### **Consultation Statement for the**

# **Proposed Submission West Berkshire Local Plan Review 2022-2039**

#### December 2022

#### Introduction

This statement has been prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012<sup>1</sup> (the 2012 Regulations) Regulation 19). This Regulation sets out the documents that must be submitted to the Secretary of State alongside the Local Plan Review (LPR). Amongst these are a statement setting out:

With regard to the preparation of the Local Plan (Regulation 19)

- Which bodies and persons have been invited to have involvement in the preparation of the plan;
- How these bodies and persons were invited to make their representations;
- A summary of the main issues raised; and
- How those main issues have been taken into account in the Proposed Submission LPR.

## Statement of Community Involvement (SCI)

A key part of the plan preparation process is involving the local community and stakeholders. The Council's revised Statement of Community Involvement (SCI)<sup>2</sup> was adopted in January 2020.

The SCI sets out the Council's policy, and standards it will seek to achieve, to ensure meaningful and effective consultation, engagement and involvement of consultees, stakeholders and other interested members of the community in the preparation of documents that make up the Local Plan and in the consideration of planning applications that are determined by the Council. All consultations on the LPR have been carried out in accordance with the details set out in the SCI.

### **Bodies and Persons Consulted**

Opportunities for statutory bodies, other organisations and local residents and businesses to be involved in the preparation of the Local Plan is provided by Regulation 18 of the 2012 Regulations.

Regulation 18 (2) (a) specifies that 'specific consultation bodies' that the Council consider may have an interest in the context of the Local Plan should

<sup>&</sup>lt;sup>1</sup> Town and Country Planning (Local Planning) (England) Regulations 2012: http://www.legislation.gov.uk/uksi/2012/767/contents/made

<sup>&</sup>lt;sup>2</sup> Statement of Community Involvement: <a href="https://info.westberks.gov.uk/localplan">https://info.westberks.gov.uk/localplan</a>

be notified of its intended preparation and invited to make representations on what it ought to contain. The 'specific consultation bodies' that were notified and invited to make comment on the LPR are as set out in Appendix A of the SCI. These bodies are all included on the Council's Planning Policy consultation database.

Regulation 18 (2) (b) specifies that other 'general consultation bodies' that the Council considers appropriate be notified of the subject of a Local Plan and invited to make representations on what it ought to contain. These are defined in Regulation 2 (1) of the 2012 Regulations as:

- Voluntary bodies some or all of whose activities benefit any part of West Berkshire;
- Bodies representing the interests of different racial, ethnic or national groups in West Berkshire;
- Bodies representing the interests of different religious groups in West Berkshire;
- Bodies representing the interests of disabled persons in West Berkshire;
- Bodies representing the interests of business in West Berkshire.

The various 'general consultation bodies' consulted on the LPR are also listed in Appendix A of the SCI.

Regulation 18 (2) (c) requires the Council to consider which residents and persons carrying on business in the District are appropriate to be notified of the subject of the LPR and invited to make representations on what it ought to contain. The Council's Planning Policy consultation database contains a list of all those individuals who have expressed an interest and/or made comment during plan preparation. Each individual has been notified of subsequent consultations. There are approximately 1500 "active3" individuals, organisations and businesses on the Planning Policy consultation database.

Bodies and persons on the Planning Policy consultation database have been notified and invited to comment on draft documents published at particular stages of plan preparation – as detailed in subsequent sections. The method of notification has primarily been by email or letter when no email address is available. Copies of documents have not been provided as a matter of course but the notification has advised:

- Where documents can be viewed and downloaded from the Council's website;
- Where paper copies of documents can be viewed; and
- Email, telephone and postal contact details to obtain further information.

<sup>&</sup>lt;sup>3</sup> "active" consultees are those who have confirmed that they wish to be kept in contact regarding the plan making process since 2017 when the Planning Policy consultation database was last reviewed.

# Consultation on the preparation of the Local Plan Review (LPR)

### **Summary**

The review of the Local Plan started in 2018 and included public consultation on the scope and content of the LPR, a second round of consultation in November/December 2018 and then consultation on the Emerging Draft LPR in December2020/February 2021.

In addition, preparation of the LPR has been informed by engagement under the Duty to Co-operate (DtC) that has been undertaken with other local authorities and bodies throughout the plan preparation period to date. A complete record of engagement under the DtC is given in the separate Statement of Compliance on the Duty to Cooperate (The DtC Statement) which will be published alongside the Proposed Submission LPR.

