



Examination of West Berkshire Local Plan  
2022-2039

**Matter 4 – North East Thatcham Strategic Site  
(Policy SP17)**

**Statement on behalf of Bucklebury Parish Council**

March 2024

Project West Berkshire Local Plan

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## Contents

1. Reasonable alternatives.....	5
2. Transport Infrastructure.....	7
3. Education Infrastructure .....	9
4. Health Care Infrastructure.....	10
5. Community Infrastructure.....	11
6. Landscape and Provision of Green Infrastructure.....	11
7. Flood risk and surface water.....	13
8. Air and noise pollution .....	14
9. Affordable Homes and Housing Mix.....	14
10. Self Build Plots .....	14
11. Biodiversity .....	15
12. Historic Environment .....	16
13. Masterplanning and the Thatcham Strategic Growth Study.....	16
14. Viability and Delivery .....	17
15. Policies Map .....	18
16. North East Thatcham Map.....	18



## **Executive Summary**

These representations are made on behalf of Bucklebury Parish Council (BPC) in response to the regulation 19 Consultation for the West Berkshire Council (WBC) Local Plan Review (LPR). The representations set out that there are multiple significant flaws in the regulation 19 version of Local Plan Review which are incapable of being remedied prior to the submission of the document for examination. The Local Plan Review, and accompanying evidence base, is fundamentally unsound for numerous reasons as set out within these detailed representations.

These representations have been prepared with significant input from experts on a variety of technical matters. Technical reports have been prepared by Yes Engineering in relation to highways and the Nature Bureau in relation to biodiversity and ecology and are appended to these representations.

The representations have been informed by ongoing consultation with the residents of Bucklebury and the surrounding area who have detailed knowledge of the history and constraints of Northeast Thatcham. This has uncovered a substantial lack of logic in the decision-making process to allocate the area to the Northeast of Thatcham for significant housing growth.

It is the position of BPC that the local plan is fundamentally unsound, specifically selection of the land North East of Thatcham as a location for large scale development. Policy SP17 is unsound in its own right and no modifications to it could be used in order to address the significant issues of soundness.

# 1 Reasonable alternatives

**Q4.1. Was the North East Thatcham site selected for allocation in the Plan following appropriate consideration of reasonable alternatives? Comments** The Planning Practice Guidance sets out the way in which the SA can assess reasonable alternatives and identify likely significant effects as follows:

- 1.1 No
- 1.2 The BPC regulation 19 statement set out the requirements from the PPG in respect of the requirements for the SA to consider and compare all reasonable alternatives as the plan evolves, including the preferred approach, and assess these against the baseline environmental, economic and social characteristics of the area and the likely situation if the plan were not to be adopted.
- 1.3 This is the framework in which the soundness of the site selection process must be considered.
- 1.4 Table 30 of the Sustainability Appraisal sets out the following in relation to Quantum of Development at North East Thatcham.

Table 30 SA/SEA of Options for Quantum of Development at North East Thatcham

North East Thatcham (quantum of development)	Summary of SA/SEA (See Appendix 4 for the full SA/SEA)	Discussion and outcome
Upto 2,500 homes	Overall development of this site would be likely to result in a positive impact on all elements of sustainability. The scale of the development provides for community infrastructure to be delivered on site, resulting in a significantly positive impact on social sustainability. While there is an unknown impact on environmental sustainability in relation to impacts on air, water, noise and soil mitigation measures would be able to deliver an overall neutral impact. Development is likely to result in a positive impact in relation to economic sustainability as employment and business opportunities will be provided for on site along with community facilities. The scale of the site allows for greater scope for onsite mitigation to any potential sustainability impacts.	<b>This option is not to be taken forward.</b> This option was originally to be taken forward and was included in the Reg 18 consultation. Despite providing a considerable number of new homes and community infrastructure to support these homes and the wider Thatcham community the potential impact the local community is considered too high, and politically a reduced number on the site is considered to be more acceptable. Therefore, this option will no longer be taken forward.
1,500 homes	Overall development of this site is likely to give a neutral impact on all elements of sustainability. The scale of the development would provide for some community infrastructure, resulting in a positive impact on social sustainability, however, the development may not be of a size to deliver a wider range of facilities to support Thatcham such as new education facilities. While there is an unknown impact on environmental sustainability in relation to impacts on air, water, noise and soil mitigation measures would be able to deliver an overall neutral impact. Development is likely to result in a positive impact in relation to economic sustainability as employment and business opportunities will be provided for on site along with community facilities. The scale of the site will mean that more additional sites will need to be allocated across the district.	<b>This option is to be taken forward.</b> This option was considered in light of the responses received to the Reg 18 consultation, which largely considered that 2,500 dwellings in Thatcham was too many. In response, the council has considered a reduced number of dwellings, which still enables a strategic level of development which can provide onsite community facilities. It is noted, that compared to a higher number of dwellings, this option may not deliver all of the education provision originally envisaged on the site, or the additional improvements to community infrastructure within Thatcham. However, a reduced number on the site is considered to be more appropriate.

