development to maximise the opportunity for tree planting within the development. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

Respondent	Summary of Main Issues	Council response
	<p>the new development in views from the north. The importance of the existing woodland belts in mitigating the visual impact is acknowledged in the Planning Committee report. The benefit of this existing landscaping with regard to the completed development would be substantially lost if PAN8 came forward for development. Consider better sites available.</p>	
Michael Hirst	<p>Proposed MM not sound as it is not justified.  The dwellings would be immediately adjacent to the houses in Riverview Road. These houses have an open and uninterrupted outlook to the west. The development would severely impact these houses, specifically the elevated position occupied by new housing, as well as the resulting noise;  If the development was repositioned to the opposite side of the field identified in PMC/Annex N this would solve the problem. Access would remain unchanged. This also removes the need to reposition the existing overhead/underground electrical cabling;  The Parish Council is concerned about the extension of the village settlement boundary, but any development will need to settlement boundary to be extended. The inclusion of a buffer between existing and new housing far outweighs any concerns about the size of the overall village settlement boundary;  The Landscape Sensitivity study highlighted the possibility of the site at the opposite side of the field being visible from the AONB on the opposite side of the valley. Upon checking this is not a possibility of any part of the site being visible from land that is accessible to the public. Thus, relocating the development to make no difference to the Landscape Sensitivity.  Fully recognise the requirement to add to the housing stock and understand Pangbourne's potential to contribute. In the case of the site there is a practical opportunity to reduce the impact on existing</p>	<p>Comments noted. The planning system does not seek to protect the view of private individuals. However, the design of the site will need to consider the amenity of local residents, through loss of light and privacy, in line with proposed Policy DM31. Criterion a) of the proposed policy for the site outlines that the development would be of a low density, and this is in recognition of the semi-rural density of development along Riverview Road.  The policy has been formulated in line with the recommendations of the LSCA, seeking to ensure the conservation and enhancement of both the North Wessex Downs and Chilterns National Landscapes. Placing the development in what is shown as the landscape buffer would not be in accordance with the LSCA and would not be acceptable from a</p>

Respondent	Summary of Main Issues	Council response
	residents without detracting from the effectiveness of the overall project.	landscape perspective. From a design perspective placing development within the landscape buffer would not integrate well with the existing grain of development. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.
Paula Saunderson	The allocation should be removed and replaced with the following three sites: <ul style="list-style-type: none"> <li>• Kennet Centre, Newbury (317 dwellings)</li> <li>• Land east of Newbury College, Monks Lane, Newbury (75 dwellings, 70 C2 beds, and supermarket)</li> <li>• Land at 20 - 28A Pound Street, Newbury (69 dwellings).</li> </ul>	Comments noted. The issues raised have previously been considered and discussed as part of the Examination. No further changes are proposed to the LPR.
Bell Cornwell obo Central Corporation (WHM) Ltd	Proposed MM not sound as not justified or consistent with national policy. The site allocation is unjustified and should be deleted with the housing quota of 25 dwellings added to RSA10.	Comments noted. The issues raised have previously been considered and discussed as part of the Examination. No further changes are proposed to the LPR.
Nexus obo Pangbourne Beavers	Proposed MM legally compliant but not sound, as not effective. Support the proposed allocation. The Council's evidence confirms Pangbourne is a sustainable location, and the site was suitable for housing, supported by the updated SA/SEA and the updated HRA.	Comments noted. The issues raised have previously been considered and discussed as part of the Examination.



Respondent	Summary of Main Issues	Council response
	<p>Criterion fii) landscape – support allocation and majority of the proposed policy wording/requirements, including the need for a LVIA. However, object to final sentence of the criterion which states that the part of the allocated site that is required as a landscape buffer ‘will remain outside the settlement boundary’. As per the response to MM3 this approach is neither effective nor justified. Therefore, this final sentence should be deleted.</p>	<p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
Henry Venners	<p>Proposed MM not sound as not positively prepared, justified or consistent with national policy.</p> <p>General themes of the Local Plan to seek to provide development in the right place and to provide protection for National Landscapes. Surprising that an allocation has been made when this will cause harm to the National Landscape. LURA provides a protected landscapes duty that has not obviously been followed.</p> <p>Alternatives have not been considered. It would have been appropriate for a recheck on the suitability of sites and engage a call for sites. But there was no engagement, and no consultation.</p> <p>This exercise would have shown that other sites should be given fair consideration, particularly considering the increased housing numbers to 1,057 per annum. Thus, this fails the tests of soundness as there was no proper consideration of alternatives.</p> <p>The AONB Board was concerned at impacts of development in the AONB and suggested reducing housing numbers therein. Increasing the numbers goes against this direction.</p> <p>Promote alternative site adjacent to existing allocation (HSA11 RSAX) for approximately 25 houses with self-build and housing suitable for older people (25% bungalows) in line with Policy DM19. Benefits of site outlined (landscape, flood risk, highways, heritage, education, ecology, utilities impacts). Site is available and should be allocated in preference to PAN8 which has notable failings.</p>	<p>Comments noted.</p> <p>Some of the issues raised have previously been considered and discussed as part of the Examination.</p> <p>The transitional arrangements make it clear there is no requirement to revisit the housing requirement at this point in time.</p> <p>The site promoted in these representations was not previously available to the Council to consider. However, the details will be kept on record for the next update to the HELAA.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM58	117	Policy RSA16 Land North of Southend Road, Bradfield Southend	1

Respondent	Summary of Main Issues	Council response
Environment Agency	<p>We have reviewed the Schedule of Proposed Additional (minor) Modifications (AM) and find that some EA comments agreed with the LPA in the agreed in the Statement of Common Ground (SoCG) with the Environment Agency have not been included in the proposed additional modifications. We are unclear if these comments have been or would be considered and included in the adopted plan.</p> <p>We note modifications suggested for polices in Chapter 8 <i>Non-Strategic Site allocations: Our Place Based Approach</i>, which the LPA agreed to include in the local plan (as we agreed with the LPA in the SoCG – attached to rep) has not been included.</p>	<p>Comments noted. No AMs are proposed for RSA16.</p> <p>The SoCG with the Environment Agency (<u>EXAM24</u>) did not propose a modification to the policy, as it was agreed Policy DM7 highlights the need for early engagement with Thames Water.</p> <p>The Main Modification proposes to delete the criterion requiring the integrated water supply and drainage strategy.</p> <p>The Council refers to its response under MM38 (policy RSA2).</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR</p>

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM59	119	Policy RSA17 Chieveley Glebe	4

Respondent	Summary of Main Issues	Council response
Environment Agency	We have reviewed the Schedule of Proposed Additional (minor) Modifications (AM) and find that some EA comments agreed with the LPA in the agreed in the Statement of Common Ground (SoCG) with the Environment Agency have not been included in the proposed additional modifications. We are unclear if these comments have been or would be considered and included in the adopted plan. We note modifications suggested for polices in Chapter 8 <i>Non-Strategic Site allocations: Our Place Based Approach</i> , which the LPA agreed to include in the local plan (as we agreed with the LPA in the SoCG – attached to rep) has not been included.	Comments noted. There are no AMs proposed for RSA17. The SoCG with the Environment Agency ( <a href="#">EXAM24</a> ) proposes two Main Modifications for RSA17. One is in relation to Flood Risk Assessment, and this is included within MM59. The second is in relation to the need for an integrated water supply and drainage strategy. The Council refers to its response under MM38 (policy RSA2). No further changes are proposed to the LPR.
Historic England	Support	Support noted
Chris Avery	The Inspector's report highlighted weaknesses in the plan's approach to the AONB status requiring the amendment of Policy SP2 and RSA17. The consequent amendments to RSA17 makes no mention of maintaining the settlement boundary. I am aware that outline planning has been granted with respect to this area and that it differs considerably from the original outline in the plan. In particular, while the plan proposes what is essentially "infill" along East Lane, in accordance with the existing settlement boundary, the outline planning consent represents a considerable departure from the	Comments noted. The site does not have planning consent for development. Whilst a larger site area was promoted for and assessed in the HELAA ( <a href="#">SIT4e</a> ), the proposed allocation comprises of a much smaller area. As explained within the Council's Written Statement for Matter 6 ( <a href="#">WS6/1</a> ), a Landscape Sensitivity Assessment (LSA, <a href="#">LAN3c</a> ) was prepared for the site (within this the site has the reference CHI011), and this recommends that development should be limited to the a continuation of the linear development along East Lane.

Respondent	Summary of Main Issues	Council response
	<p>settlement boundary, yet another breach of the AONB designation.</p> <p>It is clear that, from the outset, the council has failed to consider and properly apply the AONB designation when putting forward this site as suitable for housing development. It is also clear that, when they did so, it was without any actual consideration of the practicalities of building houses here and, very probably, without anyone actually visiting the site. The amendments to RSA17 suggest an attempt to fix what was, from the very beginning, a flawed proposal.</p> <p>It is entirely unclear what the justification is for departing from the AONB designation and essentially undermining the protected village character of Chieveley for what, in the overall context of the LP, is a small number of dwellings. The proposal to designate this area for housing should be withdrawn.</p>	<p>The 2021 NPPF (<a href="#">NAT1</a>) at paragraph 176 requires great weight to be given to conserving and enhancing landscape and scenic beauty in AONBs. Whilst at paragraph 177, the NPPF restricts against major development unless exceptional circumstances can be demonstrated and where it can be demonstrated that the development is in the public interest. The AONB has been taken into account as part of the site selection work. One of the objectives of the LSA was to consider whether development would result in harm, and the LSA made recommendations for each site considered.</p> <p>As set out within the Council's Housing Background Paper (<a href="#">HOU6</a>, pp20-24) and the Council's response to the Inspector's Preliminary Question 30 (<a href="#">EXAM2.1</a>, pp73-74), the Council considers that the exceptional circumstances test as defined in paragraph 177 of the NPPF has been demonstrated to justify the allocation of site RSA17. No further changes are proposed to the LPR.</p>
WWA Studios obo Diocese of Oxford	<p>Whilst we fully support the proposed allocation of the site under Site Reference RSA17 of the Local Plan, given the site's location and siting, we recommend that the site boundary should be extended for allow much needed affordable housing in the village as well as partly meeting the district housing needs (as set out in the latest housing need figures. We confirm the availability of the site for housing, to deliver approximately 35 units in a 0-5 years' timeframe.</p> <p><i>(Drawing attached to rep showing the comparison site boundaries)</i></p>	<p>Support for the development noted.</p> <p>The principle and potential for any further development in this location would need to be considered as part of the next Local Plan. No further changes are proposed to the LPR.</p>

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM60	121	Policy RSA18 Pirbright Institute Site, High Street, Compton	1

Respondent	Summary of Main Issues	Council response
Environment Agency	<p>We have reviewed the Schedule of Proposed Additional (minor) Modifications (AM) and find that some EA comments agreed with the LPA in the agreed in the Statement of Common Ground (SoCG) with the Environment Agency have not been included in the proposed additional modifications. We are unclear if these comments have been or would be considered and included in the adopted plan.</p> <p>We note modifications suggested for polices in Chapter 8 <i>Non-Strategic Site allocations: Our Place Based Approach</i>, which the LPA agreed to include in the local plan (as we agreed with the LPA in the SoCG – attached to rep) has not been included.</p>	<p>Comments noted. An AM is proposed relating to the archaeological desk based assessment.</p> <p>The SoCG with the Environment Agency (<u>EXAM24</u>) proposes two Main Modifications for RSA18. One is in relation to the requirement for detailed modelling of the River Pang to feed in to the FRA, and this is included within MM59.</p> <p>The second is in relation to the need for an integrated water supply and drainage strategy. The Council refers to its response under MM38 (policy RSA2).</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR</p>

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM61	124	Policy RSA19 Land west of Spring Meadows, Great Shefford	1

Respondent	Summary of Main Issues	Council response
Environment Agency	<p>We have reviewed the Schedule of Proposed Additional (minor) Modifications (AM) and find that some EA comments agreed with the LPA in the agreed in the Statement of Common Ground (SoCG) with the Environment Agency have not been included in the proposed additional modifications. We are unclear if these comments have been or would be considered and included in the adopted plan.</p> <p>We note modifications suggested for polices in Chapter 8 <i>Non-Strategic Site allocations: Our Place Based Approach</i>, which the LPA agreed to include in the local plan (as we agreed with the LPA in the SoCG – attached to rep) has not been included.</p>	<p>Comments noted. An AM is proposed relating to the archaeological desk based assessment.</p> <p>The SoCG with the Environment Agency (<u>EXAM24</u>) did not propose modifications, but it was agreed that the phasing plan would ensure adequate wastewater treatment infrastructure would be available or provided to support development.</p> <p>The Council refers to its response under MM38 (policy RSA2).</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM61	126	Policy RSA20 Land off Charlotte Close, Hermitage	1

Respondent	Summary of Main Issues	Council response
Environment Agency	<p>We have reviewed the Schedule of Proposed Additional (minor) Modifications (AM) and find that some EA comments agreed with the LPA in the agreed in the Statement of Common Ground (SoCG) with the Environment Agency have not been included in the proposed additional modifications. We are unclear if these comments have been or would be considered and included in the adopted plan. We note modifications suggested for polices in Chapter 8 <i>Non-Strategic Site allocations: Our Place Based Approach</i>, which the LPA agreed to include in the local plan (as we agreed with the LPA in the SoCG – attached to rep) has not been included.</p>	<p>Comments noted. An AM is proposed relating to the archaeological desk based assessment.</p> <p>The SoCG with the Environment Agency (<u>EXAM24</u>) did not propose modifications, but it was agreed that the phasing plan would ensure adequate wastewater treatment infrastructure would be available or provided to support development. As outlined in the SoCG criterion c) encourages the opening up of the culvert, as set out in the submitted version of the Plan.</p> <p>The Council refers to its response under MM38 (policy RSA2).</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM63	128	Policy RSA21 Old Farmhouse, Hermitage	2

Respondent	Summary of Main Issues	Council response
Environment Agency	<p>We have reviewed the Schedule of Proposed Additional (minor) Modifications (AM) and find that some EA comments agreed with the LPA in the agreed in the Statement of Common Ground (SoCG) with the Environment Agency have not been included in the proposed additional modifications. We are unclear if these comments have been or would be considered and included in the adopted plan.</p> <p>We note modifications suggested for polices in Chapter 8 <i>Non-Strategic Site allocations: Our Place Based Approach</i>, which the LPA agreed to include in the local plan (as we agreed with the LPA in the SoCG – attached to rep) has not been included.</p>	<p>Comments noted. An AM is proposed relating to the archaeological desk based assessment.</p> <p>The SoCG with the Environment Agency (<u>EXAM24</u>) did not propose modifications, but it was agreed that the phasing plan would ensure adequate wastewater treatment infrastructure would be available or provided to support development. As outlined in the SoCG criterion f) encourages the opening up of the culvert, as set out in the submitted version of the Plan.</p> <p>The Council refers to its response under MM38 (policy RSA2).</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
Historic England	Support and do not raise any soundness or legal compliance concerns.	Comments noted.



Ref	Page	Policy/Paragraph of submitted LPR	No of responses
<b>MM64 PMC16</b>	<b>130</b>	<b>Policy RSA22 Land adjacent Station Road, Hermitage</b>	<b>2</b>

Respondent	Summary of Main Issues	Council response
Environment Agency	<p>We have reviewed the Schedule of Proposed Additional (minor) Modifications (AM) and find that some EA comments agreed with the LPA in the agreed in the Statement of Common Ground (SoCG) with the Environment Agency have not been included in the proposed additional modifications. We are unclear if these comments have been or would be considered and included in the adopted plan.</p> <p>We note modifications suggested for polices in Chapter 8 <i>Non-Strategic Site allocations: Our Place Based Approach</i>, which the LPA agreed to include in the local plan (as we agreed with the LPA in the SoCG – attached to rep) has not been included.</p>	<p>Comments noted. There are no AMs proposed for RSA22.</p> <p>The SoCG with the Environment Agency (<u>EXAM24</u>) did not propose modifications, but it was agreed that the phasing plan would ensure adequate wastewater treatment infrastructure would be available or provided to support development.</p> <p>The Council refers to its response under MM38 (policy RSA2).</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
Historic England	Support and do not raise any soundness or legal compliance concerns.	Comments noted.

