



Our ref: 1366/JB/KM

Planning Policy
Development and Regulation
West Berkshire Council
Council Offices
Market Street
Newbury
RG14 5LD

Sent by email: planningpolicy@westberks.gov.uk

3 March 2023

Dear Sir/Madam,

SUBMISSION OF REPRESENTATIONS IN RESPONSE TO THE WEST BERKSHIRE COUNCIL LOCAL PLAN REVIEW 2022-2039: PROPOSED SUBMISSION (REGULATION 19) CONSULTATION (JANUARY 2023)

LAND AT LOWER WAY FARM, LOWER WAY, THATCHAM, RG19 3TL (HELAA REF. THA9)

On behalf of our clients, Mr and Mrs Pittard, I have the pleasure of submitting representations in response to the Council's consultation on its emerging Local Plan Review 2022-2039 (January 2023).

This submission comprises the following:

- Completed Representation Form; and
- Submitted Representations.

I trust that this information will be helpful in progressing the Local Plan Review. Should any queries arise in relation to the submitted information, please do contact me to discuss.

Yours faithfully,

A black rectangular box redacting the signature of James Blake MRTPI.

JAMES BLAKE MRTPI
SENIOR PLANNER

A black rectangular box redacting contact information for James Blake MRTPI.

cc. Mr and Mrs Pittard



West Berkshire Local Plan Review 2022-2039
Proposed Submission Representation Form

Ref:

(For official use only)

Please complete online or return this form to:	Online: http://consult.westberks.gov.uk/kse
	By email: planningpolicy@westberks.gov.uk
	By post: Planning Policy, Development and Regulation, Council Offices, Market Street, Newbury, RG14 5LD
Return by:	4:30pm on Friday 3 March 2023

This form has two parts:

- Part A - Your details: need only be completed once
- Part B - Your representation(s): please fill in a separate sheet for each representation you wish to make

PART A: Your Details

Please note the following:

- *We cannot register your representation without your details.*
- *Representations cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.*
- *All information will be sent for examination by an independent inspector*
- *All personal data will be handled in line with the Council's Privacy Policy on the Development Plan. You can view the Council's privacy notices at <http://info.westberks.gov.uk/privacynotices>*

	Your details	Agent's details (if applicable)
Title:	Mr and Mrs	Mr
First Name:*		James
Last Name:*	Pittard	Blake
Job title <i>(where relevant):</i>		Senior Planner
Organisation <i>(where relevant):</i>		Pro Vision
Address* <i>Please include postcode:</i>		The Lodge Highcroft Road Winchester SO22 5GU
Email address:*		[REDACTED]
Telephone number:		01962 677 044

*Mandatory field

Part B – Your Representation

Please use a separate sheet for each representation

The accompanying guidance note available at: <https://www.westberks.gov.uk/lpr-proposed-submission-consultation> will assist you in making representations.

*Your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change(s) as there will **not normally** be a subsequent opportunity to make further representations, **further submissions will ONLY be at the request of the Inspector, based on the matters and issues they identify for examination.***

Your name or organisation (and client if you are an agent):	Mr James Blake, Pro Vision (Agent) on behalf of Mr and Mrs Pittard
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Please indicate which part of the Local Plan Review this representation relates to:

Section/paragraph:	Please refer to the separate Representations
Policy:	Please refer to the separate Representations
Appendix:	Please refer to the separate Representations
Policies Map:	Please refer to the separate Representations
Other:	Please refer to the separate Representations

1. Legally Compliant

Please see the guidance notes for an explanation of what 'legally compliant' means.

Do you consider the Local Plan Review is legally compliant?

Yes

No

Please give reasons for your answer:

Please refer to the separate Representations

2. Soundness

Please see the guidance notes for an explanation of what 'soundness' means.

Do you consider the Local Plan Review is sound?

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF)

Please tick all that apply:

NPPF criteria	Yes	No
Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development		✓
Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		✓
Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground		✓
Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		✓

Please give reasons for your answer:

Please refer to the separate Representations

3. Complies with the Duty to Co-operate

Please see the guidance note for an explanation of what 'Duty to Cooperate' means.

Do you consider the Local Plan Review complies with the Duty to Co-operate?

Yes

No

Please give reasons for your answer:

Please refer to the separate Representations

4. Proposed Changes

Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to the separate Representations

5. Independent Examination

If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?

Yes

No

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To ensure that the views of our client in respect of 'Land at Lower Way Farm, Thatcham' and the shortcomings identified in the Local Plan Review and its evidence base relation to the allocation of sites and land for housing and economic delivery are heard

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

6. Notification of Progress of the Local Plan Review

Do you wish to be notified of any of the following?

Please tick all that apply:

Tick

The submission of the Local Plan Review for Independent Examination	✓
The publication of the report of the Inspector appointed to carry out the examination	✓
The adoption of the Local Plan Review	✓

Please ensure that we have either an up to date email address or postal address at which we can contact you. You can amend your contact details by logging onto your account on the Local Plan Consultation Portal or by contacting the Planning Policy team.

Signature	[REDACTED]	Date	3 March 2023
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Your completed representations must be received by the Council by 4:30pm on Friday 3 March 2023.

**WEST BERKSHIRE COUNCIL LOCAL PLAN REVIEW
2022-2039: PROPOSED SUBMISSION
(REGULATION 19) CONSULTATION
LAND AT LOWER WAY FARM, THATCHAM
HELAA REF. THA9**

Prepared by Pro Vision on behalf of Mr and Mrs Pittard

March 2023

LAND AT LOWER WAY FARM, THATCHAM
WEST BERKSHIRE COUNCIL LOCAL PLAN REVIEW
PROJECT NO. 1366

PREPARED BY:
JAMES BLAKE MRTPI
SENIOR PLANNER

CHECKED BY:
KATHERINE MILES MRTPI
DIRECTOR

DATE:
MARCH 2023

PRO VISION
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APPENDICES

- Appendix A – Site Location Plan
- Appendix B – Indicative Site Plan for 36 dwellings
- Appendix C – Local Facilities and Services Plan
- Appendix D – Physical and Environmental Context Plan

1.0 Introduction

- 1.1 These representations have been prepared by Pro Vision on behalf of our clients, Mr and Mrs Pittard, in response to West Berkshire Council's ('the Council') consultation on the Local Plan Review 2022-2039 (Regulation 19) Consultation (January 2023).
- 1.2 Our clients own the land in the District, which has previously been promoted for development on a number of occasions. These representations relate to land at Lower Way Farm, Thatcham (HELAA ref. THA9, January 2023). Our client's land has not been allocated for development in the 'emerging draft' Local Plan Review (LPR).
- 1.3 The site is identified in the Council's Updated HELAA (January 2023) as a site 'available', 'achievable' and 'potentially deliverable in part'.
- 1.4 We partly agree with this assessment, but consider that the whole site is deliverable now, being available, achievable and suitable for development. We contend the settlement boundary for Thatcham West¹ should be redrawn to include the site and that an allocation should be made in the LPR for the site's development.
- 1.5 The site is sustainably located to the south of Thatcham and offers the potential for a sustainable and logical residential development of around 36 dwellings, alongside the provision of open space and planting for ecological enhancement.
- 1.6 The site is also suitable for economic development and could accommodate a number of commercial units and business premises.
- 1.7 Both options would be in line with the Council's strategy for growth and the settlement hierarchy, although the residential use of the site is the preferred option our client's wish to pursue.
- 1.8 This representation is supported by the following documents:
 - Proposed Submission Local Plan Review Comments Form;
 - Plans prepared by Pro Vision:
 - Site Location Plan (Appendix A)

¹ As identified on Map 48 of the Settlement Boundary Review Background Paper (December 2022)

- Indicative Site Plan for 36 dwellings (Appendix B)
- Local Facilities and Services Plan (Appendix C)
- Physical and Environmental Context Plan (Appendix D)

1.9 Appendices A-D, along with Representation Letters, have previously been submitted to the Council in representations dated 4 February 2021 and 20 December 2018, however it is considered the information has not fully been taken account of by the Council in the preparation of the LPR and its evidence base.

