

From: [REDACTED]
To: [PlanningPolicy](#)
Subject: Objection to West Berkshire Council Local Plan Review 2022-2039
Date: 03 March 2023 14:27:55

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Dear Sir/Madam

Objection to West Berkshire Council Local Plan Review 2022-2039

Regulation 19 Consultation

I wish to register my ongoing objection to the proposals set out in the West Berkshire Council (WBC) Local Plan Review 2022-2039: Regulation 19 Draft (LPR). I consider that the approach taken by WBC in the preparation of the LPR is flawed, is in conflict with key requirements of the National Planning Policy Framework (NPPF), and as such, there are elements of the Plan that are unsound.

This submission follows on from my objections made to the previous draft of the LPR in February 2021. This raised a number of concerns and in particular opposed Policy SP17 and the proposed development of the North Eastern Thatcham (NET).

Of great concern is the fact that my previous objection was not acknowledged in the WBC Consultation Statement (WBCCS). It was submitted alongside my husband, Patrick Grincell and his objection was acknowledged and given the reference lpr2035, although I note that the full objection is not listed in the WBCCS and the response provided by WBC is wholly inadequate as it fails to address appropriately the objections made. I would therefore ask that my previous objections be acknowledged, and as it remains valid, I request that it is considered alongside the further points I raise below.

I have set out my further objections under the following headings:

1. Need for the Development;
2. Environmental Impacts;
3. Transport Impacts; and
4. Socio Economic Impacts.

Need for the Development

WBC has proposed revision of the number of homes for the NET development to approximately 1500 in the Plan period. WBC suggest that this is a reduction from 2500 when in effect it is an increase in the Plan period from the previously stated 1250. The 1500 number is stated as both a minimum and an approximate number and the supporting studies are still based on an eventual size of 2500 dwellings. The extent of the land allocated has also not changed and if there is a 40% reduction in housing numbers, I would expect that there should be commensurate reduction in the land take for the allocation. It follows that the implication is that the remaining 1000 homes will come forward in the next Plan period. This is disingenuous and unacceptable.

LPR Policy SP1 suggests that *Thatcham will be a focus for regeneration, for new housing and for improved provision of services and facilities*. Encouraging investment in the centre of Thatcham is welcomed, but initiatives that have the support of the Town Council should be identified. SP 1 goes on to say that *A new urban extension to the northeast of the town will provide a new residential neighbourhood with supporting*

facilities and green infrastructure in accordance with Policy SP17. There is no evidence provided that this urban extension will have any benefit for the town centre. If anything, it will detract from the centre if new facilities are delivered within the SP17 development as proposed. SP1 continues that *Opportunities will be taken to maintain and enhance the identity of Thatcham separate to that of Newbury and its surrounding rural settlements in accordance with Policy DM2.* Policy SP17 directly contradicts this ambition, with outward sprawl detracting from the town centre and generating unsustainable travel patterns. However, the greatest detriment will be the effective merging of Thatcham with Upper Bucklebury destroying the character of both the Town and the Village.

As I set out in my previous objection, I consider WBC should revisit its assessment of housing need. There are a significant number of brownfield sites that should be prioritised for development as opposed to the entirely greenfield development at NET. The allowance for windfall sites is also by WBC's own admission very cautious and this should be higher, further removing the need for the NET allocation. The update of the Housing and Economic Land Availability Assessment (HELAA), published in January 2023, includes a large number of sites that have been added since the last update, but which have been discounted. This does not provide a robust basis for the assessment of the housing need that underpins the LPR.

Paragraph 35 of the emerging draft of the NPPF states that Local Plans are 'sound' if they are Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs so far as possible, taking into account the policies in this Framework... and here particular reference is made to Paragraph 61 which states that the outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area... There may be exceptional circumstances relating to the particular characteristics of an authority which justify an alternative approach to assessing housing need.

In December 2022, the Secretary of State (SoS) issue a Written Statement that effectively removed the need to maintain a 5-year housing supply for Local Authorities with up-to-date Local Plans, removed top-down housing targets (particularly for Local Authorities with constraints like AONBs etc.) and gave a two-year transition period for LAs in the final stages of preparing Local Plans. A number of other Local Authorities have taken this opportunity to revisit their Local Plans. WBC should do the same to allow time for it to review the LPR thoroughly and arrive at a more appropriate, sustainable and less damaging set of proposals.

Environmental Impacts

As I highlighted in my previous objection, if delivered, even in a reduced form, the proposed SP17 allocation would pose a number of serious environmental threats which include:

- Permanent damage to the Bucklebury Plateau Biodiversity Opportunity Area and its ancient woodlands and heaths, in particular the Common;
- Developing on a large swathe of farmland and green space that will have a damaging effect on the broader landscape setting of the North Wessex Downs AONB that will forever ruin the open countryside for the local communities; and
- Causing harmful impacts to legally protected wildlife known to be present on the site without appropriate mitigation or compensation.

WBC has clearly paid insufficient attention to these environmental impacts. Its suggestion that the provision of SAP17 with a 'landscape' led approach and the provision of a community park will have a positive impact is clearly flawed. The reality is that SP17 will have a significantly negative impact.