### Report of responses received to the Consultation on the Proposed Main Modifications to the West Berkshire Local Plan

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM65	132	Policy RSA23 Land adjoining The Haven, Kintbury	1

Respondent	Summary of Main Issues	Council response
Environment Agency	<p>We have reviewed the Schedule of Proposed Additional (minor) Modifications (AM) and find that some EA comments agreed with the LPA in the agreed in the Statement of Common Ground (SoCG) with the Environment Agency have not been included in the proposed additional modifications. We are unclear if these comments have been or would be considered and included in the adopted plan.</p> <p>We note modifications suggested for polices in Chapter 8 <i>Non-Strategic Site allocations: Our Place Based Approach</i>, which the LPA agreed to include in the local plan (as we agreed with the LPA in the SoCG – attached to rep) has not been included.</p>	<p>Comments noted. There are no AMs proposed for RSA23.</p> <p>The SoCG with the Environment Agency (<u>EXAM24</u>) proposes two Main Modifications for RSA23. One is in relation to Flood Risk Assessment, and this is included within MM65. The second is in relation to the need for an integrated water supply and drainage strategy.</p> <p>The Council refers to its response under MM38 (policy RSA2). The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM66 PMC11	136	Policy RSA25 Long Copse Farm	6

Respondent	Summary of Main Issues	Council response
Environment Agency	We have reviewed the Schedule of Proposed Additional (minor) Modifications (AM) and find that some EA comments agreed with the LPA in the agreed in the Statement of Common Ground with the Environment Agency have not been included in the proposed additional modifications. We are unclear if these comments have been or would be considered and included in the adopted plan. We note modifications suggested for polices in Chapter 8 <i>Non-Strategic Site allocations: Our Place Based Approach</i> , which the LPA agreed to include in the local plan (as we agreed with the LPA in the SoCG – attached to rep) has not been included.	Comments noted. There are no Additional Modifications proposed for RSA25. The Statement of Common Ground (SoCG) with the Environment Agency ( <u>EXAM24</u> ) proposes two Main Modification for RSA25. One deletes reference to caravans in Flood Zones 2 and 3, which is a Main Modification. The second is in relation to the need for a drainage strategy. The Council refers to its response under MM38 (policy RSA2). No further changes are proposed to the LPR.
Irwin Mitchell LLP obo Enborne Parish Council	<ul style="list-style-type: none"> <li>Concern as to whether the Council has properly actioned points AP59 and AP60 in the Inspector's IN27, in the following ways: <ul style="list-style-type: none"> <li>Lack of evidenced need for 24 travelling showperson plots. The GTAAs predate the LPR and planning application, and have not been updated since 2021. GTAA 2021 reliant on previous GTAAs, and states 'there is no additional need for Travelling Showperson plots but it is recommended that the existing yard is safeguarded for Travelling Showperson use'.</li> </ul> </li> </ul>	Comments noted. They do not relate to the Proposed Main Modification, which relates to the removal of reference to the flood risk. The Council refers to its response under MM88 (policy DM20).

Respondent	Summary of Main Issues	Council response
	<p>Should not rely on 2015 GTAA as does not demonstrate a current need. Caravan count recorded 0 caravans within the District, and thus concerning that the allocation and planning application seem dependent and reliant on each other.</p> <ul style="list-style-type: none"> <li>• Part of site is used for Circus HQ, and there is a very small area proposed to be extended with no live permission for caravans or residential use of land.</li> <li>• Lack of explanation of why the plots are needed on this one site, at Long Copse Farm.</li> <li>• Clarification on the existing and proposed use of Long Copse Farm. Recognises maps are to be amended for consistency purposes, and presumes the changes align with the planning application site map. Long Copse Farm does not have formal record of permission for the stationing of caravans and trucks, and is used for storage, as outlined in the GTAA. The temporary use of land for caravans cannot be considered as fallback provision.</li> <li>• The site has been developed in a piecemeal manner to date (reference to the temporary permissions above). Thus, has not operated as a whole site for the purpose proposed in the allocation.</li> <li>• Concern current planning application is being used as demonstrative need.</li> <li>• Concern for reliance on the existing use of one individual plot to support the policy in its current form.</li> <li>• Predeterminate impact on the pending planning application.</li> <li>• Due to lack of evidence, and as the allocation is considered unsound, the allocation should be removed from the Plan prior to adoption. This has been done for Brighton and Hove in 2016</li> </ul>	<p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

Respondent	Summary of Main Issues	Council response
	<p>where gypsy and traveller allocations would be addressed in a part 2 plan, and Cheshire West and Chester Local Plan in 2015 which deferred allocation to a later date.</p> <ul style="list-style-type: none"> <li>• If not removed by the Inspector the Council is urged to refuse to adopt the Local Plan. If not done so EPC will be seeking to challenge the adoption of the Plan.</li> </ul>	
Keystone Law obo Peter Tompkins	<ul style="list-style-type: none"> <li>• Council failed to justify the allocation, by way of not providing an up-to-date GTAA which ought to have been the objective basis underpinning the decision to continue with the existing allocation.</li> <li>• Part of the Plan is not sound, as it does not meet objectively assessed need (in consideration of para. 62 of the NPPF). The rationale for relying on the 2021 GTAA is highly dubious. It purports to comply with the PPTS guidance and claims to represent the latest available evidence to identify the accommodation needs of travellers across the district.</li> <li>• The GTAA only concluded that ‘there is no additional need for Travelling Showperson plots but it is recommended that the existing yard is safeguarded for Travelling Showperson use’. Although doubt on what is ‘additional need’, it is clear that the original reasons for the allocation are no longer present. Site was identified due to expected movement of a specific group of individuals in connection with Zippos circus. But the site has been used for storage and rarely used (and for temporary period) for stationing caravans and trucks. The relationship with the current site owner/applicant is vague and uncertain.</li> <li>• The policy represents an unjustified extension of the territorial limits of the area covered by the permitted circus yard. The existing yard, as identified in the GTAA, is a tightly defined area, as conditioned in the original appeal decision.</li> </ul>	<p>Comments noted. They do not relate to the Proposed Main Modification, which relates to the removal of reference to the flood risk.</p> <p>The Council refers to its response under MM88 (policy DM20). The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>• Council is relying on a circular proposition that the pending application (for the caravans at Long Copse Farm) is itself demonstrative of need. However, the planning application is an opportunist ‘shot’ at obtaining planning permission on the back of an out-of-date policy.</li> <li>• The site is in a remote location, unconnected to services and served by inadequate roads. Thus this displays none of the usual sustainability credentials of a suitable housing development site. The Council’s ‘need’ case therefore requires extra close scrutiny.</li> <li>• The allocation should be removed from the Plan prior to any decisions being made about whether the Plan is sound.</li> </ul>	
John Handy	<ul style="list-style-type: none"> <li>• The policy is as the result of a speculative application. No material evidence has been presented that there is a local need to extend this site for travelling showpeople.</li> <li>• The application does not identify a wider need, only that of the applicant. The Council are taking advantage of this application to justify inclusion within the planning policy.</li> <li>• Long history of planning contraventions,</li> <li>• Issues with the allocation of the site include increased traffic; additional pressure on the primary school; pressure on the ancient woodland, with the buffer having no effect; the site’s location on battlefield should result in refusal; and that the site will become a large travellers’ site, as is the case of Micheldever, and the ‘attendant problems’.</li> <li>• Local population disenfranchised by the planning situation.</li> <li>• Ask that site is removed from planning policy.</li> </ul>	<p>Comments noted. They do not relate to the Proposed Main Modification, which relates to the removal of reference to the flood risk.</p> <p>The Council refers to its responses under MM88 (policy DM20).</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
Anthony Johnson	<ul style="list-style-type: none"> <li>• Failure to adequately address AP59 and AP60 as the MMs fail to justify the need and why the need should be addressed at</li> </ul>	<p>Comments noted. They do not relate to the Proposed Main</p>

Respondent	Summary of Main Issues	Council response
	<p>Long Copse Farm, and as there is a lack of clarity regarding the site's existing use and its relationship to the proposed development, which remains unresolved.</p> <ul style="list-style-type: none"> <li>• Relies on the pending planning application, creating a risk of predetermination and undermines the independence of the planning process. The Local Plan does not account for the possibility that the application may not be approved, leaving no contingency for meeting the identified housing needs.</li> <li>• GTAA 2021 concluded no additional needs for plots. Earlier assessments referenced a temporary need for relocation of families which does not constitute a current or local need.</li> <li>• MMs fail to clarify the relationship between the proposed 24 plots and the existing authorised use of Long Copse Farm. The eastern portion of the site has been used as a Circus HQ and agricultural holding but no formal permission for residential use. The temporary permissions for the stationing of caravans have expired further undermining its suitability for the allocation.</li> <li>• Council should therefore reconsider the proposed allocation and remove the site from the Local Plan.</li> </ul>	<p>Modification, which relates to the removal of reference to the flood risk.</p> <p>The Council refers to its responses under MM88 (policy DM20).</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
Paula Saunderson	<ul style="list-style-type: none"> <li>• Support the comments of Enborne Parish Council.</li> </ul>	Comments noted.

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM67	138	Paragraph 8.3 Sites allocated for employment land	3

Respondent	Summary of Main Issues	Council response
Paula Saunderson	<ul style="list-style-type: none"> <li>Do not agree with WBC request to remove Bond Riverside Employment Site from this Plan.</li> <li>Bond Riverside should be an employment allocation, with a new ESA policy and new map removing the public open space from the red line boundary.</li> <li>Bond Riverside, and the wider DEA, should have appropriate DPDs and included in the LDS.</li> <li>Inclusion as an ESA would give some focus and direction.</li> <li>Will the policy statement in the MM apply to Windfall Employment Sites that come forward adjacent to the DEA? Will DEA boundaries be extended in the way that settlement boundaries are extended and is there a process for consultation between Local Plan productions?</li> </ul>	<p>Comments noted. As stated in the representation most of Bond Riverside sits within a Designated Employment Area (DEA) and therefore future development within this area would be considered against policy DM32. In addition, the DEA is located within the settlement boundary of Newbury where there is a presumption in favour of development, and as such the LPR has taken the approach to not to allocate sites within settlement boundaries. DEA boundaries will be considered again as part of the next Local Plan process, and amendments made if necessary. Public consultation forms an integral part of the plan-making process.</p> <p>No further changes are proposed to the LPR.</p>
Pegasus Group obo Walkers Logistics	<ul style="list-style-type: none"> <li>MM67 now correctly states the approved floorspace figure of 10,390sqm at Membury to be included in policy ESA2 – this is supported by Walkers.</li> <li>Within MM67, there is a table, below which is some text which claims that <i>“The Council will seek to ensure that <u>sufficient sites are provided in the right locations to foster sustainable economic growth</u>”</i>. Walkers support the inclusion of the</li> </ul>	<p>Support for part of the MM noted.</p> <p>The Council has positively sought opportunities to meet the employment requirements and sets out in its response to Q11.6 (<a href="#">WS11/1</a>) that all of the available and suitable sites for industrial and/or storage and distribution development are allocated in the Plan, and WS11/1 sets out the background to this. It also outlines that the supporting text to policy SP20 the Council recognises the Plan is unable to make</p>



Respondent	Summary of Main Issues	Council response
	<p>statement but it is clear that the Plan simply does not deliver this.</p> <ul style="list-style-type: none"> <li>• Representations at the Examination raised concerns with the substantial shortfall in employment land needs identified within the LPR.</li> <li>• Pegasus Group identifies that approximately 56,190sqm of industrial space was identified to be allocated to 2041 – a minimum shortfall of 42,000sqm of industrial space, which represents 43% of the total minimum requirement.</li> <li>• It was conceded by the Council at the Examination that one of the sites included as part of the supply of industrial space may not come forward as expected – Colthrop Industrial Estate (AP67). If the site were not to come forward as an industrial site, this would increase the shortfall of industrial floorspace to more than 60,000sqm, or more than 60% of the minimum employment floorspace to be delivered.</li> <li>• The main issue is that the Council have not sought to add in any further allocations to meet the minimum floorspace figures in MM30.</li> <li>• Failure to deliver the minimum employment needs has not been included in the updated SA – the assessment of policy SP20 fails to reflect on the alternative scenario advanced by the Council where somewhere between 40-60% of the identified needs fail to be planned for.</li> <li>• Walkers confirm that their wider land holding to the west of allocation ESA2 remain available and</li> </ul>	<p>provision to meet the District’s industrial requirements in full over the plan period. The Employment Background Paper (<a href="#">EMP5</a>) highlights in Table 3 that the LPR allocates sufficient land to meet 14.6ha (10 years’ worth) of the 24.5ha of industrial land required, amounting 58,400sqm of floorspace. Given the shortfall in the later part of the plan period, the Council has committed to reassess this matter again through a review in the first five years of the Plan.</p> <p>With regard to the SA, this issue was discussed at the hearing sessions on 8<sup>th</sup> May. See Council response to representations made in relation to the SA/SEA.</p> <p>The assessment of landscape sensitivity and capacity of the wider site (14.5ha) (<a href="#">LAN7a</a>) concludes that development across the whole of the site (to the west of the allocation ESA2) would be inappropriate.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

Respondent	Summary of Main Issues	Council response
	<p>should be identified by the Inspector as an employment allocation through a MM to the Plan.</p> <ul style="list-style-type: none"> <li>The Inspector needs to make further MM to identify further sites to ensure that sufficient sites are identified to foster the sustainable economic growth advocated by the Council.</li> </ul>	
Stantec obo Copas Brothers (Farms) Ltd	<ul style="list-style-type: none"> <li>Given the identified shortfall in supply, MM67 does not go far enough to address soundness issues and therefore is not effective because it will not deliver enough development to meet the identified employment need over the plan period.</li> <li>It is considered the LPR should identify additional employment land supply to meet identified employment needs.</li> <li>As set out previously, it is considered that Land adjacent to Beenham Industrial Estate, Beenham (BEEN 11) could support the Council in meeting their employment needs and therefore the site should be included in the table set out at supporting text 8.3 (MM67) and included as its own site allocation for 20,000sqm approx. floorspace and uses E/B2/B8 and the Policies Map should be updated accordingly.</li> </ul>	<p>Comments noted. The Council has positively sought opportunities to meet the employment requirements and sets out in its response to Q11.6 (<a href="#">WS11/1</a>) that all of the available and suitable sites for industrial and/or storage and distribution development are allocated in the Plan, and WS11/1 sets out the background to this. It also outlines that the supporting text to policy SP20 the Council recognises the Plan is unable to make provision to meet the District's industrial requirements in full over the plan period. The Employment Background Paper (<a href="#">EMP5</a>) highlights in Table 3 that the LPR allocates sufficient land to meet 14.6ha (10 years' worth) of the 24.5ha of industrial land required, amounting 58,400sqm of floorspace. Given the shortfall in the later part of the plan period, the Council has committed to reassess this matter again through a review in the first five years of the Plan.</p> <p>The assessment of landscape sensitivity and capacity of the site (<a href="#">LAN8p</a> and <a href="#">LAN8q</a>) concludes that the site is not suitable for development. No further changes are proposed to the LPR.</p>

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM68	138	Policy ESA1 Land east of Colthrop Industrial Estate, Thatcham	1

Respondent	Summary of Main Issues	Council response
Environment Agency	<p>We have reviewed the Schedule of Proposed Additional (minor) Modifications (AM) and find that some EA comments agreed with the LPA in the agreed in the Statement of Common Ground (SoCG) with the Environment Agency have not been included in the proposed additional modifications. We are unclear if these comments have been or would be considered and included in the adopted plan.</p> <p>We note modifications suggested for polices in Chapter 8 <i>Non-Strategic Site allocations: Our Place Based Approach</i>, which the LPA agreed to include in the local plan (as we agreed with the LPA in the SoCG – attached to rep) has not been included.</p>	<p>Comments noted. Whilst there is an AM proposed this relates to the archaeological desk based assessment. The SoCG with the Environment Agency (<u>EXAM24</u>) proposes a Main Modification for ESA1. This is in relation to the need for an integrated water supply and drainage strategy. The Council refers to its response under MM38 (policy RSA2). The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM69 PMC17	140-141	Policy ESA2 Land west of Ramsbury Road, Membury Industrial Estate, Lambourn Woodlands	2

Respondent	Summary of Main Issues	Council response
Environment Agency	<p>We have reviewed the Schedule of Proposed Additional (minor) Modifications (AM) and find that some EA comments agreed with the LPA in the agreed in the Statement of Common Ground (SoCG) with the Environment Agency have not been included in the proposed additional modifications. We are unclear if these comments have been or would be considered and included in the adopted plan.</p> <p>We note modifications suggested for polices in Chapter 8 <i>Non-Strategic Site allocations: Our Place Based Approach</i>, which the LPA agreed to include in the local plan (as we agreed with the LPA in the SoCG – attached to rep) has not been included.</p>	<p>Comments noted. There are no AMs proposed for Policy ESA2. The SoCG with the Environment Agency (<a href="#">EXAM24</a>) proposes a Main Modification for ESA2. This is in relation to the need for an integrated water supply and drainage strategy.</p> <p>The Council refers to its response under MM38 (policy RSA2). The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
Pegasus Planning obo Walker Logistics	<ul style="list-style-type: none"> <li>Concern with the detailed boundaries as amended in Annex L of EXAM62 and also Appendix P of EXAM63. The approved layout plan for the site (attached to representation) shows that to the north of the site some landscaping will be removed and there is an area of reinforced grass and permeable paving.</li> <li>With regard to the submitted wording of ESA2, Walkers reiterate concerns (previously covered in Hearing Statements) relating to aligning the policy requirements with the</li> </ul>	<p>Comments noted. The issues raised have previously been considered and discussed as part of the Examination. The Council refer to <a href="#">EXAM44</a> and its response to the Inspector's Action Point AP68 in <a href="#">IN27</a> regarding Membury Industrial Estate. The Council do</p>

Respondent	Summary of Main Issues	Council response
	<p>implemented planning permission at the Walkers site (allocated site ESA2). These suggested changes are:</p> <ul style="list-style-type: none"> <li>- E(ii) - comments relating the buffer need to be updated to reflect the taxiing access to the airfield.</li> <li>- E(iii) – this needs to be removed as the height of the buildings in the planning permission exceeds the height of the trees to the west.</li> <li>- E(v) – this need deleting as it is unclear how HGV access into the site could have a ‘rural character’. It needs to be a functional and safe access.</li> </ul> <ul style="list-style-type: none"> <li>• In light of the failure of the Council to meet the minimum employment needs the site allocation should be extended to the west (see comments in MM67). This could comply with the policy requirements, with amendments as set out above, and will comply with the SA appraisal.</li> </ul>	<p>not consider it appropriate to amend the policy (ESA2) beyond that set out in the proposed Main Modification (MM69).</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM70	142	Policy ESA3 Land to the south of Trinity Grain, Membury Industrial Estate, Lambourn Woodlands	2

Respondent	Summary of Main Issues	Council response
Environment Agency	<p>We have reviewed the Schedule of Proposed Additional (minor) Modifications (AM) and find that some EA comments agreed with the LPA in the agreed in the Statement of Common Ground (SoCG) with the Environment Agency have not been included in the proposed additional modifications. We are unclear if these comments have been or would be considered and included in the adopted plan.</p> <p>We note modifications suggested for polices in Chapter 8 <i>Non-Strategic Site allocations: Our Place Based Approach</i>, which the LPA agreed to include in the local plan (as we agreed with the LPA in the SoCG – attached to rep) has not been included.</p>	<p>Comments noted. There are no AMs proposed for Policy ESA3.</p> <p>The SoCG with the Environment Agency (<a href="#">EXAM24</a>) proposes a Main Modification for ESA3. This is in relation to the need for an integrated water supply and drainage strategy. Planning permission cannot be implemented until a third-party secures the necessary upgrading or contributions.</p> <p>The Council refers to its response under MM38 (policy RSA2).</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
Historic England	Support and do not raise any soundness or legal compliance concerns.	Comments noted.