1.10 Our clients wish to work collaboratively with the Council, with the aim of securing the sustainable development of the site through an allocation within the LPR. These representations therefore respond to the emerging draft LPR and its evidence base, with reference to the merits of allocating the site for either residential or economic development, alongside discussing wider matters identified within the Consultation Document, building upon the information previously submitted.

1.11 In order to consider whether a Local Plan is sound, reference needs to be made to the National Planning Policy Framework (NPPF) (July 2021), in particular, paragraph 35. This identifies that a sound plan is:

a) Positively prepared – ‘providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development’;

b) Justified – ‘an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence’;

c) Effective – ‘deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground’; and

d) Consistent with National Policy – ‘enabling the delivery of sustainable development in accordance with the policies of the Framework [NPPF]’.

1.12 At this stage, having considered the evidence base behind the LPR, we consider the proposed development strategy, including the housing and economic delivery strategy is flawed and is

unlikely to be delivered as the Council expects. Opportunities to identify a more robust delivery strategy have been missed.

- 1.13 We consider there are a number of aspects where the LPR is unsound and requires changes. To aid with this, we have provided some recommendations, as outlined in the following sections.

2.0 Delivery of Housing

Overview

- 2.1 This section provides our responses to the emerging draft Local Plan Review, alongside its supporting evidence base.
- 2.2 Policies that we wish to respond to are covered in turn, with references to relevant page and paragraph numbers and other documents which form part of the Council's evidence base are referenced throughout.

Delivery of Housing

Policy SP1: Spatial Strategy

- 2.3 Policy SP1 confirms the development approach will be based on the District's three spatial areas of Newbury and Thatcham, Eastern Area and North Wessex Downs AONB, where the focus of development will *"follow the District-wide settlement hierarchy set out in Policy SP3 which takes account of the function and sustainability of settlements and promotes sustainable communities"*. We consider this to be an appropriate strategy, focusing new development in the most sustainable parts of the District, as confirmed by the policy's supporting text (paragraph 4.18).
- 2.4 Paragraph 4.11 confirms that *"The Newbury and Thatcham urban area is the main focus for development in the current Local Plan and will remain the focus in the LPR [Local Plan Review]"*. At the time of preparing the current Local Plan, this part of the District was considered to be the most sustainable spatial area to deliver the majority of new development. In light of this, the case for focusing new development in this spatial area is even greater now, given the level and range of existing facilities, services and infrastructure in the area, taking account of those also currently coming forwards.
- 2.5 Policy SP1 identifies that the spatial strategy *"will deliver a range of site sizes for residential development"*. This is supported and accords with national policy. Paragraph 68 of the NPPF outlines that *"planning policies should identify a sufficient supply and mix of sites"*. Furthermore, paragraph 69 highlights that *"small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly"*, with local planning authorities being encouraged to promote the

development of a good mix of sites. Adding to this, a mix of large, medium and smaller scale sites ensure housing needs can be met in different parts of the District.

- 2.6 Policy SP1 introduces the proposed new urban extensions to the south of Newbury at Sandlesford Park and to the north east of Thatcham. Large sites such as these – whilst capable of delivering a significant quantum of new housing – are typically complicated and take time for housing to be delivered. The importance of small and medium sized sites should therefore not be underestimated and indeed in line with the framework, at least 10% of the housing requirement should come from small sites such as our clients site. Our recommendations in this regard are expressed later in these representations.

Policy SP3: Settlement Hierarchy

- 2.7 Policy SP3 sets out the proposed settlement hierarchy for the District, building upon the spatial strategy outlined in Policy SP1. The Urban Areas of Newbury, Thatcham and the Eastern Urban Areas of Tilehurst, Calcot and Purley on Thames are outlined as being the “prime focus for housing... development, offering development potential through:

a) regeneration and change in the existing built up area; and

b) strategic and non-strategic sites allocated for housing... development”.

- 2.8 These urban areas are the most sustainable locations in the District and are therefore correctly identified as being the focus for growth. We agree with the hierarchy proposed, which has been informed by the Review of Settlement Hierarchy Topic Paper (November 2020).

Policy SP12: Housing Delivery

- 2.9 Policy SP12 identifies that “Provision will be made for 8,721 to 9,146 net additional homes in West Berkshire for the period 1 April 2022 to 31 March 2039; 513 to 538 dwellings per annum. The target figure of 538 dwellings per annum does not constitute a ceiling or cap to development”.

- 2.10 The target figure of 538 dpa constitutes a 5% uplift on the local housing need (LHN), as calculated using the standard method.

- 2.11 However, it is considered there is clear justification for higher housing growth in West Berkshire, required to meet the level of need identified in the evidence, not least in respect of addressing affordability.

Housing Requirement

1) The Duty to Co-operate

- 2.12 The Council, at paragraphs 6.5 to 6.8 of the Plan, acknowledge there is a current unmet need from Reading Borough Council (RBC) of around 230 dwellings, up to 2036 and that there will therefore be a need to consider any further unmet need, given the housing needs generated by the standard method (i.e. the 35% uplift to Reading as one of the largest urban areas in England).
- 2.13 The Council also acknowledges the distribution of unmet need has not been agreed and will be subject to further review through the plan-making process, before the need arises.
- 2.14 RBC has identified a five year review of its Local Plan is required by 2024, which will need to incorporate an urban capacity assessment. A revised future unmet need figure is therefore likely to be available in the near future. It is anticipated the future unmet need from Reading will be significant as the housing requirement increases from 689 dpa in the current RBC Local Plan to 907 dpa from Lichfield’s analysis of the standard method for local housing need (April 2022).
- 2.15 At this stage, however, and without further evidence there is no certainty on what the unmet need will be, or how it will be distributed. It is widely accepted that RBC has limited land capacity to deliver the additional housing requirements in full. Therefore, it is highly likely that neighbouring authorities, such as West Berkshire, will be required to assist with meeting a portion of the unmet need.
- 2.16 To address this incoming significant future unmet need from RBC, we consider the LPR should allow for a higher degree of flexibility as part of its housing strategy.

2) Affordable Housing and Affordability Uplift

- 2.17 We note the Vision at Chapter 3 of the LPR sets out the Council will ensure that delivering *“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, whatever their income, stage of life and ability”.

- 2.18 The Updated Housing Needs Assessment (July 2022) confirms there is a *“notable need for affordable housing, and it is clear that provisions of new affordable housing is an important and pressing issue across the District”*. The conclusions drawn identify *“the evidence does.... suggest that affordable housing delivery should be maximised where opportunities arise”*.
- 2.19 The Assessment advises the scale of affordable housing need is 697 dpa (a 188% increase on need, following the Council’s Housing Needs Assessment in 2020). This equates to 136% of the standard method minimum LHN. Accordingly, the Assessment advises that, theoretically, if 40% of all new housing delivered was for affordable housing, around 1,740 dpa would be needed to meet the Council’s affordable housing need in full (paragraph 3.24). The Council’s affordable housing position is therefore undeniably deteriorating.
- 2.20 It is acknowledged the delivery of housing in line with the standard method figure may over time improve the affordability of market housing (and therefore reduced affordable housing needs) through the affordability uplift in the standard method. However, the Council’s past housing delivery rates have generally been in line, if not greater, than the current minimum LHN, yet affordability issues and affordable housing need remains.
- 2.21 As a result, by failing to positively address the affordability issues and affordable housing need across the District within this plan period could give rise to significant social and economic consequences. These do not appear to have been given full consideration by the Council, including as part of the Sustainability Appraisal for policy SP12.
- 2.22 For this reason, the calculation of affordable housing need supports an increase in the overall housing requirement for the District. The current proposed level of housing is not ambitious enough and will likely be unable to deliver on the Council’s ‘Vision’, which provides the context of the LPR. Therefore, we advise the strategic policies and housing requirements are inadequate and will not deliver on the principles or key priorities of the LPR.

