

West Berkshire Local Plan Review 2022 – 2039 (LPR) Examination

West Berkshire Council response to

IN29: Action Points from week 5 hearing session

AP73. Council to amend the proposed modification to policy SP17 and/or reasoned justification to:

- Delete “to serve the development” in the first sentence under the heading “Community”.
- Clarify that some of the social infrastructure proposed will serve the wider population, as well as future residents on the site, and not all of it will be wholly funded by the housing developers.
- Move the bullet point relating to outdoor sports pitches to the green infrastructure section bullet point relating to open space to be provided within the developed parts of the site and include reference to policy DM40¹.
- Clarify the second bullet point under the heading “Heritage” relating to the setting of the adjacent listed buildings, with reference as appropriate to policies SP9 and DM10.

¹ Consider deleting reference to DM40 in the first sentence under the heading “Green infrastructure”.

Council Response

The Council has made the changes requested by the Inspector as set out above. As a consequence, it now proposes the following Proposed Modifications to the submitted version of policy SP17 and its supporting text:

Ref	Page of submitted LPR	Policy / Paragraph of submitted LPR	Proposed Main Modification	Reason for Modification
	63	Policy SP17	<p><i>Amend text under ‘Community’ heading of policy as follows:</i></p> <p><u>‘The site will provide a range of community facilities, including:</u></p>	<p>As a consequence of deleting ‘to serve the development’ previously proposed by the Council. Clarification of policy wording in response to the Inspector’s Action Point AP73 contained within IN29</p>

Ref	Page of submitted LPR	Policy / Paragraph of submitted LPR	Proposed Main Modification	Reason for Modification
	66	New paragraph after 6.61	<p><u>The site will deliver a number of community benefits, both for the new residents of the site and for existing residents of Thatcham. The community infrastructure required to support the development is set out in the policy, the specific details, including the location, size, and funding arrangements will be determined through the planning application stage. There may potentially be opportunities for some community infrastructure to be provided off site, or for improvements to existing services or facilities to be made as a result of the development.'</u></p>	Clarification of policy wording in response to the Inspector's Action Point AP73 contained within IN29
	63	Policy SP17	<p><i>Move text from under 'community' heading to 'Green Infrastructure' heading of policy as follows:</i></p> <ul style="list-style-type: none"> • <u>'Outdoor formal and informal sports pitches and areas'</u> <p><i>Amend text under Green Infrastructure heading as follows:</i></p> <p><u>'Green Infrastructure and open space within the developed parts of the site in addition to the community park, taking into account the requirements set out in DM40'</u></p>	Clarification of policy wording in response to the Inspector's Action Point AP73 contained within IN29
	64	Policy SP17	<p><i>Amend text under 'Heritage' heading as follows:</i></p> <p><u>'Development proposals for the site will be supported by a A Historic Environment Strategy in accordance with SP9 to demonstrate how the site's historical development, archaeological remains and historic buildings and parkland will inform the scheme and help to create a sense of place.'</u></p>	Clarification of policy wording in response to the Inspector's Action Point AP73 contained within IN29

In addition to the above proposed Main Modifications in response to the Inspector's Action Point 73, the Council also proposes the following clarifications to the Main Modifications it proposed as a result of the Inspector's Action Points AP15-24.

Ref	Page of submitted LPR	Policy / Paragraph of submitted LPR	Proposed Main Modification	Reason for Modification
	63	Policy SP17	<p><i>Amend text at first paragraph as follows:</i></p> <p>'..... provision of all infrastructure, services, open space and facilities <u>will meet the needs of the development will and be delivered in a timely and co-ordinated way across the whole site ...</u></p>	Clarification as to the requirement of proposals for the site to meet the needs of the development.
	63	Policy SP17	<p><i>Amend text under 'Community' heading of policy as follows:</i></p> <p>...</p> <ul style="list-style-type: none"> • Local centres providing local retail facilities and small-scale employment <u>business-use including ...</u> • 	Clarification as to the requirement for the local centre in terms business use/employment.
	64	Policy SP17	<p><u>Flooding and Water Environment</u></p> <p><u>Development proposals for the site will be supported by a Flood Risk Assessment, in accordance with policy SP6, which will take into account the Thatcham Surface Water Management Plan and sets out:</u></p> <ul style="list-style-type: none"> ○ <u>adequate flood mitigation measures to ensure there is no detrimental impact on flood risk in Thatcham;</u> ○ <u>surface water drainage management approaches that could deliver net gain for Thatcham town, including use of on-site sustainable drainage systems (SuDS); and</u> ○ <u>Flood alleviation measures already present on the site</u> 	Changes made to ensure consistency with SP6 and DM7, as a result of AP40 contained within IN26 and AP72 contained within IN27

Ref	Page of submitted LPR	Policy / Paragraph of submitted LPR	Proposed Main Modification	Reason for Modification
			<p><u>and how they will be retained, protected and enhanced.</u></p> <p><u>Development proposals also need to consider water resources and waste water in accordance with policy DM7.</u></p>	

An updated tracked changes version of policy SP17 and its supporting text is appended to this response (Annex A). These Proposed Modifications supersede any previous Proposed Main Modifications published by the Council.

An accompanying commentary is also set out in Annex B.

AP74. Council to clarify the implications of the latest evidence in EXAM42 Annex E (Tables 2, 3, 5, 6, 8 and 9) on the housing trajectory set out in EXAM22, including for the five year supply from 1 April 2026 (which assumed a contribution of 320 dwellings on the North East Thatcham site up to 31 March 2031).