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM71	144	Policy ESA4 Beenham Landfill, Pips Way, Beenham	1

Respondent	Summary of Main Issues	Council response
Environment Agency	<p>We have reviewed the Schedule of Proposed Additional (minor) Modifications (AM) and find that some EA comments agreed with the LPA in the agreed in the Statement of Common Ground (SoCG) with the Environment Agency have not been included in the proposed additional modifications. We are unclear if these comments have been or would be considered and included in the adopted plan.</p> <p>We note modifications suggested for polices in Chapter 8 <i>Non-Strategic Site allocations: Our Place Based Approach</i>, which the LPA agreed to include in the local plan (as we agreed with the LPA in the SoCG – attached to rep) has not been included.</p>	<p>Comments noted. There are no AMs proposed for Policy ESA4. The SoCG with the Environment Agency (<u>EXAM24</u>) proposes a Main Modification for ESA4. This is in relation to the need for an integrated water supply and drainage strategy.</p> <p>The Council refers to its response under MM38 (policy RSA2). The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM72	146	Policy ESA5 Northway Porsche, Grange Lane, Beenham	1

Respondent	Summary of Main Issues	Council response
Environment Agency	<p>We have reviewed the Schedule of Proposed Additional (minor) Modifications (AM) and find that some EA comments agreed with the LPA in the agreed in the Statement of Common Ground (SoCG) with the Environment Agency have not been included in the proposed additional modifications. We are unclear if these comments have been or would be considered and included in the adopted plan.</p> <p>We note modifications suggested for polices in Chapter 8 <i>Non-Strategic Site allocations: Our Place Based Approach</i>, which the LPA agreed to include in the local plan (as we agreed with the LPA in the SoCG – attached to rep) has not been included.</p>	<p>Comments noted. Whilst there is an AM proposed this relates to correcting a typo.</p> <p>The SoCG with the Environment Agency (<u>EXAM24</u>) proposes two Main Modifications for ESA5. The first relates to the need for a contaminated land assessment. This is proposed in as a Main Modification. The second is in relation to the need for an integrated water supply and drainage strategy. The Council refers to its response under MM38 (policy RSA2). The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>



Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM73	150	Policy DM1 Development in the Countryside	2

Respondent	Summary of Main Issues	Council response
AWE & MOD	<p>AWE plc (and AWE plc on behalf of the Ministry of Defence (MOD)) welcomes the clarity of the amendments which the Inspector has included in the modifications in particular recognition of the constraint imposed by the AWE DEPZ upon residential development in the Eastern Area.</p> <p>AWE and MOD accept that it is necessary to read and apply the plan as a whole. AWE and MOD, however, are mindful of first: the current formal Office for Nuclear Regulation (ONR) position in respect of the adequacy of the AWE Off Site Emergency Plan (OSEP) and their land use planning policy position on development which increases the population within the Detailed Emergency Planning Zone and secondly that as recent appeal decisions have demonstrated it is important to take into account the potential cumulative impact of smaller scale developments and not just the impact of one development in isolation. The impacts of cumulative development may not always be immediately apparent, and it is not possible to evidence a tipping point where an OSEP which is adequate becomes inadequate. If such evidence of impact of one development on AWE's operations were to exist, the threat to AWE's operations would have already materialised and it is imperative to avoid reaching this point given the national and international importance and irreplaceable nature of the AWE sites. Cumulative development, by whatever means (except for the purposes of development of the AWE sites and facilities themselves), within a DEPZ leads to a rise in population within the DEPZ and a proportionate increase in the consequence should a radiation emergency occur. AWE and MOD are concerned that the importance of policy SP4 and its application to ALL policies and proposed development within the DEPZ should be restated where policies could lead to an increase in residential or non residential population or activity. This should avoid any confusion and to avoid</p>	<p>Comments noted. The Plan should be read and interpreted as a whole. This is made clear in paragraph 1.6 of the <a href="#">submitted LPR (CD1)</a>.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

Respondent	Summary of Main Issues	Council response
	<p>any suggestion that a proposal that complies with these policies but not SP4 is otherwise compliant with the plan as a whole such that a decision to grant planning permission is in accordance with the development plan. This could undermine the effectiveness of SP4 in protecting the current and future operations at AWE and public safety and therefore raises soundness concerns. AWE and MOD suggest that this soundness issue could easily be resolved by including the following text: Add new sentence at the end of the policy: <b><i>“Any development proposal within the Detailed Emergency Planning Zone for AWE must comply fully with policy SP4”.</i></b></p>	
Paula Saunderson	<p>Welcome the removal of the words removed from this Policy however I think that the Placing of Rural Village Allocation Sites within this Plan must be encouraged where it makes sense and lack of Sites is stifling young families who wish stay near their Loved Ones and Older People. Not all Villages wish to produce a Neighbourhood Plan and having the volunteers to do this is asking a lot of people. The Criteria within Points DM1 a-h are rather strict as is the word Exceptionally. As an example: There are smaller field sites that came forward in the Call For Sites that would make ideal additional housing in villages such as Boxford which now has a Pub again and is on a Bus Route with nearby Primary Schooling, has a well-used Village Hall &amp; a strong Church Community. It would be ideal if some of the lost Social Housing stock that has deteriorated over the years could be replaced and Affordable Housing was included to help replace the loss of Social Housing and smaller Bungalows which are all being extended without any replacement or protections of Bungalows due to lack of Bungalows Policy. I know all these Downland Villages from my younger life, and I spent Lock Down in this Village and the Site BOX 1 which was put forward would be an ideal addition to this Plan (1.5 hectares of developable Land to the South of the Recreation Ground), but it is not in here because of criteria that will not help the village have a balanced population and housing stock for future growth. It is within the Natural Landscape however if the National Landscape Authority were asked to provide a Housing Allocations I suspect it would be considered.</p>	<p>Support for the modification noted. The other comments are noted. The issues raised have previously been considered and discussed as part of the Examination and will be considered again as part of the preparation of the next Local Plan. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM74	153	Policy DM3 Health	3

Respondent	Summary of Main Issues	Council response
AWE & MOD	<p>AWE plc (and AWE plc on behalf of the Ministry of Defence (MOD)) welcomes the clarity of the amendments which the Inspector has included in the modifications in particular recognition of the constraint imposed upon residential development in the Eastern Area. AWE plc (and AWE plc on behalf of the Ministry of Defence (MOD)) accept that it is necessary to read and apply the plan as a whole. AWE and MOD, however, are mindful of the current formal Office for Nuclear Regulation (ONR) position in respect of the adequacy of the AWE Off Site Emergency Plan (OSEP) and their land use planning policy position on development which increases the population within the Detailed Emergency Planning Zone (DEPZ) for AWE. AWE and MOD are concerned that the importance of policy SP4 and its application to ALL policies and proposed development within the DEPZ should be restated wherever directly relevant to policies included in the update. Given one of the key objectives of SP4 is to protect public safety, the effectiveness of SP4 could be undermined if not considered within any HIA. This raises soundness concerns.</p> <p>AWE and MOD suggest that this soundness issue could easily be resolved by including the following text within policy DM3: <i>“Any development proposals within the Detailed Emergency Planning Zone for AWE Burghfield and AWE Aldermaston with the potential to increase the population within the DEPZ must be accompanied by an HIA which complies fully with policy SP4”.</i></p>	<p>Comments noted. The Plan should be read and interpreted as a whole. This is made clear in paragraph 1.6 of the <a href="#">submitted LPR (CD1)</a>.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
Berkshire, Buckinghamshire and	The ICB generally supports the proposed modification as it indicates the provision of new or improved health facilities will be	Comments noted. It is important to note that the Plan needs to be

Respondent	Summary of Main Issues	Council response
Oxfordshire Integrated Care Board (BOB ICB)	<p>required as part of new development, proportionate to the additional demand that they would generate. The ICB considers that the facilities set out in the proposed modification should also include healthcare facilities as they support and promote physical health and wellbeing of West Berkshire residents which should NOT be excluded from this Policy.</p> <p>The ICB would like to point out that both the Council and the ICB are within the same Integrated Care System (ICS), which is set up by the Government across England and it is a partnership including NHS organisation and upper-tier local councils to improve local health and wellbeing. Therefore, the provision of new and improved healthcare facilities is vital to support and promote physical health and wellbeing. One of the key roles of the ICB is to improve outcomes in population health.</p> <p>While the draft Local Plan does not have a dedicated policy related to healthcare facilities, the ICB considers that it is vital for Policy DM3 to make a reference to the healthcare provisions. This is in line with the findings of the Council's Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) Environmental Report dated November 2024, which makes a reference to the NPPF related to the sufficient provision for community facilities, including health infrastructure. Clearly, the proposed modification fails to the test of soundness in terms of consistent with national policy as the current wording excludes healthcare facilities.</p> <p>The ICB would like to raise objection to the proposed modification unless the following wording should be added to the proposed Policy:</p> <p><i>Proposals for development should support healthy lifestyles, including through the use of active design principles. All proposals</i></p>	<p>read and interpreted as a whole, and all policies should be viewed together and not in isolation in the preparation and consideration of planning applications. This is made clear in paragraph 1.6 of the <a href="#">submitted LPR (CD1)</a>. <a href="#">MM34</a> amends the first paragraph of policy SP24 (Infrastructure Requirements and Delivery) to include text that makes clear that development will be required to ensure the timely and coordinated delivery of necessary infrastructure having regard to the latest version of the Council's Infrastructure Delivery Plan (IDP), through proportionate financial contributions and / or on-site provision. Where necessary, the phasing of development will be linked to infrastructure provision. The ICB is consulted as part of updates to the IDP.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

Respondent	Summary of Main Issues	Council response
	<p><i>should take into account the additional demand that they would generate to the local healthcare services.</i></p> <p><i>Applicants should engage with the NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board (BOB-ICB) or such appropriate body regarding any healthcare mitigations including but not limited to the provision of new onsite healthcare provisions or developer contributions towards any offsite healthcare estates projects, proportionate to the additional demand that they would generate. Where appropriate, the provision of new or improved health facilities will also be required as part of new development, proportionate to the additional demand that they would generate.</i></p> <p><i>Development that would have an unacceptable impact on the health or wellbeing of existing or new communities or without providing any meaningful healthcare mitigations to accommodate the additional demand that they would generate will not be permitted.</i></p>	
Paula Saunderson	<p>The Provision of a Mapped Green Infrastructure Framework SPD is fundamental to the delivery of a Health &amp; Wellbeing Policy. There is also an absence of Policy on the Provision of Medical Facilities so a process must exist to undertake Cumulative Impact Assessment for Sites within this LPR and Windfalls arising which is where we have failed in the past. The CS18 Promised GI SPD has never been delivered.</p>	<p>Comments noted. The Plan should be read and interpreted as a whole. This is made clear in paragraph 1.6 of the <a href="#">submitted LPR (CD1)</a>. The Council is developing its approach to GI as part of its review of its Environment Strategy which will be considered by the Executive later in the year. No further changes are proposed to the LPR.</p>

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM75	155	Policy DM4 Sustainable homes & buildings	2

Respondent	Summary of Main Issues	Council response
Paula Saunderson	<p>Whilst this Policy addresses Energy Efficiency within Buildings, I can see no DM Policies within this LPR to address the <b>Possible Provision of Energy</b> on lands within West Berkshire. It is highly likely the LPA will be asked to consider PAs for <b>Production of Green Energy</b> on lands within the district. Such as Solar Farms, Wind Turbines, Hydro-electric Power on the Rivers, and it will be asked to consider PAs for Data Centres and BESS so having some Policy other than the high-level NPPF &amp; NPPG would be beneficial. Without we are bound to get into rows about Windturbines!</p> <p>Sir, if there is a way of addressing these Gaps in Policy which other LPAs do have, I think it would be advantageous to have some in this LPR 2023-3041 and not wait for the next Local Plan as it is a fast changing world.</p>	<p>Comments noted. Policy DM4 addresses renewable energy as a whole and within section 3B specifically outlines the parameters in which the Council will consider and support renewable energy technology provision.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modifications. No further changes are proposed to the LPR.</p>
Neame Sutton obo Donnington New Homes	<p>Whilst Donnington New Homes is dedicated to sustainable design and development, Policy DM4 is considered aspirational and does not acknowledge the practical implications of the requirements set out, for example, the first paragraph states that new dwellings should achieve net zero operational carbon emissions, including both regulated and unregulated energy. It is unclear as to how unregulated energy will be controlled or monitored and places an onerous obligation on both the developer and future resident.</p>	<p>Comments noted. These issues were discussed at the hearing sessions on 05/06/24 and 03/10/24. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modifications. No further changes are proposed to the LPR.</p>

<b>Ref</b>	<b>Page</b>	<b>Policy/Paragraph of submitted LPR</b>	<b>No of responses</b>
<b>MM76</b>	<b>157-158</b>	<b>Supporting text to policy DM4</b>	<b>1</b>

<b>Respondent</b>	<b>Summary of Main Issues</b>	<b>Council response</b>
Newbury Town Council	Paragraph after 10.22 – Newbury Town Council would like to see the section ‘for residential refurbishment developments of 10+....’ reduced to developments of 5+. As most developments in Newbury are below 10+ properties	Comments noted. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modifications. No further changes are proposed to the LPR.

<b>Ref</b>	<b>Page</b>	<b>Policy/Paragraph of submitted LPR</b>	<b>No of responses</b>
<b>MM77</b>	<b>163</b>	<b>Supporting text to policy DM6 Water Quality</b>	<b>1</b>

<b>Respondent</b>	<b>Summary of Main Issues</b>	<b>Council response</b>
Saunderson, Paula	Support MM77	Support noted



Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM78	165	Policy DM7 Water Resources	6

Respondent	Summary of Main Issues	Council response
Newbury Town Council	Broadly supportive; however, Newbury Town Council would like to see this go further and ask that the Local Planning Authority considers the cumulative impacts of developments on capacity rather than individual developments. We would also ask that this section references that Grampian Planning Conditions would be imposed where there isn't capacity.	Comments noted. Grampian conditions are a matter for the planning application stage. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.
Environment Agency	Upon consulting with the Environment Agency further regarding the Main Modifications to delete the criteria across all residential and employment site allocations relating to the need for an integrated water supply and drainage strategy the approach was satisfactory subject to the inclusion of the following to the Main Modification in DM7 ' <b><u>There must be no negative impact on sensitive receptors including the quality of the receiving waterbody/watercourse</u></b> '. This is to ensure the water quality of the water environment and associated sensitive receptors are not negatively impacted,	Comments noted. Policy DM6 of the Plan has regard to water quality, and the aim of this policy is to ensure that the water quality of West Berkshire's waterbodies are protected and enhanced. It is important to note that the Plan needs to be read and interpreted as a whole, and all policies should be viewed together and not in isolation in the preparation and consideration of planning applications. This is made clear in paragraph 1.6 of the <a href="#">submitted LPR (CD1)</a> . The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.
Thames Water	Support amended wording in relation to water efficiency.	Comments noted.

