

**West Berkshire Local Plan Review 2022-39**

**Local Plan Submission Document**

**Draft Consultation Response by Councillor Alan Macro, Member for Theale, West Berkshire Council**

**16 February 2023**

<b>Section/ Policy</b>	<b>Subsection/ Title</b>	<b>Support/ Object/ Comment</b>	<b>Sound/ Unsound</b>	<b>Reason</b>	<b>Required Change</b>
General	General	Object	Unsound	<p>The West Berkshire Strategic Transport Model in the Evidence Base has not been updated for the following:</p> <ul style="list-style-type: none"> <li>• End date for LPR revised from 2037 to 2039</li> <li>• Additional housing sites proposed for Theale, totalling 100 units</li> <li>• Removal of housing sites proposed at Reg19 stage because of imposition of AWE DEPZs</li> <li>• Removal of proposed housing site at Pincents Hill, Tilehurst</li> <li>• Removal of proposed office employment site adjacent to M4 J12</li> </ul>	<p>The West Berkshire Strategic Transport Model in the Evidence base should be updated for the additions and omissions and re-run. The LPR should then be reviewed in the light of the results.</p>
General	General	Object	Unsound	<p>The Air Quality Assessment in the Evidence Base has not been updated for the following:</p> <ul style="list-style-type: none"> <li>• End date for LPR revised from 2037 to 2039</li> </ul>	<p>The Air Quality Assessment in the Evidence base should be updated for the additions and omissions and re-run. The LPR should then be reviewed in the light of the results</p>

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				<ul style="list-style-type: none"> <li>• Additional housing sites proposed for Theale, totalling 100 units</li> <li>• Removal of housing sites proposed at Reg18 stage because of imposition of AWE DEPZs</li> <li>• Removal of proposed housing site at Pincents Hill, Tilehurst</li> <li>• Removal of proposed office employment site adjacent to M4 J12</li> </ul>	
2.1	Context/ Constraints	Comment		Does not include all the major constraints on development in the district	Section should be expanded to include the constraints imposed by the flood plains and the Detailed Emergency Planning Zones (DEPZs) around the two Atomic Weapons Establishments. Also, the nutrient neutrality zones should be included.
2.6	Context/ Transport	Object	Unsound	Disagree with point on “well connected”	It is true that West Berkshire has several major arteries running through it, but it cannot be said that it is “well connected”. Both national (M4 and A34) and local highway networks are over-loaded and congested at peak times. This affects roads in and around Newbury, Thatcham and Theale in particular
2.6	Context/ Transport	Object	Unsound	Part on railway connections is incomplete	Section should be modified to include the Great Western Main Line, which has a station at Pangbourne and another at Goring that serves Streatley

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4.6	Constraints	Comment		AWE Detailed Emergency Planning Zones (DEPZs) are not specifically mentioned	The text regarding the AWE constraints should be re-worded to include “DEPZs”
4.7	Spatial Areas	Object Reason	Unsound	Combination of Eastern and Kennet Valley Spatial Areas	The justification for merging these areas is no longer valid. The strict constraint on the building of new homes imposed by the introduction of the DEPZs around the two AWEs means that the merging no longer provides flexibility.
SP1	Spatial Strategy	Object Reason 1	Unsound	Combination of Eastern and Kennet Valley Spatial Areas	The justification for merging these areas is no longer valid. The strict constraint on the building of new homes imposed by the introduction of the DEPZs around the two AWEs means that the merging no longer provides flexibility.
SP1	Spatial Strategy	Object Reason 2		Object to statement that “... higher densities achievable in the centres of Hungerford, Pangbourne and Theale”. Pangbourne and Theale are villages and dwelling density should reflect the village character.	Statement should be removed
SP1	Newbury and Thatcham	Object Reason 1	Unsound	The West Berkshire Strategic Transport Model has not been updated for the proposed increase in number of units on the NE Thatcham strategic site from 1,250 to 1,500 in the plan period	The West Berkshire Strategic Transport Model should be updated and re-run or the proposed increase in number of units on the NE Thatcham strategic site from 1,250 to 1,500 in the plan period. The NE Thatcham allocation should be significantly reduced or removed
SP1	Newbury and Thatcham	Object Reason 2	Unsound	The Air Quality Assessment has not been updated for the proposed increase in number of units on the NE Thatcham	The Air Quality Assessment should be updated or the proposed increase in number of units on the NE Thatcham

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				strategic site from 1,250 to 1,500 in the plan period	strategic site from 1,250 to 1,500 in the plan period removed. The NE Thatcham allocation should be significantly reduced or removed
SP1	Eastern Area	Object Reason 1	Unsound	<p>Disagree that “Theale will be a focus for additional housing through existing commitments and new allocations”.</p> <p>The Lakeside site in Theale has outline planning permission for up to 325 units, nine of which have full permission. An adjacent site, allocated in the HAS DPD, has outline permission for 104 houses.</p> <p>These homes will fully utilise services and infrastructure in Theale, particularly health services. This was recognised in Section 4.35 of the Core Strategy, which contained the following statement: “The Lakeside development has planning permission to provide 350 homes in a range of different sizes and types, which would become a well-integrated part of the Theale community. If this development goes ahead, Theale would need to undergo a period of consolidation to provide an opportunity for facilities and services to be upgraded”. No justification has been</p>	The focus on Theale should be removed and the Core Strategy requirement for a “period of consolidation” should be carried forward to the LPR.

