

Summary of the key main issues raised during the consultation on the Proposed Main Modifications to the West Berkshire Local Plan Review 2022-2039

Introduction:

As part of the ongoing examination of the West Berkshire Local Plan Review (LPR), the Inspector asked that consultation be carried out on the Proposed Main Modifications that he considered would be necessary in order for the LPR to be found 'sound'. The consultation provided an opportunity for local residents and other key stakeholders to comment on the specific changes proposed to the Plan.

This report provides a summary of what the Council considers are the key main issues arising out of that public consultation which was undertaken between 6 December 2024 and 31 January 2025. This report should be read in conjunction with the full Report of Responses to the Proposed Main Modifications Consultation (February 2025) which lists all of the duly made representations and provides a summary of all of the main issues raised with a brief Council response to those main issues.

The representations in full are available to view at: <https://www.westberks.gov.uk/lpr-mainmods-consultationresponses>, whilst the Council's responses to the representations are presented in a separate document which is available to view on the Examination website: <https://www.localplanservices.co.uk/westberkshirelpr>.

In total there were 733 separate representations received from 270 individuals and organisations on the Proposed Main Modifications, including the Sustainability Appraisal (SA/SEA) and Habitats Regulation Assessment (HRA). The breakdown of the total number of responses received to each of the Proposed Main Modifications is set out in Appendix 1.

Summary of key main issues raised to the Proposed Main Modifications:

The following section gives a high-level summary of the main issues/objections raised in respect of the Proposed Main Modifications consultation. This is not intended to indicate the significance of the issues raised in individual representations, which will be a matter for the Inspector.

Statutory consultees and general consultation bodies

There were no significant new issues raised by statutory consultees. The Environment Agency (EA) did raise concern against all the site allocations in the submitted LPR, querying whether the modifications previously agreed through the Statement of Common Ground between the Council and the EA had been taken into account in the Main Modifications to be included in the LPR. The Council has subsequently engaged further with the EA regarding its representation and can now confirm that the EA is content with the approach being taken and has no objections to the Proposed Main Modifications.

With regard to general consultation bodies, the Berkshire Oxfordshire & Buckinghamshire Integrated Care Board (BOB ICB) commented on specific policies and sought specific reference to the need for developer contributions to support improvements to primary care facilities.

Whilst ONR support the proposed modifications to policy SP4, AWE/MOD sought amendments to the policy to restrict against development proposals that would lead to an

increase in the residential or non-residential population. AWE also suggested additional wording which would require the ONR and MOD/AWE to be consulted on any development proposals within the Detailed Emergency Planning Zone (DEPZ) which would lead to an increase in population or activity. AWE/MOD has sought the inclusion of reference to policy SP4 in multiple locations across the Plan to ensure the effectiveness of the policy.

There was continued concern from some parish and town councils, including Thatcham, Bucklebury, Cold Ash, Tilehurst and Enborne about the impact of development on their communities from the strategic site at North East Thatcham (NET), the proposed new allocations in Thatcham and Tilehurst and the Travelling Showpeople site in Enborne. Cold Ash Parish Council also raised its continued concern that there had been a lack of regard to its adopted neighbourhood plan.

Development Strategy:

There continues to be concern regarding the approach taken through the spatial strategy not to allocate within settlement boundaries and the perceived implications this has for the supply and delivery of housing within the District. Some consultees felt this approach placed an over reliance on windfalls and resulted in more greenfield allocations than would be required. Some of the representations also highlighted a desire to see more flexibility with regard to the densities set out in the spatial strategy. In addition, objections were raised to the proposed amendments to the settlement boundaries, in particular at Pangbourne, Thatcham, and Tilehurst.

Delivering Housing:

Support was given to the expression of the housing requirement as a minimum. However, a number of representations raised the need to consider the increased local housing need (LHN) figure arising from the December 2024 National Planning Policy Framework (NPPF) and subsequent changes to the standard methodology used for calculating local housing need. Concern was raised regarding an inappropriate distribution and identification of site allocations, as it was felt that more work could have been undertaken to avoid further greenfield allocations within the Plan.