### Scope and content of the LPR

Between 12<sup>th</sup> February and 26<sup>th</sup> March 2018 the Council invited comments from the public on the proposed scope and content of the LPR by publishing a Local Plan Review Scoping Report. Comments were also invited on the accompanying Sustainability Appraisal (SA) Scoping Report. All of the bodies and persons included on the Planning Policy consultation database were notified by email or letter and invited to comment. The notification letter is attached in Appendix A. The consultation documents were published on the Council's website and were also available to view at the Council's Market Street offices in Newbury.

In all, there were 81 respondents to the consultation with some respondents commenting on all questions and others only commenting on those questions of specific interest to them. The detailed feedback received and information on the next steps the Council would take are contained within the LPR Scoping Report Consultation Statement which is included in Appendix B.

## **Regulation 18 Consultation**

The Council undertook a second round of consultation between 9<sup>th</sup> November and 21<sup>st</sup> December 2018 seeking views on its proposed:

- Vision for the Local Plan Review
- Revision of the existing spatial areas
- Methodology for reviewing the existing settlement hierarchy
- Criteria for the settlement boundary review
- Update of the assessment of existing Local Plan policies

This took into account revised national policy as set out in the revised National Planning Policy Framework that was published in July 2018 and the revisions made to parts of the National Planning Policy Guidance.

All of the bodies and persons included on the Planning Policy consultation database were notified by email or letter and invited to comment. The consultation document was published on the Council's website and was available to view at the Council's offices in Market Street, Newbury. The notification letter is attached in Appendix C

In all there were 123 respondents to the consultation with some commenting on all questions and others only commenting on those questions of specific interest to them. There were 438 comments made in total. A consultation statement was published in June 2019 setting out the feedback received and the next steps the Council would follow and this is set out in Appendix D.

## **Emerging Draft LPR**

In December 2020 the Council published the emerging draft version of the LPR for public consultation from 11<sup>th</sup> December 2020 to 5<sup>th</sup> February 2021. All of the bodies and persons included on the Planning Policy consultation database were notified by email or letter and invited to comment. The notification letter is attached in Appendix E. The consultation document was published on the Council's website and was also available to view at the Council's offices in Market Street, Newbury.

Individual Reponses were received from over 700 organisations and individuals making a total of 2265 separate comments. The detailed feedback received is contained in Appendices F-J.

The main changes made to the LPR as a result of the consultation on the Emerging Draft LPR are set out in the table below. Where relevant, these include amendments as a result of changes to the evidence base and updated national guidance. Other changes have also been made to the LPR since the Emerging Draft version was published, but where these relate to matters of clarification, editorial changes or factual changes they are not listed below.

Emerging Draft LPR Policy/Section	No of respon ses	Comments on substantive issues raised and changes made
Introduction & Background	37	Detailed issues only which are picked up in Appendix F
Context	16	Detailed issues only which are picked up in Appendix F
Vision	28	Detailed issues only which are picked up in Appendix F
Strategic Objectives	31	Housing Objective amended to ensure that the LPR delivers on the vision of prioritising the delivery of housing of different types, sizes and tenures to meet local needs.

Development Strategy: Our place based approach		
Background	18	Detailed issues only which are picked up in Appendix G
Spatial Areas	17	Some objections to the combining of The Eastern Area and the Eastern Urban Area. In strategic planning terms the existing Eastern Area is now very small and is very difficult to plan for in isolation. This has since created challenges in delivery. In reality, combining the two existing spatial areas is more practical and gives the Council more flexibility in strategic planning terms.
SP1 Spatial Strategy	75	Amendment to the reference to neighbourhood plans to reflect the position of sites being allocated in 'some' NPAs. Main changes reflect Policy SP20 and new SP22 Town and District Centres. A significant addition to the policy refers to the rural economy, Rural Service Centres and Service Villages. The reference to new allocations within the Cold Ash NDP has been deleted, as well as allocations for Tilehurst and Burghfield and in the North Wessex Downs AONB NPAs following comments from Parish Councils. Reference made to the addition of a new DM policy relating to the separation of settlements around Newbury and Thatcham.
SP2 North Wessex Downs AONB	39	Detailed issues only which are picked up in Appendix G
SP3 Settlement hierarchy	50	Amendments to the policy and supporting text have addressed consultee comments associated with infill or changes of use in Rural Service Centres and Service Villages (through the deletion of the reference to 'other development' and 'other minor development'). The supporting text was updated in relation to AWE.
SP4 AWE	21	The policy has been extensively reworded based on Emergency Planning's comments
	0	our environment & surroundings
SP5 Responding to Climate Change	43	Detailed issues only which are picked up in Appendix G
SP6 Flood Risk	28	The policy has been strengthened to include reference to Natural Flood Management (NFM). The Environment Agency also identified that some of the sites which are proposed for allocation would need to be subject to a Level 2 Strategic Flood Risk Assessment. This has now taken place.
SP7 Design Principles	32	The policy has been amended to clarify that the National Design Guide provides the framework for the policy. Further detail is then provided in the supporting text.
SP8 Landscape Character	24	Comments that the policy needed to be revised to distinguish between the hierarchy of international, national and locally designated sites (as per paragraph 171 of the NPPF) and identify those landscapes that are valued (as per paragraph 170). There is no definition of 'valued landscape' in the NPPF and the Council has adopted an evidence based approach. Policy slightly amended for clarity.