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				<p>given for dropping this requirement from the LPR.</p> <p>Theale will still need that “period of consolidation” once construction at Lakeside has been completed.</p>	
SP1	Eastern Area	Object Reason 2		<p>Disagree that “Theale will be a focus for additional housing through existing commitments and new allocations”.</p> <p>The sites Proposed for Theale (RSA10 and RSA11) have not been included in the Air Quality Assessment</p>	The statement “Theale will be a focus for additional housing through existing commitments and new allocations” should be removed from the LPR
SP1	Eastern Area	Object Reason 3		<p>Disagree that “Theale will be a focus for additional housing through existing commitments and new allocations”.</p> <p>The sites Proposed for Theale (RSA10 and RSA11) have not been included in the West Berkshire Strategic Transport Model</p>	The statement “Theale will be a focus for additional housing through existing commitments and new allocations” should be removed from the LPR
SP2	North Wessex Downs AONB	Object	Unsound	The statement “planning permission will be refused for major development in the AONB except in exceptional circumstances, and where it can be demonstrated to be in the public interest” is too restrictive	<p>Restricting development to this extent would increase pressures for development elsewhere in the district. It would also allow villages to “wither on the vine” because their population would age and thus reduce the viability of services such as shops, pubs, primary schools and churches.</p> <p>Major developments SHOULD be allowed in the AONB where they do not have a</p>

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					significantly adverse effect on landscape character.
SP3	Settlement Hierarchy	Object Reason 1	Unsound	<p>Some of the settlements have constraints meaning it is not appropriate for them to have non-strategic housing land allocations:</p> <ul style="list-style-type: none"> <li>• Burghfield Common and Mortimer are within the Burghfield AWE DEPZ</li> <li>• Section 4.35 of the Core Strategy contained the following statement: “The Lakeside development has planning permission to provide 350 homes in a range of different sizes and types, which would become a well-integrated part of the Theale community. If this development goes ahead, Theale would need to undergo a period of consolidation to provide an opportunity for facilities and services to be upgraded”.</li> </ul> <p>Housing construction on this development has not yet commenced, although outline permission has been granted for up to 325 homes and Reserved Matters permission has been</p>	Point (f) needs to be qualified to take these constraints into account

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				<p>granted for part of the site.</p> <p>In addition, outline permission has been granted for 104 homes on the adjacent site between The Green and the A340 (LPR site RSA9). These two sites will increase the number of homes in Theale by almost 25% when built out. Therefore, that statement is still valid and Theale still needs that “period of consolidation”.</p> <ul style="list-style-type: none"> <li>Theale has outstanding planning permission for 429 dwellings as described above. Any further housing allocations would change the character of the village and over-burden local services, particularly health services.</li> </ul>	
SP3	Settlement Hierarchy	Object Reason 2	Unsound	The imposition of the DEPZs around AWE sites mean that housing site allocations can no longer be made at two of the Rural Service Centres: Burghfield Common and Mortimer. This means that other RSCs and Service villages are being asked to take more housing and thus stretching their infrastructure and services.	Modest-sized housing allocations should be made at larger villages (other than RSCs) that have services such as convenience stores, pubs, primary schools, churches, village halls and/or public transport. Such allocations would increase the viability of the services and help such villages become more sustainable.

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SP5	Responding to Climate Change	Support	Sound		
SP6	Flood Risk	Support	Sound		
SP7	Design Quality	Support	Sound		
SP8	Landscape Character	Support	Sound		
SP9	Historic Environment	Support	Sound		
SP10	Green Infrastructure	Support	Sound		
SP11	Biodiversity and geodiversity	Support	Sound		
SP12	6.20	Object	Unsound	No explanation is given for the restriction of the windfall allowance to sites of 10 units or less, especially given that historically over 70% of new homes were built on windfall sites. The resulting low windfall allowance of 140 units per annum means that far too many units are being allocated on greenfield sites	Sites within settlement boundaries that are in the Brownfield Land Register should be evaluated and, if appropriate, be allocated in the LPR and included in the target housing total. Ditto sites subject to suitable major planning applications to change land use to housing. Greenfield housing site allocations should then either be reduced in size or removed altogether to compensate.
SP12	6.22	Object	Unsound	No sites have been allocated within settlement boundaries. For example, planning applications have been submitted for hundreds of units on a redeveloped Kennet Shopping Centre in Newbury. Another example is the London Road Industrial Estate in	Sites within settlement boundaries that are in the Brownfield Land Register should be evaluated and, if appropriate, be allocated in the LPR and included in the target housing total. Ditto sites subject to suitable major planning applications to change land use to housing. Greenfield housing site

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				Newbury where West Berks Council, who own the site, have put forward re-development schemes that include converting part of the site to housing.	allocations should then either be reduced in size or removed altogether to compensate.
SP12 6.25-	6.27	Object	Unsound	The Secretary of State's Written Statement of 6th December 2022 removed the need to maintain a 5-year housing supply for Local Authorities with up-to-date Local Plans	Paragraphs 6.25 to 6.27 should be removed from the LPR.
SP13	Sites allocated for residential and mixed-use development in Newbury and Thatcham	Object	Unsound	Allocation SP17 (NE Thatcham) is not appropriate	Allocation should be significantly reduced or removed - please see my comments on Policy SP17
SP13	6.28	Object	Unsound	Text regarding the strategic site at NE Thatcham is not appropriate.  The sentence "Strategic development in Thatcham will bring considerable benefits to the town... provision of new schools, community facilities and recreational provision." Is not accurate as the proposed benefits would only benefit the proposed new housing, not the existing town.	Please see my comments on Policy SP17.  The sentence regarding benefits should be removed.
SP13	6.29	Object	Unsound	The sentences "There is significant potential on previously developed land within settlement boundaries, particularly in Newbury town centre and	The sentence "sites within settlement boundaries are not being allocated" should be removed and sites on previously developed land within settlements should

