

## **REGULATION 18 CONSULTATION ON THE EMERGING DRAFT OF THE WEST BERKSHIRE LOCAL PLAN REVIEW TO 2037**

Initial draft response to the consultation, prepared by Councillor Lister, Leader of the Council. This document is a work in progress.

We note that the Sustainability Assessment is an interim document and separate comments are sought. Our feedback to the Sustainability Assessment is included in our response to the Local Plan, policy SP 17, as advised by West Berkshire Officers.

### **Section 1.4**

- "contribute to the achievement of sustainable development ... such that the right development happens in the right place at the right time benefiting communities and the economy.

We acknowledge the needs for sustainable development and the importance of selecting the right place, at the right time. There are different pressures on communities - ensuring 'viable villages' in rural areas is as important as respecting the limits to growth in more urbanised areas that may be constrained by geography or through limits on infrastructure.

Where infrastructure is constraining growth in one area then it is necessary to consider growth in other areas.

### **Section 1.12**

- "the Local Plan will replace in one document the three documents listed above"

We welcome the merger of the 3 documents as this should enable West Berkshire Council to articulate a clear strategic vision for the district. This must align with sustainable growth that takes into account the challenge of moving towards a net-zero carbon.

We are unclear on the status of the Sustainability Appraisal, in which an interim version has been published. We believe that the Sustainability Appraisal Report should be a robust and stable report as it forms the basis of site assessment and Local Plan evaluation. From our understanding it appears that the SA is also in an early stage, and the reference to the net zero carbon definition defined by West Berkshire Environment Strategy does not appear to be evident.

It is essential that the a formal consultation process is followed for the Sustainability Appraisal and this must be issued and completed before the next stage of the Local Plan consultation to ensure robust process in site assessment and selection.

### **Section 1.13**

- " The NPPF covers most forms of development and sets out the Government's economic, environmental and social priorities for planning in England"

We respect that NPPF must be followed, but note other organisations and commentary have identified that the NPPF is out of step with central government statements related to net-zero. We believe that the Local Plan should be robust and reflect a net-zero policy as the NPPF itself is likely to evolve during the period of the Local Plan.

### **Section 1.15**

- "The proposed submission version of the Minerals and Waste Local Plan is due to be consulted on in early 2021."

The consultation includes for the first time the combination of the Core Strategy Development Plan Document, Housing Site Allocation Plan, and Local Plan and a parallel consultation of a Sustainability Assessment that overlaps partly with an Emerging Minerals and Waste Local Plan.

We do not believe that conducting such a broad range of consultations using the minimum consultation period, without public briefings and engagements, during a pandemic, is a good approach to democratic engagement.

### **Section 1.16**

- "Neighbourhood plans must be in general conformity with, and reflect the strategic policies in, the Local Plan Review. Neighbourhood plans should not promote less development than set out in the Local Plan, but can promote more development."

It is unclear as to what takes precedent. If an existing neighbourhood plan identifies less development than the strategic policies in the Local Plan Review does the emerging Local Plan take priority?

### **Section 1.21**

- "We also undertook focussed consultation with parish and town councils, and neighbourhood plan (NDP) groups seeking views on the sites assessed in the HELAA."

We note that this consultation is the first opportunity that the public at large will have had to review the NE Thatcham proposal.

We note that West Berkshire Council failed to include the Thatcham Town Council objections to the site THA20 in the Site Assessment.

It is necessary for the Site Assessment to be updated and for a revision list to be included for the entire consultation that reflects changes made during the consultation.

At a minimum it is necessary for the revision list to include:

1. That Thatcham Town Council object to the site assessment for THA20
2. When changes were made to the statements related to publication of the Infrastructure Delivery Plan.

### **Section 1.22**

- "The document being consulted on has been produced during extraordinary times"

We respect this but would like to record that the same pressure to those people preparing a response. This consultation contains 250 pages, but by far the most important information

for Thatcham is contained with the evidence packs of which there are many thousands of pages and over 60 documents, appendixes, and spreadsheets. As this LPR impacts on Thatcham disproportionately we do not believe that sufficient attention to public consultation has been considered, nor has there been a sufficient time between Officer Briefing (from 12th January) to enable a Town Council to consult with residents and prepare a consultation response.

The impact of Covid and Brexit will both lead to unpredictable changes to economic patterns, labour demand and land use. The impact of Brexit will be unclear for some time but it raises the question of whether it is an appropriate time to set a strategic direction that includes employment centres and economic development when the business environment is so uncertain.

It is necessary that West Berkshire Council reach out to the residents of Thatcham with direct mail-shots, more detailed (virtual) briefings where the public can ask questions directly, and social media engagement prior to the second stage of consultation.

#### **Section 1.24**

- "One of the key features of the plan-led system is that development plans should be based on up-to-date evidence. The LPR is underpinned by a wide-ranging evidence base, which has been prepared and reviewed over the past three years."

We agree that any plan should be based on evidence. We note that evidence has been collected prior to the Covid crisis.

It would be inappropriate to base employment patterns, mobility patterns, and traffic profiles on a period during Covid as this does not represent historical patterns.

Nevertheless, it is difficult, and possibly inappropriate, to develop a future strategic plan under such uncertain times as the longer term implications of Covid and Brexit create great uncertainty. It is very possible that employment and mobility patterns will fundamentally change but it is impossible to place any confidence on such predictions.

#### **Section 1.25**

- "evidence can be broken down ... views and experiences of our local communities"

We appreciate that the experiences of local communities will be considered. This is particularly relevant for Thatcham as the proposed development is of such a scale that input from a wide range of stakeholders must be sought. Where there are inconsistencies between the evidence prepared by external consultants sought during the Covid period, and those of local communities we would expect the balance of evidence to be biased towards the community.

We provide feedback from residents that Town Councillors have collected from social media to support the basis for our response. This feedback reflects ~2,500 responses through either residents petitions or Councillor led surveys.

#### **Section 1.28**

- All local plans must be accompanied by a sustainability appraisal (SA) of the plan. The SA offers a systematic and robust way for checking and improving on plans and their policies as they are being developed.

We note the SA is also an interim document, and open to comments.

We note that the Sustainability Appraisal states that 'at least 1,250 dwellings is anticipated within the time period'. There is no reference within the Sustainability Appraisal of 2,500 dwellings being considered for NE Thatcham.

We refer to the SA in more detail in our response to SP 17.

### **Section 1.30**

- "We will also finalise any outstanding evidence and prepare the next version of the LPR .. to consult in May 2021"

We refer to the previous comment. These are extraordinary times and should further evidence be required, such as employment patterns, mobility, or traffic flow, it will be impossible to collect meaningful data. This calls into question what appears to be a very aggressive consultation period, for a complex consultation that for the first time is bringing together three reports and a sustainability assessment.

We believe that it is essential that WBC take into account the responses from residents and consultees ensuring a democratic approach is taken towards the second phase, which includes residents briefings such as those proposed in response to Section 1.22.

### **Section 2.1**

- "AONB .. legally protected landscape"

It is our understanding that, for AONB regions, separate policies apply instead of the presumption in favour of granting permission. Where management plans exist, development in the setting of AONB are matters for decision makers. Given that 74% of West Berkshire is AONB it is important that the proper consideration is given, and the area as a whole should not be dismissed as being unavailable for development.

This statement should describe the meaning of "legally protected" in context, and explain that this does not mean that development is prohibited.

### **Section 2.4**

- "The rural environment of West Berkshire adds significantly to the quality of life enjoyed by urban residents of the District and is a considerable asset for the area."

We recognise that the rural environment of West Berkshire is a valuable and precious asset. Nevertheless, the rural environment only adds to the quality of life for urban residents if it easily accessible.

It is essential that rights-of-way that connect urban conurbations to the surrounding countryside are maintained and strengthened to maintain the quality of life.

### **Section 2.5**

- "the current economic uncertainty which both COVID-19 and Brexit .. rates of employment in the District are high"

We agree that there is a great deal of economic uncertainty, and are concerned that committing to a Local Plan during this period is appropriate.

We note that West Berkshire contains a large number of employers, including major business and SME's, with a European focus. The largest business sector in 2019 is stated as being Professional, Scientific and Technical Businesses. We would encourage WBC to conduct primary research with a range of European facing companies to understand the extent of growth, or contraction, that is anticipated post-Brexit.

We note that in the Evidence Base the employment assessment states that "Covid19 ... the impact on the current economy and future economic growth will need to be assessed' and 'it is not possible to capture the impact .. In this report'. Given that the employment distribution, and economic development, are critical inputs to the policy and strategic direction for West Berkshire we struggle to understand how major developments can be proposed based on what may be dated mobility patterns and traffic flow.

It is necessary for West Berkshire to test the robustness of its assumptions through engagement with local businesses.

### **Section 2.6**

- "well connected in transport terms. At the centre of the District is an important road interchange"

The is a statement that is true of West Berkshire in general, but not at a local level.

We recognise that the mainline railway service is an important asset, particularly with regards sustainable travel and a and the desire to reduce private vehicle use. Nevertheless, the position remains that Thatcham is poorly connected to its station. Its location, access, and parking are sub-standard for a population centre of the size of Thatcham. The crossing creates significant congestion, with queues approaching 1km in length, and the crossing being closed for up to 40 minutes in an hour. In effect this means that Thatcham is poorly connected to the centres to the South. This information has previously been released by West Berkshire into the public domain.

Recently, Thatcham Town Council has made enquiries with GWR as to whether the scheduling at the rail crossing can be improved. In the most recent feedback (19th Jan 2020) our request to relocate trip points to reduce closure duration was rejected. There will be no changes to the Colthrop signal box until at least the period 2029-2034. Therefore there does not appear to be any credible option to reduce crossing closures.

It is essential that there is a full disclosure of the traffic queuing, crossing closure rate, and period of closure, in the evidence pack related to traffic assessment. The time period should represent pre-covid data to align with other evidence.

Further, access from Thatcham to the North is primarily through the rat-run route of Cold Ash, Hermitage and Chieveley to access the A34.

In effect this means that Thatcham is served with one primary East-West route. There are several fundamental issues with the A4 approaching, and through, Thatcham:

1. The route is over-stretched - it serves as a route for 'active-travel' with the introduction of cycle lanes; it is a main route for HGV traffic to the distribution centres to the East of Thatcham; it is a main access route for 'blue-light' services for A&E hospitals at Reading and Basingstoke (via Brimpton); it is a trunk-road and diversion route for M4 traffic; and it remains the essential route to serve local residents to enable access to the Town Centre. Consequently, the A4 within Thatcham, and its access from both the East and West routes, are often congested during peak periods.
2. The A4 road is narrow in width and contains many junctions in a short stretch through the town centre. There are recently introduced active travel measures for cycling but these are already being called into question due to vehicles colliding with the cycle lane borders ('Orcas' and poles). It remains unclear to the long term viability of these measures when traffic flows increase to pre-covid levels.

The alternative routes to the A4 all involve transiting through residential areas on roads that are not dimensioned for supporting high traffic flow or HGV (e.g. Lower Way to the South, or Bowling Green Road to the North).

Therefore we accept that whilst West Berkshire as a whole may be well-connected, we disagree that the proposed site for NE Thatcham is well-connected.