- 1.5 The conclusion against the quantum of 2,500 homes on site that it would likely to result in a positive impact on all elements of sustainability is wholly irrational and illogical. This is further compounded by the suggestion that a quantum of 1,500 homes would give a neutral impact on all elements of sustainability which again is simply not the case. No other option was presented for North East Thatcham for a lower amount of different configuration.
- 1.6 BPC undertook a justified and accurate assessment of the impacts of the allocation of North East Thatcham through policy SP17 which demonstrates that the approach taken by WBC lacks justification and is not positively prepared in any way whatsoever. BPC will present this to the inspector at examination process to demonstrate that lack of rationality in approach taken by WBC in preparation of the LPR.

- 1.7 In terms of the overall quantum there is clear evidence from the promoters of SP17 that they require 2,500 homes in order to make the site viable and secure the delivery of the infrastructure. Further representations in this regard will be made in these matters statements and at the hearing itself.

**Q4.2. Is it necessary to modify the reasoned justification to policy SP17 to refer to the West Berkshire Strategic Vision 2050 in order to make the Plan sound?**

- 1.8 No.

- 1.9 The Executive Summary of the West Berkshire Strategic Vision Document states:

*The work is informed by engagement, with input from local residents, groups and stakeholders. Supporting technical work has also been undertaken, with a separate Baseline Report (June 2022) and Socio-economic Report (June 2022) produced to ensure a robust evidence base.*

- 1.10 It is acknowledged that there was an element of engagement with BPC and other community stakeholders. However a freedom of information request received by Thatcham Town Council, and seen by BPC, confirms the specification given to Iceni (the consultants preparing the Vision Document). WBC instructed Iceni that the vision document *must align with the wider vision already outlined in the emerging draft of the LPR and reflect and support the policy direction of the document*. Therefore the Vision Document was written on the preconceived notion that the land North East of Thatcham was always going to be allocated.
- 1.11 The Vision Document does not offer a clear spatial steer in any way. The document is ambiguous and it is even stated on page 75 that the precise quantum of development is yet to be agreed. Again this is further proof that both WBC and the Consortium is preparing for a much larger quantum of development than is set out in policy SP17.
- 1.12 The timeframe set out within the Vision Document for preparation of planning applications for SP17 has now lapsed and in any event is wildly optimistic.
- 1.13 The Vision Document itself is analgous of the lack of credibility for policy SP17 and its inclusion within the reasoned justification to policy SP17 would not in anyway go to address the fundamental soundness issues of this policy within the plan.

**Q1.16. Is there substantive evidence to indicate that the development proposed in the Plan, in combination with other committed and planned development, would have an unacceptable impact on highway safety or that the residual cumulative impacts on the road network would be severe? In particular:**

- (a) Could any significant impacts on the transport network (in terms of capacity and congestion), or on highway safety, be cost effectively mitigated to an acceptable degree?**
- (b) Does the Plan contain effective policies to secure the necessary mitigations?**

- 1.14 No.
- 1.15 BPC presented significant evidence within its regulation 19 representations and it is not necessary to repeat that information within this matters statements.
- 1.16 The position of WBC in regard to cumulative impact on the road network remain unchanged. No further evidence on highways matters has been produced alongside the submitted plan nor is there any Statement of Common Ground with any of the highways related stakeholders. In any event, the conclusions of BPC are directly the opposite of WBC in regards to highway safety and cumulative impact.
- 1.17 On this basis, it is not possible for WBC to add any additional submissions at this point but instead reserve the right to review the matters statements made by WBC and the SP17 Consortium in this regard and provide evidence at the hearing sessions on this matter.