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				periphery” and “sites within settlement boundaries are not being allocated” are self-contradictory. The latter means that the LPR is allocating far more housing on greenfield sites than is necessary.	be allocated where appropriate. Housing allocations on greenfield sites should be reduced or removed accordingly.
SP14 RSA10, RSA11	Sites allocated for residential development in the Eastern Area	Object Reason 1	Unsound	Traffic modelling for these proposed sites has not been done	The sites in Theale identified by policies RS10 and RSA11 should be removed
SP14 RSA10, RSA11	Sites allocated for residential development in the Eastern Area	Object Reason 2	Unsound	No Air Quality Assessment has been carried out for these proposed sites	The sites in Theale identified by policies RS10 and RSA11 should be removed
SP14 RSA10, RSA11	Sites allocated for residential development in the Eastern Area	Object Reason 3	Unsound	These sites are close to the A4 and M4 Junction 12. This means that many journeys will be by private car, which is unsustainable	The sites in Theale identified by policies RS10 and RSA11 should be removed
SP14 RSA10 RSA11	Sites allocated for residential development in the Eastern Area	Object Reason 4	Unsound	Traffic generated from proposed housing sites RSA10 and RSA11 would greatly exacerbate existing traffic problems in Theale. Traffic data provided by SatNav company TomTom (derived from mobile phone data) for the period 1st to 4th April 2019 (i.e. before the pandemic) show the following problems:  Morning peak Delay (Secs)	The sites in Theale identified by policies RS10 and RSA11 should be removed

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				<ul style="list-style-type: none"> <li>• High St eastbound 78</li> <li>• High St westbound 82</li> <li>• A4 Hoad Way to J12 M4 51</li> <li>• J12 eastbound 60</li> <li>• Bradfield Rd eastbound/Church St 67</li> <li>• Bradfield Rd westbound/A340 60</li> <li>• Common Hill eastbound 192</li> <li>• A340 southbound/A4 192</li> <li>• Englefield Rd northbound/A340 37</li> </ul> <p>Evening peak Delay (Secs)</p> <ul style="list-style-type: none"> <li>• High St eastbound 74</li> <li>• High St westbound 77</li> <li>• A4 Hoad Way to J12 M4 34</li> <li>• M4 J12 eastbound 75</li> <li>• Waterside Dr northbound 164</li> <li>• Waterside Dr southbound 81</li> <li>• Brunel Rd westbound 85</li> <li>• Brunel Rd eastbound 69</li> <li>• Common Hill eastbound/A340 69</li> <li>• A4 westbound/A340 52</li> <li>• Englefield Rd westbound/A340 54</li> <li>• Englefield Rd eastbound/Church St 45</li> </ul>	

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				Please also see sections on policies RSA10 and RSA11 for additional reasons for rejecting these sites.	
SP14 RSA10	Whitehart Meadow, Theale	Object	Unsound	The site identified by policy RSA10 (Whitehart Meadow, Theale) is not suitable for development for the reasons I give under Policy RS10, below	The site identified by policy RS10 should be removed.
SP14 RSA11	Former sewage treatment works, Theale	Object	Unsound	The site identified by policy RSA11 (Old Sewage Works, Theale) is not suitable for development for the reasons I give under Policy RSA11, below	The site identified by policy RS11 should be removed.
SP14 6.34	New non-strategic allocations are proposed at the rural service centre of Theale and the service village of Woolhampton	Object	Unsound	The sites proposed to be allocated for housing in Theale are not suitable for development for the reason I give under policies RSA10 and RSA11, below	“the rural service centre of Theale” should be removed from section 6.34.  Other suitable sites identified in the HELAA should be allocated where these will help retain services, such as primary schools, shops, pubs, churches, village halls, etc. in villages
SP15	Sites allocated for residential development in North Wessex Downs AONB	Object	Unsound	Allocations are too restrictive	.
SP16	Sandleford Strategic Site Allocation	Object	Unsound	Warren Road is not suitable for general vehicular access	The policy should be re-worded so that Warren Road reverts to access for public transport and cycles as originally proposed.

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SP17 North East Thatcham Strategic Site Allocation		Object	Unsound	The proposal to allocate a 1,500 homes strategic housing allocation at NE Thatcham risks "putting all eggs in one basket" making it subject to risks such as have been experienced with the strategic allocation at Sandford.	The allocation should be significantly reduced or removed.
SP17 North East Thatcham Strategic Site Allocation	6.58 Settlement Boundary	Object	Unsound	The statement "the new revised settlement boundary will be defined following the studies and work identified in the policy at the application stage" leaves an unacceptably large degree of uncertainty. It would also make it difficult to resist planning applications that would take the number of dwellings on the site past the 1,500 specified in this LPR.	The new settlement boundary should be drawn in this LPR.
SP17 North East Thatcham Strategic Site Allocation		Object	Unsound	The Air Quality Assessment has not been revised to take account of the change in the number of dwellings in the plan period from 1,250 at Reg18 stage to 1,500	The Air Quality Assessment should be revised to take account of the change in the number of dwellings in the plan period from 1,250 to 1,500
SP17 North East Thatcham Strategic Site Allocation		Object	Unsound	The West Berkshire Transport Model has not been revised to take account of the change in the number of dwellings in the plan period from 1,250 at Reg18 stage to 1,500	The Air Quality Assessment should be revised to take account of the change in the number of dwellings in the plan period from 1,250 to 1,500
SP17 North East Thatcham		Object	Unsound	The proposed site is some distance from the town centre and the railway station. This means that journeys are much more	The allocation should be significantly reduced or removed.