3) The Uncertainty Buffer/Uplift

- 2.23 The Council provide for a buffer/uplift on the minimum LHN of 5%, arguing that this is to boost supply and to provide for some built-in flexibility.

- 2.24 We contend the Council should be concerned that limiting the housing supply to such a small buffer will significantly restrict the delivery of new homes. Therefore, amongst other issues, it will result in further housing prices increases to levels which create cost barriers to local residents and workers. There are many factors and variables which can affect housing supply, particularly where *“about 90% of the District is rural in character”* (LPR paragraph 2.1), therefore there is clear justification for a significantly larger buffer. A prime example of unforeseen circumstances affecting housing delivery include the recent issues relating to phosphates associated with the River Lambourn.
- 2.25 We consider an appropriate buffer will provide the LPR with greater flexibility to adapt to circumstances, should the anticipated housing supply fail to be delivered as expected. This is considered further in Section 3.
- 2.26 An appropriate uplift to the housing requirement is likely to fall between 10% and 20%, which would increase the Council’s housing target requirements to 564 to 616 dpa. This equates to finding a supply of 9,588 to 10,472 dwellings up to 2039 and follows the approach taken by other local authorities who have recently adopted Local Plans (South Oxfordshire c. 27% buffer, Maidenhead c. 12% buffer and North Herts c. 13% buffer. In addition, the draft Wokingham Local Plan currently provides for a 20% buffer.
- 2.27 We note the Regulation 18 version of the LPR included a 10% buffer/uplift. However, this figure was reduced to 5% in the Housing Background Paper (January 2023) to provide a balance between boosting housing supply in the District and considering the limitations and constraints of a largely rural District (paragraph 2.33).
- 2.28 This approach appears to be counter-intuitive as the greater the level of constraint, the greater the need for a higher buffer to provide for reasonable prospects of meeting the housing need. This is particularly the case where one of the LPR’s priorities is to improve affordability in the District. Furthermore, the SA/SEA undertaken identifies at Appendix 4, Section 2.1 that between LHN+5% and LHN+10%, the LHN+10% scores significantly higher, with an ‘overall positive, with some significantly positive effects’. However, the SA/SEA concludes at Table 26 of the report that this would put the rural nature of the district at undue pressure. The SA/SEA therefore takes the more precautionary and seemingly flawed approach which is unsuitable when considered against the LPR’s objectives.
- 2.29 The Council has failed to provide any justification to say what a 10% buffer/uplift (or greater) to the housing requirement cannot be accommodated within the District. None of the key

environmental constraints (i.e. AONB) in the District, or the rural nature of the District preclude the principle of residential development (different approach to floodplain, Green Belt, internationally protected habitats etc.). Instead, the broad and high level spatial strategy will be used to shape the form and direction of growth across the District. There is therefore no justification to identify such a reduction in the buffer, particularly where clear evidence exists to show many more sites are available in the HELAA to accommodate the District's future growth.

Summary

- 2.30 Overall, it is considered the level of housing currently proposed by the LPR is insufficient to support the Government's objective of significantly boosting the supply of housing, is significantly below the Council's aspirations of achieving and addressing the affordability problem and affording housing need issues within the District.
- 2.31 Further the strategy proposed fails to take into account the potential for unmet need arising from neighbouring authorities (particularly from RBC), given the changes in local housing needs.
- 2.32 We consider the buffer is too low, given the level of constraint and the variables across the District that affect the delivery of new housing, taking into account the level of available sites which have been identified in the HELAA.
- 2.33 It is considered this justified increasing the Council's housing target to between 564 and 616 dpa (i.e. a 10% to 20% buffer/uplift to the minimum LHN). this would equate to finding a supply of between 9,588 and 10,472 dwellings up to 2039. This level of housing will ensure a sufficient degree of flexibility is incorporated into the LPR to deliver the minimum LHN, whilst providing for choice and contingency to the market, reflective of the current and future demographic trends and housing market signals and affordability in West Berkshire.
- 2.34 Accordingly, the Council's housing target fails to meet the test for soundness in the NPPF (2021) as the LPR is not positively prepared, effective or consistent with national policy.

3.0 Meeting Housing Need

Housing Supply

- 3.1 The NPPF, at paragraph 11(b) identifies that *“strategic policies should, as a minimum, provide for objectively assessed needs for housing...”*. The LPR sets out several sources for the provision of its housing supply over the plan period, summarised in Table 2 of the Plan. These sources include: retained allocations; existing commitments on unallocated sites; windfall sites; and through new allocations in the LPR and Neighbourhood Plans.

Existing Allocations

- 3.2 The history of some of the sites identified in the supply which do not currently have planning permission (around 95 units, excluding Sandleford Park West), or only have outline permission (392 units, excluding Sandleford Park East), or where a site’s delivery has been continually delayed clearly fails to provide confidence in their timely delivery. It is therefore considered that a 10% non-implementation rate should be factored into at least some of this supply to provide a more robust strategy for delivery.

Non-allocated Sites with planning permission

- 3.3 Table 2 of the LPR identifies that around 1,958 dwellings are to be provided on un-allocated sites (including prior approvals), with planning permission. Again, it is considered a 10% non-implementation rate should be applied to this figure to provide a more robust delivery strategy, particularly as it is unlikely that all these permissions will be delivered.

Windfall Allowance

- 3.4 A windfall allowance of 1,949 dwellings (equating to 26.6% of the total housing supply) up to 2039 has been included. This has been based on the average annual delivery on small sites of less than 10 units (excluding prior approvals for permitted development) between 2006 and 2022.
- 3.5 It is recommended the Council removes, or significantly reduces, this windfall allowance as this will provide greater certainty over the supply of housing through allocations, without having to rely on the use of a windfall allowance, which by its very nature can be ambiguous. The most recent consultation on the revised NPPF and the draft Levelling Up and

Regeneration Bill (LURB) both place a greater emphasis on the need to provide a genuinely plan-led system.

- 3.6 We note the Council consider the delivery of windfall sites has been consistent and reliable, but have failed to provide any evidence about future supply to justify such an approach.
- 3.7 There appears to be recent trend that opportunities for windfalls are reducing on small sites. Table 3.1 of the Housing Background Paper identifies that delivery over the last three years (2019/2020 to 2021/2022) has reduced to an average of only 97 completions, whilst in the last five years the annual average is also only 112 completions. This is notably lower than the LPR's anticipated 140 dpa.
- 3.8 In reviewing the figures quoted above, the Council is planning to deliver 7-25 dpa above its LHN, which equates to an additional 119-425 dwellings over the 17 year plan period. As a result the windfall allowance of around 140 dpa should be removed altogether, or replaced with a significantly reduced figure, given recent trends.
- 3.9 The implications of this are significant as even a relatively modest, but more realistic reduction to 100 dpa would reduce the total housing supply by at least 549 dwellings. The solution is for a far more positive approach to planning by taking forward more of the sites available in the HELAA. This will reduce the reliance of windfall sites and provide greater certainty over the supply of housing through allocations. It will also improve overall affordable housing provisions.
- 3.10 Furthermore, paragraph 6.22 of the LPR explains that *"approximately 74% of completions in the period 2006-2022 were on unallocated, windfall sites"*. This suggests that a high proportion of planning decisions in West Berkshire have not been plan-led, which conflicts with NPPF paragraph 15, despite the Council's assertion that the windfall allowance of 140 dpa is relatively modest.
- 3.11 To ensure that planning decisions remain plan-led, alongside providing greater certainty over housing supply, we consider it prudent to reduce the windfall allowance and increase the number of housing allocations. The inclusion of additional allocations for residential development now would assist with the aim to plan holistically, instead of relying on 'piecemeal' developments through windfall sites.