Respondent	Summary of Main Issues	Council response
	<p>Object to deletion of criteria (a) and (c). Water and wastewater infrastructure is essential to any development and capacity should be ensured through the planning process. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses and/or low water pressure.</p> <p>It is important to consider the net increase in water and wastewater demand to serve the development and also any impact that developments may have off site, further down the network. The new Local Plan should therefore seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to underestimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months and Sewage Treatment &amp; Water Treatment Works upgrades can take 3-5 years.</p> <p>Thames Water offer a free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements. The amended text in the penultimate paragraph is supported in principle, but is not considered to be as</p>	<p>The topic of water resources and waste water (Policy DM7) were discussed in week 3 of the hearing sessions, and this in part related to the proposed changes to reference to the phasing of development. During the discussion, several participants commented that it is not within the power of the developer to demonstrate that there is adequate water supply and waste/foul water treatment and disposal capacity, with the statutory duty instead being on water and sewerage providers. It was also noted that criterion (c) of the policy repeated to some extent criterion (a).</p> <p>Following the session, the Inspector wrote his Action Points for the Council to amend the policy, as contained in <a href="#">IN26</a> (see AP40 on pages 3-4).</p> <p>The supporting text to policy DM7 at paragraph 10.71 is clear that early engagement with Thames Water is necessary to ensure that development is aligned with existing capacity to serve the development or that the required upgrades to the water supply network, wastewater infrastructure, sewage treatment upgrades are constructed prior to the occupation of new developments.</p> <p>Policy SP24 of the LPR has regard to infrastructure requirements and delivery. A Main Modification (<a href="#">MM34</a>) has been proposed to the policy which requires the timely and coordinated delivery of necessary infrastructure, having</p>

Respondent	Summary of Main Issues	Council response
	<p>robust as criterion (a) and (c) which should be reinstated.</p> <p>DM6 identifies key measures for ecological status under current legislation. Given that other agencies (EA, NE) are responsible for monitoring and driving this legislation the Plan should describe how coordination with external agencies will be carried out.</p>	<p>regard to the latest version of the Council's Infrastructure Delivery Plan, through proportionate financial contributions and/or on-site provision. Where necessary, the phasing of development will be linked to infrastructure provision.</p> <p>It is important to note that the Plan needs to be read and interpreted as a whole, and all policies should be viewed together and not in isolation in the preparation and consideration of planning applications. This is made clear in paragraph 1.6 of the <a href="#">submitted LPR (CD1)</a>.</p> <p>As set out within the Council's response to AP40 (see <a href="#">EXAM39</a>), where a water company is concerned that a new development may impact upon their service to customers or the environment, they may request the local planning authority impose a Grampian planning condition, whereby the planning permission cannot be implemented until a third-party secures the necessary upgrading or contributions. No further changes are proposed to the LPR.</p>
Olivia Bailey MP	<p>Note MM78 in relation to wastewater capacity, which is of great concern to residents in the Kennet Valley from whom I have received a number of representations. I look forward to these commitments being delivered.</p>	<p>Comments noted.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
Paula Saunderson	<p>Support MM78.</p>	<p>Support noted. The supporting text to policy DM7 at paragraph 10.71 is clear that early</p>

Respondent	Summary of Main Issues	Council response
	<p>A mechanism should be put in place by the LPA to allow for the Sites in this Plan and the significant amount of Windfalls that are encourage to be Cumulatively Assessed as Thames Water are only a Statutory Consultee on Sites within Local Plans. Grampian Planning Conditions should be imposed where there isn't capacity, and phasing of development must consider and be scheduled around local Pumping Station Upgrades.</p>	<p>engagement with Thames Water is necessary to ensure that development is aligned with existing capacity to serve the development or that the required upgrades to the water supply network, wastewater infrastructure, sewage treatment upgrades are constructed prior to the occupation of new developments. Policy SP24 of the LPR has regard to infrastructure requirements and delivery. A Main Modification (<a href="#">MM34</a>) has been proposed to the policy which requires the timely and coordinated delivery of necessary infrastructure, having regard to the latest version of the Council's Infrastructure Delivery Plan, through proportionate financial contributions and/or on-site provision. Where necessary, the phasing of development will be linked to infrastructure provision.</p> <p>It is important to note that the Plan needs to be read and interpreted as a whole, and all policies should be viewed together and not in isolation in the preparation and consideration of planning applications. This is made clear in paragraph 1.6 of the <a href="#">submitted LPR (CD1)</a>. As set out within the Council's response to AP40 (see <a href="#">EXAM39</a>), where a water company is concerned that a new development may impact upon their service to customers or the environment, they may request the local planning authority impose a Grampian planning condition, whereby the planning permission cannot be implemented until a third-</p>

Respondent	Summary of Main Issues	Council response
		<p>party secures the necessary upgrading or contributions.</p> <p>Grampian conditions are a matter for the planning application stage, and this is why reference to them is not included within the policy. No further changes are proposed to the LPR.</p>
Ian Watson	<p>The Environment Agency's Catchment Abstraction Management Strategy (CAMS) 2019 indicates no additional water is available for abstraction for most of the time, except limited abstraction when there are high flow rates. This is not reflected in the LPR. The Plan states "<i>All developments should implement the highest standards of water efficiency and infrastructure in order to place no additional pressure on water scarcity and quality in the river basin catchments of the Kennet and its tributaries and of the Thames and Chilterns South</i>" but does not say how this can be enforced nor who will be responsible for enforcement. DM7 provides for the efficient use of water resources and requires that new developments not exceed water use of 110 l per person per day. If developers fail to meet this standard are there any sanctions which can be applied? What is being done to ensure that Thames Water is able to undertake the necessary investments to be able to supply additional water to the new developments and treat their sewage to an acceptable standard?</p>	<p>Comments noted. The Environment Agency is a statutory consultee and has been involved throughout the preparation of the Plan and its evidence (eg. Water Cycle Study). The second paragraph of the policy states that planning conditions will be applied to new residential development to ensure that water efficiency standards are met. No further changes are proposed to the LPR.</p>

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM79	165	Supporting text to policy DM7 Water Resources	4

Respondent	Summary of Main Issues	Council response
Thames Water	<p>Objection to the deletion of paragraph 10.70. Water and wastewater infrastructure is essential to any development and capacity should be ensured through the planning process. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses and/or low water pressure.</p> <p>It is important to consider the net increase in water and wastewater demand to serve the development and also any impact that developments may have off site, further down the network. The new Local Plan should therefore seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to underestimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months and Sewage Treatment &amp; Water Treatment Works upgrades can take 3-5 years. Thames Water offer a free Pre-Planning service which confirms if capacity exists to serve the development or</p>	<p>Comments noted. The topic of water resources and waste water (Policy DM7) were discussed in week 3 of the hearing sessions, and this in part related to the proposed changes to reference to the phasing of development. During the discussion, several participants commented that it is not within the power of the developer to demonstrate that there is adequate water supply and waste/foul water treatment and disposal capacity, with the statutory duty instead being on water and sewerage providers. It was also noted that criterion (c) of the policy repeated to some extent criterion (a).</p> <p>Following the session, the Inspector wrote his Action Points for the Council to amend the policy, as contained in <a href="#">IN26</a> (see AP40 on pages 3-4). The supporting text to policy DM7 at paragraph 10.71 states that early engagement with Thames Water is necessary to ensure that development is aligned with existing capacity to serve the development or that the required upgrades to the water supply network, wastewater infrastructure, sewage treatment upgrades are constructed prior to the occupation of new developments. Policy SP24 of the LPR has regard to infrastructure requirements and delivery. A Main Modification</p>

Respondent	Summary of Main Issues	Council response
	<p>if upgrades are required for potable water, waste water and surface water requirements. If paragraph 10.70 is to be deleted then this Pre-Planning service should be mentioned.</p>	<p>(<a href="#">MM34</a>) has been proposed to the policy which requires the timely and coordinated delivery of necessary infrastructure, having regard to the latest version of the Council's Infrastructure Delivery Plan, through proportionate financial contributions and/or on-site provision. Where necessary, the phasing of development will be linked to infrastructure provision.</p> <p>It is important to note that the Plan needs to be read and interpreted as a whole, and all policies should be viewed together and not in isolation in the preparation and consideration of planning applications. This is made clear in paragraph 1.6 of the <a href="#">submitted LPR (CD1)</a>.</p> <p>As set out within the Council's response to AP40 (see <a href="#">EXAM39</a>), where a water company is concerned that a new development may impact upon their service to customers or the environment, they may request the local planning authority impose a Grampian planning condition, whereby the planning permission cannot be implemented until a third-party secures the necessary upgrading or contributions. No further changes are proposed to the LPR.</p>
Paula Saunderson	<p>Support MM79. The comment from the Council under IN26 seems a little unfair when the Council insistence in Not Allocating Sites within Settlement Boundaries and it forces many Windfall Sites that are not necessarily planned for by the Water Company who must submit DWMPs to Ofwat many years in advance.</p>	<p>Comments noted. The supporting text to policy DM7 at paragraph 10.71 is clear that early engagement with Thames Water is necessary to ensure that development is aligned with existing capacity to serve the development or that the required upgrades to the water supply network,</p>

Respondent	Summary of Main Issues	Council response
		<p>wastewater infrastructure, sewage treatment upgrades are constructed prior to the occupation of new developments.</p> <p>Policy SP24 of the LPR has regard to infrastructure requirements and delivery. A Main Modification (<a href="#">MM34</a>) has been proposed to the policy which requires the timely and coordinated delivery of necessary infrastructure, having regard to the latest version of the Council's Infrastructure Delivery Plan, through proportionate financial contributions and/or on-site provision. Where necessary, the phasing of development will be linked to infrastructure provision.</p> <p>It is important to note that the Plan needs to be read and interpreted as a whole, and all policies should be viewed together and not in isolation in the preparation and consideration of planning applications. This is made clear in paragraph 1.6 of the <a href="#">submitted LPR (CD1)</a>. No further changes are proposed to the LPR.</p>
Ian Watson	<p>EA CAMS 2019 indicates no additional water is available for abstraction for most of the time, except limited abstraction when there are high flow rates. This is not reflected in the LPR.</p> <p>The Plan states <i>“All developments should implement the highest standards of water efficiency and infrastructure in order to place no additional pressure on water scarcity and quality in the river basin catchments of the Kennet and its tributaries and of the Thames and Chilterns South”</i> but does not say how</p>	<p>Comments noted. The Environment Agency is a statutory consultee and has been involved throughout the preparation of the Plan and its evidence (eg. Water Cycle Study).</p> <p>The second paragraph of the policy states that planning conditions will be applied to new residential development to ensure that water efficiency standards are met.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding</p>



Respondent	Summary of Main Issues	Council response
	<p>this can be enforced nor who will be responsible for enforcement.</p> <p>DM7 provides for the efficient use of water resources and requires that new developments not exceed water use of 110 l per person per day. If developers fail to meet this standard are there any sanctions which can be applied? What is being done to ensure that Thames Water is able to undertake the necessary investments to be able to supply additional water to the new developments and treat their sewage to an acceptable standard?</p>	<p>in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
Ridgepoint Homes	<p>Object to deletion of 10.70 with the stated reason for the modification being that Grampian conditions may be imposed where a water company is concerned that a new development may impact upon their service to customers or the environment.</p> <p>As noted in the reason for the modification, Thames Water is the statutory undertaker responsible for water supply, sewerage, and sewerage disposal. Therefore, the duty for ensuring there is adequate water supply and waste water treatment infrastructure capacity lies with Thames Water. Accordingly, Grampian conditions should not be imposed with the effect of making development conditional to infrastructure upgrades where required and paragraph 10.70 should be re-inserted into the supporting text to Policy DM7.</p>	<p>Comments noted. The supporting text to the policy at paragraph 10.71 states that early engagement with Thames Water should ensure that any development is aligned with existing capacity to serve the development or the required upgrades are constructed prior to occupation of new development. No further changes are proposed to the LPR.</p>

<b>Ref</b>	<b>Page</b>	<b>Policy/Paragraph of submitted LPR</b>	<b>No of responses</b>
<b>MM80</b>	<b>170</b>	<b>Policy DM9 Conservation Areas</b>	<b>1</b>

<b>Respondent</b>	<b>Summary of Main Issues</b>	<b>Council response</b>
Historic England	Support	Support noted

<b>Ref</b>	<b>Page</b>	<b>Policy/Paragraph of submitted LPR</b>	<b>No of responses</b>
<b>MM81</b>	<b>171</b>	<b>Supporting text to policy DM9</b>	<b>1</b>

<b>Respondent</b>	<b>Summary of Main Issues</b>	<b>Council response</b>
Historic England	Support	Support noted

<b>Ref</b>	<b>Page</b>	<b>Policy/Paragraph of submitted LPR</b>	<b>No of responses</b>
<b>MM82</b>	<b>172</b>	<b>Policy DM10 Listed buildings</b>	<b>1</b>

<b>Respondent</b>	<b>Summary of Main Issues</b>	<b>Council response</b>
Historic England	Support	Support noted

<b>Ref</b>	<b>Page</b>	<b>Policy/Paragraph of submitted LPR</b>	<b>No of responses</b>
<b>MM83</b>	<b>174</b>	<b>Policy DM11 non designated assets</b>	<b>0</b>

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM84	182	Policy DM15 Trees	1

Respondent	Summary of Main Issues	Council response
The Woodland Trust	<p>The proposed modification would replace reference to protected trees to a more narrow requirement referring solely to Tree Preservation Orders and trees in conservation areas.</p> <p>However, there are other forms of tree protection in national legislation and the NPPF and therefore this narrower wording risks undermining those important requirements, rendering the policy unsound. NPPF Para 193c defines ancient and veteran trees outside woods as irreplaceable habitats. It is therefore entirely appropriate that policy DM11 in the local plan seeks to protect them and also other important trees which are the veteran trees of the future. The Government policy paper on ancient woodland 'Keepers of Time' (2022) states <i>"We must also take steps to identify, conserve and enhance future veteran trees as the lack of replacement 'future veterans' is a significant challenge for the future health of this resource."</i> Such trees may not be subject to TPOs given the different eligibility requirements. Indeed even where future veteran trees might qualify for TPOs, TPOs may nevertheless not have been applied, instead relying on the protection afforded by the NPPF and other national policy. NPPF protections are not limited to ancient &amp; veteran trees or to trees with TPOs. Para 136 of the NPPF states that <i>"Planning policies and decisions should ensure that ... existing trees are retained wherever possible."</i> Section 187 of the NPPF states that <i>"policies should contribute to and enhance the natural and local environment... (b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services ...and of trees and woodland"</i>.</p>	<p>Comments noted. This issue was discussed at the Examination Hearing Session on 6<sup>th</sup> June 2024. The Council's response to the Inspector's Action Point (AP41) contained within <a href="#">IN26</a> is set out in <a href="#">EXAM39</a>.</p> <p>As ancient and veteran trees are irreplaceable habitats they would be considered under policy SP11 as well. It is important to note that the Plan needs to be read and interpreted as a whole, and all policies should be viewed together and not in isolation in the preparation and consideration of planning applications. This is made clear in paragraph 1.6 of the <a href="#">submitted LPR (CD1)</a>.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

Respondent	Summary of Main Issues	Council response
	<p>The wording in the submission draft enables the LPA to identify and protect those existing trees, hedgerows and woodland that are locally important, in line with the NPPF. Furthermore, given pressures on the TPO regime and local authority resources, many trees that would qualify for TPOs may not have them in place. It would be an inversion of good policy to make the overall plan policy dependent on individual TPOs happening to exist. Retaining the original wording would not adversely affect applicants, who will be bound by the NPPF and British Standards for tree works, whichever policy wording is used. It will however enable the LPA to uphold national policy and legal protections for trees effectively, without relying entirely on the TPO regime. Indeed, MM85 states that <i>“Protected trees <b>includes</b> trees protected by a Tree Preservation Order...”</i> i.e. protection is not exclusive to TPOs. We therefore ask that this modification be withdrawn, and the submitted plan policy DM15 should stand. Should the Inspector feel that specific reference to TPOs is required, we suggest the policy could be worded as follows (reflecting the wording proposed in MM85):</p> <p><i>The loss or deterioration of protected trees, groups of trees, woodland or important hedgerows, <b>including those subject to TPOs or in conservation areas</b>, will only be permitted in exceptional circumstances and in accordance with the relevant legislation, policy and good practice recommendations. Where protected trees are subject to felling, a replacement of an appropriate number, species and size in an appropriate location will be required.</i></p>	

<b>Ref</b>	<b>Page</b>	<b>Policy/Paragraph of submitted LPR</b>	<b>No of responses</b>
<b>MM85</b>	<b>183</b>	<b>Supporting text to policy DM15</b>	<b>0</b>



Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM86	189	Policy DM19 Specialised housing	3