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Strategic Site Allocation				likely to be made using private cars. This is unsustainable	
SP17 North East Thatcham Strategic Site Allocation		Object	Unsound	This proposed strategic housing allocation would adversely affect Theale as it would greatly increase the level of traffic on the A4 past the village. Many vehicles would head east along the A4 to Reading and to the M4. This would lead to increased, unacceptable, congestion at junctions on the A4 in Theale, particularly with the A340, Hoad Way/ Waterside Drive, and at M4 Junction 12. There are already significant delays of 165 seconds for traffic emerging from Waterside Drive onto the A4 in the evening peak (TomTom mobile phone derived data for April 1-4 2019)	The allocation should be significantly reduced or removed.
SP18	Housing Type and Mix	Object	Sound	Support policy in general, but object to the statement "Around 10% of the new market housing and a maximum of 5 units of the affordable sector should also meet the wheelchair accessible standard M4(3) wheelchair user dwellings...". The word "around" is far too vague and the reason for "a maximum of 5 units" is difficult to justify.	The statement should be changed to "10% of new market housing and affordable housing should each also meet the wheelchair accessible standard M4(3) wheelchair user dwellings...".
SP19	Affordable Housing	Support			

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SP20	Strategic approach to employment land	Object Reason 1	Unsound	The proposal to allow office development in Designated Employment Areas is unsound. If the office market recovers there will be pressure to redevelop non-office premises as offices and this will lead to the loss of skilled, semi-skilled and unskilled manual occupations.	The policy should be re-worded so as not to allow office developments in Designated Employment areas
SP20	Strategic approach to employment land	Object Reason 2	Unsound	The sentence “new office developments within Designated Employment areas (DEA) will be exempt from the sequential test in accordance with Policy SP20” will endanger the viability of town centres.	Sentence should be removed
SP21	Sites Allocated for Employment Land	Support (part)	Sound	Support the removal of site EMP6 (Land north of Arlington Business 20,000 Park, Theale East Business Centre) since the Reg18 stage.. This site was completely unsuitable because it: <ul style="list-style-type: none"> <li>• Would have eroded the gap between the settlements of Theale and Calcot, contrary to policy SP1</li> <li>• The site is liable to surface water and groundwater flooding</li> <li>• The water table is only 25cm below the surface (as per drainage officer comments on the HELAA), precluding SUDS</li> </ul>	

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SP22	Town and District Centres/ Office Developments	Object	Unsound	The sentence “changes of use within the primary shopping area from Class E to other uses will be permitted where they do not result in a disproportionate concentration of non-Class E units that would be harmful to the vitality of that centre” is not sufficiently restrictive and would allow the viability and vitality of shopping areas to be eroded.	The sentence should be changed to “changes of use within the primary shopping area from Class E to other uses will be permitted where they would not be harmful to the vitality of that centre”
SP22	Town and District Centres/ Retail	Support	Sound		
SP23	Transport	Support	Sound		
RSA10	Whitehart Meadow	Object Reason 1	Unsound	Section 4.35 of the Core Strategy contained the following statement: “The Lakeside development has planning permission to provide 350 homes in a range of different sizes and types, which would become a well-integrated part of the Theale community. If this development goes ahead, Theale would need to undergo a period of consolidation to provide an opportunity for facilities and services to be upgraded”. Housing construction on this development has not yet commenced, although Outline permission has been granted for up to 325 homes and Reserved Matters permission has been	This site should be removed from the LPR

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				<p>granted for part of the site. In addition, outline permission has been granted for 104 homes on the adjacent site between The Green and the A340 (LPR site RSA9). These two sites will increase the number of homes in Theale by almost 25% when built out.</p> <p>Therefore, that statement is still valid and no justification has been given for not carrying that section forward to the LPR.</p> <p>Theale still needs that “period of consolidation”.</p>	
RSA10	Whitehart Meadow	Object Reason 2	Unsound	This site is important to the setting of Theale and to its maintenance as a separate settlement. Any development on this site would erode Theale's separation from Calcot and Tilehurst, contrary to the requirement in policy SP1 that "the individual identities of the separate settlements within this [Eastern Spatial] area will be maintained"	This site should be removed from the LPR
RSA10	Whitehart Meadow	Object Reason 3	Unsound	The site is bounded by the M4 motorway and thus subject to noise and air pollution. The latter is exacerbated in the morning peak because the M4 eastbound frequently slows to a crawl or	This site should be removed from the LPR