It is therefore necessary to clarify the statement to describe that within West Berkshire there are areas that are not well connected due to capacity constraints on infrastructure.

### **Section 3.1**

- "Making available housing of different types, sizes, tenures and affordability will be a priority in order to provide West Berkshire residents with homes and environs at sustainable locations in towns and villages that meet their needs"

We recognise that there are different pressures across West Berkshire. It is important that villages remain viable, and that primary schools, community hubs, shops and local pubs are sustainable.

It is also important that due consideration is given to transport assets such as the electric rail line to encourage sustainable travel.

We recognise the importance of the M4/A34 interchange as made clear in the Economic Assessment where it is noted that local agents regard that for industrial development "the best location would be between Newbury and the M4/A34 bypass". This is likely to drive the location of future employment centres.

Taken together, there are different pressures across West Berkshire that justify the meaning of a sustainable location. Housing could be located in either villages, or close to employment centres, or close to rail stations, with equal justification that they are sustainable.

It is necessary that the Local Plan does not give dominance to one location, because in doing so it undermines the sustainability of other locations and may lead to greater distances to travel to work.

### **Section 3.3**

- "Development and infrastructure will be sustainable, contributing to our aim to deliver carbon neutral by 2030"

We support this mission. We note that the referenced Environment Strategy states "that carbon dioxide will be reduced to a net zero level. In other words, any carbon dioxide gas emissions within West Berkshire will be balanced with an equivalent of emissions that are either offset or prevented."

Therefore, we recommend that West Berkshire has an independent assessor or carbon footprints for major new developments. Where development exceeds net zero carbon beyond 2030 a developer should demonstrate how offsetting will be used to mitigate carbon emissions.

We recommend that consideration is given to approaches such as the London Authority in which development that fail to meet net-zero carbon result in a financial contributions being delivered to the Authority to support carbon offsetting.

### **Section 3.4**

- "there will be greater opportunity for enjoyment and appreciation of the special qualities of the built and natural environment"

The proposed NE Thatcham development would subsume existing right-of-ways, and if it were to proceed would require residents to walk through a large housing estate to access the AONB to the North. This is in conflict with the statement that it will provide greater opportunity to appreciate the natural environment.

It is essential that rights-of-way from urban areas to neighbouring countryside are not compromised.

### **Section 3.5**

- "strategic objectives .. all-encompassing and interrelated"

We do not disagree with the 11 items listed when taken individually. Nevertheless, there is a lack of a cohesive vision that brings these together that outlines the inter-relation. Given that this is the first Local Plan that brings together the Development Plan, Housing Allocation Plan, and Policies, this appears to be a missed opportunity.

### **Section 4.2**

- "The NPPF promotes the effective use of land including re-using previously developed land, encourages higher densities in urban areas of high housing demand and refers to the need to release small and medium sized sites for development."

We disagree that the selection of NE Thatcham reflects this statement. NE Thatcham is outside the settlement boundary, and the identified large site is rural, countryside, and high-quality agricultural land.

Placing the majority of the entire housing supply on a single site is inconsistent with the NPPF policy.

### **Section 4.3**

- "conserving and enhancing our cultural, historic and landscape assets"

We note that the North Wessex Downs AONB Board has objected to the development of all sites that make up NE Thatcham through the HELAA process.

#### **Section 4.4**

- scale of growth that is required during the plan period is informed by ..

We respond to each of factors separately:

- .. Employment Land Review

We note that the recommendation in this review is that office space development is recommended for Newbury and Theale. If these are to be the major new employment centres there must be evidence that access to Theale (A4 eastbound, AM Peak, and A4 westbound PM Peak) can support the traffic flow, and similarly for Newbury (A4 westbound AM Peak and A4 eastbound PM Peak).

We do not observe this evidence in the Traffic Flow Analysis in the evidence pack. This needs to be urgently refreshed, and must reflect traffic flow pre-Covid for the reference case.

- .. Retail and Commercial Leisure Assessment

We note that this assessment was prepared in 2017. We are very concerned that structural changes to retail have rendered this assessment irrelevant and that the evidence base needs to be urgently refreshed.

Nevertheless, for West Berkshire we note that there is stated aim from the 2012 West Berkshire Core Strategy "to achieve growth in retail activity and increase the vitality and vibrancy of town centres.". Further, the 2006 strategy identified that "Thatcham town centre will 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 and that Thatcham town centre" (Area Delivery Plan Policy 3).

It is essential that West Berkshire assess the success, or otherwise, of this regeneration to understand the learnings from the 2006 strategy and what plans are in place for future development.

We note that the assessment identified risks to retail outlook, due to various factors, including the exit of the European Union and that this would need to be monitored in the short term.

It is important that appropriate weight is given to the recent withdrawal from the Single Market and Customs Union, its impact on GDP growth, and the purchasing power and retail demand (assuming post-Covid). Are the underlying assumptions made before leaving the EU such as retail growth of approximately 3% still valid. What are the implications for town centre design if this is not the case.

We note that the 'click-and-connect' model was recognised in the retail assessment. Covid has accelerated this transition beyond that which could have been anticipated when the assessment was produced. For example, online shopping was predicted to account for just 14% (comparison goods) and 6% (convenience goods) by 2036. A peak of 15.2% was anticipated for comparison goods, and online shopping for convenience goods such as food would increase only incrementally.

We believe that the evidence base is insufficient and out-of-date.



It is essential that West Berkshire consider the fundamental changes in retail patterns arising from Brexit and Covid, and therefore consider whether the existing assessment from 2017 remains valid.

- ... Housing and Economic Land Availability Assessment (HELAA)

Thatcham Town Council has previously objected to developments on the sites to NE Thatcham. We disagree that the HELAA developer-led approach should take precedence on housing locations - this should be instead driven by the strategic priorities outlined by West Berkshire. Housing locations aligned with the West Berkshire strategic imperatives should then be sought.

#### **Section 4.5**

- "the presence of Atomic Weapons Establishments (AWE)"

We note that the NE Thatcham falls within the AWE Outer Zone.

It is essential that West Berkshire liaise with the appropriate authorities to understand the implications of a proposed major development within the Outer Zone. This is particularly important given the scale of this development, and the impact that it will have on the A4 which is likely to be part of the off-site emergency planning.

It is necessary for the traffic forecast to represent the peak flow, and that this includes events such as motorway closures that can divert large volumes of traffic onto the A4 and hinder emergency response.

#### **Section 4.9**

- "well located in terms of access to rail and to the strategic road network"

Thatcham does not have good access to the rail station for reasons outlined previously (2.6).

Thatcham is poorly connected to its station. Its location, access, and parking are sub-standard for a population centre of the size of Thatcham.

It is stated in the Thatcham master planning work (Stage 1) that being a 1.5km walk "the station therefore does not provide easy accessibility for residents of north and west Thatcham."

Further the crossing creates significant congestion, with queues approaching 1km in length, and the crossing being closed for up to 40 minutes in an hour. In effect this means that Thatcham is poorly connected to the centres to the South.

It is necessary that this is acknowledged and this statement is modified.

#### **Section 4.10**

- "Newbury and Thatcham urban area is the main focus for development in the current Local Plan and will remain the focus in the Local Plan Review."

We note that the DPD (2012) also included the statement that most new development would include 'the East of the District close to Reading'.

We note that the Housing Site Allocations DPD (2006-2026) states that "Thatcham has a more modest level of facilities and has experienced rapid housing growth over the last few decades" and that "The Core Strategy does not, however, identify Thatcham for significant growth in this plan period due to rapid expansion in recent years."

There has not been any significant inward investment, re-generation, nor improvement of infrastructure or services, since the publication of the previous DPD and Local Plan. This Local Plan Review is therefore the opportunity to assess whether a previous approach that appears to have failed to deliver on historical objectives should be carried forward.

The phrasing of the text implies that no such consideration has been given and should be improved.

#### **Section 4.12**

- "There is significant employment provision within this area. The AWE has two major sites in this area, at Aldermaston and Burghfield and is an important provider of local jobs. There is a business park at Arlington near Theale and a number of other employment areas comprising small industrial estates."

We agree that these are the major employment hubs. We believe that West Berkshire should encourage settlements to be located that minimise distance to work, and that have either existing good transport links or that are easily scalable.

#### **Section 4.16**

- "delivery of up to 2,000 homes over the period 2006 – 2026"

This statement is not relevant for the period to 2037 for which this consultation is being conducted.

- "Hungerford, Lambourn, Compton and Hermitage have designated neighbourhood areas for the preparation of Neighbourhood Plans. Additional development for the period beyond 2026 will therefore be limited and will come in part through allocations within NDPs"

We do not understand why development beyond 2026 need be limited. The Local Plan sets out a vision to 2037, and the NDP should conform with, and not pRSArömote less development as defined in section 1.16.

It is essential that this Local Plan does not use guidance that is dated to restrict its ability to meet future housing supply beyond 2026.

#### **POLICY SP1**

- "Outside of settlement boundaries land will be treated as open countryside where development will be more restricted"

The proposed area of THA20 is countryside which has restricted development according to existing settlement boundaries. The policy appears to contradict with the selection of the strategic NE Thatcham site.

- "Thatcham .. net density of at least 35 dwellings per hectare"

- "Developments on the edge of defined settlements are generally expected to secure a net density of 30 dwellings."

These statements are inconsistent. NE Thatcham is outside an the existing settlement boundary, and defined as countryside. To maintain consistency with similar rural areas a density of 30 dwellings would be implied.

More generally, the housing density appears to be based on legacy planning assumptions. We believe it is important that West Berkshire assess whether such densities remain valid when designing residential layouts aligned with net-zero carbon. For example, orientation of buildings may become more constrained to maximise solar gain and avoid shadowing, and land may require to be set aside for renewable energy generation for offsetting purposes.

- "Demand for travel will be managed, and accessibility to sustainable transport opportunities increased through improving choice in transport modes."

We agree that where possible a choice should be offered to support active travel.

Nevertheless, we believe it would be a mistake to assume that active travel is a solution for all residents. Even for those residents that embrace active travel it cannot be assumed to be suitable many journeys, or most of the time. Further active travel is seasonable, and will be less popular during winter months, and periods of ice or snow, or rain. For this reason it cannot be used to substitute for critical infrastructure and in the absence of other evidence traffic assessment must be based on existing known traffic models (2019).

We do not believe it is possible to manage travel demand, as the policy implies. Traffic demand will be based on personal choice, and depend on economic growth and labour markets. It is important that the policy does not imply that demand is managed.

It is essential that active travel should not be used to reduce traffic flow forecasts as these must be dimensioned for peak traffic which will occur during busy periods, and when Motorway diversions are in place (particularly if it impacts emergency planning response for AWE).

- "environmental assets will continue to be protected and enhance to establish a distinctive sense of place that nurtures human health and wellbeing."

The proposed development of NE Thatcham will result in a loss of accessible countryside to the neighbouring urban areas of Thatcham, removes the green boundary to the existing well establishment settlement boundary, and has significant ecology and biodiversity implications. This reduced access to countryside is detrimental to well-being, and therefore the proposed development is in conflict with this policy.