There remained continued public concern about the principle of development at NET, and the ability of the infrastructure to cope, in particular, from communities to the north concerned about the traffic and highways impacts. However, no new issues were raised.

Delivering Economic Growth and Supporting Local Communities:

Some representations continued to raise the issue of supply, outlining that the Main Modifications do not address the lack of employment land provision over the plan period. Others also raised concern regarding the approach taken with regard to allocating employment sites within the DEPZ.

Non-Strategic Site Allocations:

With regard to specific sites, there were comments from site promoters continuing to promote specific sites not allocated within the Plan and/or not included within the settlement boundary. Site specific comments were also received from site promoters in relation to site allocations, largely supporting a particular allocation but with some also seeking further modifications to the development parameters set out within site specific policies. A couple of additional sites were promoted as well.

Particular concern was expressed by some in relation to the lack of consultation undertaken on the new housing site allocations proposed through the Main Modifications. Some stated that the process of site assessment was flawed and there was significant concern voiced from the local community about the impact of development at Pincents Hill in Tilehurst.

The approach taken to Travelling Showpeople within the LPR was raised by some, with representations noting that the Council had not properly responded to the Inspector's action points during the examination process. In addition, it was stated that there was a lack of evidence behind the allocation and the current planning application is being used as demonstrative need, with the GTAA being seen as out of date. The representations outlined a reliance on the existing use of one individual plot to support the policy. Enborne Parish Council outlined that it would seek legal challenge if the allocation (RSA25) remained in the LPR.

Development Management Policies:

The main issue to arise in this section was in relation to policy DM20 and the approach taken to Travelling Showpeople within the LPR, as outlined above. A number of representations commented on other development management policies within the Plan, however none of the representations raised any issues that had not already been considered and discussed as part of the examination, or raised any issues that would prevent the Council from continuing with the proposed modifications as consulted upon.

Habitats Regulations Assessment (HRA):

The main issues raised with regard to the HRA related to data limitations which if addressed could result in a more robust framework, proposals to develop Pincents Hill, which is open countryside, and so contradicted the aims of the Berkshire Local Nature Recovery Strategy. It was also commented that a full habitat assessment was required for the North-East Thatcham site.

Sustainability Appraisal (SA/SEA):

There were a large number of responses to the SA/SEA and overall, the main issues were that the document lacked detail, failed to provide a comprehensive and accurate assessment of individual sites and the data contained within it was not up to date. Some representations outlined that the SA/SEA had failed to take account of the new duty in the Levelling Up and Regeneration Act (LURA) 2023 in relation to Protected Landscapes to 'seek to further the purpose of conserving and enhancing the natural beauty of the area'. It was also noted that due weight needed to be given to all comments on the SA/SEA, not just those relating to the proposed modifications.

Council response:

All the comments received have been noted and duly considered. Overall, representations were received on most of the proposed modifications, with some general comments on the plan as a whole, which did not specifically relate to an individual Proposed Main Modification.

Issues raised regarding the continued in principle objection to the Council's spatial strategy are beyond the scope of the Main Modifications and the consideration of such issues would now be more appropriately dealt with in the preparation of the next Local Plan. The same can be said for the need to consider the increased LHN figure arising from the December 2024 NPPF and subsequent changes to the standard methodology used for calculating local housing need. The transitional arrangements make clear there is no requirement to

revisit the housing requirement at this point in time, and this will be considered further as part of the next Local Plan for the District.

Some of the representations sought the cross referencing of policies, however 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 [submitted LPR \(CD1\)](#).

The majority of the issues raised through the consultation have been raised previously and have been considered and discussed as part of the Examination. In responding to the individual responses, the Council has signposted where and when issues have already been addressed – see the full report on the Council's Response to the Proposed Main Modifications consultation.