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				<p>standstill past this site. This worsens air pollution because:</p> <ul style="list-style-type: none"> <li>• The density of vehicles increases as they close up, producing more pollution in a given length of road</li> <li>• Vehicle engines produce more pollution when idling or running slowly</li> </ul> <p>The pollution does not disperse so widely because it is not dispersed by moving traffic.</p>	
RSA10	Whitehart Meadow	Object Reason 4	Unsound	<p>High voltage power lines cross the site. In addition to visual intrusion and danger of electrocution (e.g. from climbing ladders or scaffolding or from flying kites), scientific research shows that they generate ozone and nitrogen oxide air pollution (increased by 13% and 30% over normal levels according to paper "Emissions of pollutants and air quality in the area of influence of high voltage overhead electrical lines" by Cociorva Danut, Mihaela Andreea Mitiu and Natalia Raischi:  <a href="https://www.researchgate.net/publication/319878124_Emissions_of_pollutants_and_air_quality_in_the_area_of_influence_of_high_voltage_overhead_electrical_lines">https://www.researchgate.net/publication/319878124_Emissions_of_pollutants_and_air_quality_in_the_area_of_influence_of_high_voltage_overhead_electrical_lines</a>).</p>	This site should be removed from the LPR

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				This would add to the pollution caused by the M4.	
RSA10	Whitehart Meadow	Object Reason 5	Unsound	The site suffers from groundwater flood risk and much of it is in flood zone 2	This site should be removed from the LPR
RSA10	Whitehart Meadow	Object Reason 6	Unsound	High groundwater levels (25cm blow ground level according to the Drainage Officer's comment in the HELAA) preclude infiltration as a SUDS solution.	This site should be removed from the LPR
RSA10	Whitehart Meadow	Object Reason 7	Unsound	The site is the source of the Sulham Brook and the high peat content of its soil attenuates surface water run-off into the brook. Any development of the site would significantly reduce this attenuation and increase the flood risk downstream (the brook flooded part of Pangbourne in 2007).	This site should be removed from the LPR
RSA10	Whitehart Meadow	Object Reason 8	Unsound	Traffic generated from housing on the site would contend with the traffic from the congested High Street at the Hoad Way Junction and with that on the busy A4, particularly in the morning peak. This would add to congestion in the High Street, at the Hoad Way/A4 roundabout and at M4 J12. It would also exacerbate traffic problems elsewhere in the highway network in Theale as described in the comments on Policy SP14	This site should be removed from the LPR
RSA10	Whitehart Meadow	Object Reason 9	Unsound	The use identified in the HELAA is "Employment uses (B2/B8)". Residential	This site should be removed from the LPR

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				use is therefore contrary to policy SP1 of this plan which states that “allocations will be related to the role and function of settlements and the development opportunities identified through the HELAA”.	
RSA10	Whitehart Meadow	Object Reason 10	Unsound	<p>The reasons for removing this site from the Housing Site Allocations DPD are still valid: The site was assessed in the 2013 Strategic Housing Land Availability Assessment (HELAA site ref was THE002) as ‘potentially developable’. The site was subsequently assessed in more detail during the preparation of the Housing Site Allocations Development Plan Document, whereby the site was not recommended for allocation due to the location of the site adjacent to the M4 (and resultant noise and air quality issues), and the location of a pylon in the centre of the site.</p> <p>In addition, the Environment Agency strongly recommended that the site was not allocated due to majority of it being in Flood Zone 2. A sequential test would have been required to allocate the site in the Housing Site Allocations Development Plan Document. Other suitable sites with a lower risk of flooding</p>	This site should be removed from the LPR

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				were not available in Theale and across the district, so the Council would have been unable to carry out the sequential test.	
RSA10	Whitehart Meadow	Object Reason 11	Unsound	The site is not included in the West Berkshire Strategic Traffic Model, meaning that the model is not accurate and that the effect of traffic generated from this site has not been assessed.	The site should be removed from the LPR
RSA10	Whitehart Meadow	Object Reason 12	Unsound	The site is not included in the Air Quality Assessment, meaning that the Assessment is not accurate	The site should be removed from the LPR
RSA10	Whitehart Meadow	Object Reason 13	Unsound	The subsoil has a high peat content. Peat is a major store of carbon. Excavation of the soil would therefore release CO2 into the atmosphere and exacerbate climate change. This would be contrary to policy SP5 of the plan	The site should be removed from the LPR
RSA10	Whitehart Meadow	Object Reason 14	Unsound	This site is very close to the A4 and M4 Junction 12. This means that many journeys will be by private car, which is unsustainable	The site should be removed from the LPR
RSA11	Former Theale Sewage Treatment Works	Object Reason 1		Section 4.35 of the Core Strategy contained the following statement: "The Lakeside development has planning permission to provide 350 homes in a range of different sizes and types, which would become a well-integrated part of the Theale community. If this development goes ahead, Theale would	The site should be removed from the LPR

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				<p>need to undergo a period of consolidation to provide an opportunity for facilities and services to be upgraded". Housing construction on this development has not yet commenced, although Outline permission has been granted for up to 325 homes and Reserved Matters permission has been granted for part of the site.</p> <p>In addition, outline permission has been granted for 104 homes on the adjacent site between The Green and the A340 (LPR site RSA9). These two sites will increase the number of homes in Theale by almost 25% when built out.</p> <p>Therefore, that statement is still valid and no justification has been given for not carrying that section forward to the LPR. Theale still needs that "period of consolidation".</p>	
RSA11	Former Theale Sewage Treatment Works, Theale	Object Reason 2	Unsound	The site is bounded by the M4 motorway and thus subject to noise and air pollution. The latter is exacerbated in the morning peak because the M4 eastbound frequently slows to a crawl or standstill past this site. This worsens air pollution because:	This site should be removed from the LPR