SP9 Historic Environment	24	Amendments have been made to the policy to more accurately reflect the wider proactive strategy the Council is adopting towards the conservation and enjoyment of the historic environment. The supporting text has been clarified to set out the programme of CAAs the Council intends to undertake. The policy has been amended to more accurately reflect the 'balanced judgement' approach to non-designated heritage assets as set out in the NPPF. Policy has also been amended to include enabling development which was originally contained as part of DC1.
SP10 Green Infrastructure	34	The definition of GI has been clarified. The policy has been updated to refer to the Green Infrastructure Framework currently being produced by Natural England. The policy has been strengthened with regard to long term maintenance requirements for major applications. Policy also strengthened in relation to PROW.
SP11 Biodiversity and geodiversity	34	A number of amendments have been made to the LPR in order to strengthen the policy protection to the water environment within the District. With regards to the hierarchy of sites, the policy and supporting text have been updated to better reflect paragraph 175 of the NPPF. With regards to the mitigation hierarchy the policy has amended to better reflect paragraph 179 of the NPPF. Reflecting its passage into the Environment Act 2021, Biodiversity Net Gain, has been moved to the start of the policy. The supporting text gives further information and clarifies that net gain has to be measurable against the recognised biodiversity accounting metric. Clarification is now provided on the type of assessment that should support a planning application. The supporting text has been amended to provide more detail on SACs in and outside the District and also amended in respect of nutrient neutrality to make clear the Council's approach is set out in Policy DM6 and that a more detailed Supplementary Planning Document will be produced.
		Delivering housing
SP12 Approach to Housing Delivery	83	A number of planning agents, on behalf of landowners or developers have argued for a higher housing requirement, raising the issues of meeting Reading's need, increasing delivery of affordable homes and supporting economic growth. Some agents questioned the use of a range for the housing requirement and felt the upper end should be a minimum figure.  On the supply side the main issues raised were the overreliance on large strategic sites which can be slow to deliver and the size of the windfall allowance, with agents generally arguing that it was too high and individuals and local and parish councils feeing it was not high enough.  It is not considered that a change in approach is required. The NPPF expects authorities to follow the standard method to assess need, and it is considered that a housing requirement that is slightly higher than the LHN, demonstrating that the assessed need can be met, is appropriate. The use of a range

		to express the requirement introduces some flexibility.  With regard to housing land supply, the Council approach is for a mix of sites, the strategic sites which can delivering infrastructure, facilities and significant numbers of affordable homes and a larger number of medium and smaller sites (including brownfield sites within settlement boundaries) that can deliver housing sooner. The windfall allowance is considered appropriate; it is a modest one based on past delivery on small sites. This also introduces some flexibility. Though the Council needs to be able to demonstrate that the housing requirement can be met in a plan- led fashion rather than relying on brownfield land to come forward at the
		appropriate time, larger sites within settlement boundaries that do come forward will further boost supply.  The policy has been updated to take account of the 2022 Local Housing Need and the updated housing supply position.
SP13 Sites allocated for residential and mixed-use development in Newbury and Thatcham	56	Some of the sites proposed for allocation in the emerging draft LPR have been removed due to changing circumstance such as revised national guidance on ancient woodland, concerns around deliverability, and the decision not to allocate sites within settlement boundaries.
SP14 Sites allocated for residential development in Eastern Area	41	The supporting text has been updated to recognise that if the DEPZ around AWE is reviewed and the emergency planning arrangements reviewed, then future reviews of the Local Plan will consider if a strategic allocation in the Grazeley area would be suitable.  Some of the sites proposed for allocation in the emerging draft LPR have been removed, due to development of sites being rolled forward from the current Local Plan being at an advanced stage of construction, and also because of the AWE Burghfield DEPZ. The development potential for two of the allocations has also been reduced following the completion of landscape sensitivity and capacity assessment.
SP15 Sites allocated for residential development in North Wessex Downs AONB	32	Some of the sites proposed for allocation in the emerging draft LPR have been removed due to development of sites being rolled forward from the current Local Plan being at an advanced stage of construction.
SP16 Sandleford strategic site allocation	40	Concern about the number of dwellings and the impact on the countryside, local roads and services in general. Warren Rd of particular concern. Lack of infrastructure provision to cope with housing. The landscape is highly valued and the site and woodlands are considered to have high ecological value and should not be developed
SP17 North East Thatcham Strategic Site Allocation	446	In response to the large number of objections to this site covering a range of issues important to local people, but largely around the environmental impact of the proposal and the impact on local infrastructure, the Council has taken the