## **2. Transport Infrastructure**

**Q4.3. What specific transport infrastructure projects and other measures are expected to be necessary to ensure the following in relation to the development proposed on the North East Thatcham allocation:**

- (a) Appropriate opportunities to promote sustainable transport modes can be taken up.**
- (b) Safe and suitable access to the site can be achieved for all users.**
- (c) Any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree at an appropriate time<sup>43</sup>.**

- 2.1 No.
- 2.2 YES Engineering Group Limited was appointed by Bucklebury Parish Council to review the transport related evidence submitted with the West Berkshire Council emerging Local Plan

specially with regards to the proposed allocation of NE Thatcham. The full report was included as appendix 5 of these regulation 19 representations.

2.3 In relation to transport it was concluded that:

- The trips rates set out by WBC are unreliable and not robust.
- The trip distribution is unrealistic (all evidence suggest traffic will be diverted from the A4).
- The proposed mitigation measures suggested by WBC are improbable at best.
- The location of site means car traffic will dominate the area.
- The Highway network in the vicinity of THA20 is already over capacity.
- No assessment has been made of the routes most likely to be affected by an increase in traffic.
- Increase in traffic through Bucklebury will pose highway safety issues.

2.4 At the time of submission of these matters statements, no further information has been released on highways.

2.5 AS set out in the council response to PQ46 and SPQ46 the council advised that further statements of common ground were to be released with National Highways, Hampshire County Council and Network Rail in January 2024. No statements have been released in this regard.

2.6 BPC will take the opportunity to review representations made by the council and the consortium for SP17 in this regard and will provide further submissions at the hearing sessions. YES Engineering Group will appear for BPC on this matter at the relevant hearing sessions.

**Q4.4. Will policy SP17, along with other relevant policies, be effective in ensuring the timely delivery of the necessary transport infrastructure projects and other measures to support development proposed at North East Thatcham?**

2.6 No.

2.7 At the time of the previous regulation 19 submissions there was not considered to be any evidence that the transport infrastructure set out within policy SP17 would be delivered in a timely fashion. There are no requirements within the wording of policy SP17 and the Thatcham Vision Document does provide any further requirements in this regard.

2.8 The onus is on WBC and the SP17 Consortium to provide evidence in this regard. Once this is available then BPC reserves the right to review this information further and provide updated submissions during the hearing where appropriate.



### 3. Education Infrastructure

**Q4.5. (a) Are the requirements of policy SP17 for early years, primary school and secondary school provision to meet the needs of the North East Thatcham development clear and unambiguous, and are they justified? (b) Will policy SP17, along with other relevant policies, be effective in ensuring that the provision is made in a timely and coordinated manner?**

3.1 No. BPC set out its position set out within the regulation 19 representations. In summary, it is clear that the plan for secondary school provision is 'unsound' for the following reasons:

- There is no satisfactory evidence of the number of pupils the school is to cater for.
- The location of a school within the proposed development is not clear.
- The number of Form Entries is not defined, but it is noted that anything less than a 6FE school is unsustainable.
- The timing and responsibility for the funding is not clear and has not been adequately costed in the viability appraisals.
- There is no evidence that the proposed funding is sufficient to meet the Council's obligations to provide education.

3.2 West Berkshire Council, as an education authority, has a duty to make arrangements for suitable school provision. How this obligation will be met across all school years is not defined or evidenced in the LPR.

3.3 It is noted that the Matter 1 Statement by Lichfields on behalf of the North East Thatcham Partnership sets out the following (with emphasis added):

*In general terms, we consider that North East Thatcham is a viable strategic allocation, at a larger scale than the Council's suggested artificial limit of 1,500 homes in the submitted plan. A larger allocation – in a modified Policy SP17 – is what is considered necessary to support the sustainable delivery of necessary infrastructure to support the strategic objective of regenerating Thatcham, and improving its services and facilities. **We will provide up-to-date viability evidence as part of this to address the consequential deficiencies in the viability evidence relied on by the Local Plan as submitted.***

3.4 As with other infrastructure requirements, it is clear that these will only be viable, deliverable and achievable as a result of a larger 2,500 dwelling development and not under the 1,500 dwelling allocation as set out in the plan. A modification to 2,500 is not considered to be a modification which could be justified as part of the examination of this plan and has been ruled out by WBC on various grounds.

