

From: [Redacted]
To: [PlanningPolicy](#)
Subject: West Berkshire LPR 2022 - 2039 - NE thatcham
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To whom it may concern,

For avoidance of doubt I do not think the LPR is legally compliant as:

Key documents and assessments have not been shared in a timely fashion within the locality.

- HIA not conducted.
- Environmental documents missing.
- Education breach of WBC obligations.

Example of this include:

Health care

WBC and developers do not appear to have arranged a relevant Health Impact Assessment in accordance with the current guideline from Public Health England (e.g. the HIA should reference how the proposal of the development has been discussed with the health service providers regarding impact on primary health care services) nor have they evidenced having liaised with the appropriately with the local health care providers or health care agencies. There has been no approach by WBC or the developers to any local GP practice to discuss site / floor space or location with them. Local practices had no input into the proposed 450 sqm floor size proposal which was only discovered with the SP17 Policy of Dec 2022, Appendix D. Accessing GPs is critical to everyone, however all three local practices are already overstretched. Furthermore one permanent and repeated temporary pharmacy closures in Thatcham have further worsened the pressure on the local primary health care. Therefore not planning, discussing and planning with an already overstretched (and diminishing service) will deny people their rights.

Environment

WBC notes in the LPR that a "Sustainability Charter is required" to establish how "policy requirements will be achieved" (including the legally required biodiversity net gains and anticipated overall positive impact on the environment sustainability). These documents do not exist or have not been made publicly available for the Reg 19 consultation. Furthermore I believe the Charter "will be informed by" various strategy documents (including one on ecology) but again this is not available. This omission, along with what has been shared with WBC of the biodiversity and Eco-sensitivity of this area is a notable and significant omission.

What is concerning is the "double speak" used in the planning documents to give the impression that there will be mitigation to both Human and Nature – however there is no evidence of any serious attempt to investigate, catalogue what is actually present within the biodiverse area, analyse it in detail and provide good clear remediation plans. WBC seems to be vague with an "all will be OK" which at this stage in the planning process seems to be insufficient despite the feedback from throughout the consultation process where concern over the habitat, environment and impact on it and the AONB has been consistently highlighted.

Education

The provisions for education from Nursery, Early years through infant to Secondary education is NOT clearly defined within the LPR. This is in breach of WBC obligations on this item. Whilst there is a vague comment in SP17 that "the site will provide Early Years provision" it is not expanded upon in detail. I will further expand the point on education later in my

feedback.

In response to the wider LPR the set-up of the document was quite confusing and not straightforward to put down thoughts. I tried and fear that I put all of my thoughts on a section that will be over looked, therefore I am also sending this to you to ensure my comments can be seen in relation to the LPR. My comments are as follows:

Transport:

a) Growing Traffic

Comments I shared at the Regulation 18 stage about the plan highlighted the increasing amount of traffic through the villages. It was understood by WBC planners that the traffic from the proposed development would link to "Floral Way" and the "A4". However WBC did not inform of a plan for an exit at the north of the site onto Harts Hill. **This only became clear on 6th Jan** when the Transport assessment was published. Harts Hill is a relatively steep road with not pedestrian walk way - however pedestrians still, on occasions, walk up the hill to the village and back down to Thatcham. Harts Hill, as highlighted in my prior response, is dug up (WBC have records of the frequency of this over the last few years - would suggest that excluding the COVID years due to a lower likelihood of infrastructure work being undertaken then) due to infrastructure challenges with water. There has been no recognition by WBC about the suitability of Harts Hill road nor the impact it will create in Upper Bucklebury with the impact of traffic through the village and wider villages. WBC acknowledge that "some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury" however it is clearly visible that the roads are not adequate, often without pavements (like Harts Hill), without street lighting (as it is a village) and will, in all likelihood result in serious accidents occurring with an increase in usage. In addition to the likelihood of accidents this in itself is in contradiction with the Strategic Environmental Assessment which proudly notes "to Reduce Accidents and Improve Safety" (see below point d).

Response from Reg 18 question WBC noted "...the TA (Transport Assessment) report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury". This assessment, it must have been done without the impact of the now "new" Harts Hill exit. Again WBC are using old reports to justify why there is little cause for concern however as highlighted plans have been changed at the last moment meaning that the Reg 18 comment made is just as valid now as it was then, in fact more so as the revision in the plan have not been evidenced by new modelling.

b) Access and Junctions

The Transport Assessment says in para 3.26 "The access arrangements for the northern end of the NET site proposes new priority junctions (with right turn lanes where appropriate) on both Floral way and Harts Hill. Results from modelling suggest that these will not cause problems". The document around this modelling nor the results from the modelling has been shared (or I certainly cannot find this). Whilst there are drawings for the other junctions - so far I have not been able to find ones for this very important junction on to Harts Hill. As the "plan for an exit onto Harts Hill" was only shared in Jan 2023 this lack of information (and not being able to view it) is disappointing. I would ask that the planning officer and any independent review of this explores why these materials were not shared in good time.