It is essential that the policy assesses the needs of existing residents, their health and well-being, and that this is reflected in the policy. The policy will need to be amended to reflect the inconsistency with selection of NE Thatcham with this statement.

- "Thatcham will be a focus for regeneration, for new housing and for improved provision of services and facilities."

There is no supporting text for this statement, and therefore it is not possible to understand the meaning of the word 'regeneration' in this statement.

The same words have been used from the previous DPD that dates to 2008, and referred to the town centre. However, since the 2008 DPD there has been increasing encroachment of residential development around the town centre, and the recent development by McCarthy & Stone reduces space for the town-centre to expand.

The Draft Local Plan was published for consultation with a statement that the IDP would be published in week beginning 14th December. The lack of any supporting text, or the publication of the IDP means that there is no evidence to support this statement.

We believe that statements that define policies should be backed up with evidence. We find no reference to substantiate this statement in either this policy (SP 1) or policy (SP 17). It is important that supporting text, or evidence, is provided that explains this specific text.

- "urban extension to the north east of the town will provide a new residential neighbourhood with supporting facilities and green infrastructure"

We note that the existing public right-of-way access serves as important access to the existing countryside. Over 90% of residents that have contacted our Town Councillors value the protection of the existing rural countryside, and that the overwhelming majority are not in favour of development.

It is important that the policy recognises the loss of green space to existing residents.

- "New allocations for housing for Cold Ash will be made through a NDP."

We are unclear as to the priority of a NDP. It is stated elsewhere that "Neighbourhood plans should not promote less development than set out in the Local Plan" yet under this policy the Cold Ash NDP appears to take precedent.

It appears to be inconsistent that NDP that are not yet published are being given priority over a Local Plan. The policy should define the legal status of NDP's that are not yet published.

- "Newbury and Thatcham will remain the focus for business development, with Newbury the main focus for office development."

This statement reinforces the low availability of office space in Thatcham, and that future economic growth and inward investment is targeted for Newbury. This is inconsistent with statements elsewhere regards managing traffic demand, Thatcham re-generation, and delivering inward investment in Thatcham.

- "Tilehurst and Burghfield will be made through NDPs. ... Allocations for housing for Hungerford, Lambourn, Compton and Hermitage will be made through NDPs."

As per previous comment, we are unclear as to the priority and legal status of undefined NDP, and whether these NDP's are valid to the period of 2026, or include the period between 2026-2037.

#### **Section 4.17**

- "Principles which underlie spatial strategy stem from overriding objective of enabling sustainable development"

It is unclear as to what exactly is the definition of sustainable in this context. We note that NE Thatcham site is only poorly related to the target economic and employment growth centres.

We provide further comments on the Sustainability Assessment in our response to policy SP 17.

#### **Section 4.18**

- "... protecting and enhancing the environmental assets of the District. The existing urban areas are regarded as the most suitable locations"

The NE Thatcham site is classed as countryside, as described in the Council's position to the Secretary of State (2016, Siege Cross). This creates a conflict between the selection of the site and the policy.

It is necessary for the plan to address this conflict.

#### **Section 4.19**

- The allocation of sites takes account of the evidence from the Housing and Economic Land Availability Assessment (HELAA), Sustainability Appraisal (SA)

We note that the SA recognises the presumption against development in the countryside.

We note that the SA is written prior to exiting the EU, and for example refers to EU Directives on building standards (Appendix 3).

We also note that the SA recognises that current installed renewable energy capacity is about 15% of the previously designated 2016 target, and that the target has not been updated to reflect West Berkshire Council policy (2019).

We also note that the Infrastructure Development Plan is part of the SA and that IDP should "deal with existing deficiencies and to cater for a growing and changing population"

It is necessary that the SA is brought up to date with relevant UK legislation to enable cross-referencing of appropriate legislation.

It is essential that the SA is updated to reflect the new net-zero carbon policy (2019) of West Berkshire Council and that any new development demonstrates how it can respect net-zero carbon.

It is essential that the IDP that has been produced is published for the consultation on the SA to be valid.

#### **POLICY SP2**

- "The strong sense of remoteness, tranquillity and dark night skies, particularly on the open downland, should be preserved."

It is very unclear as to why maintaining remoteness should be an objective for West Berkshire Council regards AONB. The value of 'remoteness' which, amongst other metrics, is used to protect AONB land from development benefits, by definition, few people. However the loss of accessible countryside and right-of-way access that is used by thousands has a much more profound effect on the residents of West Berks.

It is necessary that greater weight is given to the health and well-being of the majority, versus the relative benefit obtained by a much smaller proportion of people who cherish remoteness.

- "The conservation and enhancement of the natural beauty of the landscape will be the primary consideration in the assessment of all development proposals."

We note that the North Wessex Downs AONB Board has objected to the development of all sites that make up NE Thatcham through the HELAA process. We fail to understand why the accessible, natural beauty of landscape to the North of Thatcham, should be valued any less than land designated as AONB elsewhere.

It is necessary that equal weight is given to the assessment for NE Thatcham.

- "Planning permission will be refused for major development in the AONB except in exceptional circumstances"

We believe that this statement is inappropriate and constrains West Berkshire housing supply unnecessarily.

- " It encompasses everything that makes the area distinctive: the area's geology and landform; its climate, soils and rivers; its wildlife and ecology; its rich history of human settlement and land use over millennia; its archaeology and buildings and cultural associations;"

We note that NE Thatcham has previously been described by West Berkshire Council as "historic farmstead, proximity of woodland, and visibility across the valley. Proposals to reinforce the landscaping would only serve to partially conceal the housing, and would take an extended period to become effective".

There is a conflict between the selection of NE Thatcham and the policy SP 2 which is necessary to resolve.

### **POLICY SP3**

- " The scale of development proposals will be relative to the existing or proposed level of facilities and services in the settlement, together with their accessibility."

We agree that level of facilities, and accessibility are important factors.

We note that "Thatcham underperforms other centres in terms of service provision including education - primary, secondary, and SEN; healthcare, community, leisure and sporting facilities", that "the A4 experiences congestion during peak periods", and that " "long queues often forming in peak periods on both sides of the railway, which sometimes do not clear before the barriers come back down".

The selection of NE Thatcham is not justifiable based on its underperformance in services, and lack of suitable highways capacity, and is inconsistent with the policy.

There is a conflict between the selection of NE Thatcham and the policy SP 3 which is necessary to resolve.

### **Section 4.28**

- "is appropriate for the settlement in question and is adequately supported by infrastructure and services"

We are unclear as to what evidence has been used to support the justification for the scale of the NE Thatcham development. In particular, we do not understand how a Traffic Flow Assessment indicating no congestion on Floral Way or the A4 entering/leaving Thatcham has been obtained as this is inconsistent with remarks elsewhere regards congestion. It is also unclear with the added traffic to the A4 in area of air quality management is acceptable, and without a published IDP it is impossible to evaluate whether there is supporting infrastructure.

It is necessary for the supporting text to describe the metrics used to assess whether the identified site has supporting infrastructure. What infrastructure has been assessed, and under what conditions is a site identified as being 'adequately supported'.

#### **Section 4.30**

- "The main focus for growth will therefore be Newbury, Thatcham"

The comments made in section 4.10 apply here.

#### **Section 4.31**

- "they are still sustainable locations"

It is unclear as to what defines an unsustainable location.

The policy should indicate if any area in West Berkshire is considered unsustainable.

#### **POLICY SP 4**

- " proposals in the Outer Consultation Zone (OCZ) will be considered in consultation with the ONR having regard to the scale of development proposed, its location, population distribution of the area and the impact on public safety, to include how the development would impact on "Blue Light Services" and the emergency off site plan"

We note that the Thatcham NE plan falls within the AWE outer zone, exceeds 200 dwellings, and that it is also located on a section of road prone to congestion. It will therefore be subject to consultation with the ONR.

We request that an accurate traffic flow assessment that reflects current level of congestion is used prior to consulting with the ONR on the viability of the proposed NE Thatcham site. We would expect that consideration is also given to the use of the A4 as a primary diversion route for the M4 when there are closures.

Given that there is no evidence to indicate that this consultation with the ONR has commenced, it is necessary for West Berkshire Council to put forward alternative sites for the second phase of Draft Local Plan should future discussions with ONR restrict development.

#### **POLICY SP 5**

We agree with the importance of responding to climate change and ensuring that the Draft Local Plan aligns with the statement mission of West Berkshire Council aligned with net-zero carbon.

- "All development should contribute to West Berkshire becoming and staying carbon neutral by 2030."

We request that the policy is consistent and aligns with the definition of the Environment Strategy that "any carbon dioxide gas emissions within West Berkshire will be balanced with an equivalent of emissions that are either offset or prevented."

On this basis the policy requires to be strengthened. The policy has good intentions but could easily be circumvented by a developer. For example:

'development should contribute to becoming carbon neutral' - could imply that a cycle lane or a bus-stop contributes to, and fulfils the policy

'To achieve the highest viable levels of energy efficiency' - could lead developers to claiming that a higher level is unviable leading to poorer quality houses

'To generate and supply renewable' - could lead to a developer claiming that a single solar panel of one dwelling on 2,500 houses fulfils the policy.

It is essential that this policy is substantially strengthened, the ambition is made clear, and that statements are quantifiable.

- 'Proposals should be accompanied by a Sustainability Statement'

We note that the Sustainability Assessment report, also under consultation, does not refer to the West Berkshire Environment Strategy. Nor does it include the clear statement that "any carbon dioxide gas emissions within West Berkshire will be balanced with an equivalent of emissions that are either offset or prevented." The stated issue within the Sustainability Assessment is "reduce impacts on climate change through reduced emission of greenhouse gases". This issue in the SA is not consistent with the Environment Strategy of West Berkshire, because it does not define what level of reduced emission is considered acceptable, nor does it align with net zero.

It is essential that the Sustainability Assessment reflects the approved motion on Net-Zero Carbon, the definition within the Environment Strategy, and that the Sustainability Assessment has quantifiable targets.

It is important that this policy is revised and aligned with the Environment Strategy. Similarly, so should the SA. The aspiration needs to be clear, and we would recommend that West Berkshire require large developments to conduct a carbon assessment and footprint exercise that predicts the carbon footprint of dwellings.

If a development will lead to an excess (above) net-zero carbon we recommend that a penalty payment is made to West Berkshire Council to enable it to invest in off-setting schemes which could include large scale solar, or wind-farms (not necessarily on West Berkshire land). We recommend that an independent assessor is identified. We understand that a similar approach is taken by London Authority.

#### **Section 5.4**

- "District sets a target for carbon neutrality by 2030 being achieved by reducing carbon emissions to 350kt/annum"



It is unclear to us whether the 350kt/annum targets includes the population growth to 2037. We think it does not as the Environment Policy appears to be referenced to a 2017 baseline.

It is important that that this target is updated to reflect the growth forecasts for 2037.

### **Section 5.6**

- Designing and constructing developments that are extremely energy efficient and/or make the best use of renewable energy technologies are both ways of helping to mitigate further climate change.