		decision to reduce the number of dwellings on the site and to allocate it for 1500 dwellings for delivery over the plan period. This still enables a strategic level of development which can provide onsite community facilities. It is noted, that compared to a higher number of dwellings, this option may not deliver all of the education provision originally envisaged on the site, or the additional improvements to community infrastructure within Thatcham.
SP18 Housing type and mix	13	Comments received that NDPs should be able to set a different housing mix requirement locally. Flexibility has been introduced into the Policy where developments will be expected to reflect this mix, however, rigid application of these requirements may not be appropriate in all cases.  The Policy has been amended to require all new dwellings to meet the higher accessibility standards under Part M4 (2) of the Building Regulations.
SP19 Affordable Housing	30	Reference to affordable housing remaining at an affordable price for future generations of eligible households has been included in the final paragraph of the Policy and explained in more detail in the supporting text. The tenure split in the proposed policy has been amended to reflect the requirement to deliver First Homes. Policy has been amended to acknowledge the different circumstances relating to affordable housing provision on proposed C2 residential care developments and their specific operational characteristics. Additional text added at end of supporting text of Policy SP19 to also show specific support for affordable community led housing schemes.
Foste	ring econ	omic growth & supporting local communities
SP20 Strategic approach to economic development and hierarchy of centres	35	Policy redrafted to take into account updated evidence (taking account of Covid and Brexit) and to reflect NPPF requirements. In addition, the text relating to town centres has been removed and a new standalone policy created to address town and district centres - Proposed Submission LPR Policy SP22.
SP21 Sites allocated for economic development	92	Policy amended to reflect new site allocations and DEAs. Some Reg. 18 sites had to be removed due to their location within the DEPZ and landscape impact. New allocations are set out within SP21 to assist in meeting the updated identified need for industrial land (ELR, 2022). As a result of identifying site allocations, and to guide future development on the allocated site, each site has a new site specific policy Policy ESA 1-6.
SP22 Transport	27	Detailed issues only which are picked up in Appendix G
SP23 Infrastructure requirements and delivery	12	Detailed issues only which are picked up in Appendix G. Appendix 5 of the Emerging Draft LPR has been deleted.
Sites allocated for residential development		
RSA1 The Kennet	14	The allocation has been removed due to flood risk. As the site

Centre, Newbury		lies within the settlement boundary there is already a presumption in favour of development as set out in Policy SP1.
RSA2 Land north of Newbury College, Monks Lane, Newbury	5	The policy now requires that an integrated water supply and drainage strategy is provided in advance of development.
RSA3 Land at Bath Road, Speen, Newbury	5	The policy now requires that an integrated water supply and drainage strategy is provided in advance of development. To reflect the fact that the site lies within the Nutrient Neutrality Zone for the River Lambourn SAC a Habitats Regulations Assessment will be required to accompany any future planning application. This will be supported by an appropriate Nutrient Neutrality Assessment and Mitigation Assessment. Mitigation required will need to be operational and in place prior to any nutrient pollution being discharged. Mineral Safeguarding Area so criterion added requiring consideration of Policy 9 of the MWLP.
RSA4 Land at Coley Farm, Stoney Lane, Newbury	9	The policy now requires that an integrated water supply and drainage strategy is provided in advance of development. A Construction and Operations Management Plan (COMP) required to safeguard the oil pipeline running through the site. Mineral Safeguarding Area so criterion added requiring consideration of Policy 9 of the MWLP.
RSA5: Land adjoining New Road, Newbury	7	The allocation has been removed due to the adverse impact on the surrounding Ancient Woodland.
RSA6 Land off Greenham Road and New Road, South East Newbury	5	The site is currently allocated in the Housing Site Allocations DPD which forms part of the existing Local Plan. It is acknowledged that two of the parcels of land which make up the site have now been built out and so these will be removed from the LPR. The allocation is however being retained across the remaining part of the site that has not yet been built out. The policy has been amended accordingly.
RSA7 Land at Lower Way, Thatcham	7	Policy strengthened to address concerns about potential adverse impacts on the Kennet and Lambourn Floodplain SAC and Thatcham Reedbeds SSSI. The policy now requires that an integrated water supply and drainage strategy is provided in advance of development. Mineral Safeguarding Area so criterion added requiring consideration of Policy 9 of the MWLP.
RSA8 Land at Poplar Farm, Cold Ash	4	The allocation has been removed because it is not considered deliverable at this time.
RSA9 St Gabriel's Farm, The Ridge, Cold Ash	3	The allocation has been removed because development on the site is under construction.
RSA10 Stoneham's Farm, Long Lane, Tilehurst - Site A	4	The policy now requires that an integrated water supply and drainage strategy is provided in advance of development.  Mineral Safeguarding Area so criterion added requiring consideration of Policy 9 of the MWLP. Addition of buffer of at