Council Response

Table 1 below illustrates what the five year housing land supply from 1 April 2026 to 31 March 2031 will be based on using the latest evidence in EXAM 42 Annex E (Tables 2, 3, 5, 6, 8 and 9):

Table 1: Implications of the evidence in EXAM42 Annex E upon the five year housing land supply (1 April 2026 to 31 March 2031)

	Option 1 – Council adopts the masterplan as SPD prior to submission of a planning application		Option 2 – Council agrees the masterplan as informal guidance prior to the submission of a planning application		Option 3 – Council agrees the masterplan during the planning application process	
	Table 2 (low estimate)	Table 3 (high estimate)	Table 5 (low estimate)	Table 6 (high estimate)	Table 8 (low estimate)	Table 9 (high estimate)
A. 5 year housing land requirement including a 5% buffer	2,704 (515 * 5 years * 1.05)					
B. 5 year deliverable housing land supply	2,769	2,769	2,789	2,769	2,845	2,807
C. Total deliverable housing supply in years (B / A * 5)	5.1 years	5.1 years	5.2 years	5.1 years	5.3 years	5.2 years

With longer lead-in times to the anticipated delivery at North East Thatcham based on different scenarios presented in Annex E, the Council can demonstrate between a 5.1 to 5.3 years' supply of deliverable housing sites following the adoption of the Plan.

Table 2 below illustrates what the total housing land supply from 1 April 2023 to 31 March 2041 will be based upon using the latest evidence in EXAM 42 Annex E (Tables 2, 3, 5, 6, 8 and 9):

Table 2: Implications of the evidence in EXAM42 Annex E upon the housing land supply across the Plan period (1 April 2023 to 31 March 2041)

	Option 1 – Council adopts the masterplan as SPD prior to submission of a planning application		Option 2 – Council agrees the masterplan as informal guidance prior to the submission of a planning application		Option 3 – Council agrees the masterplan during the planning application process	
	<i>Table 2 (low estimate)</i>	<i>Table 3 (high estimate)</i>	<i>Table 5 (low estimate)</i>	<i>Table 6 (high estimate)</i>	<i>Table 8 (low estimate)</i>	<i>Table 9 (high estimate)</i>
A. Total housing requirement	9,270					
B. Total housing supply	8,864	8,712	8,872	8,826	8,872	8,872
C. Total housing supply against requirement (B - A)	-406	-558	-398	-444	-398	-398

The total housing supply against the requirement varies from -398 to -558 depending upon the options and low / high estimates of the anticipated delivery at North East Thatcham.

ANNEX A

Proposed Modifications to Policy SP17 and its supporting text as Submitted

These Proposed Modifications supersede any previous Proposed Main Modifications published by the Council.

Boxed numbers to the right of the policy refer to commentary on Main Modifications proposed to the policy as set out in Annex B.

Policy SP17 North East Thatcham Strategic Site Allocation

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

NET1

Homes

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

NET2

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

Community

The site will provide a range of community facilities, including:

NET3

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

NET4

NET5

- ~~A 2.5FTE p~~ Early years and P primary school provision on site and sports infrastructure requirements of the school. L with land to be provided and build costs to be met by the applicant;
- Secondary school and SEND provision, including the provision of land and a financial contribution, ~~land to meet the impact of the development.~~ The nature and cost of the required provision mitigation will be informed by a feasibility study, undertaken at the applicant's expense and prepared in collaboration with the Council and local stakeholders;
- ~~A 1,200sqm e~~ Community indoor facility to be used for sport and community uses with a variety of room sizes (currently use classes E and F);
- ~~Outdoor formal and informal sports pitches and areas to meet the identified needs of the development;~~
- ~~Open space to meet the needs of the development in accordance with Policy DM41.~~

NET6

NET7

NET8

Green Infrastructure

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

NET9

This network will comprise:

The provision will include:

- Conservation of the areas of ancient woodland by providing appropriate buffers between the development and the ancient woodland;
- Enhancements for biodiversity;
- A band of green infrastructure/new community park across the higher land on the northern part of the allocation (as shown on the indicative map fig.X) to be retained outside the settlement boundary. This is to create a buffer between the built development of the allocation and the adjoining countryside and the village of Upper Bucklebury to the north. The precise nature of the band of GI to be informed by a Landscape and Visual Impact Assessment and the masterplanning process;
- ~~A new community park linking Thatcham to the North Wessex Downs AONB;~~
- Green Infrastructure and open space within the developed parts of the site in addition to the community park, taking into account the requirements set out in DM40;
- Greenways which connect through the site to the park and facilitate connectivity to the wider landscape and the existing Public Rights of Way network; connection to the AONB, and include leisure routes accessible to all users.
- ~~A comprehensive network of other accessible routes and connections within the development which provide walking and cycling links along desire lines;~~
- Existing and new Public Rights of Way and A Public Rights of Way Strategy to demonstrate how existing Public Rights of Way will be protected and enhanced and how new ones will be established, including bridleway links and safe crossing points;

NET10

- ~~Retained~~ Retention of existing and provision of new trees, hedgerows and other appropriate native planting which contribute to biodiversity net gain;
- Provision of allotments;
- Outdoor formal and informal sports pitches and areas and
- A Green Infrastructure Strategy to show how the network of multifunctional green infrastructure will be delivered across the site.

Transport

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

NET11

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

NET12

- Active travel Improvements on routes between the site, Thatcham town centre and the railway station;
- Multiple access points and A-a vehicular through route;
- Sustainable transport through routes;
- Mitigation of the development's impacts on the highways network with improvements to existing junctions where they are needed and delivery of new access points for all forms of movement and transport to the site at locations to be agreed with the planning authority; ~~and~~
- How adverse impacts on air quality will be minimised; and
- Promotion and encouragement of sustainable modes of travel, in accordance with policy DM45.