Future Supply

- 3.12 Notwithstanding the above comments regarding the LPR's approach to housing supply in the District, the LPR explains there is a need to identify sites for a further 1,809 dwellings to meet the 538 dpa target (or 9,146). The LPR allocates approximately 1,720 homes (including 1,500 at North East Thatcham) and a further 80 dwellings are expected to come forward through Neighbourhood Plans.
- 3.13 Paragraph 6.11 explains that *"The allocation of sites in the LPR aims to meet delivery of a higher number of homes in order to both boost supply and have some built-in flexibility. The upper end of the range is a target but should not be considered a maximum amount. It is not intended to be a cap on development that would otherwise be acceptable"*.
- 3.14 The aim to boost supply complies with NPPF paragraph 60. Furthermore, built-in flexibility ensure the LPR is flexible and adaptable to change (paragraph 11(a) of the NPPF). However, to enable decisions regarding new development to remain plan-led (NPPF paragraph 15) and see that land is brought forwards at a sufficient rate (NPPF paragraph 23), it is necessary to ensure there is enough flexibility in the LPR.
- 3.15 Such a contingency is important, particularly as the Council is relying upon two large complex sites at Sandford Park and North East Thatcham, discussed below, to deliver a significant proportion of the District's housing needs (3,000 dwellings in total).

Housing Trajectory

- 3.16 The Council are already short of their housing target figure by 9 dwellings (LHN+5%). However, it is considered the housing trajectory during the plan period is not realistic. This is particularly with regard to the strategic allocations identified.

Sandford Park (Policies SP13 and SP16)

- 3.17 This is an allocated site which was first allocated in 2012 and makes up a significant portion of the LPR's delivery of housing across the plan period. The site is split into two parcels, known as 'Sandford East' and 'Sandford West'.
- 3.18 Appendix 2 of the Housing Background Paper identifies the housing trajectory, including the phasing of individual sites. The Council content that Sandford East, which benefits from outline planning permission, will begin delivery 100 dpa from 2025/2026 through to 2034/2035, with 80 dwellings to be provided during the years 2035/2036.

- 3.19 This trajectory appears to be overly optimistic, particularly given the previous planning delays over the site and that a reserved matters application has yet to be submitted for any phase(s) of the development. There is also a need to address several pre-construction planning conditions. As such, the start date of 2025/2026 for first completions to be achieved by seems to be a 'best case scenario', although unlikely to be accomplished.
- 3.20 It is understood the site is to be delivered by a single housebuilder. This could therefore lead to a lower absorption rate due to a lack of variety of housing product, in accordance with the findings of Letwin's Independent Review of Build Out (October 2018). The 100 dpa expected across the plan period is considered to be impractical and will affect the site's delivery over the plan period.
- 3.21 In relation to Sandleford West, this site does not have any planning permission. This is despite an outline application being submitted in April 2018. It appears the Council are awaiting an amended package of information and revised plans. Therefore, first completions in 2027/2028 are purely speculative. There will also be a requirement to submit and agree reserved matters and address any pre-commencement conditions ahead of ground being broken.
- 3.22 As such, it is considered the Council's reliance on the delivery of Sandleford Park during the plan period should be approached with caution. The Regulation 18 Consultation on the LPR identified that Sandleford Park was expected to deliver 1,000 dwellings across the plan period. This seems to be a more robust figure than the 1,580 dwellings currently proposed and a more practical basis for the LPR's housing delivery strategy.

North East Thatcham (Policies SP13 and SP17)

- 3.23 This is another major allocated site being relied on heavily by the Council for the delivery of housing over the plan period, however the Council have reduced the delivery of site from a total of 2,500 dwellings to 1,500 dwellings. Notwithstanding this, the Council anticipate the site will deliver 1,500 homes over the plan period (although this has increased from 1,250 dwellings expected at the Regulation 18 stage of the LPR). This appears to be unjustified for the following reasons:

Justification for North East Thatcham

- 3.24 The supporting evidence base for the allocated site, including the Thatcham Strategic Growth Study (which includes a Vision and Concept Plan) still refers to the delivery of 2,500 homes. It has not been updated to reflect the position in the current version of the LPR. This also includes Viability Testing, which tested 2,300 to 2,500 new homes. This work would need to be updated to allow for the LPR to be found sound.
- 3.25 In addition, the site allocation policy refers to the delivery of a secondary school. However there is no updated viability appraisal to confirm this is deliverable for a site of 1,500 new homes in total, raising the following concerns:
- The Thatcham Growth Study (TGS) (Stage 3) acknowledges that strategic development at this scale (for 2,500 new homes) is the only approach likely to deliver an additional secondary school for the town, without which any growth would cause issues in provision.
 - The TGS (Stage 3) notes the scale of development (2,500 new homes) would not create the need for a secondary school development on its own. Therefore, is only half-funded by developer contribution. A reduction to 1,500 homes further undermines this and is likely to increase the funding gap further, with no indication of how this would be resolved.
 - A secondary school would internalise a significant number of trips from the proposed development. The Access and Movement Report for North East Thatcham, within the TGS (Stage 3) assumes a secondary school will have 50% internal trips. Therefore, with questions surrounding the potential delivery of a secondary school for a site of only 1,500 new homes, the sustainability credentials of North East Thatcham are unclear.
- 3.26 As a result, the identification of North East Thatcham is potentially not justified as there are significant gaps in the evidence to support the allocation of the site for 1,500 new homes. In particular, the lack of delivery of a secondary school and reduction in housing numbers would remove the key justification for growth at this location to help deliver new education provisions and additional community infrastructure. Appendix 4 of the SA/SEA acknowledges this, however the Council still seek to proceed on this basis as it is considered that 2,500 new homes in Thatcham is too great.

Scale and timescales for Housing Delivery

- 3.27 In addition to the above, the Council’s assumptions on the expected housing supply from North East Thatcham are also unreasonable. The Housing Background Paper demonstrates the Council expect the site to start delivering 150 dpa from 2029/2030 to 2038/2039. We consider this to be overly optimistic.

- 3.28 Market evidence demonstrates that schemes of 1,500 dwellings typically take approximately 7 years from the validation of an application through to first completions². Given the timescales for the adoption of the LPR (the Local Development Scheme indicates adoption in late 2024) and assuming a planning application for the site is submitted by the end of 2024/2025, first completions are not able to be projected before 2031/2032. The timescale proposed by the Council for delivery is optimistic, given there is a need to prepare and agree to a coherent masterplan or development framework, if prior mineral extraction is necessary and/or there are delays to the adoption of the LPR. In addition, as noted with Sandleford Park, the Council has a previous poor record over the delivery of its strategic sites within their expected timescales.

- 3.29 Market evidence also suggest that for sites of 1,500 new homes, a realistic average annual build-out rate is around 100 to 120 dpa³. Therefore, delivering completions from 2031/2032 at 120 dpa is likely to only equate to 960 dwellings at best over the plan period, resulting in a shortfall of 540 dwellings on this allocate site alone.

Summary

3.30 Table 3.4 of the Housing Background Paper sets out the housing supply and future supply for the Council during the plan period. The following table provides a comparison with our analysis and findings above:

Supply Category	Net units outstanding (the Council’s figures)	Net units outstanding (our analysis of the Council’s figures in comparison)
Local Plan retained allocations		
Sandleford Park	1,580	1,000 (-580)
Housing Site Allocations DPD	990	942 (-48)

² Lichfield’s Start to Finish (2nd Edition) February 2020
³ Lichfield’s Start to Finish (2nd Edition) February 2020

<i>Subtotal:</i>	2,570	1,942 (-628)
Neighbourhood Plan Allocation		
Stratfield Mortimer	82	82
Local Plan allocations not being retained (due to site being at an advanced stage of construction)		
Newbury Racecourse	465	465
Housing Site Allocations DPD	256	256
<i>Subtotal</i>	721	721
Existing planning commitments on unallocated sites	1,958	1,763 (-195)
Existing planning commitments for C2 Use Class communal accommodation	57	57
New allocations within the LPR	1,720	1,180 (-540)
Sites to be allocated within neighbourhood plans	80	80
Small site windfall allowance to 2039	1,949	1,400 (-549)
Total	9,137	7,225 (-1,912)

Table 1: Analysis of net units outstanding

- 3.31 With the figures in Table 1 in mind, it is clear the Council's housing supply fails to meet the minimum LHN (8,721 dwellings). Further, even by discounting the expected housing shortfall from North East Thatcham during the plan period, this results in the total loss of any headroom built in by the 5% buffer/uplift. The Council's housing supply would therefore fall short of meeting the minimum LHN (where $9,137 - 540 = 8,597$).
- 3.32 As such, the Council's housing target fails to meet the test for soundness in the NPPF (2021) as the LPR is not positively prepared, effective or consistent with national policy.