As a result of the responses there are a few specific instances where the Council considers that further clarification within the LPR is required, and these are set out in the Schedule of Proposed Further Main Modifications (February 2025). The Proposed Further Main Modifications relate to:

- Policy SP12 - to clarify the annual housing requirement, as well as making clear that the Council can demonstrate a five-year housing supply post adoption of the Plan.
- Policy RSA1 – to clarify the need for the requirement for a Flood Risk Assessment
- New RSA policy – Henwick Park - to ensure factual accuracy with regard to the indicative map for the site and the geographical depiction of policy DM2. This Proposed Further Modification results in a consequential change to the settlement boundary around Thatcham on the Policies Map. This proposed change is set out in the Schedule of Proposed Further Changes to the Policies Map (February 2025)

In the main, and excluding those further modifications outlined above, the representations did not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Main Modifications consulted on between 6 December 2024 to 31 January 2025.

What happens next?

The representations received during the Proposed Main Modifications consultation have been submitted to the Inspector undertaking the examination, along with a summary of the main issues and the Council's response to the issues raised.

The Inspector will consider all the comments received and will decide whether any further hearings are necessary, or if any issues need to be revisited before issuing his final report.

Appendix 1**The total number of responses received to each of the Proposed Main Modifications:**

Ref	Policy/Paragraph of submitted LPR	No of responses
Plan as a whole	General observations	9
Plan as a whole	No comments	3
MM1	Paragraph 4.11 Vision	3
MM2	Paragraph 4.17 Key diagram	0
MM3	Policy SP1 Spatial strategy	101
MM4	Policy SP2 AONB	5
MM5	Supporting text to policy SP2	10
MM6	Policy SP3 Settlement hierarchy	5
MM7	Supporting text to policy SP3	4
MM8	Policy SP4 AWE	5
MM9	Supporting text to policy SP4	2
MM10	Policy SP6 Flood risk	5
MM11	Supporting text to policy SP6	3
MM12	Supporting text to policy SP7	1
MM13	Policy SP9 Historic environment	1
MM14	Supporting text to policy SP9	3
MM15	Policy SP10 Green Infrastructure	2
MM16	Policy SP11 Biodiversity	0
MM17	Supporting text to policy SP11	3
MM18	Policy SP12 Housing delivery	10
MM19	Supporting text to policy SP12	10
MM20	Policy SP13 Sites Allocated in Newbury and Thatcham	1
MM21	Policy SP14 Sites Allocated in Eastern Area	0
MM22	Policy SP15 Sites Allocated in AONB	1
MM23	Policy SP16 Sandford Strategic site	4
MM24	Supporting text to policy SP16	4
MM25	Policy SP17 North East Thatcham strategic site	67
MM26	Supporting text to policy SP17	39
MM27	Policy SP18 Housing type & mix	2
MM28	Policy SP19 Affordable Housing	5

Ref	Policy/Paragraph of submitted LPR	No of responses
MM29	Supporting text to policy SP19	4
MM30	Policy SP20 Employment land	6
MM31	Supporting text to policy SP20	4
MM32	Policy SP21 Sites for employment land	1
MM33	Policy SP22 Town & district centres	2
MM34	Policy SP24 Infrastructure requirements & delivery	2
MM35	Paragraph 8.2	1
MM36	After para 8.2 Sites allocated: Newbury and Thatcham	7
MM37	Policy RSA1 Newbury College, Newbury	2
MM38	Policy RSA2 Bath Rd Speen, Newbury	2
MM39	Policy RSA3 Coley Farm, Newbury	1
MM40	Policy RSA4 Greenham Rd, Newbury	1
MM41	Policy RSA5 Lower Way, Thatcham	1
MM42	New RSA policy - Land at Henwick Park	16
MM43	New RSA policy - Land east of Regency Park Hotel,	14
MM44	New paras before Policy RSA6 Sites allocated: Eastern Area	11
MM45	New RSA policy - Land at Pincents Lane, Tilehurst	140
MM46	Policy RSA6 Stonehams Farm, Tilehurst	1
MM47	Policy RSA7 72 Purley Rise, Purley on Thames	1
MM48	Policy RSA8 Dorking Way, Calcot	1
MM49	Policy RSA9 Land between A340 & The Green, Theale	2
MM50	Policy RSA10 Whitehart Meadow, Theale	1
MM51	Policy RSA11 Former STW, Theale	1
MM52	Policy RSA12 Pondhouse Farm, Burghfield Common	1
MM53	Policy RSA13 A4 Bath Road, Woolhampton	2
MM54	New paras before Policy RSA14 Sites allocated AONB	3
MM55	Policy RSA14 Lynch Lane, Lambourn	1
MM56	Policy RSA15 Newbury Road, Lambourn	1
MM57	New RSA policy - North of Pangbourne Hill, Pangbourne	9
MM58	Policy RSA16 Southend Road, Bradfield Southend	1
MM59	Policy RSA17 Chieveley Glebe, Chieveley	4
MM60	Policy RSA18 Pirbright Institute, Compton	1
MM61	Policy RSA19 Spring Meadows, Great Shefford	1