The Thatcham NE site is SW facing and has elevated location. Such locations lend themselves to a good wind-resource (SW is the prevailing wind direction) and sites clear of woodland are fairly rare in West Berkshire. We would therefore encourage West Berkshire to conduct a survey of the wind and solar resource on site and to assess the level of renewable energy that can be harvested. This should be used to inform future development of the site with regards the potential for off-setting.

We note that the Sustainability Assessment state that there is "clear evidence and justification that West Berkshire needs to do more to meet national targets in relation to CO2 emissions reduction." and that "current installed capacity is about 15% of the previously designated 2016 target".

It is necessary to update the Sustainability Assessment which is now dated as the target of 2016 predates the commitments made in July 2019. Following this update it is important to assess what is the current installed capacity relative to the new target and to understand the scale of challenge that remains.

### **Section 5.8**

- The principles of climate change adaptation and mitigation are embedded within this policy

We believe that the policy (or subsequent policies) must go further. Defining 'principles' without quantitative statements, or without enforcement policies, is unlikely to lead to the principles being achieved.

We note that the Thatcham Strategic Plan makes virtually no reference to net zero carbon, or renewable energy schemes. If the policy were to have force we would expect this to be a core part of the proposal.

### **POLICY SP 6 (Flood Risk)**

- "The sequential approach will be strictly applied across the District. Development within areas of flood risk from any source of flooding,"

This policy appears to be written to reflect the Sequential Test as described in the Strategic Flood Assessment. We would expect that a Strategic Flood Assessment should include downstream flooding potential, in addition to fluvial flow and surface flooding.

We do not understand why areas that contribute to downstream flooding are not considered with the same importance as flooding from fluvial flow. For example, Thatcham suffered from flooding in 2007 caused by water run-off on the hills to the North of Thatcham - the same hills that are now being proposed for development.

The NE Thatcham site must be included as part of a strategic flood assessment, and the associated report updated.

We recommend that the policy is modified to reflect the importance of run-off on downstream properties and that the Thatcham NE site is assessed on this basis.

The area of NE Thatcham adjacent to the A4 (Siege Cross and Colthrop) leads to significant water runoff and flooding on the A4 and downstream towards Siege Cross dwellings and Colthrop industrial estate. It is likely that any flood alleviation would have to be significant, and consume the lower part of the development area. This does not appear to be considered in the master-plan (Stage 3) yet it has significant implications because it is likely to overlap to the proposed areas for the school and playing-fields.

We note that the Thatcham NE site (the part that is named 'Dunston Park' to the West) includes an area where there is a public right-of-way and includes a flood alleviation scheme. During a recent inspection following a spell of dry weather it was notable that the land is saturated and extremely boggy (to the extent that the land towards the bottom of the slope is inaccessible). It is clear that the soil structure and landscape is leading to a high ground water, and this is also supported by a statement in the HELAA assessment. There is no explanation as to how a development would maintain an equivalent level of water absorption as a green-field. We believe it is essential that appropriate surveying is conducting before the site proceeds as a credible proposal for development.

### **Section 5.9**

- "This policy aims to achieve a planning solution to flood risk management wherever possible, steering vulnerable development away from areas affected by flooding."

The policy must also achieve a solution that avoids shifting a flooding problem elsewhere. The existing developments on the slopes above Thatcham (such as Dunston Park) contributed to the flooding in Thatcham in 2007 due to a failure to include sufficient drainage and/or SuDS schemes on the higher ground.

It is essential that the policy places equal priority on houses outside the proposed development area, as to the development itself. This statement requires to be reconsidered as a sequential approach that ignores downstream flooding would be unacceptable.

### **Section 5.10**

- "This study supports this policy and has been used to evaluate allocation sites"

It is our understanding that the study is for fluvial flow and does not consider downstream flooding.

We request that the SFRA is reworked for the Thatcham NE to included downstream flooding.

### **Section 5.13**

- "This has already been carried out for those sites allocated within this plan .. Development should therefore comply with the requirements of national planning policy alongside this policy."

The single largest, and most significant site, of NE Thatcham does not appear to be assessed and is not considered in the Level 2 plan.

We request clarification from West Berkshire that the site will be assessed both for downstream flooding potential as well as on-site flooding.

If the national policy is insufficient, we would request that an additional policy or assessment is made by West Berkshire.

### **Section 5.19**

- "Not increase flood risk, either upstream or downstream"

We agree with this statement. There must be no increase in downstream flooding and this must be in the policy. The impact of climate change must be described.

### **POLICY SP 7 - Design Principles**

We believe that West Berkshire and Thatcham has benefited from good policy and principles that in general have delivered buildings with distinctive styles.

- "the siting and layout of development will promote the efficient use of land"

The properties that follow this statement are all desirable. Nevertheless, the policy fails to consider how layout may impact on energy use - either due to orientation of building or shadowing. We recommend that this statement is reconsidered to include aspects of net-zero carbon.

We agree with statements related to delivering character and identity, and richness in detail. Nevertheless, we are concerned that this is subjective and would like to understand how such statements are assessed.

- Green infrastructure (GI) – development will be designed to maximise the potential for strengthening GI in accordance with policy SP10 and should include arrangements for its long term maintenance and management;

We welcome the statement that arrangements for long term maintenance and management are included. Nevertheless, we are aware that the Ancient Woodland ("The Plantation") associated with Dunston Park was also expected to have been adopted by West Berkshire for long term maintenance, but for whatever reason it was not adopted. Therefore we are concerned there is insufficient follow-through on these statements and recommend that a process that allocates reserved funding sufficient for long term maintenance of green infrastructure is also defined.

### **POLICY SP 8 - Landscape Character**

- The natural, cultural, and perceptual components of the character of the landscape will be considered as a whole.

With regards to the Thatcham NE site, the existing landscape is agricultural interspersed with well-maintained and historic hedgerows, a scattering of ancient trees, and bounded by well-established woodland or hedgerows. These natural landscape features provide the countryside feel towards the edge of the existing settlement, and define the countryside landscape beyond.

Historic hedgerows are valuable to the ecology of an area and support a wide range of biodiversity and wildlife. It is not possible to remove a historic hedgerow and claim a substitution of biodiversity elsewhere as the ecology may have developed over many decades, or hundreds of years.

Therefore, these features should be retained wherever possible and natural wildlife corridors should be sought that lead to more of an 'ecovillage feel' built on principles of net-zero carbon.

### **Section 5.33**

- "A landscape does not have to have a designation to be valued locally."

We agree with this completely. Nevertheless, little regard seems to have been made to the loss of countryside which is valued highly by residents of Thatcham.

### **Policy SP 9 - Historic Environment**

We agree that the historical environment should be maintained, and recorded, wherever possible.

The area surrounding Dunston Park has historic and archaeological significance, and previous surveys have uncovered evidence of Bronze Age and Iron Age settlements. These findings have helped to support the hypothesis that Thatcham has justification for the claim of being the longest continuous habitation in England.

- "For known assets of archaeological interest, or on land where there is archaeological potential, an archaeological desk-based assessment will be required as a minimum."

We expect that the existing evidence in NE Thatcham exceeds the minimum threshold of a desk-based assessment.

### **Policy SP 10 - Green Infrastructure**

- "Development will protect and enhance existing GI assets and linkages and add to the local network for the benefit of both the natural environment and the health and wellbeing of the community."

As noted in SP 8, with regards to the Thatcham NE site, the existing landscape is agricultural and countryside interspersed with well-maintained and historic hedgerows, a scattering of ancient trees, and bounded by well-established woodland or hedgerows. These natural landscape features provide the countryside feel towards the edge of the existing settlement, and define the countryside landscape beyond.

Historic hedgerows are valuable to the ecology of an area and support a wide range of biodiversity and wildlife. It is not possible to remove a historic hedgerow and claim a substitution of biodiversity elsewhere as the ecology may have developed over many decades, or hundreds of years.

The natural landscape, and hedgerows provide wildlife corridors that support diverse wildlife in the remaining Ancient Woodland (The Plantation). The proposed site would encircle the remaining woodland and break the connection to the countryside.

The proposed site of Thatcham NE would also hinder access to the countryside as it would be subsume existing rights-of-way.

We note that during the HELAA assessment the Thatcham NE carried a "High risk of adverse nature conservation impacts" due to "Areas of ancient woodland and Local Wildlife Sites adjacent to the site"

The selection of Thatcham NE, being rural and countryside, is in conflict with the policy statement that is in the benefit of the natural environment. Nor is the selection aligned with the well-being for existing Thatcham residents.

The conflict between the NE Thatcham site selection and the policy need to be resolved.

### **Policy SP 11 - Biodiversity and geodiversity**

- Development proposals will conserve and enhance biodiversity and/or geodiversity and will deliver a net gain.

As noted earlier, with regards to Thatcham NE we recognise that there are many kilometres of ancient hedgerows that support a range of biodiversity. The encircled Ancient Woodland is also a recognised Local Wildlife Site and is recorded on the Thames Valley Environment Record.

Policy needs to reflect on how wildlife sites are not weakened, but improved.

The conflict between the NE Thatcham site selection and the policy need to be resolved.

### **Policy SP 12 - Housing Delivery**

We are not in a position to comment on how the target dwelling number has been obtained.

However, we do question whether historic predictions of housing demand are still relevant given the extraordinary changes brought about by both Covid and the exit from the EU which might change the relative attractiveness of different regions. We also note from external sources (BBC, Dec 2020) that "

A computer-based formula used to decide where houses should be located has been "updated" to focus more on cities and urban areas in the North and Midlands." We therefore seek clarity as to whether recent changes are being reflected in the housing growth forecast.

The dominant labour demand in West Berkshire is related to professional services and employment from large business that are predominantly European facing. However with the lack of support for professional services in the EU trade agreements, it is clear that there will be shift in employment, and European based businesses may shift their employment overseas.

Whether this means that West Berkshire remains such a desirable place, driven partly by employment prospects, remains unclear.

### **Section 6.7**

- "Several sources will ensure a continuous supply of land for housing"

We do not agree with this statement. There is such a heavy focus on a small number of sites, such as Thatcham NE, that the policy is in grave danger of failing should unanticipated delays occur.

We recommend that housing supply should be more evenly distributed over a greater number of sites to reduce the risk of a failure to supply, and also to ensure every area has the ability to respond to increased population growth with appropriate investment in services.

## **POLICY SP 13 Sites Allocated**

### **(And reference to Site Assessment and Thatcham Strategic Growth)**

As noted earlier, we do not agree that there should be such a single large site responsible for providing housing supply. The policy is in grave danger of failing should unanticipated delays occur.

The Thatcham Strategic Growth study appears to be, at least partly, based on the read-through of the appeal and response by the Secretary of State to the Siege Cross development (Stage 1 Report, section 4.5). This was a proposal for 495 dwellings that did not encroach into the areas now being proposed (Dunston Park, and Colthrop Village) for NE Thatcham, and there were many issues identified in the appeal where the balance of one was outweighed by the balance of another.

It cannot be assumed that the same outcome would apply for a different proposal that is approximately five times the scale.