c) Car Parks

Surprisingly drawings are showing a new car park on Harts Hill. The purpose of this car park is a mystery as WBC has not clarified its need. As highlighted above in my points, a car park would add additional pressure onto a rural, unlit road - keeping in mind that this is the countryside and not an urban area. The local concern is that there is already levels of antisocial behaviour on the Common car parks and this unexplained car park would only promote this further.

d) Strategic Environmental Assessment (SEA)

The SEA which was shared with the local plan notes in Objective 4 "To promote and maximise opportunities for all forms of safe and sustainable transport." The SEA makes the following assessment: "To reduce accidents and improve safety" - Council assessment is "the policy is likely to have a Positive Impact on road safety as safe travel will be critical to the design of the site". Firstly and as highlighted above, Harts Hill is a rural and relatively steep hill without pavements - safety will not be improved but will be reduced and impaired. With the new exit noted in the plans on this road, motor traffic will clearly increase on it meaning that there will not reduce accidents. In addition the SEA proudly notes "To increase opportunity for walking, cycling and use of public transport". The council assessment of this is that this is significantly positive impact! Their commentary is "The policy is likely to have a significant impact on walking, cycling and public transport as the development should be designed with these in

mind." WBC removed Free School Buses from Upper Bucklebury to the local school, Kennet meaning a reduction in public transport - so their track record is not good in this regard. Furthermore it is not articulated how these lofty ambitions will be achieved in the materials that have been shared as part of this consultation exercise. Words are easy to note and so too lofty ambitions – however without the specific details being shared on this, it seems clear that no clear assessment has been undertaken or if it has it has not been shared with the public. In addition it is recognised that the locality is used by cyclists and enjoyed by walkers - however by building over what is currently walked over and by increasing traffic on the surround roads with traffic (that are used by cyclists and walkers) this is in direct contradiction to these proud statements in the SEA.

Environment

As part of my Reg18 feedback, which has not been suitably addressed by the plan (as I will outline below) nor the feedback provided by WBC to it I would again highlight:

There is no evidence to support the claims that SP17 will have a positive impact on the environment. I would put simply that changing countryside (farmed or otherwise) and developing it cannot result in a positive impact for the environment. In contrast and with common sense, there is every reason to believe it will have a very negative impact on the environment. I would question, how logically, can digging up the ground (habitat for wild animals such as newts and red listed birds) can be positive; how can laying housing or road foundations into the land be good for the environment that these creatures live in along with local plants; how can having thousands of people living in an area where bats, badgers, foxes and deer roam freely and unconstrained be an improvement for their environment? Any comments to the contrary is not being truthful.

It is nonsense to suggest (and I am quoting to response given by WBC to initial response to the plan) that 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB will help on this.' All of these animals and insects and plants are currently able to freely grow and go where ever they need to and are not constrained by an "a network of green infrastructure". Furthermore this wording is vague and meaningless as there is no clear definition as to what this network actually is or comprises of, nor specifically which species will use this supposed infrastructure. I would simply ask – can a bat – which is present in these locales use this? Can a Red Kite? How about a badger (that dig) or some of the rarer plants occur naturally in this area? If WBC has not undertaken a clear assessment and shared the outcome of it, how can they answer questions using this "green infrastructure" as answer to these types of questions. As noted below – WBC demonstrates a breath taking lack of appreciation on this critical item and are not able to articulate how they will successfully mitigate this factor.

The original plan had "Two Country Parks" spaced across the slope inside the Biodiversity area. However NO details had been provided about how these "Country Parks" would be formed. In the updated SP17 text these "Country parks" have been what seems to be "downgraded" to undefined "community parks". This lack of details and specificity only highlights how little WBC considers this area and protecting the natural environment and the public enjoyment of it (which in turn they highlight they will do). As SP17 has no proven plans for providing suitable green space and protecting the biodiversity of this area there will be inevitable "spill over of people" into the adjacent areas (which are AONB). Again WBC has given no thought to this nor the impact of it with a development of this size and scale except to extolling the virtue of providing a somewhat vaguely titled green infrastructure network which will "take advantage of the landscape" to "facilitate connection to the AONB, and include leisure routes accessible to all users". Destroying the existing habitat to lay vaguely termed "green infrastructure" would not aid the environment – and if it did the increase in amounts of people into the AONB would have a clear deleterious effect to that. Please note the vision of Bucklebury common is explicitly focussed on NOT increasing human pressure on the fragile ecosystem they are working to restore.