Sustainability

Development ~~proposals for~~ of the site will be supported by an Energy Statement or a detailed energy section within the Sustainability Statement ~~Charter~~ which will establish how policy requirements ~~will be achieved~~. This ~~will be informed by:~~

NET13

- An ~~Energy Strategy~~ which sets out measures ~~to achieve a model low carbon development (following the energy hierarchy) in accordance with Policies SP5 and DM4;~~ including:
 - ~~Net zero carbon (regulated and unregulated energy) emissions for dwellings;~~
 - ~~BREEAM 'excellent' non residential buildings;~~
 - ~~on-site renewable energy to assist in the delivery of a net zero carbon neutral development; and~~
 - ~~carbon off-setting.~~
- ~~An Integrated Water Supply and Drainage Strategy which will set out:~~
 - ~~Measures to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site; and~~
 - ~~Surface water management approaches that could deliver net gain for Thatcham town, including use of on-site sustainable drainage systems (SuDS).~~

NET14

- ~~An Ecology Strategy which will set out:

 - ~~A Biodiversity Net Gain Strategy to show how net gain will be achieved including through habitat restoration and linkages;~~
 - ~~How priority habitats and ecological features will be protected and enhanced;~~
 - ~~The creation of new ecological features; and a site-wide management plan.~~~~
- ~~A Green Infrastructure Strategy which will show how a network of multifunctional green infrastructure will be delivered across the site.~~
- ~~A Public Rights of Way Strategy to demonstrate how existing Public Rights of Way will be protected and enhanced and how new ones will be established, including bridleway links and safe crossing points.~~
- ~~A Lighting Strategy which will include consideration of dark skies, particularly in relation to the nearby North Wessex Downs AONB, and measures to mitigate the impact on biodiversity.~~
- ~~A Landscape and Visual Impact Assessment (LVIA) in accordance with the Landscape Institute Guidelines for Landscape and Visual Impact Assessment 3rd edn. 2013. This will inform the final capacity, development, design and layout of the site and requirements for green infrastructure and the provision of public open space. The LVIA will be informed by the Landscape Sensitivity Assessment (2021) of the site.~~
- ~~A Mineral Resource Assessment (MRA)~~
- ~~A Historic Environment Strategy to demonstrate how the listed buildings in the area will be conserved and how the impact of the development on their settings has been considered.~~
- **A Construction and Operations Management Plan (COMP) to shall** accompany any planning application on the site. The COMP shall safeguard the oil pipeline from operational works, including the provision of an appropriate buffer.

NET15

Flooding and Water Environment

Development proposals for the site will be supported by a Flood Risk Assessment, in accordance with SP6, which will take into account the Thatcham Surface Water Management Plan and sets out:

NET16

- adequate flood mitigation measures to ensure there is no detrimental impact on flood risk in Thatcham;
- surface water drainage management approaches that could deliver net gain for Thatcham town, including use of on-site sustainable drainage systems (SuDS); and
- Flood alleviation measures already present on the site and how they will be retained, protected and enhanced.

Development proposals also need to consider water resources and waste water in accordance with policy DM7.

Biodiversity

Development proposals for the site will be supported by a Biodiversity Strategy in accordance with policy SP11 which will set out:

NET17

- How biodiversity net gain will be achieved including through habitat restoration and linkages;
- How priority habitats and ecological features will be protected and enhanced;
- The creation of new ecological features; and
- A site-wide biodiversity management plan.

Landscape

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

NET18

Heritage

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

NET19

Lighting

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

NET20

Mineral Resources

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

NET21

Masterplanning and Design Code

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

NET22

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

Supporting text

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

6.53 The vision for Thatcham contained in the Core Strategy DPD (2012) was that Thatcham town centre would be a focus for regeneration, enabling the town to fulfil its role within the District's Hierarchy of Centres by improving the retail offer and enhancing the streetscape. The provision of leisure and community facilities for all ages would be improved and encouraged within the town centre. The town would become more self-contained providing a range of job opportunities and encouraging residents to shop and socialise locally. Additionally, the Core Strategy concentrated housing expansion in Newbury.

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

NET23

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

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

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

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

NET24

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

6.60 The Council's spatial strategy is outlined in Policy SP1 and affirms a continued approach to focusing development in settlements in line with a District-wide settlement hierarchy (contained in Policy SP3). Thatcham, as part of the Newbury and Thatcham urban area, is a sustainable location for development as confirmed in the Strategic Vision 2050. The TSGS shows the most sustainable way for development to come forward in the town and this policy draws on that evidence.

NET25

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

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

NET26

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

NET27

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

NET28

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

NET29

x.xx The site will deliver a number of community benefits, both for the new residents of the site and for existing residents of Thatcham. The community infrastructure required to support the development is set out in the policy, the specific details, including the location, size, and funding arrangements will be determined through the planning application stage. There may potentially be opportunities for some community infrastructure to be provided off site, or for improvements to existing services or facilities to be made as a result of the development.

NET30

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

NET31

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

NET32

x.xx Flood risk and surface water drainage is a key consideration for Thatcham, following extensive surface water flooding in the summer of 2007 as a result of high intensity rainfall overwhelming storm drains and culverted streams. The flood event was considered to be in the order of a 1 in 200 year event. Following the flooding various studies and strategies were developed to identify opportunities for reducing flood risk in the town. The Thatcham Surface Water Management Plan (2010) sets out a number of proposed measures to reduce flood risk in Thatcham, focusing on retaining runoff upstream of Thatcham to reduce peak flows through the existing urban area and drainage system. A number of flood attenuation ponds have been

NET33

constructed on the North East Thatcham site, and these are to be retained and enhanced in addition to Sustainable Drainage Systems (SuDS) provided on the site. The Integrated Water Supply and Drainage Strategy involving localised and strategic flood management measures will be required, in line with the requirements of the West Berkshire Sustainable Drainage Systems SPD (2018).