		least 15m to the ancient woodland. Allocation boundary revised to exclude part of the landscape buffer to the north for clarity.
RSA11 Stoneham's Farm, Tilehurst - Site B	4	The allocation has been removed because development on the site is under construction.
RSA12 72 Purley Rise, Purley on Thames	5	The policy now requires that an integrated water supply and drainage strategy is provided in advance of development. A large part of the site is not considered appropriate for development this is reflected in the amount of the site allocated as required landscape buffer. In the interests of clarity, the Council has adjusted the boundary of the allocated site to remove the landscape buffer.
RSA13 Land adjacent to Junction 12 of M4, Bath Road, Calcot	4	The allocation has been removed because development on the site is under construction.
RSA14 Land adjacent to Bath Road and Dorking Way, Calcot	3	The policy now requires that an integrated water supply and drainage strategy is provided in advance of development.  Mineral Safeguarding Area so criterion added requiring consideration of Policy 9 of the MWLP.
RSA15 Land between A340 and The Green, Theale	5	The policy now requires that an integrated water supply and drainage strategy is provided in advance of development. A Construction and Operations Management Plan (COMP) required to safeguard the oil pipeline running through the site. Mineral Safeguarding Area so criterion added requiring consideration of Policy 9 of the MWLP. Ecological Impact Assessment now required. Policy also makes clear that the required landscape buffer in the western part of the site will be retained outside of the settlement boundary for Theale.
RSA16 Whitehart Meadow, Theale	25	Following landscape evidence, which was obtained in part due to comments from the AONB and Natural England, the housing number has been amended from 100 to 40. The policy includes a list of criteria, and includes specific criterion to limit the impact on the landscape. Criteria added in relation to buffer to watercourse and need for FRA; a detailed water supply strategy; an ecological assessment; and provision of walking and cycling routes. Since the consultation on the emerging draft LPR, other detailed criteria have also been included in the policy to guide the development.
RSA17 Former Theale Sewage Treatment Works, Theale	23	Following landscape evidence, which was obtained in part due to comments from the AONB and Natural England, the housing number has been amended from 70 to 60. The policy includes a list of criteria, and includes specific criterion to limit the impact on the landscape. Criteria added in relation to buffer to watercourse and need for FRA; a detailed water supply strategy; and an ecological assessment. Since the consultation on the emerging draft LPR, other detailed criteria have been included in the policy to guide the development.
RSA18 Land	8	The policy now requires that an integrated water supply and