## 4. Health Care Infrastructure

**4.6 Is the requirement of policy SP17 for a 450 sqm GP surgery on the site justified, and would it be effective in ensuring that the additional need for primary health care arising from the development can be met? (b) Will policy SP17, along with other relevant policies, be effective in ensuring that the provision is made in a timely and coordinated manner?**

- 4.1 No.
- 4.2 The provision of health care infrastructure was a matter of substantial concern raised by BPC as part of the regulation 19 submissions.
- 4.3 The North-East Thatcham development plan (SP17) proposes a 450 sq m primary healthcare facility with the suggestion that a GP Surgery be offered to the Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board or other such appropriate body. However, the document is bereft of detail or insight into strategic healthcare planning.
- 4.4 Tackling health and wellbeing requires a multi-agency approach. There has been no approach by WBC or the developers to any local GP practice to discuss an appropriate site, floor-space or location to which one or more practices could relocate. An enlarged primary healthcare site is required and might be better located close to the middle of Thatcham to improve access and minimise traffic as the proposed NE Thatcham development is peripheral to the centre of the population. This would be likely to be supported by Thatcham Town Council but has not been suggested in the sustainability appraisal of site options. Local practices did not have input with the inadequate 450 sq m floor size proposal which they only discovered with the SP17 Policy of December 2022, Appendix D.
- 4.5 It is noted that Thatcham Town Council has obtained further information through Freedom of Information Requests which demonstrate a distinct lack of consultation and coordination with the relevant bodies in relation to healthcare infrastructure on the site. BPC endorses this position and requests that the inspector scrutinises this matter in much further detail during the hearings.
- 4.6 Reviewing the scanty healthcare recommendations within the Thatcham Strategic Growth Study (David Lock and Associates) - Stage 2: Thatcham Present, paragraph 4.10 states: 'A dialogue with the relevant healthcare and education agencies should be established early in the master planning process to address concerns that social infrastructure may not be provided.' The Stage 3: Thatcham Future report published in September 2020 includes no further detail except the outcome of a community representatives' workshop, that the existing GP facilities are at capacity and suggesting a new health centre.
- 4.7 As with the concerns on education it is clear that the consortium for North East Thatcham requires a much larger allocation of 2,500 in order for the healthcare infrastructure to be viable and deliverable.

## 5. Community Infrastructure

**Q4.7. Is the requirement of policy SP17 for a 1,200 sqm indoor facility for sport and community uses on the site justified? Will policy SP17, along with other relevant policies, be effective in ensuring that the provision is made in a timely and coordinated manner?**

- 5.1 No
- 5.2 Concerns raised by BPC around the timing of delivery and the viability of other infrastructure items are equally applicable to the delivery of community infrastructure. There is scant evidence that any of the community infrastructure elements are viable for the smaller 1,500 allocation as set out in policy SP17.
- 5.3 BPC will make further representations at the hearing sessions in response to what is set out by BPC and the SP17 in their matters statements.

## 6. Landscape and Provision of Green Infrastructure

**Q4.8. Will policy SP17, along with other relevant policies, be effective in ensuring the provision of a comprehensive green infrastructure network on the site including outdoor formal and informal sports pitches and other areas of open space to meet the needs of the development; a new community park linking Thatcham to the AONB; and greenways through the site for walkers and cyclists?**

- 6.1 No.
- 6.2 The description set out by the inspector on the landscape of North East Thatcham is endorsed by BPC. It paints a highly accurate picture of the landscape setting of this site and it is considered that development of any homes within this landscaping would be highly harmful to its setting and character.
- 6.3 The LPR makes provision for a country park which is indicated as three areas on the plan accompanying the allocation.
- 6.4 The Reg 18 version of the LPR contained only 2 areas for the country park, the third was added for landscape reasons – to help support the need for rural separation on Harts Hill
- 6.5 The AONB board objects to the concept of a country park in close proximity to the AONB as it will encourage visitors to the area which has the potential to cause further harm to the wider areas.
- 6.6 The ‘country park’ has not been designed to support biodiversity net gain – not only are the areas indicated shown in isolated points (and not part of the broader habitat network) but also there is no evidence to suggest the levels of biodiversity net gain they might deliver, alongside the devastating scale of development it is there to buffer.
- 6.7 A carpark has been provided to attract users to the country park, but this is counter intuitive to the need to protect The Common and the wider AONB.