We do not agree with the dismissal of alternative sites because "only growth of a strategic scale could support the service provision and regeneration that Thatcham requires". This statement is not backed up with evidence because there has been no publication of the Infrastructure Development Plan and there has been no publication that explains how the congestion on surrounding roads would be mitigated. We therefore disagree that neighbouring sites can be discounted if there is a failure of evidence that THA20 can be delivered.

### **Section 6.19**

- Strategic development in Thatcham will bring considerable benefits to the town, not only in the provision of new housing, including affordable housing, but in the provision of new schools, community facilities and recreational provision."

We are concerned that in the context of development there appears to be no consideration given to transport and highways, including air quality. This surprises us because the proposed site, being in an existing rural area, and at distance from proposed employment centres will unavoidably be reliant on private vehicle use. The evidence base provided recognises congestion on the A4, at the station crossing, and surrounding roads yet this evidence appears to have been ignored in the Local Plan. This appears to be a serious omission.

It is essential that this statement is corrected to include the benefit, or detriment, related to transport and highways.

## **POLICY SP 17 - NE Thatcham**

We do not agree with the selection of NE Thatcham as being the dominant site for the majority of all housing in West Berkshire when taking into account the connectivity constraints, and the forecast demand for economic development. Unless there is a very

significant improvement to critical infrastructure we believe there is a fundamental mismatch in policy in describing NE Thatcham as a sustainable development site.

We also have concerns related to how the Local Plan is being prepared - in relation to the strategic growth masterplan activity, and the status of the sustainability assessment used to score sites. Our comments cover the following four sections.

## **1. The connection between the Strategic Growth Master-Plan Study and the Local Plan**

The Thatcham Strategic Growth Study is in essence a consultant's report that offers one possible approach to the development of North East Thatcham.

The statement in the Local Plan that proposals should 'have regard (to the Growth Study) and positively respond' is insufficient to determine the legal status of the Strategic Growth Study. Therefore, it is unclear if any elements in the Growth Study are binding on a developer.

It is notable that many of the non-strategic sites have more detail defined within their associated RSA policies than the strategic site of NE Thatcham.

For example, other sites have statements associated to access, air quality surveys, traffic calming, ecology protection, building style and visibility, protection of rights-of-way, preservation of tree-belts, limitation of built-form, landscaping measures, transport assessments that take into account different stages of growth, habitat surveys, etc.

The precedent set by the non-strategic sites should follow through to SP 17.

Therefore, it is essential that SP 17 defines the following:

- It must set out the legal framework of SP 17 and its connection to the Growth Study
- It must identify those policies that are required to be followed and these should be elevated to the Local Plan

## **2. The connection between the Local Plan and the Sustainability Appraisal Report, and comments on the Sustainability Appraisal.**

The status of the Interim Sustainability Appraisal (SA) that is issued with this Draft Local Plan is unclear to us. The introduction on the West Berkshire page invites comments, but we do not understand if this is a formal consultation. If so, this should be made clear.

It is also unclear if this is the first time that a Strategic Environmental Assessment (SEA) has been subsumed within the Sustainability Appraisal by West Berkshire. We think that one of the most important issues on environmental assessment is the carbon assessment of new buildings, and their use. However the net zero climate motion and associated environment strategy (2019) does not seem to be referenced. This appears to be an omission. The document must be brought up to date to reflect the net zero climate motion, and net-zero requirements for 2030 as defined in other policies. Specifically, the agreed definition as stated in the West Berkshire Environment Strategy "that carbon dioxide will be reduced to a net zero level" must be referenced.

We note that throughout the draft Local Plan there are references to NE Thatcham as being sustainable. Because both documents (SA and Local Plan) are draft it is unclear which takes priority. We think it is essential that an approved SA is produced following a formal consultation prior to the next consultation on the Local Plan and site assessment being

judged against it, otherwise the site assessment itself is without foundation and subject to challenge.

The following comments refers to the scoring and assessment of NE Thatcham, Appendix 4:

In its summary statement the SA states that "NE Thatcham is sustainable because it maximises provision of social housing, self-build plots, new green infrastructure, schools, and improvements for sustainable travel." There is no reference to traffic flow or highways infrastructure, nor does the statement align with the Environment Strategy of West Berkshire for net zero carbon. It is essential that that SA fully considers a Traffic Assessment that ensures the site is deliverable and will not lead to harm to health due to air quality, or levels of congestion that cumulatively adds to a traffic load on surrounding roads that is unable to be supported with the capacity constraints.

The SA scores NE Thatcham significantly positive (the highest rating) for supporting active lifestyles, yet it proposes that playing fields will not be supported on site. We disagree that such a strategy lends itself to the highest score possible. It is important that the SA assessment process describes how it has allocated the highest rating possible on this objective.

The SA scores NE Thatcham significantly positive (the highest rating) for the protection and enhancement of green infrastructure, and to improve the quality of the (6) rights-of-way. Yet the (6) rights of way will all be subsumed into the development and the existing rural, and countryside, environment will be lost. There is no reference in policy SP 17 that protects right-of-way and so we disagree with the assessment that this can lead to the highest rating possible.

The SA states that it will bring community infrastructure commensurate to the development. This implies that no support will be given if existing infrastructure is already sub-standard which is acknowledged in the masterplan, stage 1, review. Therefore the assessment must take into account policy SP3 that "scale will be relative to existing facilities and services". On this basis we disagree that such a development can score highly and the SA must describe how it came to this conclusion.

The SA scores NE Thatcham highly on enhancing biodiversity and geodiversity. The assessment (SA, Appendix 4) consider boundaries to Ancient Woodland but makes no reference to mature hedgerows that will be lost, or the much broader ecological studies that would require to be conducted prior to planning approval. In the previous (2017) application it was noted that: "No phase of development shall commence until a detailed "Ecological Mitigation and Enhancement Strategy" for that phase has been submitted to and approved in writing by the Local Planning Authority. Such Strategy shall include, but not be limited to, detailed creation & management of meadows, wetlands/swales, parkland, buffer zones, and reptile areas, with monitoring undertaken annually for a five-year period, followed by further monitoring in year-seven, and year ten, with a review of the Plan after the 10th Year, and provisions for reporting the results to the Local Planning Authority." The only statement in the mitigation for this SA is that "appropriate buffers for ancient woodland would be required". This is wholly insufficient for a rural site of the scale proposed which certainly requires an ecological assessment before coming to positive conclusions on enhancing biodiversity. We disagree with its conclusion and the SA must describe how it came to this position in light of the previous requirements for mitigation and ecological assessment that were prepared in 2017 for the same area.

The SA scores NE Thatcham neutrally with regards to "enhancing the character of the landscape". We disagree with this assessment, because a development of 2,500 dwellings on elevated land is not going to be consistent with the landscape. West Berkshire previously



stated that the much smaller proposed development at Siege Cross would "would rise above the settlement to such a degree as to harm both its setting, and that of the nearby AONB". The SA must describe how it arrives at a different conclusion as to what it presented to the Secretary of State.

The SA scores NE Thatcham neutrally with regards to air quality. The assessment makes no reference to the existing Air Quality Management Area on the A4 and the impact that increased traffic will make. The failure to account for this is in conflict with policy DC 7 which considers the cumulative effects on health from the development itself or cumulatively. The SA also states that "nitrogen dioxide have been reducing over the last 5 years" yet on the West Berkshire website it is stated that "During 2015 there were no exceedances of the annual mean, however in 2016 the annual mean NO2 concentration was exceeded at 2 sites within the Thatcham AQMA". This implies that air quality is on a worsening trend. In our view it is not credible to claim that a 2,500 development will lead to a neutral impact on air quality. It is essential that the SA must describe how it has assessed air quality, resolves the conflict with DC 7, and resolves the conflict between statements on the website and within the SA. On our understanding we disagree with the neutral rating.

The SA scores NE Thatcham neutrally on "Will it help reduce vehicular traffic and/or congestion?". We fail to understand how the SA has come to a neutral conclusion when earlier (HELAA assessment) it is stated that "Development would have a very significant impact on the local highway network". There is a clear contradiction and the SA must address this contradiction and describe how it came to its conclusion.

The SA references SP5 (Climate Change) and states that the site "will be expected to help with achieving this SA objective". As we note in our response to SP 5 we do not believe the referenced policy reflects the Environment Strategy for West Berkshire. As a result, the assessment is not meaningful. It is essential that the SA must refer back to the net-zero carbon definition as stated in the Environment Strategy.

The SA scores NE Thatcham positively on its ability to "reduce West Berkshire's contribution to greenhouse gas emissions" yet there is no evidence as to how it will reduce emissions. We fail to understand how the development will reduce emissions as no reference to this is made in policy SP 17, nor in the masterplan. In the absence of any evidence, or stated policy, this statement is misleading. The SA must provide evidence on the carbon assessment that leads to this conclusion.

The following more general comments refer to the main body of the SA:

The sustainability assessment states that the development will bring "positive effects related to the objectives of improving health, safety and wellbeing". In preparing our response Councillors have collected over 400 direct responses from residents of which 91% value the green space and access to it through the existing right-of-way access, and note that a separate residents petition has recorded 1,600 objections. The SA does not provide support as to how health, and well-being, is considered for existing residents and it does not adequately cover air quality. The evidence base does not include a health impact assessment, and in its absence it appears that Officers are prejudging the outcome of a study that has not yet been conducted. Therefore we do not agree with this statement, and if it to be included it must reflect the broader health impacts to align with DC 2.

We agree with the sustainability assessment that we should be "maximising opportunities for safe and sustainable travel" and the electric main-line through Thatcham is a recognised asset. However, for Thatcham the station remains difficult to access due to the crossing, has limited parking and is responsible for significant congestion. We do not agree that a strategic site of 2,500 properties can be considered without addressing improved access to, and over,

the crossing. Alternative approaches for sustainable travel can be justified with a different approach, for example a distribution of smaller housing developments along the whole stretch of rail-line.

We note that the sustainability assessment puts great value on the AONB and its "effects on health and equality". We do not understand why an equivalent consideration is not placed on the larger population centre of Thatcham that value access to the country side, which may have a proportionally larger benefit on population health.

The sustainability assessment places emphasis on "efficient of land use" yet it does not address the loss of high-quality agricultural land. We do not understand how this efficiency measure has been derived.

We note that the sustainability assessment refers to use of land for "regeneration and change, as well as encouraging infill, changes of use and other development within the settlement boundary." The proposed strategic site is neither regeneration, infill, or within the existing settlement boundary. Therefore we do not agree that by this definition the NE Thatcham site meets the criteria.

We note that the sustainability assessment "sets out a presumption against development in the countryside". It is necessary that the countryside surrounding Thatcham is given equal protection, as it is both high value agricultural land and serves as accessible green space to residents in Thatcham.

We note that the sustainability assessment states that "policy would have a significantly positive effect in terms of the reduction of climate change emissions". We do not believe this is consistent with the environment strategy of West Berkshire that "the definition that will be adopted is that carbon dioxide will be reduced to a net zero level". We seek clarification as to whether the existing environment policy of net zero is being maintained, or whether the policy in the Local Plan has redefined the definition in the environment strategy. There is no evidence in the policy for SP 17 that carbon dioxide emissions will be reduced relative to existing levels. Thatcham Town Council, with West Berkshire Council, have previously stated our ambition to migrate towards net zero emissions and it is essential that West Berkshire develop policies that are self-consistent with their adopted Environment Strategy. It is essential that this is addressed in both the SA and the Local Plan.