- 3.33 In summary, the LPR should be allocating more sites for housing over the plan period that are consistent with the broad spatial strategy, noting that there are many available sites within the HELAA which have been overlooked, including our client's site 'Land at Lower Way Farm' (HELAA ref: THA9).
- 3.34 The level of housing shortfall, potentially around 2,363 to 3,247 dwellings when providing a 10 to 20% buffer to the LHN, in accordance with the comments outlined in Section 2, is significant. This shortfall should therefore be addressed through additional allocations to the LPR, rather than any early or immediate review of the Local Plan, which would be to defer difficult, strategic planning decisions rather than demonstrating a positive approach to planning now.

4.0 Meeting Economic Need

Current Policy Position

4.1 Currently, the adopted policy position for business development is set out at Policy CS9 of the Core Strategy 2006-2026 (adopted 2012). This policy states that, with regard to proposals outside of defined protected employment areas, proposals for business/B8 uses will be assessed by the Council against the compatibility with uses in the area surrounding the proposals and the potential impacts on those uses and the capacity and impact on the road network and access by sustainable modes of transport.

4.2 The Core Strategy at paragraph 5.46 identifies a shortfall of B1 floorspace by approximately 121,000sqm and a potential shortfall in the longer term of B8 floorspace of approximately 24,000sqm. It is noted the Council *“seeks to ensure that sufficient sites are provided in the right locations to foster sustainable economic growth. This means maintaining a portfolio of sites available to meet demands for B8 in suitable location... and facilitating the growth of B1 floorspace to meet future requirements”*.

4.3 Turning to the LPR, the following policies are considered relevant to discuss:

Policy SD1

4.4 In relation to economic development, Policy SD1 seeks *“employment development to meet the existing and future economic demands of businesses... to help promote sustainable patterns of development”*. This is supported and in line with national policy. Paragraph 20 of the NPPF sets out that *“Strategic policies should set out an overall strategy for the pattern, scale and design quality of places and make sufficient provision for housing, employment, retail, leisure and other commercial development”*. Paragraph 80 of the NPPF identifies that *“Planning policies should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity”*.

Policy SP3: Settlement Hierarchy

4.5 Policy SP3 sets out the proposed settlement hierarchy for the District, where the Urban Areas of Newbury, Thatcham and the Eastern Urban Areas of Tilehust, Calcot and Purley on Thames

are outlined as being the *“prime focus for... economic development, offering development potential through:*

a) regeneration and change in the existing built up area; and

b) strategic and non-strategic sites allocated for... economic development”.

4.6 Again, we agree with the hierarchy proposed for economic development.

Policy SP20: Strategic Approach to Employment Land

4.7 This policy seeks to make provision for business development comprising offices, industrial and storage and distribution where they are located on sites allocated for business development, on a suitable site within a settlement boundary, within a Designated Employment Area (DEA), on previously developed land within existing suitably located employment sites or within the countryside provided the proposal is in accordance with other relevant policies within the LPR.

4.8 Paragraph 7.16 identifies that the *“District has a vast rural area that is host to a large number of small and medium sized enterprises which are vital to providing job opportunities and a diverse economy. The LPR therefore seeks to support appropriate new or expanding businesses in the countryside”.*

4.9 Further, paragraph 7.20 explains that *“business development within the district is dominated by small and medium sized units. Demand for such accommodation is likely to be met through smaller individual sites and within multi-occupancy employment areas. The Council will encourage the provision of small and medium sized businesses, including flexible workspace which enables businesses to start, develop and thrive in West Berkshire”.*

4.10 This appears to be a sensible approach and allows for flexibility in the delivery of employment land across the District.

4.11 It is noted that in December 2020, the Council published their Local Plan Review 2020-2037 Emerging Draft, informed by a number of evidence base documents, including the HELAA (2020), Employment Land Review (ELR) (2020), the Western Berkshire Functional Economic Market Area Assessment (FEMA) (2016) and the West Berkshire Economic Development Needs Assessment (EDNA) (2016).

4.12 Draft policy SP20 sought the provision of 65,000sqm of industrial, storage and distribution floorspace in the District over the plan period, to address the market shortage outlined in the ELR (2020), which identified that:

“Demand is also more pressing given the current market shortage, and there is a need to frontload the plan with 16 ha of easily deliverable sites”.

4.13 The findings of the ELR (2020) in relation to industrial, storage and distribution floorspace also reflect the earlier findings of the FEMA and EDNA, both produced in 2016. The executive summary of the EDNA finds that:

4.14 *“Demand for industrial space remains strong and very low levels of vacancy reflect a limited supply of industrial accommodation (particularly modern, good quality space). Development of new industrial space in the FEMA has been limited in recent years, with much of the existing stock relatively dated and in need of refurbishment. Local commercial property agents report that demand for industrial premises is currently outstripping supply and an upward trend in industrial rental values in recent years has led to new speculative industrial development being just about viable within the FEMA. The key issue going forward is a lack of new land and/or space to accommodate new development”.*

4.15 It is therefore fundamentally clear that the provision of additional floorspace proposed by draft policy SP20 would go a significant way towards meeting the overall demonstrated need. Furthermore, the ELR (August 2020) made a series of recommendations to the Council, which included:

- Over the 2020-2036 plan period, planning for a minimum 11 ha (65,000 sqm for office uses and a minimum 16 ha (62,000 sqm for industrial uses.
- Consider identifying additional land and examining the potential of housing sites to secure an element of new office or industrial space.

4.16 The ELR at paragraph 4.64 concludes in relation to the office market that the office market is currently performing reasonably well but due to a lack of new build development there is a lack of modern purpose-built stock.

4.17 Regarding industrial space, paragraph 4.95 confirm that there is demand from a mix of local and larger companies serving the area, as well as national occupiers.

- 4.18 The ELR Addendum (December 2022) identifies at paragraph 4.30 that there is just a single office unit available in Thatcham which is not particularly attractive to modern office requirements. Demand from a mix of local and larger companies remains the same for industrial space (paragraph 4.59), with available units having fallen slightly (Table 4.22).
- 4.19 Paragraph 4.76 highlights that *“despite new development occurring in Thatcham... there is an acute shortage in many of the size ranges”*.
- 4.20 Appendix C (Sites’ Assessment) identifies ‘Land at Lower Way Farm’ (HELAA ref. THA9) as being commercial and residential, being within the built up area and having ‘good’ prospects in terms of attractiveness to occupiers. It is considered to achieve a ‘reasonable compatibility with surrounding uses’ and scores reasonably overall.
- 4.21 The recommendation recognises the site currently supports some small scale employment activity and has good access to the A4 and would likely be attractive for light industrial/workshop type premises/uses, but only on a small scale.
- 4.22 Paragraph 7.7 of the LPR notes that there is a lack of supply of suitable sites for office development and *“little to no viability in the market at present”*. The Council therefore seeks to promote the supply and refurbishment/upgrading of existing offices. Policy SP20 removes the requirement for office developments within Designated Employment Areas (DEAs) and promotes the redevelopment and regeneration of existing employment sites for business development.
- 4.23 Paragraph 7.8 highlights that *“The provision of industrial space has been consistently strong over recent years, and both trend-based projections and economic forecasts indicate growth in industrial space. The ELR 2022 therefore recommends a minimum industrial requirement of 91,109sqm or 23 ha of land to 2039 to meet identified needs”*.
- 4.24 The main focus for the provision of industrial space is through the regeneration of the London Road Industrial Estate (LRIE) and is expected to provide flexibility to the need figures in the later part of the plan period. However, focusing industrial development primarily in one area is concerning and does not allow for other suitable and sustainably located sites to come forward which would be able to make an important contribution to meeting the identified needs of the District.