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

~~6.63 Further detailed work will be required to develop a coherent masterplan to take the development forward. The Council will commission the masterplan, this~~ which will be produced in collaboration with the applicant, the community and other stakeholders and funded by the developer as part of a Planning Performance Agreement. It will be based on existing evidence and information already produced to support the allocation of the site, including the Thatcham Strategic Growth Study. The masterplan will provide a guide as to the location and extent of built development, land uses green infrastructure including the green buffer, key access arrangements, community and other infrastructure. The Masterplan will be agreed, by the Council, prior submission of a planning application.

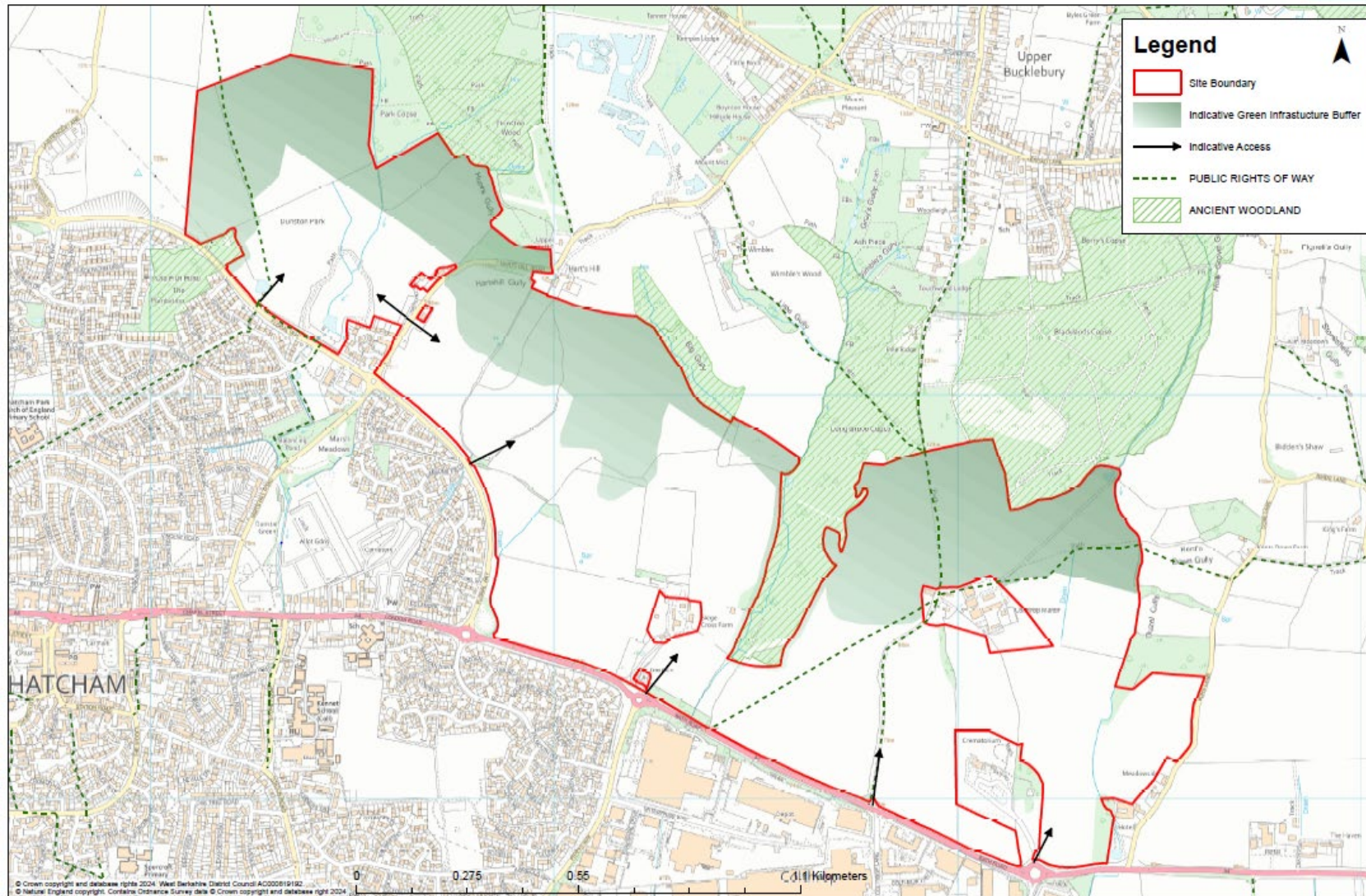
NET34

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

NET35

NET36

North East Thatcham - Indicative Site Plan



ANNEX B

Commentary on Main Modifications proposed to policy SP17 and its supporting text following submission set out in Annex A

Ref	Location	Modification	Reason
NET1	Policy SP17 1 st Paragraph	Land as shown on the Policies Map is allocated for <u>the delivery of a comprehensive</u> , sustainable, low carbon, urban extension comprising of distinct neighbourhoods defined by their landscape, and connected and contributing to Thatcham, and woven through with natural habitats and links. . The site will be masterplanned <u>Proposals must demonstrate how and delivered as a whole to achieve a comprehensive development.</u> The <u>the provision of all infrastructure, services, open space and facilities will meet the needs of the development will and be delivered in a timely and co-ordinated way across the whole site alongside the phased delivery of residential development.</u> The Thatcham Strategic Growth Study provides guiding principles for the delivery of the site therefore proposals will demonstrate that these guiding principles have been positively responded to.	For clarity and effectiveness. To ensure the policy sets out the overall key requirements for the development and to provide clarity as to the policy is expected to be delivered. See Council's written statement Matter 4, Q4.16. Further changes made in response to the Inspector's Action point AP15.
NET2	Policy SP17 'Homes'	The site is to be allocated for <u>the phased delivery of</u> approximately 1,500 dwellings which will be completed within the period of the <u>P</u> plan. These dwellings will comprise <u>an appropriate mix of a housing types, tenures and sizes having regard to mix which complies with the housing mix contained in Table 3 of p</u> Policy SP18. In addition at least: <ul style="list-style-type: none"> • 40% of dwellings will be affordable housing <u>in accordance with SP19</u>; and • 3% of dwellings will be delivered via serviced custom/self-build plots. 	Clarification as the housing mix expected on the site in response to the Inspector's Action Point AP16. Reference to SP19 also added for clarity.