It is essential that the sustainability assessment address the above points, is a robust and stable document, and that the above points regarding site assessment are addressed.

### **3. Introductory comments on the master-planning exercise for Thatcham**

We acknowledge the very considerable effort that has gone into producing the Thatcham Stage 1, Stage 2, and Stage 3 reports and recognise that there is pressure for more housing. There are several key issues which we believe are not addressed.

#### **3.1) Traffic Flow**

The problems of traffic capacity in Thatcham are well understood, and primarily exist due to geographical constraints that lead to single primary route, the A4, supporting East-West traffic.

Alternative route that avoid the A4 require diversion through residential roads such as Lower Way, or Bowling-Green Road, which are not designed for high throughput and have limited capacity due to residential access, mini-roundabouts, and shared usage with active travel.

North-South routes are limited to the South due to the rail-crossing, and to the North with traffic capacity constraints introduced with the chicanes at Cold-Ash.

We have specific concerns related to the assessment of traffic in this emerging plan that we detail in the following. We also make further recommendations in policy SP 22 that requires traffic assessments over a series of time periods such as [0,5,10,17] years.

- a. The lack of historical investment in critical transport infrastructure leads to a chronic problem in the areas surrounding the proposed development including Floral Way, A4 and Pipers Way. We note that this issue is familiar to Officers from previous planning applications and are surprised it is not referenced in the Traffic Assessment.

The previous application for Siege Cross (2017) prepared for planning consent, and included the reference that "revised signage for the approach to the Floral Way roundabout from the east to encourage more through-traffic to use the Thatcham Northern Distributor Road (NDR) via Floral Way in preference to the A4."

We appreciate there is no easy answer to an increase in traffic flow but would draw attention to the comments by residents exiting residential roads off Bowling Green Road and Floral Way that already complain of heavy traffic flows at peak time. This narrow road has limited capacity due to residential access, mini-roundabouts, shared usage with active travel (the cycle lane is on the pavement on one side of the road only), and has been the location of a number of recent accidents.

Therefore the ability to act as a relief road is limited, and creates further problems for existing residents. Without a more substantial diversion of traffic, probably a new road route that avoids Bowling Green Road, we do not think it would be appropriate to divert traffic onto Floral Way from the A4 that transits Bowling Green Road. It certainly would not be appropriate for HGV traffic and therefore remain concerned that there is no viable alternative to the A4.

- a. In the Phase 1 Traffic Assessment (Table 5.3) there is no reference to traffic flow eastbound from the junction of Floral Way to Pipers Way. In peak-period AM it is eastbound traffic to Pipers Way on the A4 (either from Newbury and environs, or locally from Thatcham) that creates congestion. A backlog of traffic arises because of congestion at Pipers Way that backs up to the exit of Floral Way/A4, and also because traffic exiting from Floral Way has to give priority to traffic on the A4. We would expect that with the new developments and the increased demand from the location of the secondary school the traffic flow and congestion is very likely to increase. The Traffic Assessment needs to be updated to include eastbound traffic.

We note that in the HELAA assessment for THA20 it is stated that "Development would have a very significant impact on the local highway network. Opportunities for modal shift should be maximised. A transport assessment would also be required". The Phase 1 Traffic Flow Assessment states that there is little difference between traffic flow with the core forecast (base case) and the future forecast with the development (+2,500 houses). This inconsistency with previous statements in the HELAA indicate to us that there is a flaw in the Traffic Assessment.

- b. From our understanding of Table 5.3 it appears that traffic flow on Floral Way has not been considered. This is the main access road to the proposed development. It is a

serious omission if not included and the Traffic Assessment must be updated to include this road.

- c. The illustrative map (Appendix B, Traffic Assessment) also implies there is no congestion on any of section of the A4 either side of Thatcham, or approaching Newbury. There is no explanation why this is the case. The Traffic Assessment needs to be revisited, and an explanation is essential.
- d. We think it is important that the traffic assessments also take into account that the A4 through Thatcham is an essential route for blue-light services to reach the primary A&E hospitals in Reading, and in Basingstoke. Ambulances for Basingstoke use the Brimpton bridge crossing as Thatcham crossing is often closed with unpredictable access.. We are concerned that with increased congestion on the A4, and the various demands on the A4 (primary trunk road, active travel, M4 diversion route, central route for local traffic) blue-light services will be compromised.

From the emerging draft plan, we do not believe sufficient consideration has been given to the above points and that the evidence base is incomplete. The Traffic Assessment should consider access for emergency services that use the A4.

- e. On the access to the South:

There appears to be a failure to account for the implications of the rail-crossing, which can be shut for up to 40 minutes per hour, substantially limiting traffic movements and creating serious congestion within Thatcham resulting in queues approaching 1km in length (information as disclosed by WBC). The supporting maps (Appendix B-E) indicating locations of congestion omits the queuing of traffic and leads to a false and misleading impression of traffic in the area.

This is inconsistent with the statement in the Thatcham Stage 1 review that states "long queues often forming in peak periods on both sides of the railway, which sometimes do not clear before the barriers come back down" nor the evidence on the ground that Officers will be familiar with. This is a very serious issue for the Town and the Traffic Assessment must be revised to include these known issues.

We note that the masterplan refers to a cost/benefit analysis for a bridge that has been conducted, but this is not provided in the evidence pack. This analysis must be shared as part of the evidence base.

We note that the dismissal of a bridge is partly based on assertions that it distracts from other transport modes. We disagree with this statement as the employment centres of Basingstoke are only accessible by private vehicular use. It is essential that the Traffic Assessment, and the Thatcham Strategic Growth Plan, address this issue and describe the other transport modes that are considered as alternative to the crossing in order to assess if this is credible.

The dismissal of a bridge is also partly based on an assertion that implies new residents are unlikely to access the employment centres in Basingstoke. We disagree that new residents are less likely to use the bridge than residents in immediately adjacent areas. It is important that the Strategic Growth Assessment explains how it will reduce traffic demand on this route for new residents, relative to existing residents in neighbouring areas.

The assessment of transport must also include the capacity of car parking on the North side of the crossing (as the South side is often inaccessible due to the crossing being

closed). There will be a substantial increase in demand if the station is to be encouraged, as not everybody can walk/cycle to the station from NE Thatcham. As far as we can tell, this capacity constraint hasn't been considered.

In our view, the lack of a proper North/South route for Thatcham means that the prospect of a bridge has to be considered to replace the crossing. It would open up employment centres in Basingstoke without having to divert commuters through the A4, and it would also make the retail park more accessible for residents. It would also enable a more holistic approach to transportation increasing access and use of the electric trains reducing reliance on personal vehicles.

We note the comments in the Stage 2 Thatcham master-planning exercise that adding a bridge would cost around £15m. In our view, central government funding should be sought for this development as it serves multiple districts and forms part of national infrastructure.

We do not agree that the master-plan has addressed constraints that the level-crossing introduces on Thatcham and we do not agree that alignment with the master-plan will lead to benefits to either existing, or new, residents, of Thatcham. It is essential that the strategic plan accurately assess the demand and addresses the points above.

### **3.2) Improving services and facilities for Thatcham residents**

We note that the master plan refers to the existing Local Plan (2012) Statements such as "Thatcham town centre will 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 will be improved and encouraged within the development of the new town centre."

In the period since 2012 there has been increasing encroachment of residential development around the town centre, and the recent development by McCarthy & Stone reduces space for the town-centre to expand. The remaining area of the town is within a conservation area. In our view the opportunity for 'a new town centre' as previously envisaged has been missed and the town is increasingly 'hemmed-in'.

We acknowledge that a strategic development may release funds for investment in the area. Nevertheless, without the publication of the IDP we are unable to assess that the previously identified shortfalls will be addressed, and whether the previous commitments to town centre regeneration remain a priority.

We also note that the Inspector's report in 2012 stated that "reference to development (on greenfield sites adjoining the settlement] addressing local needs is thus misleading and needs to be more circumspect". We therefore reserve judgement to the benefits that will be delivered to the residents of Thatcham when considered against the growth in traffic, and the much reduced access to green space.

Therefore we do not accept that the master-plan is sufficient justification to progress with NE Thatcham as a strategic site as the evidence base is missing key information.

### **3.3) Leisure Access and Playing Fields**

The NE Thatcham Stage 3 report proposes that 'an additional 1ha' of playing fields at the existing Henwick Worthy sports field would contribute to the development. This site is managed by a Joint Management Committee (JMC) that have not been approached

to assess whether this is feasible. It is important that the statements in the Draft Local Plan are credible, and based on evidence.

Our understanding is that there is no space for 'an additional 1ha' of playing fields, nor is there capacity for car-parking as demand frequently exceeds capacity resulting in parking on Henwick Lane and neighbouring residential roads.

It is essential that the statement is corrected to note that availability of additional land at Henwick Worthy is made conditional on the outcome of discussions with the JMC.

As far as we can tell, there is no provision in the master-planning work for improvement of the Kennet Leisure Centre. This facility is in need of refurbishment and appears to have been de-prioritised by West Berkshire relative to other facilities in the region.

#### **4. Comments on the SP 17 policy including references to Strategic Growth Study (Stage 3)**

The following comments refer to the SP 17 policy and statements.

- "is allocated for a residential-led development"

Within the Thatcham Strategic Growth Study considerable emphasis is given to the development of local employment and the addition of office space that will reduce the requirement to travel off-site. It is unclear to us to how this would be delivered and phased, when it is a residential-led development.

- "The site will be delivered to achieve a sustainable, comprehensive and landscape-led development"

We have covered the comments about sustainability above, and challenge the claim that it is sustainable when it does not consider traffic flow and its impact on surrounding roads.

- "supportive of proposals which have regard, and positively respond, to the master planning work contained in the Thatcham Strategy Growth Study"

We have covered our concerns on the status of the master planning work above. It is unclear if the Growth Study is binding, and its relation to policies in the Draft Local Plan.

- "a new strategic country park"

We note that considerable emphasis is given to this within the Strategic Growth Study which includes 19 separate references. However it is unclear to us exactly what is defined by a strategic country park and where it is located, but our understanding is that it is the area of land that is uneconomic to be developed due to location on high ground or incline. If so, these areas are existing agricultural land and unwooded and not typical of a country park which are usually associated with mature trees. It would take many years to establish the characteristics of a typical country park. If this is the case it should be stated in the strategic plan.

Reference is made to access to the North Wessex Downs yet the proposed development appears to subsume 6 existing rights-of-way that already provide this access. It is not apparent that the proposed location for the Country Park provides increases access to the North Wessex Downs.

It is also stated that the country park links are strongly connected to the existing town, encouraging greater accessibility of the countryside. It is not clear to us why a country park at the edge of a new development increases accessibility for existing residents of Thatcham. The Strategic Growth Study should provide explanation to why this access is improved relative to the existing right-of-way access.

We understand the desire for developers to promote a country park as it puts into use uneconomic development land, however this should not be used to justify a lack of delivery of other forms of recreational land such as playing fields. We also note feedback from existing residents that the natural countryside is cherished. We have received no feedback that there is demand for country park for recreational use.