Policy SP21: Sites Allocated for Employment Land

- 4.25 This policy seeks to allocate 20,400sqm of B2/B8 floorspace over the plan period in Thatcham, specifically on 'Land east of Colthrop Industrial Estate' (Policy ref. ESA1). Paragraph 7.24 explain that this is a 'logical extension and would aid in meeting the identified need in the Urban Area of Thatcham.
- 4.26 However, we consider that by focusing all the B2/B8 floorspace over the plan period in one area, this does not allow opportunities for other sites to come forwards which would be able to offer economic benefits to Thatcham and the wider urban area of Newbury and potentially risks stifling the choice and availability of B2/B8 premises.

Summary

- 4.27 The evidence base demonstrates there is demand for small and medium sized sites for employment in the District. The Council's approach to only focus development economic and business development in specific areas of the District appears short-sighted, given there is an identified need and demand for a significant amount of industrial development.
- 4.28 In summary, the LPR should be allocating more sites for economic and business development over the plan period that are consistent with the broad spatial strategy, noting that there are many available sites within the HELAA which have been overlooked, including our client's site 'Land at Lower Way Farm' (HELAA ref: THA9).

5.0 Land at Lower Way Farm, Thatcham

- 5.1 In the context of the concerns raised about the vulnerability of the emerging development strategy and the obvious solution of identifying a greater yield of new homes from the sites available in the HELAA, we now discuss our client's land, which has been overlooked as a sustainable and available site for development.
- 5.2 Representations were most recently submitted to the Council on 4 February 2021 in response to the West Berkshire Council Local Plan Review 2020-2037: Emerging Draft Consultation (December 2020) and in support of the land owned by our clients at Lower Way Farm, Thatcham (HELAA ref THA9). The representations set out, in detail, the suitability of the site for development.
- 5.3 Following the consideration of the site in the updated HELAA (January 2023) this concluded the site is available, achievable and 'potentially developable in part', dependent on further assessment over whether circumstances exist to support the change to the settlement boundary.
- 5.4 In summary, we confirm the site remains suitably located to the south of Thatcham and offers the potential for a sustainable and logical residential development of around 36 dwelling, alongside open space and planting for ecological enhancement.
- 5.5 Alternatively, the site also offers the potential for a sustainable and logically located commercial development, which could build on the success of the nearby Riverside Studios employment site.
- 5.6 Both options would be in line with the Council's strategy for growth and the settlement hierarchy, as outlined in Policy SP3.
- 5.7 The TSG (Stage 2) Strategic Growth Study at paragraph 5.12 states that *"small sites such as... Lower Way Farm... should be excluded... as they are not of sufficient scale to deliver a strategic allocation. This does not mean they are unsuitable for development, simply that they fall outside of the scope of this study"*.
- 5.8 We do not agree with this conclusion and this conflicts with NPPF paragraph 69 which highlights the importance of small and medium sized sites in making important contributions to the housing requirement of an area. Further, there are various merits in favour of the site's development. We consider there are compelling reasons for the settlement boundary

to be redrawn and the site allocated in the LPR for, preferably residential development.

Whilst not exhaustive, the following reasons provide certainty as to why the site is a developable option:

- There is an identified need for a range of different sized sizes for housing in West Berkshire to meet the indicative housing requirements during the plan period. Due to its modest scale, the site could be built out quickly in accordance with paragraph 69 of the NPPF and provide for affordable housing.
- The site is immediately adjacent to the built-up area of Thatcham, which is capable of accommodating significant levels of growth, given the range of facilities and services it currently offers and is therefore a sustainable location for development.
- The site has a good relationship with existing residential development to the north and would fit well into the existing pattern of the settlement, providing an appropriate mix of housing type and tenure.
- There are opportunities to create high quality green infrastructure which would present an attractive and distinctive setting to development.
- The site is close to local services and facilities with opportunities for walking, cycling and the use of public transport, which could positively effect sustainability.
- The site is within a Biodiversity Opportunity Area which presents an opportunity to include biodiversity enhancements and net gain for the development. The site is not subject to any other specific environmental or statutory designations, such as Green Belt, Special Protection Area (SPA), Area of Outstanding Natural Beauty (AONB), Site of Special Scientific Interest (SSSI) and is outside of the DEPZ emergency zone.
- The area of the site put forwards for development would be within Flood Zone 1 and at 'very low risk' from surface water flooding⁴.

Availability of THA9

⁴ Environment Agency Flood Map for Planning

5.9 The site is considered to be available for residential or commercial development immediately. Our client's own the land outright, which is in single ownership and there are no legal issues which would prevent the timely delivery of the site for development.

Achievability of TH9

5.10 The site is considered to be 'achievable' for the reasons set out below:

- A vehicle access can be delivered via the existing access to Lower Way Farm, onto Lower Way.
- The site is vacant agricultural land – therefore, it is likely there are no significant constraints (such as contamination) which would preclude the development of the site on viability grounds.
- Our client's wish to only work with a reputable developer who is able to demonstrate a good track record for delivery.

5.11 In summary, there are no insurmountable constraints to prevent the delivery of 'Land at Lower Way Farm, Thatcham' (HELAA ref: THA9). The site is suitable, available and achievable for residential or commercial development now, which can help the Council to meet its identified housing and employment needs in a timely and sustainable manner. Accordingly, we consider the Council should review its delivery strategy and allocate our client's site for development in the LPR.

5.12 Alternatively, the site could be accommodated within a revised settlement boundary, given its modest scale. It is considered that the development of this site would relate well to the existing settlement pattern and urban/mixed use nature of the area and would clearly make a greater contribution to the built form of this area, rather than the wider countryside. Such amendments to settlement boundaries through the LPR provides an opportunity to proactively deliver small and medium-scale sites which will help to boost supply and help meet the Council's housing and employment needs targets across the plan period.

5.13 In relation to Riverside Studios (HELAA ref. THA24) the Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) (November 2022) concludes that development of the site would result in an overall neutral impact, with a positive impact on economic sustainability as the site is promoted for redevelopment of an existing employment area. no negative sustainability impacts have been identified. However, the site is not recommended

for allocation as it is an existing employment use for small scale independent businesses and its allocation would not be consistent with the strategy for employment allocations set out in the LPR.

- 5.14 Again, we do not agree with this conclusion, given this is a successful employment site and the absence of any constraints. We consider there are compelling reasons for the site to be allocated for employment, in addition to the allocations proposed in the draft Local Plan Review and suggest the spatial area settlement boundary should be extended to include this site, with an allocation made to incorporate it.

6.0 Conclusion

6.1 These representations have been prepared by Pro Vision on behalf of our clients, Mr and Mrs Pittard in response to West Berkshire Council's consultation on its Local Plan Review 2022-2039 (Regulation 19) Consultation (January 2023).

6.2 Our clients have concerns that the Council's LPR is currently unsound, having regard to the tests of soundness at paragraph 35 of the NPPF. It is considered there are a number of matters which indicate the proposed strategy fails to be robust enough to be sound and is therefore liable to fail in its objectives. There is justification to increase both the housing and employment requirements to address these issues, including:

- The LPR's priority to improve affordability and to deliver additional affordable homes;
- The need to boost supply significantly and to build in greater flexibility in the LPR, if the anticipated housing supply does not delivered as expected;
- Unmet need from neighbouring authorities (i.e. RBC); and
- The LPR's property to facilitate and support a strong, diverse and sustainable economic base across the District.

6.3 With the above in mind, it is considered that the Council's housing target should be increased to between 564 to 616 dpa (i.e. to provide a 10% to 20% buffer/uplift to the minimum LHN), which would equate to finding a supply of between 9,588 to 10,472 dwellings up to 2039.