Ref	Location	Modification	Reason
NET3	Policy SP17 'Community' 1 st sentence	The site will provide <u>a range of community facilities, including:</u>	In response to Inspector's Action Point AP73
NET4	Policy SP17 'Community' Local centre	<ul style="list-style-type: none"> Local centres providing local retail facilities and small-scale <u>employment business-use including</u> for community use (approximately 1,100sq.metres Class E and F2); 	For effectiveness. Removal of use class and floor area. Originally included to give certainty about what would be required on site but does not provide the flexibility needed to deliver the infrastructure requirements. See Council's written statement Matter 4, Q4.7. Change of 'employment' to 'business-use' for consistency with references throughout the document and to allow flexibility.
NET5	Policy SP17 'Community' Health Care	<ul style="list-style-type: none"> <u>Primary Healthcare provision and associated infrastructure, which is operationally and financially viable, the details of which should be agreed with 450sq.metres GP Surgery to be offered to the Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board (BOB-ICB) or other such appropriate body, taking into account the feasibility study carried out by BOB-ICB. Further detailed feasibility work should be carried out at the applicant's expense in collaboration with BOB ICB;</u> 	For effectiveness. To adopt a more general policy requirements for health care facilities, in line with discussions between the Council and the BOB ICB. See Council's written statement Matter 4, Q4.6 .

Ref	Location	Modification	Reason
			<p>Further modifications made in response to the Inspector's Action Point AP20. Modification has been agreed by the BOB ICB.</p>
NET6	<p>Policy SP17 'Community' Education</p>	<ul style="list-style-type: none"> • Early years provision; • A 2.5FTE p <u>Early years and P</u>primary school <u>provision</u> on site and sports infrastructure requirements of the school. L <u>with</u> land to be provided and build costs to be met by the applicant; • <u>Secondary school and SEND provision, including the provision of land and a financial contribution, –land to meet the impact of the development.</u> The nature and cost of the <u>required provision mitigation</u> will be informed by a feasibility study, undertaken at the applicant's expense and prepared in collaboration with the Council and local stakeholders; 	<p>To provide clarity and ensure that the policy if effective in ensuring adequate education facilities are provided on the site to meet the needs of the development. See Council's written statement Matter 4, Q4.5. Further changes have been made for clarity around the secondary school provision, and inclusion of SEND in response to increasing numbers of SEND pupils across the District and in response to the Inspector's Action Point AP20.</p>
NET7	<p>Policy SP17 'Community' Community</p>	<ul style="list-style-type: none"> • A 1,200sqm e <u>Community indoor facility</u> to be used for sport and community uses with a variety of room sizes (currently use classes E and F); 	<p>For effectiveness. Removal of use class and floor area. Originally included to give certainty about what would be required on site but does</p>

Ref	Location	Modification	Reason
	Indoor Facility		not provide the flexibility needed to deliver the infrastructure requirements. See Council's written statement Matter 4, Q4.7.
NET8	Policy SP17 'Community' Sports pitches/open Space	<ul style="list-style-type: none"> ● Outdoor formal and informal sports pitches and areas to meet the identified needs of the development; ● Open space to meet the needs of the development in accordance with Policy DM41. 	Bullet points moved to under 'Green Infrastructure' heading in response to Inspector's Action Point AP20 and AP73.
NET9	Policy SP17 'Green Infrastructure' 1 st Paragraph	The site will provide a comprehensive <u>network of green infrastructure network and open space across the whole site in accordance with SP10 which will respond positively to the take advantage of the sensitivities of the landscape, protect and enhance landscape and biodiversity features of value within and around the site and make provision for biodiversity net gain.</u>	To give certainty that the policy will be effective in ensuring the provision of a comprehensive green infrastructure network on the site and to give clarity that a significant portion of the site will be safeguarded as a green infrastructure buffer outside the developable area of the site. See Council's written statement Matter 4, Q4.8. Reference to SP10 added in response to the Inspector's Action Point AP21.

Ref	Location	Modification	Reason
NET10	Policy SP17 ‘Green Infrastructure’ Bullet points	<p><u>The provision will include:</u></p> <ul style="list-style-type: none"> • <u>Conservation of the areas of ancient woodland by providing appropriate buffers between the development and the ancient woodland;</u> • <u>Enhancements for biodiversity;</u> • <u>A band of green infrastructure/new community park across the higher land on the northern part of the allocation (as shown on the indicative map fig.X) to be retained outside the settlement boundary. This is to create a buffer between the built development of the allocation and the adjoining countryside and the village of Upper Bucklebury to the north. The precise nature of the band of GI to be informed by a Landscape and Visual Impact Assessment and the masterplanning process;</u> • A new community park linking Thatcham to the North Wessex Downs AONB; • <u>Green Infrastructure and open space within the developed parts of the site in addition to the community park, taking into account the requirements set out in DM40;</u> • <u>Greenways which connect through the site to the park and facilitate connectivity to the wider landscape and the existing Public Rights of Way network; connection to the AONB, and include leisure routes accessible to all users.</u> • A comprehensive network of other accessible routes and connections within the development which provide walking and cycling links along desire lines; • <u>Existing and new Public Rights of Way and A Public Rights of Way Strategy to demonstrate how existing Public Rights of Way will be protected and enhanced and how new ones will be established, including bridleway links and safe crossing points;</u> 	<p>To give certainty that the policy will be effective in ensuring the provision of a comprehensive green infrastructure network on the site and to give clarity that a significant portion of the site will be safeguarded as a green infrastructure buffer outside the developable area of the site.</p> <p>See Council’s written statement Matter 4, Q4.8. Clarification around the band of GI to the north of the site in response to the Inspector’s Action Point AP21.</p>