- 6.8 The Sustainability Appraisal sets out the allocation for development at North East Thatcham under policy SP17 would have a positive impact against the objective to *conserve and enhance the character of the landscape*. The WBC justification for this assessment states that *the policy is likely to have a positive impact on landscape character as consideration of the landscape is written into the policy*. This conclusion is absurd and lacks any justification.
- 6.9 As the inspector points out, the Thatcham Growth Study requires 50% of the site to be provided as green open space of various types.
- 6.10 It is not clear what resulting density of the development parcels would be as no information in this regard is provided but it is assumed that the resulting development would be built at a density much higher than the surrounding area.
- 6.11 It is also unclear on how a higher amount of development would be accommodated. Either it would result in even higher density development of each parcel which is further out of character of the setting of the site or would involve expanding development parcels into areas designated for parkland and buffer area.

**Q4.9. Will policy SP17, along with other relevant policies, be effective in ensuring the development proposed is sympathetic to its landscape setting, and preventing harm to the AONB and other valued landscapes<sup>48</sup>?**

- 6.10 No.
- 6.11 BPC has identified three key areas of environmental objection to the proposed Thatcham North-East strategic development site (SP17). These points of objection were summarised in the Bucklebury public meeting on December 2<sup>nd</sup> as follows:
- Damage to the Common
  - Greenfield development in an AONB setting.
  - Poor excuse of a 'country park'
- 6.12 There is no evidence to support claims that SP17 will have a positive impact on the environment. By contrast, there is every reason to believe it will have a significantly negative impact.
- 6.13 The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.
- 6.14 With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.'

- 6.15 The Policy lacks focus for development within the setting of the AONB. Given the wide area of land (74%) that is covered by the AONB in the district there will consequently be a large amount of land that will be within its setting.
- 6.16 The Thatcham Strategic Growth Study (TSGS) offers little assessment of the damage THA20 would cause to the AONB, apart from acknowledging that the AONB partnership has objected to it, and that there is “little intervisibility between the two if an appropriate buffer is included in any proposals.” This does not adequately assess the effect the development would have on the AONB. The document goes on to say “The link with the North Wessex Downs ....is less strong” and then promotes links as a benefit for the town, with absolutely no consideration of the impact on the AONB.
- 6.17 In short, all evidence points to the inappropriate nature of this proposal. It would have a direct and irretrievable negative impact on the AONB. WBC are charged to protect the AONB, and should reconsider the positioning of SP17 as a viable site.

## 7. Flood risk and surface water

**Q4.10. Will policy SP17, along with other relevant policies, be effective in ensuring that the development will be safe from flooding for its lifetime and will not increase flood risk elsewhere<sup>51</sup>?**

- 7.1 Flood risk is a significant threat to Thatcham, and so, by interpretation of WBC’s own policy SP6, the development at North East Thatcham under policy SP17 is not appropriate.
- 7.2 The Thatcham Strategic Growth Study even reinforces these arguments:
- “Flood risk and surface water drainage is a key consideration...particularly so within the town of Thatcham where extensive surface water flooding was experienced in 2007.”
  - “There is a risk of surface water flooding within the site along the natural drainage routes based on Environment Agency modelling”.
  - “The extent of surface water risk to the site is highest at the north-western end of the site, known as Dunston Park”
  - “An essential issue to address for development at North East Thatcham is the management of surface water runoff.”
  - “Management of surface water drainage is a key concern for development on the slopes above Thatcham”.
- 7.3 It is noted that there is no statement of common ground between WBC and the Environment Agency which would demonstrate agreement of these matters. BPC request that this is matter that is rigorously scrutinised by the inspector during the hearing sessions.

## **8. Air and noise pollution**

**Q4.11. (a) Is the location of the site suitable for the development proposed taking into account the likely effects of noise and pollution on the health and living conditions of future residents<sup>53</sup>? (b) If so, will the Plan be effective in helping to ensure that any potential adverse effects will be adequately mitigated?**

- 8.1 This is a further key area of concern for BPC. The parish council do not have the technical capability or resources to review the proposals in this regard so will be reviewing the matters statements from the council and site promoters and may make further submissions during the hearings if necessary.