adjoining Pondhouse Farm, Clayhill Road, Burghfield Common		drainage strategy is provided in advance of development. Further clarification given to the buffer zone to the watercourse and also buffer to Ancient Woodland, Policy strengthened to clarify the requirements in relation to footpath and cycle links.
RSA19 Land to the rear of The Hollies Nursing Home, Reading Road and Land opposite 44 Lamden Way, Burghfield Common	7	The allocation has been removed due to objections from Emergency Planning on grounds of public safety.
RSA20 Land north of A4 Bath Road, Woolhampton	6	The policy has been amended to require an archaeological desk based assessment. The policy now requires that an integrated water supply and drainage strategy is provided in advance of development.
RSA21 Land east of Salisbury Road, Hungerford	4	The allocation has been removed because development on the site is under construction.
RSA22 Land adjoining Lynch Lane, Lambourn	10	The policy now requires that an integrated water supply and drainage strategy is provided in advance of development. A housing phasing plan will be required to ensure development does not outpace delivery of essential network upgrades to the East Shefford Sewage Treatment Works. To reflect the fact that the site lies wihtin the Nutient Neutrality Zone for the River Lambourn SAC a Habitats Regulations Assessment will be required to accompany any future planning application. This will be supported by an appropriate Nutrient Neutrality Assessment and Mitigation Assessment. Mitigation required will need to be operational and in place prior to any nutrient pollution being discharged
RSA23 Land at Newbury Road, Lambourn	7	The policy now requires that an integrated water supply and drainage strategy is provided in advance of development. The policy also includes a criterion to reflect the fact that the site lies within the Nutrient Neutrality Zone for the River Lambourn SAC.
RSA24 Land off Stretton Close, Bradfield Southend	2	The allocation has been removed because development on the site is under construction.
RSA25 Land North of Southend Road, Bradfield Southend	11	The housing number has been amended to 20 based on reassessing the development potential, landscape impact and relationship with the adjacent housing site. Since the consultation on the emerging draft LPR, detailed criteria have been included in the policy to guide the development.
RSA26 Land at Chieveley Glebe, Chieveley	20	The policy now requires the development design and layout to be further informed by a Heritage Impact Assessment. Since the consultation on the emerging draft LPR, detailed criteria have been included in the policy to guide the development.
RSA27 Pirbright	7	The policy now requires that an integrated water supply and

Institute Site, Compton		drainage strategy is provided in advance of development. Policy amended to make clear the former east/west public footpath through the site should be reinstated and the adjacent line of trees and remnants of the hedgerow should be retained. If feasible, access for residents to Compton Primary School and/or The Ilsleys Primary School should also be provided.
RSA28 Land west of Spring Meadows, Great Shefford	9	The policy now requires that an integrated water supply and drainage strategy is provided in advance of development. Since the consultation on the emerging draft LPR, detailed criteria have been included in the policy to guide the development.
RSA29 Land off Charlotte Close, Hermitage	9	The policy now requires that an integrated water supply and drainage strategy is provided in advance of development. Green infrastructure requirements clarified to adopt a more strategic approach to the provision of GI in conjunction with the two other allocations in this part of Hermitage. Development design now seeks opportunities to open up the culvert and contribute to biodiversity net gain. Strengthened requirements in relation to foot and cyclepath linkages. To reflect the fact that the site lies within the Nutrient Neutrality Zone for the River Lambourn SAC a Habitats Regulations Assessment will be required to accompany any future planning application. This will be supported by an appropriate Nutrient Neutrality Assessment and Mitigation Assessment. Mitigation required will need to be operational and in place prior to any nutrient pollution being discharged. Mineral Safeguarding Area so criterion added requiring consideration of Policy 9 of the MWLP.
RSA30 Land to the south east of the Old Farmhouse, Hermitage	9	The policy now requires that an integrated water supply and drainage strategy is provided in advance of development. Green infrastructure requirements clarified to adopt a more strategic approach to the provision of GI in conjunction with the two other allocations in this part of Hermitage.  Development design now seeks opportunities to open up the culvert and contribute to biodiversity net gain. Strengthened requirements in relation to foot and cyclepath linkages.  Amended to introduce some flexibility with regards to access. To reflect the fact that the site lies within the Nutrient Neutrality Zone for the River Lambourn SAC a Habitats Regulations Assessment will be required to accompany any future planning application. This will be supported by an appropriate Nutrient Neutrality Assessment and Mitigation Assessment. Mitigation required will need to be operational and in place prior to any nutrient pollution being discharged. Mineral Safeguarding Area so criterion added requiring consideration of Policy 9 of the MWLP.
RSA31 Land adjoining The Haven, Kintbury	20	Detailed issues only which are picked up in Appendix H
RSA32 New Stocks Farm, Paices Hill,	5	Detailed issues only which are picked up in Appendix H