Ref	Policy/Paragraph of submitted LPR	No of responses
MM62	Policy RSA20 Charlotte Close, Hermitage	1
MM63	Policy RSA21 Old Farmhouse, Hermitage	2
MM64	Policy RSA22 Station Road, Hermitage	2
MM65	Policy RSA23 The Haven, Kintbury	1
MM66	Policy RSA25 Long Copse Farm, Enborne	6
MM67	Para 8.3 Sites allocated for employment land	3
MM68	Policy ESA1 Land east Colthrop Industrial Estate, Thatcham	1
MM69	Policy ESA2 Land west of Ramsbury Road, Membury Estate	2
MM70	Policy ESA3 Land to south of Trinity Grain, Membury Estate	2
MM71	Policy ESA4 Beenham Landfill, Pips Way, Beenham	1
MM72	Policy ESA5 Northway Porsche, Grange Lane, Beenham	1
MM73	Policy DM1 Development in the Countryside	2
MM74	Policy DM3 Health and Wellbeing	3
MM75	Policy DM4 Sustainable homes & buildings	2
MM76	Supporting text to policy DM4	1
MM77	Supporting text to policy DM6 Water Quality	1
MM78	Policy DM7 Water Resources & Waste Water	6
MM79	Supporting text to policy DM7	4
MM80	Policy DM9 Conservation Areas	1
MM81	Supporting text to policy DM9	1
MM82	Policy DM10 Listed Buildings	1
MM83	Policy DM11 non-designated heritage assets	0
MM84	Policy DM15 Trees, woodland and hedgerows	1
MM85	Supporting text to policy DM15	0
MM86	Policy DM19 Specialised housing	3
MM87	Supporting text to policy DM19	1
MM88	Supporting text to policy DM20	4
MM89	Policy DM27 Sub-Division of Dwellings in the Countryside	0
MM90	Policy DM30 and supporting text Residential space standards	2
MM91	Policy DM31 Residential amenity	0
MM92	Supporting text to policy DM31	1
MM93	Supporting text to policy DM32	2
MM94	New DM policy & ST - RAF Welford & Denison Barracks	1

Ref	Policy/Paragraph of submitted LPR	No of responses
MM95	Policy DM35 Rural economy	1
MM96	Supporting text to policy DM35	1
MM97	Policy DM37 Equestrian and Horseracing Industry	1
MM98	Supporting text to policy DM37	1
MM99	Policy DM38 Existing Educational Sites in the Countryside	0
MM100	Supporting text to policy DM38	0
MM101	Policy DM41 Digital infrastructure	1
MM102	Policy DM42 Transport infrastructure	1
MM103	Policy DM43 Theale Rail – Road Transfer Site	3
MM104	Supporting text to policy DM43	2
MM105	Policy DM44 Parking	2
MM106	Policy DM45 Travel Planning	0
MM107	Supporting text to policy DM45	2
MM108	Appendix 3 AWE maps	0
MM109	Appendix 6 NDPs	0
MM110	Appendix 7 Policies superseded	1
MM111	Appendix 8 Housing trajectory	2
SA/SEA	SA/SEA	61
HRA	HRA	41