Ref	Location	Modification	Reason
		<ul style="list-style-type: none"> • Retained <u>Retention of existing and provision of new trees, hedgerows and other appropriate native planting which contribute to biodiversity net gain;</u> • <u>Provision of allotments;</u> • <u>Outdoor formal and informal sports pitches and areas and</u> • <u>A Green Infrastructure Strategy to show how the network of multifunctional green infrastructure will be delivered across the site.</u> 	
NET11	Policy SP17 'Transport' 1 st Paragraph	Measures will be included to improve accessibility by, and encourage use of, non-motorised <u>sustainable</u> transport modes.	Clarification, to ensure opportunities for all types of sustainable travel modes are considered, not just non-motorised transport modes.
NET12	Policy SP17 'Transport' Bullet points	<p>Development proposals for the site will be supported by <u>A a Transport Assessment, Strategy and Travel Plan to</u> will provide detail on how this will be achieved, including:</p> <ul style="list-style-type: none"> • Active travel Improvements on routes between the site, Thatcham town centre and the railway station; • <u>Multiple access points and A-a vehicular through route;</u> • Sustainable transport through routes; • Mitigation of the development's impacts on the highways network with improvements to existing junctions where they are needed and delivery of new access points for all forms of movement and transport to the site at locations to be agreed with the planning authority; and • How adverse impacts on air quality will be minimised; <u>and</u> • <u>Promotion and encouragement of sustainable modes of travel, in accordance with policy DM45.</u> 	To ensure the policy is effective and justified. To ensure the details included in the background to the IDP are included in the policy. See WS4/1 Council response to Q4.4.

Ref	Location	Modification	Reason
NET13	<p>Policy SP17</p> <p>'Sustainability' Energy statement and Sustainability Statement</p>	<p>Development proposals for of the site will be supported by an Energy Statement or a detailed energy section within the Sustainability Statement Charter which will establish how policy requirements will be achieved. This will be informed by:</p> <ul style="list-style-type: none"> • An Energy Strategy which sets out measures to achieve a model low carbon development (following the energy hierarchy) in accordance with Policies SP5 and DM4; including: <ul style="list-style-type: none"> ○ Net zero carbon (regulated and unregulated energy) emissions for dwellings; ○ BREEAM 'excellent' non residential buildings; ○ on-site renewable energy to assist in the delivery of a net zero carbon neutral development; and ○ carbon off setting. 	<p>Clarification around the Energy. sustainability requirements for the site, in response to the Inspector's Action Point AP17.</p>
NET14	<p>Policy SP17</p> <p>'Sustainability' Bullet points</p>	<ul style="list-style-type: none"> • An Integrated Water Supply and Drainage Strategy which will set out: <ul style="list-style-type: none"> ○ Measures to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site; and ○ Surface water management approaches that could deliver net gain for Thatcham town, including use of on-site sustainable drainage systems (SuDS). • An Ecology Strategy which will set out: <ul style="list-style-type: none"> ○ A Biodiversity Net Gain Strategy to show how net gain will be achieved including through habitat restoration and linkages; ○ How priority habitats and ecological features will be protected and enhanced; 	<p>Details moved to specific topic areas within the policy, to provide greater clarity as to the requirements for the policy.</p>

Ref	Location	Modification	Reason
		<ul style="list-style-type: none"> ○ The creation of new ecological features; and a site-wide management plan. ● A Green Infrastructure Strategy which will show how a network of multifunctional green infrastructure will be delivered across the site. ● A Public Rights of Way Strategy to demonstrate how existing Public Rights of Way will be protected and enhanced and how new ones will be established, including bridleway links and safe crossing points. ● A Lighting Strategy which will include consideration of dark skies, particularly in relation to the nearby North Wessex Downs AONB, and measures to mitigate the impact on biodiversity. ● A Landscape and Visual Impact Assessment (LVIA) in accordance with the Landscape Institute Guidelines for Landscape and Visual Impact Assessment 3rd edn. 2013. This will inform the final capacity, development, design and layout of the site and requirements for green infrastructure and the provision of public open space. The LVIA will be informed by the Landscape Sensitivity Assessment (2021) of the site. ● A Mineral Resource Assessment (MRA) ● A Historic Environment Strategy to demonstrate how the listed buildings in the area will be conserved and how the impact of the development on their settings has been considered. 	
NET15	Policy SP17 'Sustainability' Final bullet points	<ul style="list-style-type: none"> ● A Construction and Operations Management Plan (COMP) <u>to</u> shall accompany any planning application on the site. The COMP shall safeguard the oil pipeline from operational works, including the provision of an appropriate buffer. 	Requirements changed from 'shall' to 'to'