## **9. Affordable Homes and Housing Mix**

**Q4.12. Are the requirements in policy SP17 for (a) at least 40% affordable homes and (b) a mix of house types that complies with Table 3 in the Plan on the North East Thatcham site justified, including in terms of need and viability?**

- 9.1 No.
- 9.2 As with other requirements from this site, BPC has significant concerns over the viability and deliverability of the affordable homes on this site and it is clear that the consortium requires a much larger allocation of 2,500 in order for these matters to be delivered.

## **10. Self Build Plots**

**Q4.13. Is the requirement in policy SP17 for at least 3% of dwellings to be delivered via serviced custom/self-build plots justified, including in terms of need and viability?**

- 10.1 BPC does not intend to make any comments on this matter.

## 11. Biodiversity

**Q4.14. Will policy SP17, along with other relevant policies, be effective in minimising impacts on and providing net gains for biodiversity? In particular:**

**(a) Will sites of biodiversity value be protected and enhanced in a manner commensurate with their statutory status or identified quality<sup>56</sup>?**

**(b) Will significant harm to biodiversity be avoided, adequately mitigated, or as a last resort compensated for<sup>57</sup>?**

**(c) Will development avoid the loss or deterioration of any irreplaceable habitats<sup>58</sup>?**

- 11.1 It is considered that there are some significant issues with soundness on the approach taken to ecology and biodiversity impact as a result of the allocation of the land at North East Thatcham.
- 11.2 BPC commissioned reports from the Nature Bureau in relation to biodiversity and the country park and these were set out within the regulation 19 representations.
- 11.3 The Regulation 19 submissions from BPC set out detailed submissions in respect of potential damage to Bucklebury Common and Damage to Ecology.
- 11.4 The data being used to establish the presence of species is out of date. In 2020, Bucklebury Parish sought environmental records for the 41 LWSs impacted by SP17:
- 80% of surveys were conducted more than 15 years ago
  - 50% were more than 20 years old
  - 44% were over 30 years old
- 11.5 BPC has appointed ecologists to conduct an independent study of the impacted area and the findings set out within the regulation 19 submissions.
- 11.6 The Sustainability Appraisal states that the allocation of development at North East Thatcham will have a significantly positive impact as a result of policy SP17. The WBC justification states that *the policy is likely to have a significantly positive impact on biodiversity as it sets out specific requirement for the development.*
- 11.7 Based on the representations made in relation to this matter it is not considered that the plan is justified, effective or consistent with national policy and is unsound on this basis alone.

## 12. Historic Environment

**Q4.15. Will policy SP17, along with other relevant policies, be effective in ensuring that the development proposed conserves and enhances the historic environment in accordance with national policy<sup>60</sup>? If not, would the Council's proposed main modification ensure the Plan is sound in that respect?**

- 12.1 No
- 12.2 The Statement of Common Ground between WBC and Historic England states that HE consider policy SP17 to be unsound and states that they require more detailed articulation of the council's approach to the historic environment at this location. A main modification has been suggested which would require a Historic Environment Strategy 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.
- 12.3 This Historic Environment Strategy should have informed both the selection of SP17 and the SA assessment in regards to historic environment. The proposed main modification would not ensure that policy SP17 is sound.
- 12.4 The Sustainability Appraisal states that the allocation of North East Thatcham under policy SP17 would have a positive effect on the SA objective to protect or conserve and enhance the built and historic environment to include sustaining the significant interest of heritage asset. It is not considered that this assessment is justified in any way whatsoever and the policy lacks credibility as a result.
- 12.5 The LPR is not considered to be justified or consistent with national policy in respect of heritage impact and is unsound on this basis alone.