Section/ Policy	Subsection/ Title	Support/ Object/ Comment	Sound/ Unsound	Reason	Required Change
				<ul style="list-style-type: none"> <li>• The density of vehicles increases as they close up, producing more pollution in a given length of road</li> <li>• Vehicle engines produce more pollution when idling or running slowly</li> </ul> <p>The pollution does not disperse so widely because it is not dispersed by moving traffic.</p>	
RSA11	Former Theale Sewage Treatment Works, Theale	Object Reason 3	Unsound	<p>High voltage power lines run past the site. In addition to visual intrusion and danger of electrocution (e.g. from climbing ladders or scaffolding or from flying kites), scientific research shows that they generate ozone and nitrogen oxide air pollution (increased by 13% and 30% over normal levels according to paper "Emissions of pollutants and air quality in the area of influence of high voltage overhead electrical lines" by Cociorva Danut, Mihaela Andreea Mitiu and Natalia Raischi:  <a href="https://www.researchgate.net/publication/319878124_Emissions_of_pollutants_and_air_quality_in_the_area_of_influence_of_high_voltage_overhead_electrical_lines">https://www.researchgate.net/publication/319878124_Emissions_of_pollutants_and_air_quality_in_the_area_of_influence_of_high_voltage_overhead_electrical_lines</a>).</p>	This site should be removed from the LPR

Section/ Policy	Subsection/ Title	Support/ Object/ Comment	Sound/ Unsound	Reason	Required Change
				This would add to the pollution caused by the M4.	
RSA11	Former Theale Sewage Treatment Works, Theale	Object Reason 4	Unsound	The site is severely contaminated from its history as a sewage works (until the mid-1980s) and as a depot for the old Bradfield Rural District Council. It is also rumoured to have been used as a waste site by the RDC. The cost of decontamination could make the provision of affordable housing on the site unviable, and perhaps make development of the site unviable.	This site should be removed from the LPR
RSA11	Former Theale Sewage Treatment Works, Theale	Object Reason 5	Unsound	A large proportion of the site is in flood zone 2. The site also is at risk from surface water and groundwater flooding (please see relevant section in the HELAA). This significantly reduces the extent of deliverable land and the latter makes SUDS problematic.	This site should be removed from the LPR
RSA11	Former Theale Sewage Treatment Works, Theale	Object Reason 6	Unsound	The access to the site would be from the single-track end of Blossom Lane. Blossom Lane is very narrow in places and also has narrow footways. The footway on its southern side (that most likely to be used by pedestrians from the site) is not continuous, meaning that pedestrians would either have to walk in the road or cross it twice giving road safety concerns.	This site should be removed from the LPR

Section/ Policy	Subsection/ Title	Support/ Object/ Comment	Sound/ Unsound	Reason	Required Change
				<p>The majority of pedestrians walking to the western end of Theale High would walk along Blossom Lane and Crown Lane. Crown Lane's footways are extremely narrow, only 60cm in places, meaning that pedestrians would have to step off footways to pass each other. There is no footway at all on the west side of Crown Lane at its southern end.</p> <p>The combination of increased pedestrian traffic and narrow and missing footways means increased numbers of pedestrians walking in, and crossing, the road. This, in combination with increased vehicle movements caused by the development would pose serious road safety dangers.</p>	
RSA11	Former Theale Sewage Treatment Works, Theale	Object Reason 7	Unsound	<p>The majority of traffic accessing the site would use Crown Lane*. It would impose another 41 to 44 movements in the am peak and 34 to 41 in the pm peak on this road**. This would cause the following problems:</p> <ul style="list-style-type: none"> <li>• The lane is effectively single-track because its eastern side is a parking bay reserved for residents.</li> <li>• Opposing vehicles could cause gridlock.</li> </ul>	This site should be removed from the LPR

Section/ Policy	Subsection/ Title	Support/ Object/ Comment	Sound/ Unsound	Reason	Required Change
				<ul style="list-style-type: none"> <li>• Contention with traffic on the convoluted junction with the High Street would increase tailbacks on Crown Lane.</li> <li>• It would add to congestion on the High Street and at the Station Road mini roundabout.</li> </ul> <p>10 to 14 vehicles accessing the site would use the Play Platt/Englefield Road junction in both peaks*.</p> <p>This would exacerbate the existing delays of 40 seconds in the am peak at this junction. It would also exacerbate traffic problems elsewhere in the highway network in Theale as described in the comments on Policy SP14</p> <p>* Traffic movement information from the traffic assessment in the planning statement for planning application 16/02850/OUTMAJ, 88 homes at Former Sewage Treatment Works Theale, adjusted for 60 homes</p>	
RSA11	Former Theale Sewage Treatment Works, Theale	Object Reason 8	Unsound	The reasons that the site was not allocated in the Housing Site Allocations DPD are still valid:	This site should be removed from the LPR

Section/ Policy	Subsection/ Title	Support/ Object/ Comment	Sound/ Unsound	Reason	Required Change
				<p>When the preferred options version of the Housing Site Allocations Development Plan Document was consulted upon, significant concern was raised regarding access to the site, with limited scope for improvements to be made without acquiring third party land. Further technical work was carried out following preferred options, in particular landscape assessment work indicated that the site would be suitable for development subject to various mitigation measures, including a buffer to separate the site from the existing village. As a result, the site was not considered to be well related to the existing settlement and could result in a negative impact in terms of impact on the character of the built environment.</p> <p>At the submission stage, the site was not recommended for allocation.</p>	
RSA11	Former Theale Sewage Treatment Works, Theale	Object Reason 9	Unsound	The site is not included in the West Berkshire Strategic Traffic Model, meaning that the model is not accurate and that the effect of traffic generated from this site has not been assessed.	This site should be removed from the LPR
RSA11	Former Theale Sewage	Object Reason 10	Unsound	The site is not included in the Air Quality Assessment, meaning that the Assessment is not accurate	. The site should be removed from the LPR