6.4 In addition, the Council's housing supply would fail to meet the minimum LHN. This is particularly due to the LPR's reliance on large strategic sites (Sandleford and North East Thatcham) and windfall sites. This approach is questionable in terms of the timescales for housing delivery and annual rate of completions, not to mention that windfall sites are, by their very nature, not guaranteed.

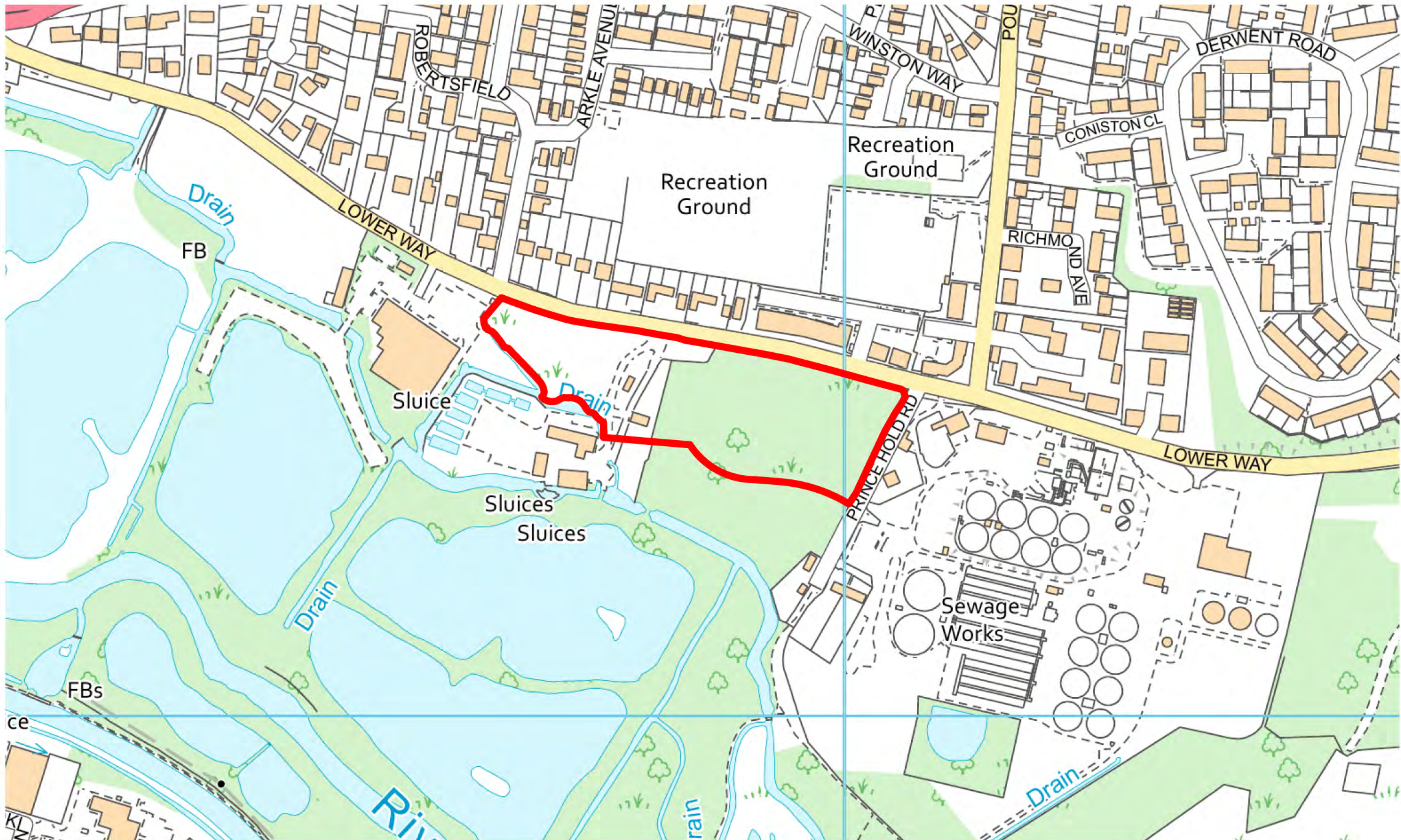
6.5 The Council's justification for the allocation at North East Thatcham is also potentially unsound, given the lack of updated evidence and the reduction in housing numbers.

6.6 As a result and noting the significant amount of available land identified in the updated HELAA which has been overlooked, including our client's site, it is concluded that a suitable solution would be for the LPR to allocate more sites for housing over the plan period,

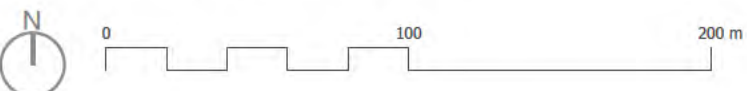
consistent with the broad strategy of focusing development on the most sustainable settlements, including Thatcham, in accordance with Policy SP3 (settlement hierarchy).

- 6.7 Accordingly, we are of the view that's the Council should consider 'Land at Lower Way Farm, Thatcham' for allocation in the LPR. We have demonstrated the site is developable, suitable, available and achievable now. Therefore, we consider the Council has been premature in overlooking this opportunity.
- 6.8 The site's allocation would, in principle, be consistent with the settlement hierarchy. Alternatively, there is also an opportunity to simply amend the settlement boundary for Thatcham as part of the Council's review to provide additional opportunities for growth to help meet the Council's housing and employment needs over the plan period.
- 6.9 Similarly, from an economic perspective, our client's site is ideally located to help accommodate some of the economic needs of the District and would be able to build on the success of 'Riverside Studios' (HELAA ref. THA24) as an employment site, enabling small and medium sized businesses an opportunity to start and grow in Thatcham. Our clients own the commercial premises to the south and west of the site, known as 'Lower Way Farm Riverside Studios', which is a successful established local employment premises. As such, we consider this should be reflected in its allocation in the Local Plan Review as a site for economic development. This will safeguard the modest level of employment opportunities that the site provides.
- 6.10 At this stage, we consider the LPR to be unsound, but have provided our recommendations to ensure the plan is made to be more robust. We therefore trust these representations clearly set out our client's position and respectfully request the above is given due consideration by the Council as part of the examination into the West Berkshire Local Plan Review.

Appendix A – Site Location Plan



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REV.	DATE	AMENDMENTS	DRAWN	CHECKED
1	18.12.18		MH	JM

CLIENT:
 Mr & Mrs Pickard

PROJECT:
 Lower Way Farm,
 Lower Way, Thatcham

DRAWING:
 Site Location Plan

DATE:
 December 2018

SCALE: 1:2500
 A3
 DWG NO: 1366
 SK1-01
 REV: #

Appendix B – Indicative Site Plan for 36 dwellings



LOWER WAY FARM

OPEN SPACE

NEW PLANTING FOR ECOLOGICAL ENHANCEMENT

EXISTING TREES

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REV.	DATE	AMENDMENTS	DRAWN	CHECKED
1	29.03.17		CD	JP
2	17.12.18		MH	JM