We recall the inspectors previous words "reference to development (on greenfield sites adjoining the settlement] addressing local needs is thus misleading and needs to be more circumspect".

- "small-scale employment space"

We agree that interspersed employment space is attractive and may help to reduce vehicular use. It is unclear to us if the employment space is proposed to be adjacent to Colthrop Industrial Estate, or interspersed through the residential areas. It is also unclear as to who develops this infrastructure - would it be a condition of planning or would it be led by West Berkshire Council. We suggest that this is also clarified in the economic plan as it is a different approach to the current focus of Arlington and Newbury Business Park which appear to be the centre of anticipated growth.

As we note in the introduction, we believe there is a lack of detail for this policy when compared against the non-strategic sites. A much greater level of detail is essential for a strategic site and it essential that where precedent is made for other non-strategic sites, the same level of clarity is introduced into this policy. Without such detail in SP 17, the SA itself is fundamentally flawed because it is assessing a proposed site that does not have binding commitments.

#### **Section 6.45**

- "Delivery of at least 1,250 dwellings is anticipated within the plan period."

We are unclear as to the anticipated rate of development. There is a very large difference between 1,250 dwellings and the upper level of 2,500. The statement should describe the likely rate of development in order that phasing for other community assets can be assessed. It is important that Thatcham is not left waiting for 17 years before substantial benefits to town centre re-generation, and community infrastructure is delivered.

#### **Section 6.47**

- "As work on the Local Plan Review progresses it will include any additional, specific, mitigation measures and infrastructure requirements"

We agree with the Thatcham Stage 1 review that "Development would have a very significant impact on the local highway network." Without a strategic transport review that includes a bridge, and diversionary routes that avoid transiting the residential

routes of Bowling Green Road we fail to understand how mitigation of increased traffic flow can be accommodated. This needs to be addressed immediately to ensure there is a credible route going forwards.

We are concerned that a strategy that places so much reliance on a single site that has strategic infrastructure limits may ultimately be undeliverable.

### **Policy SP 18 - Housing Type and Mix**

We agree that a mix of housing will be required that needs to be reviewed regularly to reflect demand.

### **Policy SP 19 - Affordable Housing**

We agree with the ambition for affordable housing, but are concerned that the phrase "will be sought by negotiation" implies a weak starting position. We would suggest that this is rephrased to state: "the levels of affordable housing provision will be: "

We agree with the statement "Affordable homes will be built to net zero carbon standards". This should reduce energy poverty and ensure high quality living standards.

### **Policy SP 20 - Strategic Approach to Economic Development and Hierarchy of Centres**

It is unclear to us how the small-scale employment as defined in SP 17 for the strategic site of Thatcham NE fits into the hierarchy.

It is also unclear as to where the priority location is for warehouse facilities and logistics. In the economic development assessment it was identified that agents would seek locations close to the A34/M4 junctions and in the labour assessment it was acknowledged that this is a growth area accounting for 40% of labour demand.

### **Policy SP 21 - Sites Allocated for Economic Development**

We note that Colthrop Estate has an allocation of land for industrial, storage and distribution. We are unclear if the purpose of this allocation is for logistics - in which case the employment may be relatively low - or for other purposes.

We recognise the new employment area of Theale and acknowledge the good rail connectivity from Thatcham. Nevertheless, the restricted access and parking at Thatcham Station is also likely to lead to many new residents commuting by private vehicle. As we note elsewhere, active travel (from the new development to the station) will not be suitable for everybody. Therefore it will be important that the Traffic Assessment fully considers the new employment areas in future predictions.

### **SP 22 - Transport**

We refer to the transport related issues noted for Thatcham in our response to SP 17.

We welcome the reference to the Climate Emergency and minimising the impact on the environment. To this end we encourage improved access to the station.



- "For residential development, a full Transport Assessment will be required where 60 or more dwellings are proposed."

The period of the Local Plan covers 17 years. It is impossible to predict what the traffic profile will look like in 2037 as this will be speculative, but there is more certainty in traffic profiles in shorter time periods as they will be similar to known patterns.

Therefore it is important that traffic assessment start from known, evidence based, traffic densities based on measurements. Traffic assessments must consider the impact over a series of time periods such as [0,5,10,17] years in which [0] represents the base line from existing known traffic flows (using a baseline of 2019 before Covid created extraordinary reduction in traffic use).

- "Mitigate any impact on local transport networks and the strategic road network"

We recognise the importance of the statement to "Mitigate any impact on local transport networks" and "Development (at Thatcham NE) would have a very significant impact on the local highway network" and seek guidance on the mitigation measures proposed.

It is necessary for the policy to define that traffic assessments are conducted for the full period of the Local Plan, 2020-2037 with a base line that represents existing known (pre-covid) traffic flow.

### **SP 23 - Infrastructure Requirements and Delivery**

We note that the term 'infrastructure' has multiple meanings referring to either narrow definitions such as critical infrastructure (utilities and transport) to broader definitions that include GP surgeries, libraries, community centres etc.

For example, it is unclear regards to the Thatcham NE whether proposals related to new office space are part of the development and paid by the developer, or part of infrastructure and requires new inwards investment or seed capital from West Berkshire.

Without the associated IDP it is difficult to judge what is the intention of this policy.

It is essential that with the policy the definition of infrastructure is included.

### **Section 8 - non strategic sites**

We make some observations where principles of environmental protection set a principle that must be applied equality to policy SP 17.

### **Policy RSA 3**

We note that this non-strategic site places emphasis on noise and air quality surveys, environmental protection such as habitat protection for wildlife, limitation of built form to avoid development on the skyline, tree planted landscapes and tree belts, and that rights-of-way across the site will be protected. No noise

We would expect that a strategic, rural, countryside site would also at least the same environmental protection.

This policy establishes a principle of protection that should apply equally to policy SP 17.

It is necessary to include the same principles to SP 17 including noise and air quality surveys and environmental protection.

#### **Policy RSA 4**

We note that a distinct reference is given to a flood risk assessment for flood risk downstream.

This policy establishes a principle of protection that should apply equally to policy SP 17.

It is necessary to include the same principles to SP 17.

#### **Policy RSA 5**

We note the specific reference given to protection of Ancient Woodland and buffer.

This policy establishes a principle of protection that should apply equally to policy SP 17.

It is necessary to include the same principles to SP 17.

### **Section 9 - Development Control Policies: Our place based approach**

#### **DC 1 Development in the Countryside**

As we have noted in SP 17 there is an inconsistency in policy between selecting SP 17 as a strategic site and DC 1 that sets a presumption against development in the countryside and outside settlement boundaries.

This is a position that West Berkshire held strongly in 2016/7 for the Siege Cross development noting that it reflects historic settlements, is best and most versatile land, and forms part of the setting of AONB making a positive contribution to the wider landscape.

It is necessary for the countryside in Thatcham to be given the same weighting in protection, to that of countryside elsewhere.

#### **DC 2 Health and well-being**

- "will promote, support and enhance positive mental and physical health and wellbeing and thus contribute to reducing health inequalities"

As we have noted in SP 17 and earlier, the loss of green-space and rights-of-way to neighbouring countryside will have an adverse impact on the well-being of existing residents in Thatcham. Of all responses received from residents to Councillors the most pressing concern is the loss of green-space and this dominates over other aspects including GP access. We therefore disagree that SP 17, and Thatcham NE, is an outcome that either promotes, supports or enhances wellbeing.

- "Development that would have an unacceptable impact on the health or wellbeing of existing or new communities will not be permitted."

It is necessary to define and quantify what is an unacceptable impact on health. As well as the loss of green-space and recreational paths to a rural space, the development of THA17 will increase traffic and congestion in an Air Quality Management Area.

### **DC 3 Building Sustainable Homes and Businesses**

We acknowledge that high quality and sustainable homes are essential for supporting the net zero carbon objectives of West Berkshire. We note that the West Berkshire Environment Strategy states the definition for net zero is that "carbon dioxide will be reduced to a net zero level. In other words, any carbon dioxide gas emissions within West Berkshire will be balanced with an equivalent of emissions that are either offset or prevented".

This inclusion of this definition is necessary to align terminology and should be part of this Policy.

We recognise that Homes Quality Mark level 4 is a standard that is designed to deliver a high-quality holistic approach to dwellings and building communities. Nevertheless there are aspects of the scheme that are open to being 'gamed' by developers as 39 assessment issues deliver 'credits' can be played-off against each other. This is particularly the case for a large development where 'credits' can be obtained in one part of the development at relative ease that avoid more difficult issues being confronted. Careful oversight is required to ensure that good outcomes for West Berkshire are delivered.

We would suggest that HQM Level 4 is a requirement, but that the 'credits' related to energy efficiency are called out explicitly. There may be several ways to do this:

1. In the HQM request that a minimum of Home Energy Performance Ratio (HEPR) of 0.9 is specified.
2. Define a Dwelling Emission Rate (DER) in Part L 1A that align with net zero and can be assessed using Standard Assessments Procedures (SAP)

The disadvantage of (1) is that the HEPR calculation within HQM is based on a proprietary algorithm (although it appears to be related to Part L Building Standards) and the selected value (HEPR=0.9) needs to be reviewed against their definition to ensure it does meet the objectives of the West Berkshire. This is beyond the scope of our assessment.

Basing a solution on (2) enables West Berkshire to set their own targets. We understand that an approach by London Authorities attempts something similar, and where developers fail to meet the targets set they pay a penalty towards carbon offsetting schemes. This produces a market incentive to deliver buildings that are close to net zero carbon and provides the Council with a revenue source to fund offsetting.

Whatever approach is chosen key requirements are related to high quality insulation, airtightness, careful design to avoid cold-bridges, controlled ventilation and heat recovery. As buildings will no longer be heated by fossil fuels, the use of ground or air-source heat pumps are likely to become standard. We recommend that new buildings have radiators and associated plumbing designed for lower heat distribution - requiring larger surface areas and piping - in order the heat pumps can operate with high coefficients of performance. It is also likely that larger heat-stores will be required that enable solar heating of hot-water, or the use of immersion heaters from solar or off-peak low-carbon electricity, to be maximised and any supplemental high-carbon electricity to be minimised.

An essential part of delivering high quality buildings is also related to enforcement. We would expect to see policy statements that define how testing to a defined target will be assessed.

For example, air-tightness may be measured on a subset of houses to ensure that standards are being met in the field. The enforcement procedure should also define penalties and remedies required if standards are not met.

As we note earlier, we believe that renewable energy resource should be assessed in a similar manner to material extraction in advance of allocating planning and assigning land use. For example, solar radiance and wind are the key resources available. National policy has been opposed to onshore wind in recent years but there are indications this may change.

We state in our response to SP 17 that the formal and legal relationship between the Master-Planning exercise and policies in the Local Plan is unclear. There is a statement in the Stage 3 masterplan that states "most of the homes in NE Thatcham will not be connected to the gas grid". We believe that this should be a policy that applies to all new houses in order to de-carbonise heating and it should be reflected in policy DC 3.