Aldermaston		
RSA33 Long Copse Farm, Enborne	5	A large part of the site is not considered appropriate for development which is reflected in the amount of the site allocated as required landscape buffer. In the interests of clarity, the Council has adjusted boundary of the allocated site to remove the landscape buffer. Policy also amended to require an ecological impact assessment, to clarify the criterion on the buffer to the Ancient Woodland to be informed by an assessment, and to be considerate of the M+WLP.
	De	velopment Management Policies
All DC poli	cies amen	ded to DM policies for the Proposed Submission LPR
DC1 Development in the countryside	21	Policy has been amended to cover residential development in the countryside only. This is in the interests of clarity. Proposed Submission LPR Policy DM35 will set out the Council's approach to sustaining a prosperous rural economy. Policy SP1 has been amended to highlight the principle that proposals to strengthen and diversify the rural economy will be encouraged.
DC2 Health and wellbeing	13	Detailed issues only which are picked up in Appendix I
DC3 Building Sustainable Homes and Businesses	30	Detailed issues only which are picked up in Appendix I
DC4 Environmental nuisance and pollution control	10	Detailed issues only which are picked up in Appendix I
DC5 Water quality	9	Policy amended to require proposals which are not connecting to the sewer network and which are within 500 metres of a SSSI to carry out an assessment. Policy amended to require proposals for built development to be at least ten metres away from the top of the bank of the nearest watercourse or main river providing or retaining a natural or semi-natural habitat buffer. Supporting text has been included to provide further information and justification. Policy amended so that special regard is given to the River Kennet and River Lambourn to support the improvement of their status and overall health. Supporting text has been amended in relation to Sustainable Drainage Systems to ensure that the policy is consistent with paragraphs 174 and 183 of the NPPF. Policy has been amended to clarify that proposals within the hydrological catchment of the River Lambourn SAC or River Test will be required to demonstrate nutrient neutrality.
DC6 Water resources	11	The title of the policy has been amended to include 'wastewater' to provide greater clarity. The supporting text has been strengthened to provide the justification for the higher water efficiency standard. Policy amended to highlight that where upgrades to water supply and waste water networks are required, consideration should be given to the phasing of development. Such as change will ensure that the policy has

		greater regard to paragraph 174 (criteria 3) of the NPPF.
DC7 Air Quality	7	The supporting text has been amended regarding the impact that green infrastructure can have in relation to air quality. The policy has been updated to provide greater clarity and reflect Planning Practice Guidance.
DC8 Conservation Areas	11	Historic England concerned about the lack of commitment to CAAs. This has been dealt with under Policy SP9 but the supporting text of this DM policy has also been amended accordingly.
DC9 Listed Buildings	10	Detailed issues only which are picked up in Appendix I
DC10 Non- designated Heritage Assets	13	Detailed issues only which are picked up in Appendix I
DC11 Registered Parks and Gardens	12	Detailed issues only which are picked up in Appendix I
DC12 Registered Battlefields	8	Detailed issues only which are picked up in Appendix I
DC13 Assets of Archaeological Importance	7	Detailed issues only which are picked up in Appendix I
DC14 Trees, woodland and hedgerows	26	The policy has been tightened and more detail provided for ancient woodlands
DC15 Entry level exception schemes	10	New national policy has been published (Written Ministerial Statement on First Homes) which replaces paragraph 72 of the National Planning Policy Framework. Entry-level exception sites have therefore been replaced with First Homes exception sites.
DC16 Rural Exception Housing	11	Detailed issues only which are picked up in Appendix I
DC17 Self and custom build	12	The Council has proposed residential allocations in the LPR that will include an element of self-build (North East Thatcham and Purley Rise). It is not considered necessary to have site allocations specifically for self- and custom-build housing.
DC18 Specialised housing	10	Policy amended to clarify that the need implies locally identified need in the whole District. Amendments to Policy and supporting text to confirm delivery of specialist care housing as part of the mix on the strategic housing allocations in the Local Plan and from other large housing sites where feasible.
DC19 Gypsies, Travellers and Travelling Showpeople	12	Policy updated to respond to GTAA refresh 2021. Criteria added to safeguard existing authorised sites, and outline where sites could be directed to, and list of criteria updated to be consistent with other policies in terms of requirements. Reference made to the preparation of a specific DPD in the policy.