Section/ Policy	Subsection/ Title	Support/ Object/ Comment	Sound/ Unsound	Reason	Required Change
	Treatment Works, Theale				
RSA11	Former Theale Sewage Treatment Works, Theale	Object Reason 11	Unsound	The subsoil on the site is made up of peat (when the adjacent part of the Woodfield Way estate was built, peat to a depth of approximately two metres was excavated). Peat is a very good store of carbon. This carbon would be released as CO2 when excavated to build out the site, exacerbating climate change contrary to policy SP5	The site should be removed from the LPR
RSA11	Former Theale Sewage Treatment Works, Theale	Object Reason 12	Unsound	This site is close to the A4 and M4 Junction 12. This means that many journeys will be by private car, which is unsustainable	The site should be removed from the LPR
ESA6	Land adjacent to Padworth IWMF, Padworth Lane	Comment	Sound	The site contains the remnants of equipment and machinery to load trains with oil products and tranship between road and rail. It is therefore extremely likely to be contaminated.	Point (h) should be reworded to require an intrusive contaminated land assessment and remediation measures.
DM1	Residential Development in the Countryside	Support	Sound		
DM2	Separation of Settlements around Newbury and Thatcham	Object	Unsound	The policy should require gaps between other settlements, such as: <ul style="list-style-type: none"> <li>• Between Theale and Calcot/ Tilehurst</li> <li>• Between Pangbourne and Purley-on-Thames</li> </ul>	The policy should be re-titled as “Separation of Settlements” and the list of settlements should be expanded to include: <ul style="list-style-type: none"> <li>• Theale and Calcot/Tilehurst</li> <li>• Pangbourne and Purley-on-Thames</li> </ul>

<b>Section/ Policy</b>	<b>Subsection/ Title</b>	<b>Support/ Object/ Comment</b>	<b>Sound/ Unsound</b>	<b>Reason</b>	<b>Required Change</b>
DM3	Health and Wellbeing	Support	Sound		
DM4	Building Sustainable Homes and Businesses	Comment	Sound	The policy covers building standards, renewable energy developments and carbon offsetting. These are three very different subjects and should be covered by different policies. The subject matter is supported.	The policy should be divided into three policies to cover each of the three subjects separately.
DM5	Environmental Nuisance and Pollution Control	Support	Sound		
DM6	Water quality	Support	Sound		
DM7	Water Resources and Waste Water	Support	Sound		
DM8	Air Quality	Support	Sound		
DM9	Conservation Areas	Support	Sound		
DM10	Listed Buildings	Support	Sound		
DM11	Non-designated Heritage Assets	Support	Sound		
DM12	Registered Parks and Gardens	Support	Sound		
DM13	Registered Battlefields	Support	Sound		

<b>Section/ Policy</b>	<b>Subsection/ Title</b>	<b>Support/ Object/ Comment</b>	<b>Sound/ Unsound</b>	<b>Reason</b>	<b>Required Change</b>
DM14	Assets of Archaeological Importance	Support	Sound		
DM15	Trees, Woodland and Hedgerows	Support	Sound		
DM19	Specialised Housing	Comment	Sound		Policy should contain a requirement that proposals should comply with all other relevant policies in this plan.
DM20	Gypsies, Travellers and Travelling Showpeople	Object	Unsound	Travelling showpeople are a separate community group and shouldn't be included in the same policy as gypsies and travellers	A separate policy should be written for travelling showpeople
DM21	Retention of Mobile Home Parks	Support	Sound		
DM24	Conversion of Existing Redundant or Disused Buildings in the Countryside to Residential Use	Support	Sound		
DM25	Replacement of Existing Dwellings in the Countryside	Comment Support	Sound	Points (d), (e) and (f) should be subservient to point (c). Otherwise, policy is supported.	Points (d) to (f) should be renumbered in a different series to (a) to (c), and points (f) to (i) renumbered from (d) to (g)

Section/ Policy	Subsection/ Title	Support/ Object/ Comment	Sound/ Unsound	Reason	Required Change
DM28	Residential Extensions	Support	Sound		
DM29	Residential Annexes	Support	Sound		
DM30	Residential Space Standards	Support	Sound		
DM31	Residential Amenity	Object	Sound	Object to “where possible” in point (iv). This would provide a “get out” for developers that would undermine the policy. Gardens should always conform to the minimum length of 10.5 metres. Otherwise, policy is supported	“where possible” should be removed from point (iv)
DM32	Designated Employment Areas	Object	Unsound	Office developments in DEAs should be subject to the sequential test	The sentence “New office proposals located within a DEA will not be required to satisfy the sequential test” should be removed from the policy
DM32 Designated Employment Areas	12.7	Object	Unsound	The statement that “the redevelopment and regeneration of land within DEAs to provide additional business development that meets the needs of the District will be supported” is not restrictive. It is likely to lead to the loss of occupations, particularly “blue collar” ones within DEAs.	Section 12.7 should be removed.
DM32 Designated Employment Areas	12.9	Object	Unsound	Office developments in DEAs should be subject the sequential test	The last sentence of section 12.9 should be removed