Ref	Location	Modification	Reason
NET16	Policy SP17 'Flooding and Water Environment'	<p><u>Development proposals for the site will be supported by a Flood Risk Assessment, in accordance with SP6, which will take into account the Thatcham Surface Water Management Plan and sets out:</u></p> <ul style="list-style-type: none"> ○ <u>adequate flood mitigation measures to ensure there is no detrimental impact on flood risk in Thatcham;</u> ○ <u>surface water drainage management approaches that could deliver net gain for Thatcham town, including use of on-site sustainable drainage systems (SuDS); and</u> ○ <u>Flood alleviation measures already present on the site and how they will be retained, protected and enhanced.</u> <p><u>Development proposals also need to consider water resources and waste water in accordance with policy DM7.</u></p>	<p>Text moved from under Sustainability heading of the policy.</p> <p>Changes made to ensure consistency with SP6 and DM7, as a result of AP40 and AP72.</p>
NET19	Policy SP17 'Biodiversity'	<p><u>Development proposals for the site will be supported by a Biodiversity Strategy in accordance with policy SP11 which will set out:</u></p> <ul style="list-style-type: none"> ○ <u>How biodiversity net gain will be achieved including through habitat restoration and linkages;</u> ○ <u>How priority habitats and ecological features will be protected and enhanced;</u> ○ <u>The creation of new ecological features; and</u> ○ <u>A site-wide biodiversity management plan.</u> 	<p>Text moved from under Sustainability heading of the policy for effectiveness.</p> <p>WS4/1 Council response to Q4.14</p>
NET18	Policy SP17 'Landscape'	<p><u>Development proposals for the site will be supported by a Landscape and Visual Impact Assessment (LVIA) in accordance with the Landscape Institute Guidelines for Landscape and Visual Impact Assessment 3rd ed. 2013. This will inform the final capacity, masterplan for the development, design and layout of the site and requirements for green infrastructure and the provision of public</u></p>	<p>Text moved from under Sustainability heading of the policy for clarity regarding what would be required in relation to landscape. See</p>

Ref	Location	Modification	Reason
		<u>open space. The LVIA will be informed by the Landscape Sensitivity and Capacity Assessment (2021) of the site and policy SP5.</u>	Council's written statement Matter 4, Q4.8
NET19	Policy SP17 'Heritage'	<u>Development proposals for the site will be supported by a Historic Environment Strategy in accordance with SP9 to demonstrate how the sites historical development, archaeological remains and historic buildings and parkland will inform the scheme and help to create a sense of place.</u>	Text moved from under Sustainability heading of the policy to ensure that the development conserves and enhances the historic environment in accordance with national policy. In response to the Inspector's Action Point AP73.
NET20	Policy SP17 'Lighting'	<u>Development proposals for the site will be supported by a Lighting Strategy which will include consideration of dark skies, particularly in relation to the nearby North Wessex Downs AONB, and measures to mitigate the impact on biodiversity.</u>	Text moved from under Sustainability heading of the policy. Additional text added for clarity about what is required in relation to lighting.
NET21	Policy SP17 'Mineral Resources'	<u>Development proposals for the site will be supported by a Mineral Resource Assessment (MRA) which identifies any potential viable mineral resources on the site and considers firstly prior extraction, and then incidental extraction as part of the development.</u>	Text moved from under Sustainability heading of the policy. Additional text added for clarity about what is required in relation to the mineral resource assessment.

Ref	Location	Modification	Reason
NET22	Policy SP17 'Masterplanning and Design Code'	<u>The site will be masterplanned, funded by the applicant and prepared in collaboration with the applicant, the Council, the community and other stakeholders, prior to the submission of a planning application. The Masterplan will provide the framework to guide the development and should be based on the evidence base underpinning the Local Plan and outcome of further technical work prepared in line with requirements of this policy. The masterplan will provide a guide as to the location and extent of built development, land uses, green infrastructure including the green buffer, key access arrangements, community and other infrastructure. Proposals must have regard to, and demonstrate how, they have been guided positively by the agreed masterplan. A design code, prepared by the developer and agreed with the local planning authority, should be secured by a planning condition as part of any outline planning permission.</u>	Clarification and additional information regarding the development of the masterplan. In response to the Inspector's Action Point AP15
NET24 3	Supporting Text Para 6.54	<u>In reviewing the vision for Thatcham as part of the LPR and to best understand how to plan for growth in Thatcham within the plan period, the Council commissioned masterplanning work (Thatcham Strategic Growth Study (TSGS) 2020). The Thatcham Strategic Growth Study was carried out in 2019 – 2020 to understand how to plan for growth in Thatcham over the plan period. The West Berkshire Strategic Vision 2050 was drafted in 2022 to guide sustainable growth over the long term in the context of paragraph 22 of the updated NPPF published in 2021. These documents include relevant information that form part of the justification for the LPR's spatial strategy and the strategic allocations in Newbury and Thatcham.</u>	In response to the Inspector's Action Point AP24

Ref	Location	Modification	Reason
NET24	Supporting Text Para 6.58	The western edge of the site is adjacent to the existing Thatcham settlement boundary along Floral Way and Bath Road (A4). The eastern end of the site is adjacent to Colthrop Industrial Estate, which is contiguous with Thatcham. The new revised settlement boundary will be defined following the studies and work identified in the policy at the application stage.	In response to the Inspector's Action Point AP22
NET25	Supporting Text Para 6.60	The Council's spatial strategy is outlined in Policy SP1 and affirms a continued approach to focusing development in settlements in line with a District-wide settlement hierarchy (contained in Policy SP3). Thatcham, as part of the Newbury and Thatcham urban area, is a sustainable location for development <u>as confirmed in the Strategic Vision 2050</u> . The TSGS shows the most sustainable way for development to come forward in the town and this policy draws on that evidence.	To ensure the policy is justified and consistent with national policy. Council response to PQ33.
NET26	Supporting Text New Para after 6.61	<u>The site plan (figure x) shows indicative locations for access points and for the band of green infrastructure buffer to the northern part of the site. The final layout, access, landscaping and green infrastructure will be determined following the completion of further work such as LVIA and the masterplanning process required by policy SP17.</u>	In response to the Inspector's Action Point AP23.
NET27	Supporting Text New Para after 6.61	<u>It is anticipated that approximately half of the site will be set aside as Green Infrastructure, to serve the new population at North East Thatcham and be retained in perpetuity. An area, across the north of the site, will provide a buffer between the new development and the existing community of Upper Bucklebury to the north and comprise an extensive area of multi-functional green space, which will protect ancient woodland and areas of ecological value while providing opportunities for informal recreation. In addition, green infrastructure</u>	In response to the Inspector's Action Point AP21.