Respondent	Summary of Main Issues	Council response
Berkshire Oxfordshire and Buckinghamshire Integrated Care Board (BOB ICB)	<p>Specialist housing will usually have a greater demand for healthcare services. Important for applicants to demonstrate any new specialist housing developments would not have a material impact on nearby healthcare services. The proposed modification only specifically refers to the location in terms of accessibility of facilities and services.</p> <p>However, it is also about whether appropriate mitigations are proposed including, but not limited to, developer contributions towards healthcare to support offsite primary care estates projects or to deliver an onsite provision with the agreement of the ICB, as the primary care commissioner if it is providing NHS GP services. While the LPR does not have a dedicated policy related to healthcare, it is vital to ensure any new specialist housing developments should be supported by a health impact assessment and other relevant Policies in the Plan.</p> <p>The proposed modification should be in a standalone bullet point instead of incorporating into bullet point b of the Policy.</p>	<p>Comments noted. Policy DM3 of the Plan has regard to health and wellbeing. A Main Modification has been proposed to the policy (<a href="#">MM74</a>) to state that provision of new or improved health facilities will be required as part of new development, proportionate to the demand that they would generate.</p> <p>MM74 also sets out that a Health Impact Assessment will be required for major developments of other development likely to have a potentially significant impact on the health and wellbeing of the local population or particular groups within it in relation to either the nature of the use proposed or its location in relation to other uses.</p> <p>It should also be noted that <a href="#">MM34</a> amends the first paragraph of policy SP24 to include text that makes clear that development will be required to ensure the timely and coordinated delivery of necessary infrastructure having regard to the latest version of the Council's Infrastructure Delivery Plan (IDP), through proportionate financial contributions and / or on-site provision. Where necessary, the phasing of development will be linked to</p>

Respondent	Summary of Main Issues	Council response
		<p>infrastructure provision. The ICB is consulted as part of updates to the IDP.</p> <p>The Plan needs to be read and interpreted as a whole, and all policies should be viewed together and not in isolation in the preparation and consideration of planning applications. This is made clear in paragraph 1.6 of the <a href="#">submitted LPR (CD1)</a>.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
Paula Saunderson	<p>The West Berkshire Vision to 2050 states a projected increase of 1200 with Dementia. Is there any evidence this Special Group will be catered for? Over 2700 increase in those with mobility problems to 2039. Likewise, 1200 wheelchair adapted dwellings which equates to 12% of total housing need. Some of these special needs will overlap and many will have end of life needs that cannot be delivered in ordinary housing domiciliary care. Unsure if the Plan is clear enough on how and where the sites to fulfil these special housing needs will be met.</p> <p>The Class C definitions for specialist housing are unclear and is difficult to ensure those wishing to have Domiciliary Care can do so with the necessary physical and social infrastructure that transforms development into communities by providing required physical and social infrastructure for older people and those with special needs. The Plan should include a policy on space and</p>	<p>Comments noted. They do not relate specifically to the Proposed Main Modifications.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

Respondent	Summary of Main Issues	Council response
	access standards for individual bedrooms in specialist housing. The policy and supporting text makes no reference to space standards within individual bedrooms.	
Planning Bureau obo McCarthy Stone & Churchill	Based on comments to MM29 ninth paragraph, we do not feel that reference to C2 and C3 should be made as no definition is provided. Instead, MM86 should read <i>'Affordable housing contributions will be required in accordance with the requirements of Policy SP19'</i> .	Comments noted. The issues raised are considered to already be addressed by the Proposed Main Modification (MM87). The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM87	189	Supporting text to policy DM19 Specialised housing	1

Respondent	Summary of Main Issues	Council response
Planning Bureau obo McCarthy Stone & Churchill	Largely support MM87 as it clarifies the definition of housing for older people. However, to be consistent with terminology within the PPG and with comments against MM86, we would recommend that the word 'Specialist' is added to the beginning of new sentence 1 and that the wording following 'merits' is deleted as the wording could potentially cause ambiguity contrary to para 16 point d of the NPPF. The new paragraph would therefore read as follows; Specialist Housing for older people covers a wide range of needs, from sheltered housing (where residents live mainly independent lives whilst sharing some communal facilities) through to extra care housing and care homes, where a level of personal health care is typically provided. Proposals for specialist housing will be considered on their own merits, having regard to whether the proposal falls within Class C2 or Class C3 of the Use Classes Order. This will depend upon factors such as the level of personal care offered; the type of accommodation and level of communal space and facilities. Preapplication advice should be sought if clarification is needed as to whether a development is likely to constitute a specialist care housing provision.	Comments noted. The PPG (Paragraph: 014 Reference ID: 63-014-20190626) states that "it is for the local planning authority to consider into which use class a particular development may fall", and this has been reflected within the Main Modification to paragraph 11.17. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM88	192-193	Policy DM20 Gypsies, Travellers and Travelling Showpeople supporting text	4

Respondent	Summary of Main Issues	Council response
Irwin Mitchell LLP obo Enborne Parish Council	<ul style="list-style-type: none"> <li>• Concern as to whether the Council has properly actioned points AP59 and AP60 in the Inspector's IN27, in the following ways: <ul style="list-style-type: none"> <li>○ Lack of evidenced need for 24 travelling showperson plots. The GTAAs predate the LPR and planning application, and have not been updated since 2021. GTAA 2021 reliant on previous GTAAs, and states 'there is no additional need for Travelling Showperson plots but it is recommended that the existing yard is safeguarded for Travelling Showperson use'. Should not rely on 2015 GTAA as does not demonstrate a current need. Caravan count recorded 0 caravans within the District, and thus concerning that the allocation and planning application seem dependent and reliant on each other.</li> <li>○ Part of site is used for Circus HQ, and there is a very small area proposed to be extended with no live permission for caravans or residential use of land.</li> <li>○ Lack of explanation of why the plots are needed on this one site, at Long Copse Farm.</li> <li>○ Clarification on the existing and proposed use of Long Copse Farm. Recognises maps are to be amended for consistency purposes, and presumes the changes align with the planning application site map. Long Copse Farm does not have formal record of permission for the stationing of caravans and trucks, and is used for storage, as outlined in the GTAA. The temporary use of land for caravans cannot be considered as fallback provision.</li> </ul> </li> </ul>	<p>Comments noted.</p> <p>These issues were discussed at the Examination Hearing Sessions on 11<sup>th</sup> June 2024 and on 3<sup>rd</sup> October 2024, and as part of the Council's responses to the Inspector's MIQs (<a href="#">WS10.1</a>). The planning history was also presented to the Inspector as part of <a href="#">EXAM36</a> and <a href="#">EXAM37</a>. Maps showing the extent of the planning permissions, planning applications, and existing and proposed site allocations were submitted in <a href="#">EXAM59</a>.</p> <p>The Council responded to the action points <a href="#">AP59 and AP60</a>, with further discussion at the Hearing Session on 3<sup>rd</sup> October.</p> <p>The continued need for the allocation was also set out in the landowner's (RPS) Written Statement (<a href="#">FWS10/3</a>) and oral evidence.</p> <p>The allocation beyond the existing yard seeks to ensure there is</p>

Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>• The site has been developed in a piecemeal manner to date (reference to the temporary permissions above). Thus, has not operated as a whole site for the purpose proposed in the allocation.</li> <li>• Concern current planning application is being used as demonstrative need.</li> <li>• Concern for reliance on the existing use of one individual plot to support the policy in its current form.</li> <li>• Predeterminate impact on the pending planning application.</li> <li>• Due to lack of evidence, and as the allocation is considered unsound, the allocation should be removed from the Plan prior to adoption. This has been done for Brighton and Hove in 2016 where gypsy and traveller allocations would be addressed in a part 2 plan, and Cheshire West and Chester Local Plan in 2015 which deferred allocation to a later date.</li> <li>• If not removed by the Inspector the Council is urged to refuse to adopt the Local Plan. If not done so EPC will be seeking to challenge the adoption of the Plan.</li> <li>• In contrast to the Council's response to AP59 and AP60 the supporting text to DM20 is detailed and refers to the GTAA whereas it does not for the Travelling Showperson allocation.</li> </ul>	<p>adequate space for the plots. Planning permission does not usually exist prior to the allocation of sites.</p> <p>The planning application reiterates the commitment of the landowner to develop the site and gives confirmation that the site is available to develop, in response to the existing site allocation. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
Keystone Law obo Peter Tompkins	<ul style="list-style-type: none"> <li>• Council failed to justify the allocation, by way of not providing an up-to-date GTAA which ought to have been the objective basis underpinning the decision to continue with the existing allocation.</li> <li>• Part of the Plan is not sound, as it does not meet objectively assessed need (in consideration of para. 62 of the NPPF). The rationale for relying on the 2021 GTAA is highly dubious. It purports to comply with the PPTS guidance and claims to represent the latest available evidence to identify the accommodation needs of travellers across the district.</li> </ul>	<p>Comments noted.</p> <p>The Council refers to its response to Enborne Parish Council above. The GTAA is up-to-date, with the 2021 update the most recent assessment. The GTAA forms part of the evidence base in the production of policies, where the 'research method is grounded in</p>

Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>• The GTAA only concluded that ‘there is no additional need for Travelling Showperson plots but it is recommended that the existing yard is safeguarded for Travelling Showperson use’. Although doubt on what is ‘additional need’, it is clear that the original reasons for the allocation are no longer present. Site was identified due to expected movement of a specific group of individuals in connection with Zippos circus. But the site has been used for storage and rarely used (and for temporary period) for stationing caravans and trucks. The relationship with the current site owner/applicant is vague and uncertain.</li> <li>• The policy represents an unjustified extension of the territorial limits of the area covered by the permitted circus yard. The existing yard, as identified in the GTAA, is a tightly defined area, as conditioned in the original appeal decision.</li> <li>• Council is relying on a circular proposition that the pending application (for the caravans at Long Copse Farm) is itself demonstrative of need. However, the planning application is an opportunist ‘shot’ at obtaining planning permission on the back of an out-of-date policy.</li> <li>• The site is in a remote location, unconnected to services and served by inadequate roads. Thus this displays none of the usual sustainability credentials of a suitable housing development site. The Council’s ‘need’ case therefore requires extra close scrutiny.</li> <li>• The allocation should be removed from the Plan prior to any decisions being made about whether the Plan is sound.</li> </ul>	<p>an understanding of the requirement of the NPPF’ (GTAA 2021 para 3.1). The existing text at 11.26 of DM20 remains in place, which outlines that a GTAA has been undertaken to inform the LPR.</p> <p>The site has been through a site selection process in consultation with key stakeholders, and has been assessed through the Sustainability Appraisal (<a href="#">CD3a</a> and <a href="#">CD3i</a>).</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
Anthony Johnson	<ul style="list-style-type: none"> <li>• Failure to adequately address AP59 and AP60 as the MMs fail to justify the need and why the need should be addressed at Long Copse Farm, and as there is a lack of clarity regarding the site’s existing use and its relationship to the proposed development, which remains unresolved.</li> </ul>	<p>Comments noted. These issues were discussed at the Examination Hearing Sessions on 11<sup>th</sup> June 2024 and on 3<sup>rd</sup> October 2024, and as part of the Council’s responses</p>

Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>• Relies on the pending planning application, creating a risk of predetermination and undermines the independence of the planning process. The Local Plan does not account for the possibility that the application may not be approved, leaving no contingency for meeting the identified housing needs.</li> <li>• GTAA 2021 concluded no additional needs for plots. Earlier assessments referenced a temporary need for relocation of families which does not constitute a current or local need.</li> <li>• MMs fail to clarify the relationship between the proposed 24 plots and the existing authorised use of Long Copse Farm. The eastern portion of the site has been used as a Circus HQ and agricultural holding but no formal permission for residential use. The temporary permissions for the stationing of caravans has expired further undermining its suitability for the allocation.</li> <li>• Council should therefore reconsider the proposed allocation and remove the site from the Local Plan.</li> </ul>	<p>to the Inspector’s MIQs (<a href="#">WS10.1</a>). The planning history was also presented to the Inspector as part of <a href="#">EXAM36</a> and <a href="#">EXAM37</a>. Maps showing the extent of the planning permissions, planning applications, and existing and proposed site allocations were submitted in <a href="#">EXAM59</a>.</p> <p>The Council has responded to the action points <a href="#">AP59 and AP60</a>, with further discussion at the Hearing Session on 3<sup>rd</sup> October.</p> <p>The continued need for the allocation was also set out in the landowner’s (RPS) Written Statement (<a href="#">FWS10/3</a>) and oral evidence.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
David Tompkins	<ul style="list-style-type: none"> <li>• Proposed MM is not positively prepared – no objective assessment has been cited or referenced, as references to the GTAA have been removed. The GTAA contradicts the proposed level of site allocation and no other objective assessment of the development requirements have been cited in advance of the allocation site selection (RSA25);</li> </ul>	<p>Comments noted. The Council refers to its response to Enborne Parish Council above.</p> <p>The GTAA is up-to-date, with the 2021 update the most recent assessment, and has informed the continued allocation of the site.</p>



Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>• Proposed MM is not justified – in the absence of any objectively assessed need it is impossible to evaluate whether the LPR is the most appropriate strategy and no other reasonable alternatives have been proposed or discussed;</li> <li>• Proposed MM is not effective – It has not been shown that DM20 and RSA25 is deliverable as it is not clear what legal relationship the land owner has to the circus, or that the circus agrees with the proposed allocation;</li> <li>• Proposed MM is not consistent with national policy – the LPR should enable the delivery of sustainable development in line with the NPPF. The NPPF calls for all policies to be underpinned by relevant and up-to-date evidence. As the evidence based is omitted the MM renders the LPR non compliant with the NPPF. Similarly, as the NPPF requires the needs of travellers to be assessed in line with the PPTS, and as the GTAAs have been set aside the accommodation/plot requirements cannot have been formulated in accordance with the NPPF.</li> </ul>	<p>The GTAA forms part of the evidence base in the production of policies. The existing text at 11.26 of Policy DM20 remains in place, which outlines that a GTAA has been undertaken to inform the LPR.</p> <p>The site is deliverable. As part of the evidence gathering exercise in seeking to carry forward existing site allocations the agent confirmed the landowner was still committed to delivering the allocation. This is also repeated in the landowner’s (RPS’) Written Statement <a href="#">FWS10/3</a>. The site has been through a site selection process in consultation with key stakeholders, and has been assessed through the Sustainability Appraisal (<a href="#">CD3a</a> and <a href="#">CD3i</a>).</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

<b>Ref</b>	<b>Page</b>	<b>Policy/Paragraph of submitted LPR</b>	<b>No of responses</b>
<b>MM89</b>	<b>202</b>	<b>Policy DM27 Subdivision</b>	<b>0</b>

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM90	207	Policy DM30 Residential Space Standards and supporting text	2

Respondent	Summary of Main Issues	Council response
Newbury Town Council	Disappointed to see this removed. The reason for its deletion is accepted, though consider it is an essential part of any local plan review.	Comments noted. Residential space standards can be considered as part of the preparation of the next Local Plan. No further changes are proposed to the LPR.
Neame Sutton obo Donnington New Homes (DNH)	DNH support high-quality design and the positive impact this can have on people's quality of life and wellbeing. DNH support the removal of the policy, as there is no evidence that the space standards will improve the quality of housing delivered, or that dwellings that are below the space standards aren't meeting residents' needs. The deletion of the policy allows sufficient flexibility to allow smaller developments to be delivered with well-designed residential units and ensure the viability of schemes.	Support noted

<b>Ref</b>	<b>Page</b>	<b>Policy/Paragraph of submitted LPR</b>	<b>No of responses</b>
<b>MM91</b>	<b>208</b>	<b>Policy DM31 Residential amenity</b>	<b>0</b>

<b>Ref</b>	<b>Page</b>	<b>Policy/Paragraph of submitted LPR</b>	<b>No of responses</b>
<b>MM92</b>	<b>208</b>	<b>Supporting text to Policy DM31 Residential amenity</b>	<b>1</b>

<b>Respondent</b>	<b>Summary of Main Issues</b>	<b>Council response</b>
Neame Sutton obo Donnington New Homes (DNH)	The National Design Guide (para 132) highlights that balconies can enhance outdoor amenity and provide a degree and separation from public space. With the densities being sought, it may not always be possible to accommodate the full amenity space requirement through communal space. Balconies can be used to offset this shortfall through private amenity space. The MM to accept balconies as acceptable forms of amenity space is supported.	Support noted.

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM93	210	Supporting text to policy DM32 Designated Employment Areas	2

Respondent	Summary of Main Issues	Council response
Paula Saunderson	Bond Riverside as a Site within the LONDON ROAD ESTATES DEA should be included as an Employment Site Allocation. At the moment it is in limbo and even a short ESA Policy would help.	Comments noted. As stated in the representation most of Bond Riverside sits within a Designated Employment Area (DEA) and therefore future development within this area would be considered against policy DM32. In addition, the DEA is located within the settlement boundary of Newbury where there is a presumption in favour of development, and as such the LPR has taken the approach to not to allocate sites within settlement boundaries. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.
Pro Vision obo Wasing Estate	Proposed modification considered unsound, however, representation supports the clarification of the definition of the use classes.	Comments noted. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.

<b>Ref</b>	<b>Page</b>	<b>Policy/Paragraph of submitted LPR</b>	<b>No of responses</b>
<b>MM94 PMC18 PMC19</b>	-	<b>New DM policy and supporting text RAF Welford and Denison Barracks</b>	<b>1</b>

<b>Respondent</b>	<b>Summary of Main Issues</b>	<b>Council response</b>
Defence Infrastructure Organisation (DIO)	Proposed modifications considered legally compliant and sound.	Support noted.

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM95	216	Policy DM35 Rural Economy	1

Respondent	Summary of Main Issues	Council response
Pro Vision obo Wasing Estates	Welcome change to criteria (a) from 'long term' to 'positive'. Consider changes to criteria d), h), and j) are necessary as set out in previous representations to Reg 19 and for examination hearings.	Comments noted. The issues raised have previously been considered and discussed as part of the Examination. The Council's <a href="#">Written Statement 11 (Economic Development)</a> details why the criteria are necessary. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.



Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM96	217	Supporting text to Policy DM35 Rural Economy	1

Respondent	Summary of Main Issues	Council response
Pro Vision obo Wasing Estates	Do not support the changes to paragraph 12.20 which states that 'supporting evidence will be provided with a planning application'. The supporting text suggests business plans and estate plans as forms of supporting evidence, which is more onerous than the NPPF policy, and precludes proposals for economic development coming forward.	Comments noted. The issues raised have previously been considered and discussed as part of the Examination at the Hearing Session on Wednesday 12 <sup>th</sup> June 2024. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.

<b>Ref</b>	<b>Page</b>	<b>Policy/Paragraph of submitted LPR</b>	<b>No of responses</b>
<b>MM97</b>	<b>220-221</b>	<b>Policy DM37 Equestrian</b>	<b>1</b>

<b>Respondent</b>	<b>Summary of Main Issues</b>	<b>Council response</b>
Rapleys obo Lambourn Trainers Association	Support	Support noted

<b>Ref</b>	<b>Page</b>	<b>Policy/Paragraph of submitted LPR</b>	<b>No of responses</b>
<b>MM98</b>	<b>221-223</b>	<b>Supporting text to policy DM37</b>	<b>1</b>

<b>Respondent</b>	<b>Summary of Main Issues</b>	<b>Council response</b>
Rapleys obo Lambourn Trainers Association	Support	Support noted

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM99	224	Policy DM38 Development on Existing Educational and Institutional Sites in the Countryside	0

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM100	224	Supporting text to Policy DM38 Development on Existing Educational and Institutional Sites in the Countryside	0

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM101	230	Policy DM41 Digital infrastructure	1

Respondent	Summary of Main Issues	Council response
Simon Pike	<p>Paragraph 114 of the NPPF is unsound – it is not clearly defined, not within the reasonable capability of a developer to deliver, not within the reasonable capability of a planning authority to assess, nor future proofed. Paragraph 114 has remained unchanged from July 2018 to December 2024, despite telecoms being a fast-moving field. During this period, 5G has moved from ‘next generation’ to current generation, and the basic concepts of 6G as the next generation are already being defined. By 2026, the definition of 6G will be insufficiently mature to be taken into account in any planning decision, but by 2041, 6G will almost certainly be the dominant mobile technology, and might already be obsolete. However, construction of strategic sites granted detailed planning approval at the start of the Plan Period may still be under construction well beyond 2041. As a result of paragraph 114 of the NPPF being unsound, local planning authorities are unable to convert the provisions of this paragraph into sound policies. In any case, most aspects of this paragraph will be delivered by telecommunications services providers and mobile network operators – which are required to deliver comparable objectives through Regulations, licence conditions and agreements with Government. Unreasonable to expect a Local Plan Policy to set out digital infrastructure can be upgraded over a period of 15 years or more, when the telecoms industry is unable to do this,</p> <p>The term ‘gigabit-capable broadband’ has no clear engineering meaning but is widely (mis)used by Government and industry, so I accept these paragraphs as sound.</p>	<p>Comments noted.</p> <p>The main issues raised are in relation to the soundness of paragraph 114 of the NPPF. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
	<p>Support the deletion of the criteria (a), (b), and (c) as they are not deliverable or necessary. However, their deletion fails to reflect the</p>	<p>Support noted.</p>

Respondent	Summary of Main Issues	Council response
	<p>provisions of paragraph 114 of the NPPF, in particular the priority for full fibre.</p> <p>Unless infrastructure is duplicated, the access to services from a range of providers is a matter for regulation by Ofcom of local loop unbundling and third party access to ducts, which is outside the scope of planning regulation. However, the provision of ducts to premises does facilitate this. Suggest that the deleted wording is replaced by the following:  <u><i>“All residential developments and all new employment generating development should include the infrastructure for the provision of gigabit-capable broadband to each dwelling or business unit. This should use full fibre connections in ducts to the premises, unless this is not feasible.”</i></u></p>	<p>The type of connection required of development is set out in Part R of the Building Regulations, and criteria (a), (b), and (c) have been proposed for deletion to avoid duplication with the Buildings Regulations.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>
	<p>Support deletion of criterion d as it is not deliverable.</p>	<p>Support noted.</p>
	<p>The final paragraph of the policy appears to be in response to paragraph 16 (a) and (b) of the NPPF. Unsure how LPAs are supposed to ‘ensure’ that these two requirements are met as they are addressed through Wireless Telegraphy Act licences, the Radio Equipment Regulations 2017, and the Electromagnetic Compatibility Regulations 2016. The enforcement body for these is generally Ofcom.</p> <p>A large proportion of electronic communications infrastructure is deployed under permitted development rights, and therefore outside the remit of the local planning authority to assess.</p> <p>Paragraph 16 (a) and (b) of the NPPF is undeliverable and unsound because it is impractical for local planning authorities to implement them as workable policies.</p> <p>It follows that the last paragraph of Policy DM41 must also be unsound. However, as this is the result of it correctly reflecting a provision of NPPF that is inherently unsound, it should remain in the Policy.</p>	<p>Comments noted.</p> <p>The main issues raised are in relation to the soundness of paragraph 16 (a) and (b) of the NPPF.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>

<b>Ref</b>	<b>Page</b>	<b>Policy/Paragraph of submitted LPR</b>	<b>No of responses</b>
<b>MM102</b>	<b>232</b>	<b>Policy DM42 Transport infrastructure</b>	<b>1</b>

<b>Respondent</b>	<b>Summary of Main Issues</b>	<b>Council response</b>
Paula Saunderson	With a high percentage of windfalls, especially those inside settlement boundaries, this Modification will be hard to achieve. And I am not sure enough discussions has taken place around the A4 as an arterial route and the A339.	Comments noted. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.



Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM103	234	Policy DM43 Theale Rail – Road Transfer Site	3

Respondent	Summary of Main Issues	Council response
Firstplan obo Englefield Estate	<p>Points of objection raised at Reg.19 have been addressed through a SoCG dated 20 March 2024.</p> <p>The modifications proposed, as set out in the SoCG, ensure that the Plan is positively prepared and responds to identified need and facilitates sustainable development; the Plan is justified in that the evidence points to the need to support growth of rail freight provision both generally and in regional/local plan terms; and ensure consistency with National Policy, which the Main Modifications now provide.</p> <p>Englefield Estate confirm that the Proposed Main Modifications in respect of Policy DM43 and supporting text are considered to be sound for the reasons as detailed above (positively prepared, justified and consistent with National Policy).</p>	Support noted
Network Rail	Network Rail support the new wording of policy DM43.	Support noted
PSP obo Beftonforth Ltd	Proposed modifications, as agreed in the March 2024 Statement of Common Ground, considered legally and sound	Support noted

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM104	234	Supporting text to policy DM43 Theale Rail – Road Transfer Site	2

Respondent	Summary of Main Issues	Council response
Firstplan obo Englefield Estate	<ul style="list-style-type: none"> <li>• Points of objection raised at Reg.19 have been addressed through a SoCG dated 20 March 2024.</li> <li>• The modifications proposed, as set out in the SoCG, ensure that the Plan is positively prepared and responds to identified need and facilitates sustainable development; the Plan is justified in that the evidence points to the need to support growth of rail freight provision both generally and in regional/local plan terms; and ensure consistency with National Policy, which the Main Modifications now provide.</li> <li>• Englefield Estate confirm that the Proposed Main Modifications in respect of Policy DM43 and supporting text are considered to be sound for the reasons as detailed above (positively prepared, justified and consistent with National Policy).</li> </ul>	Support noted.
PSP obo Beftonforth Ltd	Proposed modifications, as agreed in the March 2024 Statement of Common Ground, considered legally and sound	Support noted.

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM105	235	Policy DM44 Parking	2

Respondent	Summary of Main Issues	Council response
Newbury Town Council	Second Paragraph: the new wording weakens the parking requirements.	Comments noted. The modification provides flexibility in recognition that town centre developments can have, within easy reach, alternative means of travel to the private car. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.
Paula Saunderson	In the absence of a build-to-rent policy within the LPR the Council's Highway Design Guidance for Residential Development might need amending to include another category which caters for these types of developments.	Comments noted. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.

<b>Ref</b>	<b>Page</b>	<b>Policy/Paragraph of submitted LPR</b>	<b>No of responses</b>
<b>MM106</b>	<b>238</b>	<b>Policy DM45 Travel Planning</b>	<b>0</b>

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM107	238	Supporting text to policy DM45	2

Respondent	Summary of Main Issues	Council response
Paula Saunderson	In the absence of a build-to-rent policy in a tall building (such as the Kennet Centre - NEW3) without enough parking of its own, consideration might need to be given for the monitoring of travel plans, therefore I agree with this Modification.	Support noted.
Ridgepoint Homes	Objects to the inclusion of the proposed new paragraph after 12.112 which states that the monitoring period for Travel Plans for large multi-occupancy developments which may be built over an extended period may cover a period encompassing the construction and final occupation of the development and include a period of up to five years beyond final occupation. This may lead to uncertainty in the Travel Plan monitoring requirements and may in the case of larger sites result in many years of monitoring, at the unnecessary expense of the developer. We propose that this should be amended to require Travel Plans to be monitored from 5 years from final occupation for large multi occupancy developments to allow sufficient time for travel patterns to be established.	Comments noted. The purpose of a Travel Plan is to influence travel behaviour from an early stage of the development's progress; not wait until, possibly undesirable, patterns of travel behaviour have been established. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.

<b>Ref</b>	<b>Page</b>	<b>Policy/Paragraph of submitted LPR</b>	<b>No of responses</b>
<b>MM108 PMC20</b>	<b>251-253</b>	<b>Appendix 3 AWE land use planning consultation zones</b>	<b>0</b>

<b>Ref</b>	<b>Page</b>	<b>Policy/Paragraph of submitted LPR</b>	<b>No of responses</b>
<b>MM109</b>	<b>258-260</b>	<b>Appendix 6 NDPs</b>	<b>0</b>

Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM110	261 - 268	Appendix 7 Schedule of policies to be superseded/ deleted	1

Respondent	Summary of Main Issues	Council response
Paula Saunderson	Policy CS2 Newbury Racecourse strategic site allocation should be retained as the Eastern Phase of this Strategic Site Allocation is not yet built.	<p>Comments noted. Some site allocation policies from the Core Strategy and the Housing Site Allocations DPD have not been carried forward as they have either been built out or are nearing completion. For Newbury Racecourse the first two phases of development are already completed.</p> <p>The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modification. No further changes are proposed to the LPR.</p>



Ref	Page	Policy/Paragraph of submitted LPR	No of responses
MM111	269	Appendix 8 Housing Trajectory	2

Respondent	Summary of Main Issues	Council response
Paula Saunderson	Reduction in numbers at Newbury Racecourse not reflected in the housing trajectory. Phase 2 of Sterling Gardens is not included in the housing trajectory. Land Off Faraday & Kelvin Road, Newbury should be excluded from the housing trajectory due to various constraints.	Comments noted. The Council's housing trajectory covers the period 2023/24 to 2040/41. During the examination hearing sessions, the Inspector was clear that the housing trajectory should have a fixed reference point which is based on comprehensive information about planning permissions as at 1 April 2023. Phase 2 of Sterling Gardens is included in the Council's housing trajectory. Land Off Faraday & Kelvin Road - This site has an extant permission for 160 dwellings. The deliverability assessment of the site remains unchanged using the fixed reference point which is based on comprehensive information about planning permissions as at 1 April 2023.
Nexus obo Pangbourne Beavers	Land north of Pangbourne Hill can realistically deliver 12 homes in 2027/28 and 13 homes in 2028/29.	Comments noted. The Council adopts a cautious and evidence-based approach when assessing the deliverability of sites to ensure that housing projections remain realistic. This includes a detailed review of site constraints, developer intentions, and market conditions. The housing trajectory will be regularly monitored and updated as part of the Authority Monitoring Report to reflect any changes in site progress, planning permissions, or external factors influencing housing delivery. No changes are proposed to the LPR.

Ref	Page	Document	No of responses
SA/SEA	-	<b>Updated Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) Report – Proposed Main Modifications (November 2024)</b>	<b>61</b>

Respondent	Summary of Main Issues	Council response
Newbury Town Council	<p>Town Council has produced a SWOT analysis of data in SEA.</p> <p>Strengths:</p> <ul style="list-style-type: none"> <li>• Comprehensive data collection, Strategic sites allocations, Public consultation.</li> </ul> <p>Weaknesses:</p> <ul style="list-style-type: none"> <li>• Data gaps, Complexity</li> </ul> <p>Opportunities:</p> <ul style="list-style-type: none"> <li>• Adaptive planning, Enhanced stakeholder engagement</li> </ul> <p>Threats:</p> <ul style="list-style-type: none"> <li>• Data obsolescence, Resource limitations</li> </ul> <p>The following data gaps are identified within the evidence base:</p> <ul style="list-style-type: none"> <li>• Environmental assessments may not include sufficient localised data (air quality, biodiversity loss, flood risk analysis)</li> <li>• Limited clarity and gaps in detailed infrastructure planning (transport modelling, healthcare/education facilities)</li> <li>• Affordable housing evidence relating to trends and actual needs of residents</li> <li>• Lack of granular data on economic development</li> <li>• Limited analysis of community feedback</li> </ul> <p>Threats to the Local Plan:</p> <ul style="list-style-type: none"> <li>• Outdated/incomplete evidence (demographics, environmental data)</li> <li>• Climate change impacts (accelerated risks)</li> <li>• Economic uncertainty</li> <li>• Community opposition</li> </ul>	<p>Comments noted.</p> <p>The suggestions are not within the scope of the SA/SEA, which is an assessment tool for the Local Plan Review (LPR). The SA/SEA is a systematic process carried out during the preparation of the Local Plan. Its role is to promote sustainable development by assessing the extent to which the emerging plan will help to achieve relevant environmental, economic and social objectives.</p> <p>It is an iterative process which informed the development of the plan. It is based on best available data and helps to make sure that the proposals in the plan are appropriate given the reasonable alternatives.</p> <p>The content of the Plan has been informed by a significant amount of evidence, and this is detailed in the <a href="#">examination library</a>. It covers, inter alia, air quality, flood risk, infrastructure,</p>

Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>• Strain on existing infrastructure (traffic, education, healthcare, public services, flooding, electrical supplies)</li> <li>• Ecological and heritage impacts (impacts on AONB, cultural landmarks and skyline of Newbury, Newbury conservation area)</li> <li>• Resource and budget constraints restrict/delay the delivery of infrastructure projects and community facilities</li> <li>• Regulatory and policy change (national planning policies/environmental legislation could undermine parts of the plan).</li> </ul> <p>The SEA should:</p> <ul style="list-style-type: none"> <li>• Bridge data gaps</li> <li>• Strengthen community engagement</li> <li>• Mitigate climate risks</li> <li>• Priorities infrastructure delivery</li> </ul> <p>Closing data gaps:</p> <ul style="list-style-type: none"> <li>• Environmental assessments – air quality / biodiversity / flood risk analysis</li> <li>• Infrastructure planning – transportation, education &amp; health care</li> <li>• Affordable housing evidence - Newbury housing need assessment</li> <li>• Economic development – sectoral studies should identify growth industries, needs of business</li> <li>• Community feedback insights</li> </ul> <p>Solutions to threats</p> <ul style="list-style-type: none"> <li>• Mitigating outdated/incomplete evidence</li> <li>• Address climate change risks</li> <li>• Reduce community opposition</li> <li>• Manage strain on infrastructure</li> <li>• Protect ecology and heritage</li> <li>• Mitigate economic and resource constraints</li> </ul>	<p>transport modelling, employment, landscape assessments and housing need assessment.</p> <p>No changes proposed.</p>

Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>• Address regulatory changes</li> </ul> <p>Suggest details recommendations and strategies for transport, housing and public engagement which align with the Local Plan:</p> <ul style="list-style-type: none"> <li>• Transport – public transport enhancements, active travel infrastructure, traffic management, park-and-ride, green transport initiatives, new transport hubs, future proofing roads.</li> <li>• Housing – affordable housing delivery, diverse housing mix, brownfield development, sustainable housing design, smart housing allocation, infrastructure-linked housing, rural and suburban integration.</li> <li>• Public engagement – targeted community consultation, transparent communication, feedback loop, citizens advisory panels, community-led initiatives, youth engagement, digital tools for engagement, annual reviews.</li> </ul>	
<p>Thatcham Town Council</p> <p>David Bridle</p>	<p>The SA/SEA must take to account consequences of the new requirement in S245 of the Levelling Up and Regeneration Act 2023 (LURA), as it might impact policies within the area of the National Landscape and its setting. The 2024 SA/SEA has not done this so needs to be reviewed and updated.</p> <p>Para 8/13 of the Environmental Assessment of Plans and Programmes Regulations 2004 is clear that consultation on any relevant document is a consultation on the whole document. The focus of this consultation is on the Main Modifications to the SA/SEA. The Council must also take account of other comments, in particular those made in relation to changes in legislation/guidance since the last SA/SEA was published.</p> <p>Consultation on the SA/SEA undertaken at Reg 19 did not comply with the statutory requirements for notification, and many</p>	<p>Comments noted.</p> <p>The Council acknowledges that Appendix 3 of the SA has not been factually updated to refer to the enhanced protected landscapes duty brought about by the Levelling Up and Regeneration Act 2023. It is therefore proposed to update the Appendix accordingly. Policy 5b of the SA/SEA specially considers the conservation and enhancement of landscape character, and all policy options and the policies themselves have been considered against this SA/SEA objective.</p> <p>As set out within the Council’s Written Statement to Matter 3 (WS3/1), the</p>