Education

As well as vagaries on the Early years provisions on education, the provision for Primary is also unclear. There is no data or evidence on the planned number of schools or Form entry requirements. The LPR proposes the sum of £12m be contributed by the developers to primary education however it is impossible to assess if this is sufficient or not. The LPR does not state when it will make this funding available or the primary school or Schools to. WBC has not highlighted the planning timelines for those schools to be able to accommodate new pupils. the LPR is also vague on Secondary education. Currently the two local schools in catchment is Kennet and Downs, both which are oversubscribed. As this development is nearer Kennet School it would mean that Bucklebury school children would be penalised. Kennet school has not had any notable building or investment from WBC in it for some considerable time (my two children attend or attend the school). The LPR proposes £15m to be contributed by the developers with an indication that another school will be built there are no details around the location of land to be provided and hence there is no possibility of assessing the suitability of this. Furthermore there is no evidence on how the £15m has been developed and whether the long term viability of this figure (for example if it is to be paid in a single step, if it is to be paid in multiple years will it remain at £15m or increase (notable impact on this figure is the current rates of inflation which have been in place at high rates before and after the LPR was drawn up?). This will result in insufficient spending on education penalising all children. Furthermore the LPR references a report by David Locke Associates and Stantec on behalf of WBC and proposes funding for a 6-8FE (Form entry years) school half funded by the developer contribution. This could mean that the oversubscribed secondary schools of Kennet or Downs would not any funding - however they would logically be picking up those children outside of the 6FE years, if it was not an 8FE school...due to costing..... I believe Government guidelines on this is that secondary schools with less than a 6FE are not sustainable. HOWEVER the development plan states that this new development is not sufficient to fill a 6-8 FE school "5.18....the scale of growth proposed is not sufficient on its own to fill a 6-8FE secondary

school" and "5.19.....it is not considered feasible for a new school to be smaller than 6FE." BUT with the apparent 40% reduction in housing allocation in the 2023 LPR (to 1500 from 2500) a secondary school is likely not sustainable in this location - however the plans remains silent on this very important item. In the development plan it was noted that the education provision exercise was based upon WBC data on pupil yield from a 2011 study (that is 12 years old and totally out of date). This means costing assumptions will be incorrect. to tame matters worse the study also notes "4.83 The study has not engaged in a detailed demographic prediction and modelling exercise to determine future primary and early years educational demand across the town and has not attempted to predict the long term capacities of existing schools. " This seems to be a concerning assumption or omission on these plans even more so if figures with developers are already noted in the planning application of £12m / £15m! WBC therefore agreed to these **without knowing**:

- a) how many pupils need to be catered for,
- b) where the new school would be located,
- c) the number of form entries needed,
- d) timing of funding (and if it is inflation protected?) and
- e) if the amount of money being proposed is really sufficient in the first place.

WBC, as an education authority, has a duty to make adequate arrangements for suitable and sustainable school provisions. How has this been met across all school years if it has not been defined clearly; evidenced correctly or costed reasonably using up to date figures across all affected groups in the LPR.

Identity

The LPR makes no reference or minimal acknowledgement of the identity of the local villages that will be impacted development, notably Upper Bucklebury.

The development of this size from Thatcham up the slopes to Upper Bucklebury will clearly impact the village and villages surrounding it. This area of West Berkshire is one of the last rural areas with historic ties to old traditions. A development of this size and nature will remove any of these traditions and the rural identity of the area will be removed. This has not been addressed in the Plans. Interestingly WBC or local planning applications cite this as reasons to dismiss planning applications – so if this is so important why is there no or minimal reference to this in the LPR?

In summary the Reg 19 has omissions in it, used out of date data; has not included relevant documentations (with assumptions and considerations noted); has ignored the impact of transportation on the area and the impact of this even though updating their plan with a car park and Harts Hill entrance / exit); not highlighting in detail how health services will be delivered except to note that a 450 sqm facility would be provided..... however no HIA has been published or is accessible; ignoring the impact on Health services in the area of such a large development; have blithely ignored the local voices who have consistently highlighted the rich biodiversity of the area (WBC nor developer, as noted, has not studied the locality nor articulated how it would adequately deal with the protected birds and species present, only to comment in general and unsubstantiated terms around “a green infrastructure network” without any back up research, cataloguing or solutioning taken place); nor considered the impacts on the AONB which is acknowledged will take place in the LPR; nor using up to date data on education and therefore leading one to assume incorrect assumptions which could result in wrong proposed figures and costings nor even paused in the consideration of the plan in light of what the Secretary of State, Michael Gove, who also noted that local constraints and concerns should be noted (nb the local council – Bucklebury is opposed to the development). Taking all of this into consideration and the amount of gaps and omissions – it is not clear on how this proposal can be justified to proceed and as such **I am fully opposed to it.**

Kind regards

Rob Gerdes