

From: [REDACTED]
To: [PlanningPolicy](#)
Cc: [REDACTED]
Subject: West Berkshire Local Plan Review 2022-2039 - Proposed Main Modifications Consultation
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Good afternoon,

Following West Berkshire Borough Council undertaking a Proposed Main Modifications Consultation, please find attached a copy of Thakeham's representation to the consultation.

I would be grateful if you could confirm receipt of this e-mail and the attached document.

Kind regards

Rhett

Rhett Flashman
Planner

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THAKEHAM



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THAKEHAM

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

17th January 2025

Dear Sir / Madam,

West Berkshire Local Plan Review 2022-2039 – Consultation on the Proposed Main Modifications

Thakeham Homes Limited ('Thakeham') is writing in response to the West Berkshire Council Proposed Main Modifications Consultation. The consultation on the Main Modifications follows the Examination Hearings of the West Berkshire Local Plan Review 2022-2039.

The consultation response below, reflects Thakeham's interest in the emerging West Berkshire Local Plan and therefore comments have not been made in response to all of the proposed Main Modifications.

Consultation Response

Main Modification Reference	Thakeham's Response to the Proposed Main Modification
MM3	<p>Whilst Thakeham is supportive of densities varying across the Borough; it is important that densities of Sites make efficient use of land as set out in paragraph 129 of the NPPF and reflect the local area rather than following a prescriptive density requirement. The wording of the proposed modification should ensure flexibility and judgment on a site-by-site basis; therefore ensuring that efficient use of land is achieved, whilst reflecting the local character.</p> <p>Thakeham therefore proposes the following amendments.</p> <p><i>Developments on the edge of defined settlements are generally expected to secure a net density of approximately 30 dwellings per hectare outside of the AONB, and approximately 20 dwellings per hectare within the AONB. Densities should reflect the local character and make efficient use of land.</i></p>
MM4	<p>Thakeham supports the additional second paragraph within Policy SP2 which confirms that development within the North Wessex Downs National Landscape (AONB) must have regard to the interrelationship with the AONB and its landscape character and special qualities. This aligns with National Policy, which looks to ensure that where development occurs within the AONB, it is</p>

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	<p>sensitively located and is designed to avoid or minimise any adverse impacts on the AONB.</p>
MM5	<p>Thakeham supports the proposed modification and the clarification it provides that the allocation of a site through a Neighbourhood Plan provides the exceptional circumstances necessary to allow permission within the North Wessex Downs National Landscape (AONB).</p> <p>The proposed supporting text also confirms that applications that meet the requirements of the allocation and the policies within the development plan relevant to its determination, would be seen in accordance with the development plan and consistent with national policy.</p> <p>This policy therefore ensures that exceptional circumstances does not need to be justified through an application on an allocated site.</p>
MM6	<p>Thakeham support the inclusion of the new paragraph at the end of Policy SP3 as it helps promote that Neighbourhood Plans can allocate non-strategic sites for development that are located either within and/or adjoining settlement boundaries; as the push for Neighbourhood Plans to allocate residential development will help ensure that the Council meets its housing need. The clarification that Neighbourhood Plans cannot allocate strategic sites is also beneficial as larger strategic sites require additional consideration and more detailed examination such as that Local Plans are put through. Ensuring Neighbourhood Plans do not allocate strategic sites also ensures that the Neighbourhood Plan-making process can proceed at a quicker rate as larger sites have the potential to delay the process due to the additional evidence base required; which can also be costly for qualifying bodies.</p>
MM18	<p>Thakeham supports the modification to Policy SP12 which requires Lambourn to deliver approximately 25 dwellings through its emerging Neighbourhood Plan. As outlined in the emerging Local Plan, for the Council to meet its minimum housing requirement of 9,270 dwellings, it will require sites to be allocated through neighbourhood plans that are not within the settlement boundary; and therefore would be assumed under the windfall allowance; or have already been allocated through an other development plan document.</p> <p>However, whilst Thakeham is supportive of the inclusion within Policy SP12, Thakeham believes the Council could go further in ensuring that Neighbourhood Plans deliver a supply of homes that can help the Council achieve its minimum housing number. It is therefore proposed that the following amendment is made to the proposed modification.</p> <p><u><i>Sites to be allocated in Neighbourhood Plans</i></u> <i>The Council will supply a minimum housing requirement figure to those qualifying bodies either preparing or updating a neighbourhood plan, with the Council ensuring that all forthcoming</i></p>

	<p>Neighbourhood Plans that intends to include residential allocations.</p> <p><i>For those plans currently in preparation, it will be necessary to identify sites to meet the following levels of development:</i></p> <ul style="list-style-type: none"> • <i>Hungerford: minimum 55 dwellings</i> • <i>Lambourn: minimum 25 dwellings.</i> <p>The following suggested changes ensure that the forthcoming Neighbourhood Plans align with the current national directive to deliver a sufficient supply of homes. This change will help ensure that the Council meets its minimum housing target.</p>
MM19	<p>Thakeham supports the amendments to the supporting text of Policy SP12. The amendments made through MM19 reflect the Local Plans's direction to meet part of its housing need through Neighbourhood Plans. Modification MM19 therefore strengthen the requirement for Neighbourhood Plans to not only come forward and be part of the Development Plan, but to also allocate sites for development outside of the settlement boundary, that can ensure that the that the Council achives its minimum requirement of 515 dwellings per annum.</p> <p>The inclusion of the right for the Council to intervene in Neighbourhood Plans which fail to identify opportunities to address housing or where neighbourhood Plan are not made in a timely fashion is an important inclusion, that Thakeham supports.</p>
MM28	<p>Thakeham supports the proposed amendment to remove the requirement to deliver 25% First Homes and instead increase the tenure split of Shared Ownership to 30%. This modification aligns with the 2024 NPPF which under footnote 31, removes the requirement to deliver a minimum of 25% of affordable housing as First Homes. This modification therefore aligns with National policy as well as allowing the more proven and effective affordable housing housing tenure to come forward within the Borough.</p>

We trust that this representation is taken into account in the process going forward and we would be grateful for confirmation of receipt. In the meantime, please do not hesitate to contact me if you have any queries or require any further information.

Yours faithfully,



**Rhett Flashman
Planner**

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