Finally, we also acknowledge that the Part L Building Standards are currently under consultation by central government. This poses a further risk to defining a Local Plan because there is a risk that whatever is proposed is subject to national regulations that may shortly change. We request that the next stage of consultation of the Local Plan is reviewed against the status of the outcome of the Part L building standards.

To align with the West Berks Environment Strategy the following amendments to policy are necessary:

1. The policy should refer to the definition of net zero as described in the West Berkshire Environment Strategy
2. All new developments must be carbon audited.
3. All new development must have binding zero-carbon policies

#### **Section 10.19**

- "natural environment (XXX) and health (xxx)"

These statements appear to be incomplete.

#### **Section 10.24**

- "Where appropriate, renewal energy proposals will be integrated in to the proposed scheme"

This appears to be a weak statement, as it enables a developer to make arguments to avoid renewable energy for many reasons. If an appropriate standard is set the renewable energy should be a central pillar of any multi-dwelling new development. If a development site has poor solar resource due to North facing a developer contribution towards offsetting should be sought (as noted earlier).

#### **Section 10.25**

- "Measures to increase the adoption of retro-fitting energy efficiency measures"

We support this measure. The transition towards net-zero starts with improving efficiency of assets (typically this is lower cost and returns higher carbon benefits) as renewable energy tends to be higher cost for the return on carbon delivered.

## **Section 10.27**

- "Changes to national targets"

As noted earlier we acknowledge this may happen sooner rather than later.

## **Section 10.28**

- "The Council will carefully scrutinise proposals"

We also expect Council to scrutinise carefully ongoing and final build quality.

## **Policies DC4 - Environmental Nuisance and Pollution Control**

- " no harm to the amenity of occupants of neighbouring land and buildings, and future occupants of the development, through an unacceptable increase in pollution, including from light, noise, dust, vibration and/or odour."

We have received several comments from residents on Floral Way who are very concerned about the implication of increased noise. This is because properties have been built up to the boundary of Floral Way, in some cases on elevated land, and the noise is already producing an environmental nuisance as windows are unable to be opened adjacent to the road. Residents also complain about vibration from heavy goods vehicles on both the A4 and Floral Way.

We note that odour control is a major nuisance to Thatcham residents that live close to the Sewage Works on Lower Way and concern has been expressed regards the capacity of the existing site, its ability to manage greater volumes, and the odour emitted.

It is necessary to amend the policy to consider the cumulative effect on existing residents in areas outside the immediate development area.

## **DC5, DC6**

No comment.

## **Policy DC 7 - Air Quality**

- "Development will be permitted where it does not lead to adverse effects on health or the environment either from the development itself or cumulatively."

We are very concerned that the AQMA on the A4 is not being regularly monitored, and that insufficient consideration is given to the emissions in the local environment. This is particularly important due to the vicinity of a primary school close to the A4 in Thatcham.

We note that West Berkshire recognise Thatcham as an Air Quality Management Area and that the most recently referred to measurements on the website are from 2016 which states that "the annual mean NO2 concentration was exceeded at 2 sites within the Thatcham AQMA".

We do not agree that the Sustainability Assessment had demonstrated evidence that the new Thatcham NE development passes the test outlined in (a), (b), or ( c ) as the cumulative effect to traffic on the A4 may lead to adverse health. It is clearly not appropriate to perform

an AQA whilst vehicle traffic levels are suppressed during Covid so we seek guidance on the approach that has been taken to monitor NOx and particulate levels during peak AM periods when children are more likely to be exposed to heavy traffic flow.

For reasons outlined earlier we do not believe that a mitigation approach of diverting A4 traffic onto residential roads (Floral Way and then Bowling Green Road) would be credible or sustainable.

Within Thatcham there is a recurring issue related to odour nuisance from the sewage works at Lower Way. We require that the policy reflect odour nuisance as a part of policy.

Therefore it is essential that evidence for Thatcham NE is provided that:

1. Demonstrates the AQMA monitoring is recent and that future growth will not adversely affect air quality during any period from 2020 - 2037 within the Local Plan
1. It is essential that the policy reflects odour nuisance, and how this will be assessed.

**Policy DC 8 - Conservation Areas**  
**Policy DC 9 - Listed Buildings**  
**Policy DC 10 - Non designated heritage**  
**Policy DC 11 - Registered Parks**  
**Policy DC 12 - Registered Battlefields**  
**Policy DC 13 - Archaeological**

No comment

#### **Policy DC 14 - Trees, woodland and hedgerows**

- "The policy encourages new planting and protects trees, woodland and hedgerows because of their habitat value"

We support the protection of trees, woodland and hedgerows. Historic hedgerows are of particular value in rural countryside areas surrounding NE Thatcham as they provide wildlife corridors between disjointed areas of remaining ancient woodland. It is important that such hedgerows are preserved.

- "will be considered in accordance with policy DC12, for those within Registered Parks and Gardens, or policy DC11 for those forming part of non-designated heritage assets."

It is unclear to us whether these cross references are correct as DC 12 refers to registered battlefields, and DC 11 refers to registered parks and gardens.

- Loss or damage of non-protected trees, woodland or hedgerows should be avoided, and if demonstrated as being unavoidable, appropriate replacement or compensation including aftercare will be required.

It is unclear what period of after care is required. The replacement of ancient, or mature, hedgerows with replacement requires a maintenance contract for many decades.

It is necessary that the references to other policies is corrected.

It is essential that this policy reads through to the Stage 3 Strategic Plan for Thatcham and mature hedgerows are preserved.

It is necessary to define the period of aftercare and that supporting text describes the type of maintenance required.

### **Policy DC 15 - Entry level exception schemes**

- "with those in a designated rural area"

It is unclear to us if THA10 is a designated rural area. According to previous definitions it is, and therefore we understand that priority should be given to households with a local connection.

It is necessary that this is clarified.

### **Policy DC 16 - Rural exception housing**

No comment

### **Policy DC 39 - Local shops**

- "New developments of 1,500 homes or more will be expected to include a local shop as part of the development scheme, located so as to maximise footfall and links to the existing community."

This threshold is unclear, and there is no indication as to how this policy scales if developments are substantially more than 1,500 homes. Does a single local shop apply equally for 1,500 homes and 10,000 homes?

There is no indication to phasing. Is it the intention of the policy that a local shop is delivered at the completion of a development, or near to the beginning?

It is necessary for the policy to define how the support for local shops increases with the number of dwellings, and phasing.

- "presumption in favour of the provision of new or enhanced community facilities"

It is clear that a new development must meet the needs of a new community. It is unclear as to the provision that will be provided to existing adjacent communities if there is an existing shortfall on identified services - for examples larger libraries, GP surgeries, policing presence, etc. This is relevant for Thatcham where is recognised in the Thatcham Stage 1 report that there the town is under provisioned relative to towns of a similar size.

It is necessary for policy to reflect on the needs of adjacent communities.

### **Appendix 3:**

- "We are also undertaking a detailed 'on the ground' community led assessment of each individual settlement. This work is being undertaken in co-operation with parish and town councils and neighbourhood planning groups and is still in progress."
- "The Council will take a landscape led approach"

We note that the landscape for NE Thatcham is recognised by West Berkshire Council in their submission to the Secretary of State as being countryside, and not urban fringe.

- Principle include that "settlement boundaries protect the character of a settlement and prevent unrestricted growth into the countryside."

We note that settlement boundary on the North side of Thatcham was defined to prevent unrestricted growth and the proposed extension is in conflict with existing boundaries.

- Boundaries will exclude "Recreational or amenity open space which extends into the countryside"

We note that the NE Thatcham proposed site would require the settlement boundary to extend into the countryside and is in conflict with this definition.

### **APPENDIX to Thatcham Town Council Response**

This section will be updated prior to submission.

It will include:

1. A graphical summary of all responses from a Councillor led survey requesting feedback from residents on a "Thatcham Development Survey".
2. Example quotes from residents provided to Councillors from the this survey.
3. A summary of the number of people that responded to a resident petition opposed to the development.

Example based on existing responses:

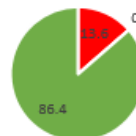
1. The graphical summary will be of the following form:



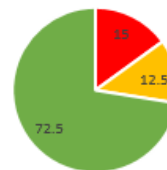
Where 1 is not important and 5 is very important, how important are the following to you?

Transport related issues demonstrate strong evidence of congestion and demand for a bridge

Suffer traffic congestion (yes/no)

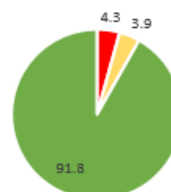


Need for bridge (scale 1-5)

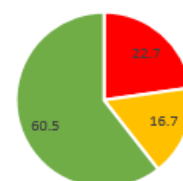


Very strong response related to accessing GP appointment indicating concern with capacity, and strong response related to secondary school places.

Ease of GP appointment? (scale 1-5)



Level of Secondary School Places (scale 1-5)



2. Resident responses will be provided in the following form:

Name	Response
Name1	<p>Roads in Thatcham cannot take the extra traffic. Floral Way has houses about 20ft from the road, houses already rattle when HGV's go past and the extra traffic would be a blight. Whilst later developments near Tull Way are built back from the road and have soil banks to stop noise, the planners allowed Floral Way to be elevated so it's very noisy. I presume planners did not expect such huge growth 25 years ago.</p> <p>The queues to cross the railway are massive. The proposed new houses would require residents to travel from East to West to get to Tesco, Sainsbury's, Lidl and Aldi and each time they would have to go down the A4 or along Floral Way/Tull Way creating vast amounts of traffic, noise and pollution.</p> <p>Infrastructure and services have to be improved and developed. We also need to consider the quality of life for existing residents. Planners approved housing close to Floral Way, the noise is already awful (can't open windows in summer, house rattles with HGV's) so you should not add to this burden - unless you are going to provide infrastructure and compensation to existing residents."</p>
Name2	<p>The availability of local green spaces and wildlife is not only important for the appeal and attractiveness of the town and the health of the environment, but also for our young people to explore and remain close to nature. The green spaces have been invaluable for walks and exercise and the knock on effects</p>

	<p>for mental health. It is undoubtedly a benefit of Thatcham that it feels like a town that borders a rural setting.</p> <p>The access to the A4 is already a big area of traffic congestion (in pre-pandemic times), especially from the Floral Way junction, and down to the Southern Electric building and train crossing beyond. A large increase of new residents will only exacerbate this problem. This is also the case with the Thatcham level crossing, which is already a cause of massive congestion and will only get worse as a portion of new residents also follow the usual route to south Newbury and Basingstoke."</p>
<i>Name3</i>	<p>There are barely enough facilities and infrastructure to support the present number of residents in Thatcham. No further housing should be agreed until facilities such as a new school and doctors surgery have been built. This should be completed prior to the houses being built as the developers usually promise these but invariably run out of funds before the houses are completed.</p>
<i>Name4</i>	<p>A crossing over the railway line and river/canal is essential but probably needs to be easy of the current crossing. There are no dedicated entertainment venues as all halls and Kennet school Hall are multi use and mostly now too small without parking or public transport.</p>

3. A residents petition 'say no to 2,500 new houses' has been signed by 2,043 residents. Comments in the public domain with named residents can be [found at this link](#).