DC20 Retention of mobile home parks	6	Detailed issues only which are picked up in Appendix I
DC21 Residential use of space above shops and offices	8	Policy updated to state developments are above non-residential units, deleting 'shops'.
DC22 Housing Related to Rural Workers	9	Educational and institutional establishments have been removed from the policy, and a new policy written for such establishments in the countryside. The term 'business' has been inserted to replace 'enterprise' to be consistent with the NPPF and other LPR policies.
DC23 Conversion and/or re-use of Existing Redundant and Disused Buildings in the Countryside to Residential Use	12	The Policy has been clarified to refer to 'conversion of existing redundant and disused buildings' only. Added vehicular access to be suitable in landscape terms. Supporting text amended to strengthen approach to such development.
DC24 Replacement of Existing Dwellings in the Countryside	8	Supporting text strengthened to consider design and impact on landscape. Supporting text strengthened to consider climate resilience.
DC25 Extension of residential curtilages in the countryside	8	Insertion of specific landscape features to be maintained, to aid in conserving and enhancing local character.
DC26 Sub-division of Existing Dwellings in the Countryside	8	Criterion added to include that the proposal is not subject to a condition restricting its use to ancillary accommodation.
DC27 Residential extensions	8	Detailed issues only which are picked up in Appendix I
DC28 Residential annexes	7	Detailed issues only which are picked up in Appendix I
DC29 Residential space standards	11	Detailed issues only which are picked up in Appendix I
DC30 Residential amenity	8	Detailed issues only which are picked up in Appendix I
DC31 Designated Employment Areas	16	Policy amended to strengthen safeguarding and to more clearly reflect uses within DEAs. In addition, text relating to Theale rail-road transfer facility has been removed and a new standalone policy created for this site - Proposed Submission LPR Policy DM43.
DC32 Supporting the Rural Economy	16	Policy redrafted to better reflect the strategic aims of the approach to employment in rural areas and outside of Designated Employment Areas; in subsuming elements of deleted DC33 (PDL in the countryside), and removing reference to farm diversification which will be a new stand alone policy. Reference to 'enterprise' amended to 'business' to reflect NPPF and consistent with approach throughout the LPR. Addition of accessibility in the supporting text to reflect NPPF and in consideration of the rural nature of the District

		with opportunities to deliver environmental benefits.	
DC33 Redevelopment of previously developed land in the countryside	9	The policy has been deleted. It has been amalgamated into Policy DM35 (Sustaining a Prosperous Rural Economy), which covers the redevelopment of land in the countryside for economic purposes. It was considered that a DM policy approach to the rural economy, in terms of new and redeveloped buildings would be better placed under one policy, and reduce any perceived confusion for users of the Plan.	
DC34 Equestrian/racecour se industry	9	Further clarifications made in relation to the horseracing industry. Further detail provided in the supporting text with regards to the 'necessity' test. Title amended to Equestrian and Horseracing Industry	
DC35 Transport infrastructure	16	Detailed issues only which are picked up in Appendix I	
DC36 Parking and Travel Plans	15	An additional policy has now been created to cover Travel Planning.	
DC37 Public open space	14	Detailed issues only which are picked up in Appendix I	
DC38 Promotion of FTTP (fibre to the premises)	11	Policy title amended to Digital Infrastructure to reflect changing technology	
DC39 Local shops, farm shops and community facilities	12	Policy redrafted to more clearly reflect the policy requirements and the uses considered.	
Appendices			
Appendix 1 Monitoring & Delivery	2	Detailed issues only which are picked up in Appendix J	
Appendix 2 Evolution of the LPR	2	Appendix to be deleted	
Appendix 3 Settlement Boundary Review	37	Comments taken forward as part of the SBR	
Appendix 4 AWE Policy Development Category Examples	2	Detailed issues only which are picked up in Appendix J	
Appendix 5 Critical Infrastructure Schedule of the IDP	6	Appendix to be deleted	
Appendix 6 Existing Designated Employment Areas	4	Detailed issues only which are picked up in Appendix J	
Appendix 7 Residential Parking Zones	2	Detailed issues only which are picked up in Appendix J	

Appendix 8 How policies applied in NP context	1	Detailed issues only which are picked up in Appendix J
Appendix 9 Schedule of policies to be superseded/ deleted	4	Detailed issues only which are picked up in Appendix J
Appendix 10 Glossary	2	Detailed issues only which are picked up in Appendix J

All the detailed changes made to the Emerging Draft LPR can be found in the 'Tracked Changes' document which will be published alongside the Proposed Submission LPR 2022-2039 when it is published for formal consultation on 6<sup>th</sup> January 2023.

Where changes have been made to the LPR, the SA/SEA has been reviewed to see if the outcomes of the assessments have changed. This is detailed at the appropriate place within the SA/SEA Environmental Report which will be published alongside the Proposed Submission LPR.

# **Duty to Cooperate (DtC)**

Consultation overlaps with engagement and liaison under the Duty to Cooperate. Except where specifically mentioned, this Statement does not cover the Council's engagement, liaison and working with other local authorities and bodies under the Duty to Cooperate.

The DtC Statement sets out the details of the engagement and liaison carried out under this duty and will be published alongside the Proposed Submission LPR.

### Conclusion

In the preparation of the Proposed Submission LPR the comments made as part of the earlier consultations have been taken into account and where appropriate changes have been made to the Plan.