Ref	Location	Modification	Reason
		<u>will be provided within the areas of built development. Built development should respond to the findings of the LVIA and ensure an appropriate form of development taking into account the constraints of the site, including below ground infrastructure. Areas of isolated development should be avoided.</u>	
NET28	Supporting Text New Para after 6.61	<u>The indicative GI buffer boundary takes into account the landscape work done to support the TSGS, and uses the 105m contour to the west and central portion of the site, with the 100m contour to the east. The gas pipeline across the north of the site is required to have designated standoff areas and given its location to the north of the site development to the north of the pipeline is not considered appropriate. The final extent of the GI buffer will be determined through the LVIA, masterplan and other relevant background work carried out to support a planning application on the site.</u>	In response to the Inspector's Action Point AP21 and AP22 Setting out the reasoning behind the indicative GI buffer shown on the map.
NET29	Supporting Text New Para after 6.61	<u>The Settlement Boundary for Thatcham, in an exception to the settlement boundary review criteria set out in Appendix 2, will be revised through a future Plan to reflect the extent of the built up area once that has been defined through the masterplanning and planning application processes required by policy SP17. Consideration of whether it is appropriate to designate a gap between Thatcham and Upper Bucklebury, in line with policy DM2, will be considered once the settlement boundary has been redrawn.</u>	In response to the Inspector's Action Point AP23.
NET30	Supporting Text New Para after 6.61	<u>The site will deliver a number of community benefits, both for the new residents of the site and for existing residents of Thatcham. The community infrastructure required to support the development is set out in the policy, the specific details, including the location, size, and funding arrangements will be determined through the planning application stage. There may potentially be opportunities for some</u>	In response to the Inspector's Action Point AP73

Ref	Location	Modification	Reason
		<u>community infrastructure to be provided off site, or for improvements to existing services or facilities to be made as a result of the development.</u>	
NET31	Supporting Text New Para after 6.61	<u>New education provision, including early years, primary and secondary provision will be required to support the needs of the development. Early years and primary provision will be provided on site. The requirements for secondary and SEND provision will be determined following the completion of a feasibility study which will consider the best solution for secondary education requirements in Thatcham. It is expected that land will be required on the site, and financial contributions to support delivery of the preferred solution.</u>	In response to the Inspector's Action Point AP20
NET32	Supporting Text New Para after 6.61	<u>Primary healthcare facilities should be provided, with associated car parking and landscaping. The facilities should be operationally and financially viable and take into account the feasibility study commissioned by the NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board (BOB-ICB). The facility should provide room sizes that comply with the Department of Health Building Note 11-01 (or any successor documents). The provision and any contractual arrangement of the facility will need to be agreed as part of any planning application coming forward on the site. Where the onsite provision of a facility in accordance with this policy is not viable, the Council will expect other offsite mitigation measures, to ensure the primary healthcare provision can support the new population growth. The applicant should engage with the BOB-ICB at an early stage to discuss the details of any offsite provision. A further feasibility study, to identify office mitigation measures, would need to be carried out at the applicant's expense and any identified offsite mitigation measures will be funded by the applicant through developer contributions.</u>	In response to the Inspector's Action Point AP20

Ref	Location	Modification	Reason
NET33	Supporting Text New Para after 6.61	<u>Flood risk and surface water drainage is a key consideration for Thatcham, following extensive surface water flooding in the summer of 2007 as a result of high intensity rainfall overwhelming storm drains and culverted streams. The flood event was considered to be in the order of a 1 in 200 year event. Following the flooding various studies and strategies were developed to identify opportunities for reducing flood risk in the town. The Thatcham Surface Water Management Plan (2010) sets out a number of proposed measures to reduce flood risk in Thatcham, focusing on retaining runoff upstream of Thatcham to reduce peak flows through the existing urban area and drainage system. A number of flood attenuation ponds have been constructed on the North East Thatcham site, and these are to be retained and enhanced in addition to Sustainable Drainage Systems (SuDS) provided on the site. The Integrated Water Supply and Drainage Strategy involving localised and strategic flood management measures will be required, in line with the requirements of the West Berkshire Sustainable Drainage Systems SPD (2018).</u>	Clarification as to the requirements relating to the water environment in response to the Inspector's Action Point AP18.
NET34	Supporting Text Para 6.63	<u>Further detailed work will be required to develop a coherent masterplan to take the development forward. The Council will commission the masterplan, this which will be produced in collaboration with <u>the applicant, the community and other stakeholders and funded by the developer as part of a Planning Performance Agreement. It will be based on existing evidence and information already produced to support the allocation of the site, including the Thatcham Strategic Growth Study. The masterplan will provide a guide as to the location and extent of built development, land uses green infrastructure including the green buffer, key access arrangements, community and other infrastructure. The Masterplan</u></u>	Clarification and additional information regarding the development of the masterplan. In response to the Inspector's Action Point AP15

Ref	Location	Modification	Reason
		<u>will be agreed, by the Council, prior submission of a planning application.</u>	
NET35	Supporting Text New Para after 6.63	<u>A Design Code will be developed alongside the planning application, secured by condition, and agreed with the Council prior to submission of the first reserved matters application.</u>	In response to the Inspector's Action Point AP15
NET36	Indicative site map	To replace the indicative site map	In response to the Inspector's Action Point AP22