CLIENT:
Mr & Mrs Pickard

PROJECT:
**Lower Way Farm,
 Lower Way, Thattham**

DRAWING:
Illustrative Layout

DATE:
March 2017

SCALE: **1:1000 @ A3**

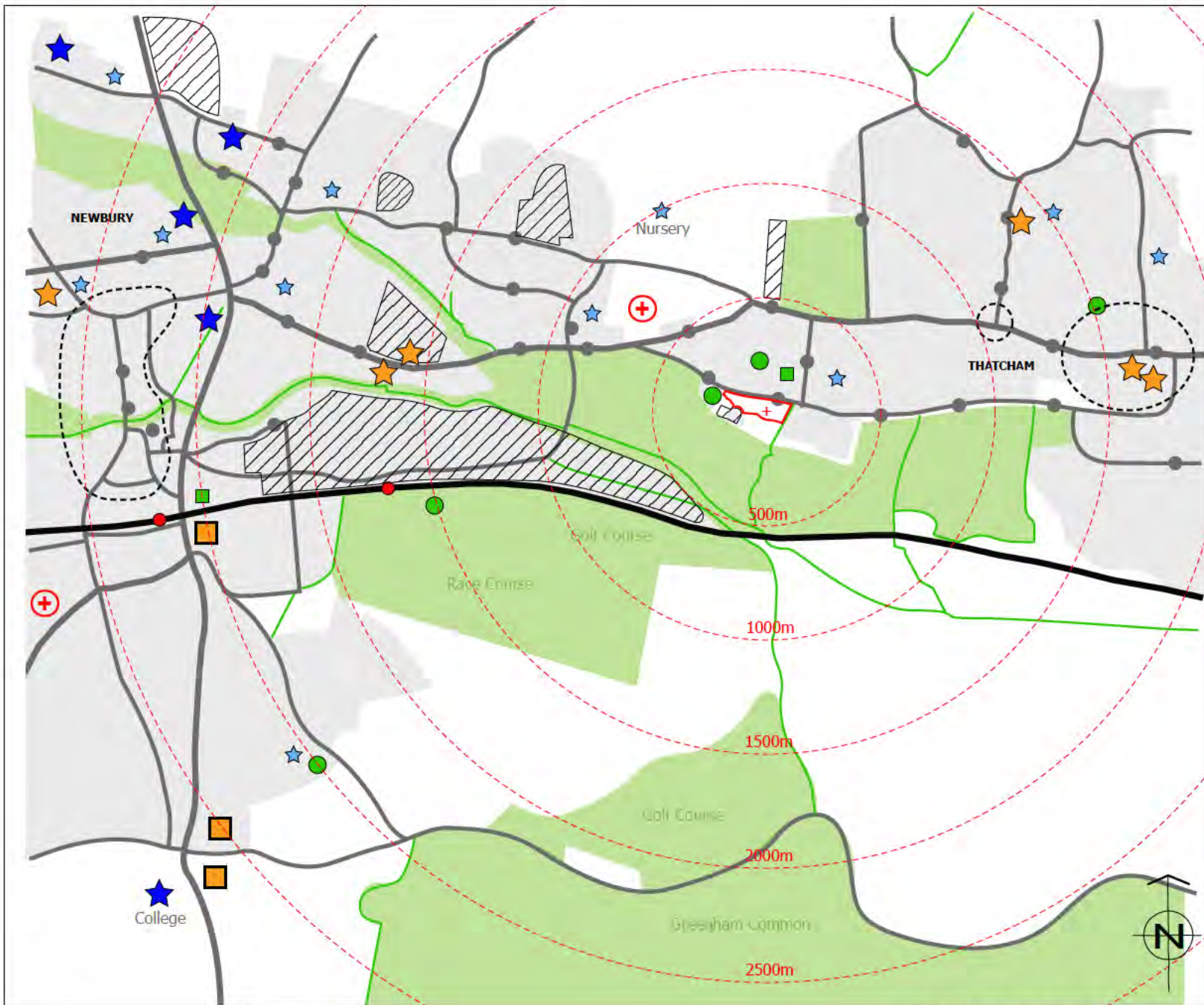
DWG NO: **1366/SK02**

REV: **A**



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Appendix C – Local Facilities and Services Plan

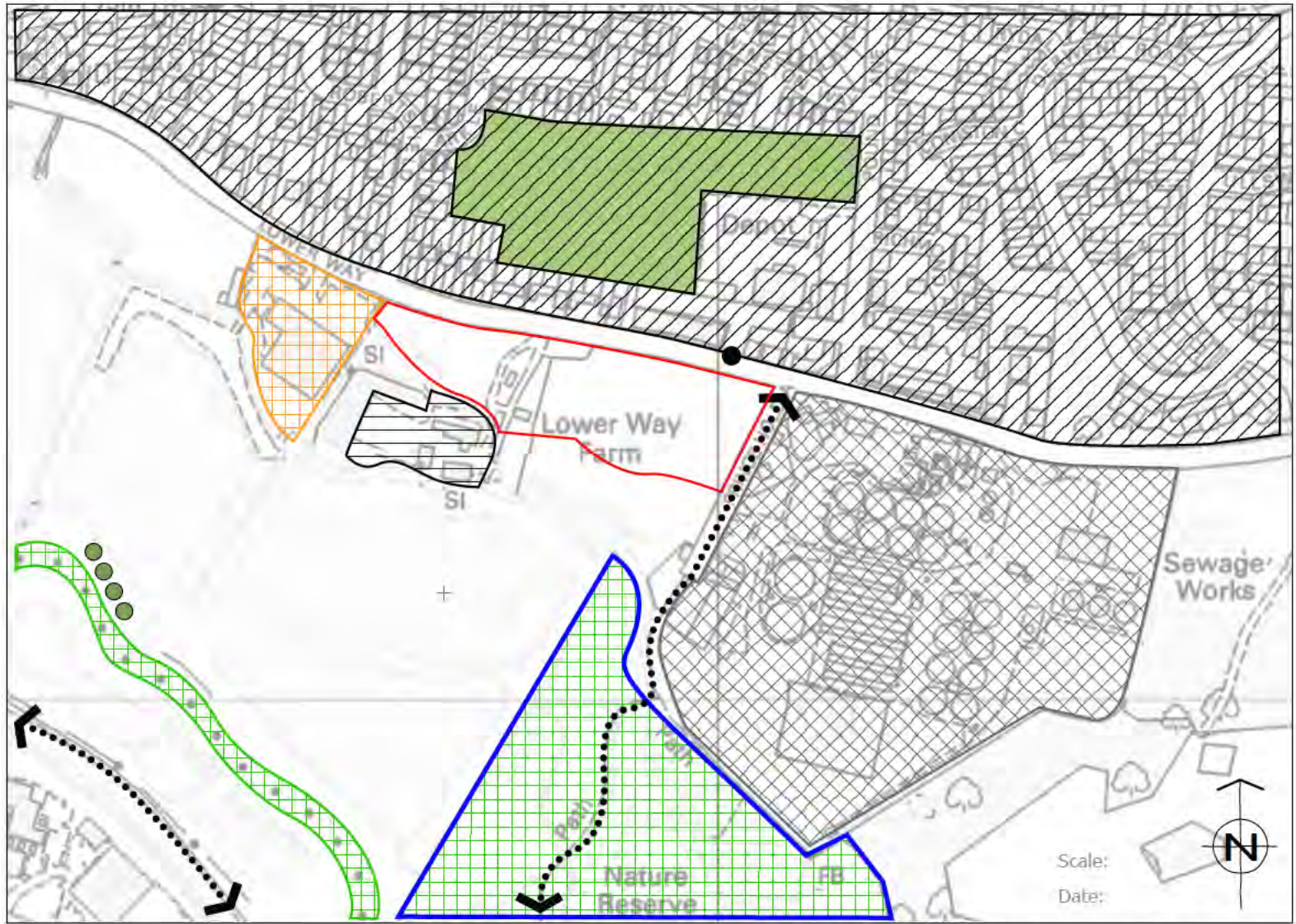


- ### Map Key
- Site Boundary
 - Town Centre / Local Centre
 - Employment
 - Retail Park
 - Supermarket
 - Hospital
 - Sports & Leisure
 - Open Space & Recreation
 - Recycling Centre
 - Secondary School
 - Primary School
 - Railway Line / Station
 - Principal Movement Corridor
 - Secondary Movement Corridor
 - Bus Stop
 - Public Footpath

Local Facilities & Services
December 2018



Appendix D – Physical and Environmental Context Plan



Map Key

-  Site Boundary
-  Urban Area
-  Employment Site
-  Sewage Works
-  Leisure Facility
-  Public Open Space
-  SSSI
-  Nature Reserve
-  Tree Preservation Order
-  Public Right of Way
-  Bus Stop

Physical & Environmental Context
 not to scale
 April 2013