## 13. Masterplanning and the Thatcham Strategic Growth Study

**Q4.16. Does policy SP17 set out an effective approach to masterplanning to achieve the comprehensive development of the site along with the timely and coordinated provision of infrastructure and services? In particular: (a) Is it clear who is responsible for preparing the various strategies referred to and the masterplan, what status those documents will have, and how they relate to each other and to the preparation and determination of planning applications?**

**(b) Will effective mechanisms be in place to ensure that all necessary physical, social and green infrastructure is provided in a timely and coordinated manner in relation to the proposed new homes?**

**Q4.17. (a) Is the requirement for proposals to respond positively to the guiding principles provided in the Thatcham Strategic Growth Study justified? (b) If so, does it provide a clear and unambiguous approach for the preparation of a masterplan and preparation and determination of planning applications?**

- 13.1 No – the Thatcham Growth Study was prepared for a 2,500 scheme and has not been prepared for the smaller 1,500 scheme. It is therefore not considered that the Thatcham Growth Study



should provide the guiding principles for the site as there is a clear disconnect between what it says and what policy SP17 now says.

- 13.2 As set out, BPC has significant concerns around the viability of the infrastructure. Further there is no mechanism within the wording of policy SP17 or the supporting text to secure timely delivery of any of the infrastructure.

## 14. Viability and Delivery

**Q4.18. Is there a reasonable prospect that development proposed at North East Thatcham could start in 2029/30, and that 1,500 dwellings could be viably developed, meeting all of the requirements of policy SP17 and other relevant policies, by 2039?**

**Q4.19. (a) Could more than 1,500 dwellings be satisfactorily accommodated on the North East Thatcham site, meeting all of the requirements of policy SP17 and other relevant policies? (b) If so, is it necessary to modify the reference in policy SP17 to refer to a different scale of development?**

- 14.1 It is clear from the comments of the North East Thatcham consortium as part of the matters 1 statement that they require 2,500 dwellings from the development in order to make the development viable and for delivery of the associated infrastructure requirements to be guaranteed.
- 14.2 The consortium for SP17 specifically state within their matter 1 statement that ***We will provide up-to-date viability evidence as part of this to address the consequential deficiencies in the viability evidence relied on by the Local Plan as submitted.*** This should be a serious cause for concern for the inspector in considering the viability of SP17 in its allocation within the plan. It is not just a lack of evidence in relation to viability of the allocation but the fact that the developers themselves say the allocation is not viable.
- 14.2 It is not possible for policy SP17 to be modified for a different scale of development. A larger scale of development has been discounted by the council within the Sustainability Appraisal . Notwithstanding this, a modification to policy SP17 would be outside of what is considered reasonable within the planning practice guidance and could not be done within the scope of this plan.
- 14.3 The Planning Practice Guidance states that *where the changes recommended by the Inspector would be so extensive as to require a virtual re-writing of the local plan, the Inspector is likely to suggest that the local planning authority withdraws the plan* (Paragraph: 057 Reference ID 61-057-20190315). It is considered that a modification of the plan from 1,500 to 2,500 would be 'extensive' as defined under nation planning guidance.

## 15. Policies Map

**Q4.20. Does the settlement boundary shown on the submitted policies map need to be changed around the North East Thatcham allocation? How could a new revised settlement boundary be defined on the adopted policies map following the studies and work identified in policy SP17?**

**Q4.21. Are the areas within the allocation defined on the policies map as country park and green links justified, and will they be effective in illustrating geographically the application of relevant parts of policy SP17?**

**Q4.22. Which policy in the Plan does the car park designated on the policies map relate to?**

- 15.1 No.
- 15.2 It is noted that the North East Thatcham boundary as shows in policy SP17 is set around the entire allocation. This is markedly different from the boundary for Sandford Park where the buffer areas are excluded. Whilst the areas for Country Park / Public Open Space are shown there is no indication of access points, position of infrastructure or other buffer areas.
- 15.3 There is no indication of what the Potential Car Park relates to.

## 16. North East Thatcham Map

**Q4.23. Is the purpose of the North East Thatcham map in the Plan, and its relationship with the policies map, clear and unambiguous?**

- 16.1 As stated above the policies map for North East Thatcham is considered as very ambiguous. It provides no assistance to the developers, local stakeholders or decision makers in assessing how development should come forward on the map.
- 16.2 It fails to show where access to the site should be taken from and also where key elements of infrastructure should be positioned.
- 16.3 The exit indicated from the site onto Harts Hill Road is ill defined but is likely to become the major route for traffic entering and leaving the site given the regular congestion on Floral Way and the A4. This has not been taken into account in the highway monitoring associated with the allocation.