Section/ Policy	Subsection/ Title	Support/ Object/ Comment	Sound/ Unsound	Reason	Required Change
DM34	Retail Parks	Object		The IKEA and Dunelm retail warehouses are not an integral part of the retail park centred on Sainsburys Calcot. IKEA, in particular, is very prominent in the landscape and causes severe traffic congestion at times. Pincents Lane, and its junction with the A4, is not suitable for the volume of traffic attracted by large retail premises. Any future development proposal for the IKEA or Dunelm site should not be for retail.	“Pincents Lane, Calcot” should be renamed “Calcot Retail Park” and its boundary in the Policies Map should be redrawn to exclude the Dunelm and IKEA sites.
DM37	Equestrian and Horseracing industry	Object	Unsound	This policy is covering two distinct subjects. It is aiming to control equestrian developments and to support the horseracing industry.	The policy should be replaced by two: one for proposed equestrian developments and one to support the horseracing industry.
DM39	Local Community Facilities	Support	Sound		
DM40	Public Open Space	Support	Sound		
DM41	Digital Infrastructure	Object	Sound	Telecommunications infrastructure should be required. Policy is otherwise supported.	“should consider” in point d should be reworded as “should accommodate”.
DM42	Transport Infrastructure	Support	Sound		
DM43	Theale Rail-road Transfer Site	Object	Unsound	Vehicular access to the currently undeveloped southern part of the site (former builder’s yard) could have an adverse impact on residents in Wigmore Lane	Policy should require that access to the currently undeveloped southern part of the site (former builder’s yard) should avoid the residential part of Wigmore Lane

<b>Section/ Policy</b>	<b>Subsection/ Title</b>	<b>Support/ Object/ Comment</b>	<b>Sound/ Unsound</b>	<b>Reason</b>	<b>Required Change</b>
DM44	Parking	Comment	Unsound	No parking requirements for dwellings larger than 4-bedrooms are given. Otherwise, support policy	The parking requirements table should be expanded to cover at least 5-bedroom houses.
DM45	Travel Planning	Support	Sound		
Table 10 Monitoring Indicator 1 - Climate Change	Number and percentage of residential development (one or more dwellings) applications approved which include renewable, zero and low carbon energy technologies	Object	Unsound	No target is given for “Number and percentage of residential development (one or more dwellings) applications approved which include renewable, zero and low carbon energy technologies	A challenging target should be given
Table 10 Monitoring Indicator 1 - Climate Change	Number and percentage of non-residential development (100sqm or more) applications approved which include renewable, zero and low	Object	Unsound	No target is given.	A challenging target should be given

Section/ Policy	Subsection/ Title	Support/ Object/ Comment	Sound/ Unsound	Reason	Required Change
	carbon energy technologies				
Table 11 Monitoring Indicator 2 - Housing	To meet the housing requirement to 2039	Object	Unsound	The target of 538 is the top of the range of 513 to 538 dwellings per annum given in policy SP12. It should be the minimum in the range given in policy SP12: 513 dwellings per annum.	The target should be changed to 513 dwellings per annum (the minimum in the range)
Table 11 Monitoring Indicator 2 - Housing	To maintain Five Year Housing Land Supply	Object	Unsound	The Secretary of State's Written Statement of 6th December 2022 removed the need to maintain a 5-year housing supply for Local Authorities with up-to-date Local Plans	The target should be removed.
Table 11 Monitoring Indicator 2 - Housing	To optimise the use of previously developed land	Object	Unsound	No target is given for the use of previously developed "brownfield" land. Use of brownfield land is a government and council priority. Also, use of brownfield land minimises the use of greenfield land.	A challenging target should be given for the use of previously developed "brownfield" land.
Table 11 Monitoring Indicator 2 - Housing	To provide affordable housing to meet local need	Comment	Unsound	The target of 30-40% on site of 10+ dwellings does not make it clear that 30% is for developments on brownfield land and 40% is for developments on greenfield land.	The wording should be changed to make it clear that 30% is for developments on brownfield land and 40% is for developments on greenfield land.
Table 11 Monitoring Indicator 2 - Housing	Number of net dwellings completed by dwelling size	Comment	Sound	No target is given.	A target should be given that is based on those in Policy SP18/Table 3.
Table 14 Monitoring Indicator 5 -	Number and details of sites identified	Object	Unsound	Target of "decrease in numbers" is not suitable as a reduction could be caused by total loss of sites.	A more meaningful target should be given.

<b>Section/ Policy</b>	<b>Subsection/ Title</b>	<b>Support/ Object/ Comment</b>	<b>Sound/ Unsound</b>	<b>Reason</b>	<b>Required Change</b>
Culture and Heritage	Heritage at Risk Register				
Appendix 5	Residential Parking Zone - Pangbourne, Theale and Eastern Settlements	Comment	Unsound	Pangbourne Zone 2 and Eastern Urban Area zones overlap, causing potential confusion	Map should be re-drawn to avoid zones overlapping
Appendix 6	The impact of the five year housing land supply on a NDP	Object	Unsound	The Secretary of State's Written Statement of 6th December 2022 removed the need to maintain a 5-year housing supply for Local Authorities with up-to-date Local Plans	This section should be removed from the LPR.
Policies Map		Comment	Unsound	The policies map does not show the following for Theale: <ul style="list-style-type: none"> <li>• primary shopping area</li> <li>• two conservation areas</li> </ul>	The map should be updated