Respondent	Summary of Main Issues	Council response
	<p>respondents were probably unaware there were invited to comment.</p> <p><i>Comments made in relation to Table in Section 2.4, Appendix 4 (pp.21-23) and Appendix 5 (pp.62-66) -</i> The main modifications might have an indirect impact on other aspects of the SA that the council have not identified. The Council must give full weight to the comments made on the SA, not just those relating to the Main Mods. Assessments should not be based on unsubstantiated speculation. The number of unsubstantiated and questionable assumption in the SA are inconsistent with the content of SP17. The SA has not been adequately reviewed in light of the Main Modifications. It still refers to BREEAM Excellent, which MM25 deletes.</p> <p>Proper SA needs to be undertaken, and the size of the development reconsidered.</p> <p>The SA should consider 1760 dwellings as a reasonable alternative for development. The 2500 dwellings figure seems to be arbitrary derived from a rudimentary calculation in the TSGS, which does not take into account the provision of SP17 or subsequent development of flood attenuation ponds. Any changes should be reflected in the non-technical summary and the main body of the document. Suggested changes to SA Tables.</p> <p><i>Comments made in relation to Appendix 8a (pp.59-66 and 75) CA12 and CA17 -</i> SA/SEA for both sites are almost identical and are clearly inadequate and incorrect. Assessments are generalisations which do not address related elements within the policies.</p>	<p>Council notes the introduction of the LURA and proposes a minor modification (AM4.4) to the supporting text of policy SP2 to reflect that the Council has a duty to seek to further the primary purpose of the legislation. It is important to note that the Plan should be read and interpreted as a whole and all policies should be viewed together and not in isolation in the preparation and consideration of planning applications. This is made clear in paragraph 1.6 of the <a href="#">submitted LPR (CD1)</a>.</p> <p>The Council's Written Statement to Matter 3 emphasises the clear endorsement from the North Wessex Downs Council of Partners to both the overall landscape led approach being adopted and the approach taken to the consideration of major development. The issues raised in relation to the Reg 19 stage have previously been considered and discussed as part of the Examination.</p> <p>All comments on the SA/SEA will be given appropriate consideration. The SA/SEA was discussed during the hearing sessions and the Inspector asked the council to do additional work. This work was published in <a href="#">EXAM26B</a>.</p>

Respondent	Summary of Main Issues	Council response
	<p>If done properly, the SA/SEA may show that these sites are not capable for delivering sustainable development in accordance with the policies of the NPPF. Suggested changes to SA tables.</p> <p><i>Comments made in relation to assessment of policy DM2: Separation of settlements around Newbury and Thatcham, SA Objectives 1, 2, 5 and 7, Appendix 6 (pp.6-10) - 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.</i></p>	<p>The Council is satisfied all requirements relating to the SA/SEA have been covered.</p> <p>Whilst policy SP17 removed the reference to BREEAM Excellent, policy DM4 still requires all non-residential development to be BREEAM Excellent. The Plan needs to be read and interpreted as a whole.</p> <p>The Council does not consider 1760 dwellings to be a reasonable alternative for the site. While this is the number of dwellings that can be delivered within the plan period, the site has capacity for up to 2500 dwellings and in line with the requirements of the NPPF to make efficient use of land and optimal use of the potential of sites (NPPF Sept 2023, Para 125).</p> <p>The Thatcham Strategic Growth Study (<a href="#">SIT2a</a>, <a href="#">SIT2b</a>, <a href="#">SIT2c</a>) considered the capacity of the site and identified a capacity of approx. 2500 dwellings, taking into account site constraints and standard density.</p> <p>In relation to CA12 and CCA17, the two sites are adjacent to one another, and share similar characteristics. The council disagrees that the SA/SEA fails to demonstrate that the sites are</p>

Respondent	Summary of Main Issues	Council response
		<p>capable of the delivery of sustainable development.</p> <p>In relation to policy DM2, the Council refers to its response to Prosper Infinity Ltd set out below.</p>
<p>Andrew Black obo Bucklebury Parish Council</p>	<p>Comments made previously on the SA.</p> <p>Particular concerns about how scoring has been done and why these have not changed with an increase in housing numbers at North East Thatcham.</p> <p>Given the location in the setting of the AONB it is considered that the masterplan area would need an Environmental Impact Assessment (EIA) to be undertaken. Impact of 2,500 dwellings was not adequately assessed during the preparation of the plan, therefore PPG is clear that an SA is required to assess the significant effects of that scale of development on the local area. No attempt is made to address the previous reasons why 2500 dwellings on the site was discounted.</p> <p>The approach taken and scoping against all SA objectives is flawed.</p> <p>Policy SP17 states that mitigation will be required which directly contradicts the assessment.</p> <p>Despite detailed wording changes to SP17, the SA remains unchanged. It is inconceivable that the impact at 1500 and 2500 would be the same.</p>	<p>Comments noted.</p> <p>The SA/SEA considered both 2,500 dwellings and 1,500 dwellings. The site was originally proposed for 2,500 dwellings and the SA/SEA and therefore, the SA/SEA had already considered the site being developed for this scale of development. Reverting from 1,500 dwellings to 2,500 dwellings did not therefore, need to be reassessed. This is set out in the <a href="#">SA/SEA</a> on page 42.</p> <p>The site at North East Thatcham will be screened for EIA as part of the planning application process.</p> <p>The site is suitable for development at 2,500 dwellings. While the number was reduced for a number of reasons, the evidence indicates that the site is suitable of delivering 2,500 dwellings, and at 2,500 dwellings it ensures best use is made of the site and that all infrastructure proposed by the policy can be delivered.</p>

Respondent	Summary of Main Issues	Council response
		<p>The SA/SEA assesses the policy itself and the impact that the policy will have over no policy.</p> <p>The SA/SEA considered the site at both 1,500 and 2,500 dwellings as set out on page 42. 2,500 dwellings had already been subject to SA/SEA, and therefore, did not need to be assessed again.</p> <p>No changes proposed.</p>
Cold Ash Parish Council	<p>Little evidence that sites have been reassessed. SA has been updated, but update to original site assessment. SA appears to reverse the original findings with little explanation.</p> <p>No consideration of potential sites that have come forward since the HELAA.</p> <p>Little evidence setting out how the sites have been reassessed.</p> <p>There is no new additional documentation demonstrating how the statements now published in the amended SA/SEA have been evidenced.</p>	<p>Comments noted.</p> <p>The SA/SEA has been updated to consider the main modifications.</p> <p>The Council's response to AP14 (see <a href="#">EXAM26</a>) sets out the addition information used to identify those sites that are suitable and available for residential development</p> <p>Since the last update to the HELAA was published, the Council has not held any 'call for sites'.</p> <p>The reassessment of sites was done in response to Action Points issued by the Inspector (AP14 and AP29). The work carried out is set out in <a href="#">EXAM26</a> (AP14) and <a href="#">EXAM32</a> (AP29).</p> <p>No changes proposed.</p>
Ian Bell	No comments on SA/SEA	n/a
Alan Clapson	Objection to the proposed modification to include Pincents Lane as an allocation.	Comments do not relate to the SA/SEA. The comments are the same as those made against MM45. No changes are proposed.



Respondent	Summary of Main Issues	Council response
	<ul style="list-style-type: none"> <li>• This is the last open land in Tilehurst and still has all the criteria of a Strategic Gap, acting as a division of areas between Calcot, Tilehurst and Theale.</li> <li>• This development contravenes the West Berkshire Core Strategy 2006-2026 (section 5) as the site is outside the settlement boundary, is on undeveloped land and has not been allocated for residential development in the HSA DPD.</li> <li>• Building that has already be completed at he A4 / Dorking Way junction has introduced even further transport and highways issues to an already extremely congested area (eg. the well publicised weekend gridlocks resulting in people being trapped in the IKEA carpark) and any development of Pincents Lane would only add to this.</li> <li>• There is insufficient infrastructure (schools, amenity, etc) to support this number of dwellings and no additional facilities are being planned.</li> <li>• While it is proposed that the bollards stopping traffic going down Pincents Lane be retained, the traffic issues that will be created by this development may lead to further proposals to open up the lane for through traffic. Opening up Pincents Lane to vehicular access would dangerously increase traffic around Little Heath, St Paul's, Birch Copse and Springfield schools.</li> <li>• If the bottom of Pincents Lane is opened for access to the A4 / M4, a "rat run" will be created along Little Heath Road and City Road, increasing traffic to unsustainable levels.</li> <li>• This is an greenfield site and this development would result in the loss of bio-diversity and will threaten species thriving on the site ( such as bats, badgers, deer, foxes, rabbits, hedgehogs, pollinating insects and many bird species) and the government</li> </ul>	

Respondent	Summary of Main Issues	Council response
	are actively encouraging development of brownfield. This area is earmarked for inclusion in the Local Green Space Plan.	
Annette Dickens	Impact of extra 1000 dwellings at North East Thatcham (policy SP17) on sustainability not dealt with. SA remains unchanged. The LURA has statutory requirements regarding environmental protection that have not been taken into account in the SA.	Comments noted. The Council refers to its response to Thatcham Town Council set out above. No changes proposed.
Barry Dickens	<p>P.23 - SA says 1500 homes would have neutral impact on sustainability, but at 2500 dwellings it would have a positive impact without any substantive evidence to support this.</p> <p>Presumption is that SP17 is sustainable, it is not. It will be car use heavy. SA acknowledges that the environmental sustainability is unknown. No certainty all the needed infrastructure will be funded/built, and not necessarily on site.</p> <p>2.4 App 4 (4) Residents will not walk/cycle or use the bus to work. Public transport on the site will be minimal.</p> <p>(7) Built on high quality farmland when brownfield sites are available in more sustainable locations.</p> <p>3.1 App (4) Will not generate any discernible sustainable travel options – will all still be by car.</p> <p>(6) this statement is untrue</p> <p>SP17 (app 5) - Heading says there have been significant changes to the policy, but no overall chance to the outcome without evidence to back this up.</p> <p>(4a) reflects inadequacy of the SA and only considers internal roads/site exists. No plans to make any road safety improvement to surrounding rural roads.</p> <p>(5) Biodiversity statement is based on flimsy &amp; outdated evidence</p> <p>(6d) too loose a statement relating to wastewater/sewage – this must be upgraded before occupation</p> <p>(10a) MMs give no detail on what retail/employment opportunities there will be on site, so cannot be positive.</p>	<p>Comments noted. The SA/SEA considered the site at both 1,500 and 2,500 dwellings as set out on page 42. 2,500 dwellings had already been subject to SA/SEA, and therefore, did not need to be assessed again. 2,500 dwellings provides greater positive opportunities for infrastructure provision associated with the site.</p> <p>The issues raised have previously been considered and discussed as part of the Examination. No changes proposed.</p>

Respondent	Summary of Main Issues	Council response
Antonia Elliott	<p>No updates to SA's impact assessment as a result of increased dwellings at NET.</p> <p>The Environment Agency has just released updated flood maps and shows that many of the new sites are a high risk of flooding. This is a particular issue in Thatcham.</p>	<p>Comments noted. The SA/SEA considered the site at both 1,500 and 2,500 dwellings as set out on page 42. 2,500 dwellings had already been subject to SA/SEA, and therefore, did not need to be assessed again.</p> <p>Flooding is considered as part of the SA/SEA, and a Strategic Flood Risk Assessment has been prepared as part of the preparation of the LPR.</p> <p>On 25 March 2025, the Environment Agency will publish updated Flood Zone data and an updated version of the 'Flood Map for Planning'. No changes proposed.</p>
Fiona Lawrie	Comments are not related to the SA/SEA	n/a
Belinda Matthewman	Comments are not related to the SA/SEA	n/a
Save Pincents Hill Group (30 separate individuals)	Make reference to advice given in the Landscape Phase 2 Report in relation to the site at Pincents Hill – the site should not be pursued further for housing on landscape grounds.	Comments do not relate to the SA/SEA. No changes proposed.
Sue Morgan Damian Musker Bernie Southgate Finola Southgate	Lack of update to SA regarding increase in dwellings at North East Thatcham (policy SP17).	Comments noted. The SA/SEA considered the site at both 1,500 and 2,500 dwellings as set out on page 42. 2,500 dwellings had already been subject to SA/SEA, and therefore, did not need to be assessed again. No changes proposed.
David Southgate	<p>Concerns regarding scoring against key matters such as landscape and biodiversity – why have these not changed despite increased numbers.</p> <p>No attempt to address reasons for lower number previously set out.</p>	Comments in relation to North East Thatcham noted. The SA/SEA assesses the policy itself and the impact that the policy will have over no policy.

Respondent	Summary of Main Issues	Council response
	<p>SP17 in direct contradiction to assessment as the policy requires mitigation.</p> <p>Revised SP17 wording means many aspects are to be addressed through further studies and masterplanning process, but the council maintains its assessment of the allocation as having a positive outcome. No change to assessment following policy changes, therefore it is fatally flawed.</p>	<p>Therefore, the change in number did not impact the outcome of the policy assessment. The SA/SEA considered the site at both 1,500 and 2,500 dwellings as set out on page 42. 2,500 dwellings had already been subject to SA/SEA, and therefore, did not need to be assessed again. No changes proposed.</p>
Eric Lloyd	No specific comments relating to SA/SEA	n/a
Alison May	<p>Comments made in relation to ecology at HSA 15 Pondhouse Farm, Clayhill Road, Burghfield Common (p.78 of the SA/SEA). The Ecology header states: <i>“Ecology: Omer’s Gully is located within the site and would need to be protected. The site is adjacent to ancient woodland. Tree Preservation orders and a Local Wildlife Site. Appropriate buffers would be to be provided.”</i> This statement is misleading. Omer’s Gully is not located within the site. The site boundary is located and includes part of Pondhouse Copse, an ancient and semi natural woodland including a freshwater stream being a tributary to Foudry brook which continues to suffer from illegal sewage spills. An appropriate buffer to protect Pondhouse Copse ancient woodland and the freshwater steam would need to be greater than the minimum 15 metres to protect the sustainability of the woodland and its inhabitants.</p> <p>The buffer to the ancient woodland should exclude any proposed SUDs and should comprise native woodland trees/shrubs which will contribute to the long term protection of a neglected woodland. A minimum buffer of 50 metres is necessary. The site is located between 3 ancient woodlands – one section being substantially felled during the 1990s to build houses. An EclA-non EIA will be conducted to establish the full extent of the woodland and its</p>	<p>Comments noted. The issues raised have previously been considered and discussed as part of the Examination, in particular at the hearing session held for Matter 6 on 4 June 2024.</p> <p>The site specific policy (RSA12) includes various parameters which any planning application must adhere to. These include:</p> <ul style="list-style-type: none"> <li>• Ecological Impact Assessment and a protected species survey.</li> <li>• Flood Risk Assessment that will include the consideration of surface water flooding and will advise on appropriate mitigation measures.</li> <li>• A buffer of at least 15 metres between the development and areas of ancient woodland.</li> </ul> <p>No changes proposed.</p>

Respondent	Summary of Main Issues	Council response
	inhabitants. To date the landowner, Englefield Estate, has denied the relevant professional ecologists the opportunity to access those areas of the woodland located within or adjacent to the defined boundary area.	
Stephanie Molloy	<p>Comments made in relation to SA/SEA SP17 North East Thatcham Sustainability Appraisal</p> <p>2(a) no evidence that the dwellings will mean people have an active healthy lifestyle.</p> <p>2(b) no evidence in crease in dwellings will reduce fear of crim/anti social behaviour.</p> <p>2(c) no assessment taken place, no evidence of anything to protect GI across the district.</p> <p>4(a) how dwellings will reduce road safety is far fetched. Road surveys should be taken during rush hour. Impacts on Harts Hill have not been considered.</p> <p>5 No safeguard for biodiversity. Should be building on non-productive farmland</p> <p>8(a) energy efficiency removed so can't have a positive effect.</p> <p>8(c) how can water consumption and reuse be measured, should be in place before planning is approved.</p>	<p>Comments noted.</p> <p>The SA/SEA assesses the policy and the linked impacts the policy will have. It is at the application stage that the applicant will have to demonstrate that all of these elements can be achieved.</p> <p>No changes proposed.</p>
	<p>Comments made in relation to RSA13</p> <p>No infrastructure in place for these dwellings. No safe exit onto A4.</p> <p>No consultation with the public as to how this will be done.</p> <p>Rejected before, and nothing for the Council to say why it should go ahead.</p>	<p>Comments noted.</p> <p>As set out within the Council's Written Statement to Matter 6 (<a href="#">WS6/1</a>), access to the site from A4 Bath Road has been informed by consultation with the Council's Highways and Transport team who advised that acceptable access could be obtained from A4 Bath Road.</p> <p>No changes proposed.</p>
Carol Newby	Lack of update to SA regarding increase in dwellings at North East Thatcham (policy SP17)	Comments noted.

Respondent	Summary of Main Issues	Council response
David Newby		The SA/SEA considered the site at both 1,500 and 2,500 dwellings as set out on page 42. 2,500 dwellings had already been subject to SA/SEA, and therefore, did not need to be assessed again. No changes proposed.
Calliope Orfanos	<p>Difficult to accept that additional dwellings will have a positive impact on environmental sustainability.</p> <p>Identifying country parks and open space as a means of landscape enhancement seems strange – failure to describe, evaluation and provide updated data.</p> <p>Greater flood risk because of development.</p> <p>Not sure how Biodiversity Net Gain (BNG) will be provided or monitored.</p>	<p>Comments in relation to North East Thatcham noted. The SA/SEA considered the site at both 1,500 and 2,500 dwellings as set out on page 42. 2,500 dwellings had already been subject to SA/SEA, and therefore, did not need to be assessed again.</p> <p>As set out within the SA/SEA in Appendix 5 (pp.62-66), the policy requires the consideration of Sustainable Drainage Systems that could deliver net gains for Thatcham. A modification to the policy requires the existing flood attenuation ponds to be retained, protected and enhanced.</p> <p>The provision of open space and country parks has been used in other developments as a means of landscape enhancement.</p> <p>As set out within the supporting text to policy SP11, the Council will deliver BNG in line with the latest guidance and the Environment Act 2021. BNG is part of the mitigation hierarchy and applicants for planning permission will</p>

Respondent	Summary of Main Issues	Council response
		be required to demonstrate that they have made all reasonable efforts to avoid losses of significant habitats and to mitigate any significant effects on biodiversity before demonstrating how the legally required BNG will be delivered. No changes proposed.
Paula Sanderson	<p>Not a very thorough piece of work.</p> <p>Not aware during Reg 19 that we could respond to the SA/SEA, so unable to make comparisons.</p>	Comments noted. The issues raised have previously been considered and discussed as part of the Examination. No changes proposed.
Craig Smith	<p>Difficult to accept that additional dwellings at North East Thatcham will have a positive impact on environmental sustainability.</p> <p>Identifying country parks and open space as a means of landscape enhancement seems strange – failure to describe, evaluation and provide updated data.</p> <p>Greater flood risk because of development</p> <p>Not sure how BNG will be provided or monitored.</p>	<p>Comments noted.</p> <p>The SA/SEA considered the site at both 1,500 and 2,500 dwellings as set out on page 42. 2,500 dwellings had already been subject to SA/SEA, and therefore, did not need to be assessed again.</p> <p>As set out within the SA/SEA in Appendix 5 (pp.62-66), the policy requires the consideration of Sustainable Drainage Systems that could deliver net gains for Thatcham. A modification to the policy requires the existing flood attenuation ponds to be retained, protected and enhanced.</p> <p>The provision of open space and country parks has been used in other developments as a means of landscape enhancement.</p> <p>As set out within the supporting text to policy SP11, the Council will deliver</p>

Respondent	Summary of Main Issues	Council response
		BNG in line with the latest guidance and the Environment Act 2021. BNG is part of the mitigation hierarchy and applicants for planning permission will be required to demonstrate that they have made all reasonable efforts to avoid losses of significant habitats and to mitigate any significant effects on biodiversity before demonstrating how the legally required BNG will be delivered. No changes proposed
Henry Venners	<p>Comments made in respect of RSA7 (72 Purley Rise) The report on progress despite dated November 2024 is outdated all the 30 homes consented are built (some are awaiting decoration and new inhabitants) but by and large the approved scheme can be considered delivered, but of course only for 30 homes. A suggestion is made to make small and reasonable adjustment to allow the policy aims of 35 dwellings to be provided. That site has been delivered as 'Leopard Lane'</p> <p>Comments made in respect of Pangbourne Hill, p.101- Insufficient consideration given to ability to not build 25 homes elsewhere – National Landscape, Highways capacity concerns. No analysis sort to find another site.</p>	<p>Comments do not relate to the SA/SEA.</p> <p>No changes proposed</p>
Ian Watson	<p>Comments made in respect of SP11 (pp.26 – 27). Whilst the importance of the Kennet SSSI is noted in both the Local Plan Review and Schedule of Proposed Main Modifications, there is little mention of the compulsory measures required to maintain the SSSI status through protection from pollution, increased nutrient inputs or the impact of construction work. The Plan notes that the two Kennet SACs will need protection, but the measures indicated are more aspirational than required. The Plan needs</p>	<p>Comments do not relate to the SA/SEA. Ecological Impact Assessments will be required at the planning application stage, and it is the responsibility of the applicant to prepare these. No changes are proposed.</p>



Respondent	Summary of Main Issues	Council response
	strengthening to ensure that developments do not adversely affect the SACs. The allocation at Lower Way in Thatcham requires an Ecological Impact Assessment to be conducted, but the Plan does not say who is responsible for carrying this out, nor does it say what powers the Council could use to enforce any findings from the EIA and ensure that there is no adverse impact on the Kennet SSSI.	
Nexus obo Croudace	Comments do not relate to SA/SEA	n/a
Pegasus Group obo Walkers Logistics	The failure to deliver the minimum employment needs has not been included in the updated SA – the assessment of policy SP20 fails to reflect on the alternative scenario advanced by the Council where somewhere between 40-60% of the identified needs fail to be planned for.	Comments noted. The issues raised have previously been considered and discussed as part of the Examination at the hearing sessions in May 2024. No changes proposed.
Prosper Infinity Ltd	<p>DM2 – flawed as has not taken into account Newbury Leisure Park as PDL. SA/SEA needs to be reviewed and amended.</p> <p>App 5 – Assessment is incorrect. Newbury Leisure Park is PDL. Policy seeks to undermine, prevent and oppose ‘promote and improve land use; and maximising the use of pdl/buildings.</p>	Comments noted. Newbury Leisure Park (THA21) was not taken forward as an allocation, and the reasons for this are set out within the Council’s response to AP29 ( <a href="#">EXAM32</a> ). Newbury Leisure Park was also discussed at the Examination Hearing Session on 2 October 2024. The Appropriate Countryside Designation Study ( <a href="#">SET2</a> ) explains the national policy relevant to the study. As part of the preparation of the LPR, a review of the District’s settlement boundaries was undertaken and this is set out within the Settlement Boundary Review Background Paper ( <a href="#">SET9</a> ). Newbury Leisure Park was not identified as being recommended for

Respondent	Summary of Main Issues	Council response
		<p>inclusion within the settlement boundary because it did not meet the criteria for inclusion. National planning policy has for some time placed an emphasis on optimising the use of previously developed land, and the spatial strategy as set out in SP1 echoes this. However just because a site is previously developed, does not necessarily mean it is suitable for development or a particular type of development. Less than 10% of the total site area lies within Flood Zone 1 which is at low risk of flooding. The site is being promoted for a residential use, and in the NPPF's flood risk vulnerability classification this is a 'more vulnerable' use. The NPPF is clear that development should be directed away from areas at the highest risk. There are other suitable sites which are not at risk of flooding. Newbury Leisure Park has not been included as an allocation because it is unsuitable. No changes are proposed.</p>
Pro Vision obo Hope and Clay Construction Ltd	It is considered the SA prejudices the prospect of development at Easter Park, simply because of its location in the DEPZ.	Comments noted. The Council disagrees the SA does this. The SA/SEA considered the site in terms of its potential as a site allocation and the approach taken in the LPR is not to allocate within the DEPZ. No changes proposed

Ref	Page	Document	No of responses
HRA	-	Habitats Regulations Assessment (HRA)	41

Respondent	Summary of Main Issues	Council response
Newbury Town Council	<p>Data limitations</p> <ul style="list-style-type: none"> <li>- Outdated/non-specific data – may not reflect current ecological conditions which will affect the accuracy of predictions. Legislation requires assessments to be based on best available evidence, using best practice recommendations.</li> <li>- Cumulative effects analysis – report lacks comprehensive analysis of cumulative effects from multiple plan policies/in combination with other projects. Could impact on protected sites.</li> <li>- Absence of detailed monitoring framework to track effectiveness of the proposed mitigation measures over time. Should have SMART monitoring framework and implement BNG</li> <li>- Insufficient analysis of climate change impacts</li> <li>- Limited evaluation of other regional plans</li> <li>- Generalised species impact analysis</li> </ul> <p>Addressing the weaknesses and gaps will mean a more robust framework to safeguard WBs valuable natural habitats while facilitating sustainable development.</p>	<p>Comments noted. The evidence base needs to be proportionate. Council considers it has undertaken the necessary work required at this stage of the plan making process. No changes proposed.</p>
<p>Antonia Elliott</p> <p>Belina Matthewman</p>	<p>Additional highway movements will impact on habitats in terms of air quality</p> <p>No evidence that soil quality will be maintained or improved impacting on wildlife</p>	<p>Comments noted. They do not relate specifically to a section of the HRA. No changes proposed.</p>

Respondent	Summary of Main Issues	Council response
Save Pincents Hill Group (30 separate individuals)	Berkshire Nature Recovery Strategy, will set out actions to protect biodiversity of local areas, reduce climate change and enhance other environmental benefits. Pincents Hill is open countryside which would seem to contradict the aims of the BLNRS.	Comments noted. They do not relate specifically to a section of the HRA. No changes proposed.
Bernie Southgate	Full habitat assessment is needed as it is AONB (NET)	Comments noted. Full habitat assessments will be done at the planning application stage. No changes proposed.
Sue Morgan Damian Musker David Southgate Alastair Guy & Victoria Lees Dave Peacock	Comments made not related to the HRA.	Noted. No changes proposed.
Ian Bell	Habitats are not a concern of the current government.	Noted. No changes proposed.
Alan Clapson	Dismisses Pincents Lane stating there will no adverse effects.	Comments noted. The HRA considers impacts on specified Habitats Sites. The site at Pincents Lane has been screened out as there is no potential for the proposal to result in adverse effects on the integrity of the Habitat Sites. No changes proposed.

## Appendix 1: List of Respondents

### Statutory Bodies:

Andrew Black obo Bucklebury Parish Council  
Cold Ash Parish Council  
Environment Agency  
Historic England  
Holybrook Parish Council  
Hungerford Town Council  
Irwin Mitchell LLP obo Enborne Parish Council  
National Highways  
Natural England  
Network Rail  
Newbury Town Council  
Purley on Thames Parish Council  
Thames Water  
Thatcham Town Council  
Tilehurst Parish Council

### General Consultation Bodies:

AWE & MOD  
Berkshire Gardens Trust  
Berkshire Oxfordshire & Buckinghamshire Integrated Care Board (BOB ICB)  
Burdwood Surgery  
Canal & River Trust  
Defence Infrastructure Organisation  
Exolum Pipeline System Ltd  
Office Nuclear Regulation (ONR)  
Pang Valley Flood Forum  
Rapleys obo Lambourn Trainers Association  
Reading West Mid Berkshire Labour Party  
Swifts Local Network: Swifts & Planning Group  
Thames Regional Flood and Coastal Committee  
The Woodland Trust  
Transport for London

### Other Stakeholders:

Adams, Dawn  
Adams, Paul  
Ainsworth, Jennifer & Richard  
Akister, Lisa  
Akister, Rachael  
Anderson, Angela  
Anderson, Kirsty  
Armstrong, Peter  
Atkins, Chris  
Avery, Chris

Bailey, Olivia MP  
Baker, Jane  
Barnes, Paul  
Basden, Caroline  
Beard, Michael  
Beeney, Nicola  
Bell, Ian  
Bell, Sharon  
Betskowski, Mark  
Betteridge, Jordan  
Billington, Clayton  
Bishop, Mike  
Boon, Stuart  
Booth, Anne  
Booth, John  
Boulos-Walsh, Mary  
Brand, A  
Brickley, Carol  
Bridle, David  
Brims, John  
Broady, Jan  
Broady, Sarah  
Butcher, Allison  
Butcher, Liz  
Carden, Liam  
Carmichael, Alan  
Carr, Eileen  
Carver, Linda  
Chenery, Abby  
Cheverton, Celestine  
Clapson, Alan  
Clarke, Sarah  
Codling, Cllr Heather  
Collard, Simon & Christine  
Collen, Charlotte  
Collen, Simon  
Connell, Julie  
Courtney, Neal  
Cox, Helen  
Cox, Jayne  
Croal, Charles  
Davies, John  
Davies, Steve  
Davis, Anne & Terry  
Dickens, Annette  
Dickens, Barry

Dillon, Jean & Peter  
Dodgson, Carmen  
Elliott, Antonia  
Ellis, Stephen & Marlene  
Emmens Roberts, Corey  
England, Graham  
Farmer, Zofia  
Fitchett, Laura  
Fittall, David  
Fleming, Maurice  
Frankum, Roger  
Frankum, Wynne  
Gamester, Stan  
Gomor, H E  
Goodwin, Ian  
Gray, Bernice  
Hadley, Robert  
Hallett, Florence  
Handy, John  
Hannam, Simon  
Harper, Sheena  
Harries, Allan  
Hay, Helen  
Hendry, Jonathan  
Hewitt, Jennifer  
Higgins, Glen  
Hill, Michael  
Hillen, Emma  
Hirst, Michael  
Holloway, Bridget  
Horne, Kevin  
Horne, Liz  
Johnson, Anthony  
Karlsen, Steve  
Kelly, Caroline  
Keystone Law obo Tompkins, Peter  
Kichenide, Lucia  
Knight, Mark  
Lau, Mr  
Lawrie, Fiona  
Lees, Alastair & Guy, Victoria  
Linden, Tony  
Lloyd, Eric  
Lovegrove, Jenny  
Ludford, David & Sonia  
MacKay, Christine

Magnusson, Anna  
Manning, Christine  
Marriage, Christopher  
Massy-Collier, Nancy  
Matchwick, Prue  
Matthewman, Belinda  
Maulini, Hannah  
Maulini, Maria  
May, Alison  
Mc Ginn, Tony  
McCullen, Neil  
McManus-Fry, Ellen  
Molloy, Stephanie  
Montague-Johnstone, Katharin  
Morando, Emanuela  
Morgan, Sue  
Morrison, Michael  
Muir, Carol  
Mumby, David & Emily  
Muncer, Graham  
Murawska, Marzena  
Musker, Damian  
Newby, Carol  
Newby, David  
Ng, Yeng  
Nottridge, Anthony & Madeline  
Ockenden, Alan  
Orfanos, Calliope  
Parascandolo, John  
Payne, Audrey  
Peacock, Dave  
Pearson, Maxine L  
Pike, Simon  
Pottinger, Emma  
Powell family  
Prior, Eileen  
Read, Cllr Chris  
Resident, C  
Resident, J  
Rowberry, IJ  
Rutherford, James & Anne  
Saunderson, Paula  
Save Pincents Hill Group (obo 30 separate individuals)  
Seth, Ben  
Shearn, Cara  
Skidmore, Nik



Smith, Craig  
Smith, Sharon  
Smyth, Norma  
Somerville, Neil & Rosalind  
Southgate, Bernie  
Southgate, David  
Southgate, Finola  
Spice, Jo  
Stockley, Mr & Mrs C  
Taylor, Cllr Clive  
Taylor, Leanne  
Taylor, Steve  
Teal, Phil  
Tompkins, David  
Triggs, Fay  
Tuttle, Annmarie  
Vaughan, Anne  
Vian, Mr & Mrs  
Vought, Paul  
Watson, Ian  
Watts, Serena  
Weedon, Peter  
Weller, Jane  
Weston, Paul  
White, Diane  
Whittaker, John & Gloria  
Wild, Janet  
Wilkinson-Flood, Karen  
Withers, Brian  
Woodrow, Steve  
Woods, Georgina  
Wyles, Helen  
Yau, Susanna

**Landowners, site promoters and developers:**

Atkinson, Joe  
Bell Cornwell obo Central Corporation (WHM) Ltd  
Firstplan obo Englefield Estate  
Gleeson Land  
JPPC obo Mr & Mrs Fenton  
Lichfields obo North East Thatcham Partnership  
Neame Sutton obo Donnington New Homes  
Nexus obo Croudace Homes  
Nexus obo Pangbourne Beavers  
Parkin, Jane  
Pegasus obo Walker Logistics

Planning Bureau obo McCarthy Stone & Churchill  
Pro Vision obo CALA Homes  
Pro Vision obo Hope & Clay  
Pro Vision obo Wasing Estate  
Prosper Infinity Ltd  
PSP obo Beftonforth Ltd  
Ridgepoint Homes  
Rolfe Judd obo Planned Holdings  
Rolfe Judd obo Regency Homes  
Stantec obo Copas Brothers  
Thakeham  
TOWN obo Pincents Lane  
Venners, Henry  
Viable Placemaking obo Young Estates  
Walsingham Planning obo Colthrop Village Consortium  
White Peak obo Bloor Homes Land south of Gorse Covert  
White Peak obo Bloor Homes Sandleford Park East  
Woolf Bond Planning Ltd  
WWA Studios obo Diocese of Oxford