The LPR that a Sustainability Charter is required to establish how '*policy requirements will be achieved*' (including the legally required biodiversity net gains and the anticipated overall

positive impact on environmental sustainability). WBC maintains that the Charter '*will be informed by*' various strategy documents (including one on ecology). However, the strategy documents either do not exist or have not been made publicly available for the Regulation 19 consultation.

Even at a capacity of 1500 homes the population of the new SP17 development would be around 4,000 people. This new population will have open space needs which are unlikely to be provided for on site alone with the vague reference to a 'community park'. As such, the new residents of SP17 and those visiting them will inevitably be spill-over into adjacent areas. The LPR acknowledges this stating that the intent for SP17 is to focus people into the AONB by suggesting that it will provide a green infrastructure network which will '*take advantage of the landscape*' to '*facilitate connection to the AONB, and include leisure routes accessible to all users.*' This is in direct contradiction with the management vision for Bucklebury Common which is explicitly focused on not increasing human pressure on the fragile ecosystems they are working to restore and nurture.

WBC's Sustainability Appraisal for the LPR accepts that SP17 will have a negative impact on environmental sustainability: 'The site is a greenfield site and therefore, would result in a negative impact on environmental sustainability which would need to be mitigated.' However, **no indication is given to what this mitigation might be, and it is simply unacceptable to leave this to chance in the hands of the developers.**

For the reasons outlined above, I consider that the LPR is in direct conflict with the NPPF and Paragraph 117 that states that planning policies and decisions should contribute to and enhance the natural environment.

Transport Impacts

The NPPF at Paragraph 104 states that transport issues should be considered from the earliest stages of plan making and development proposals, so that: '*the potential impacts of development on transport networks can be addressed*'. In preparing the LPR, I consider that WBC has fundamentally failed to meet this key requirement of the NPPF.

As I referred to in my previous objection the proposals included within Policy SP17 will generate significant amounts of new transport movements. This is particularly the case for vehicle movements on to the local highway network, including the narrow road that passes through Upper Bucklebury. Whilst WBC suggest that traffic from the NET development will be directed to the A4, it also acknowledges that there will be inevitable diversion onto the surrounding lower order roads such as Broad Lane passing through Upper Bucklebury. With a new population of circa 4000 people there will be at least that number of new car movements on the road network and to suggest that this will not be the case in this location is wholly unrealistic. On top of this, there will be the inevitable additional traffic created by those visiting or servicing the development.

The inclusion of the new junction proposed on Harts Hill linking the new development is a clear demonstration that it is intended that traffic will be diverted in that direction and onto a road that passes through Upper Bucklebury that is simply inappropriate for this level of additional vehicles. This road is inadequate, without pavements and has the potential for serious accidents. Significant disruption from an increased volume of traffic will cause additional queuing through the village, which in turn will inevitably cause increases in air pollution, which will directly harm the health of the residents of Upper Bucklebury.

I consider that the air quality assessment prepared by WBC fails to address this. Furthermore, the document is now out of date because it is based on the LPR running to 2037, not to 2039. This affects the traffic levels forecast for the end of the LPR period and the resultant traffic pollution.

WBC's high level Transport Assessment that underpins the LPR states (Paragraph 3.26) that

the modelling undertaken for the new priority junction at Harts Hill Road *suggests* it will *not cause problems*. However, these **modelling results are not provided nor are any drawings for the proposed junction**. The lack of certainty here is very worrying, so too is the lack of any detailed assessment of the significant impacts these proposals will have on the road network and the lives of the existing residents of Upper Bucklebury.

The Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) which accompanies the LPR Plan consultation assesses the allocation SP17 against key Sustainability Objectives. Objective 4 is to *promote and maximise opportunities for all forms of safe and sustainable transport* and WBC concludes that the policy *is likely to have a Positive Impact on road safety as safe travel*. This assessment is fundamentally flawed as the introduction of great volumes of additional traffic onto unsuitable local roads **will have a significantly adverse impact on the existing residents of villages like Upper Bucklebury**.

The possible siting of a secondary school in the proposed NET development would result in a significant increase in traffic across the whole Thatcham area. This has not considered in the traffic plans and models in the LPR.

In addition to the challenges faced through Villages like Upper Bucklebury, there will inevitably be further congestion on the Floral Way and the A4 and the key junctions in the area. A major bottle neck currently is the crossing at Thatcham train station. There is nothing in the proposals for SP17 that seeks to address this and so the proposed development of at least 1500 new homes and the significant additional traffic this will generate will further exacerbate the problem.

WBC's failure to address this is a major failing and demonstrates its lack of understanding of the issues facing the residents of Thatcham and the surrounding Villages such as Upper Bucklebury which it would be aware of if it had engaged constructively with existing residents instead of imposing such an ill-conceived, unsustainable, and damaging proposal though through the form of Policy SP17.

Socio-economic impacts

Healthcare provision

The Policy SP17 proposes a 450 sqm primary healthcare facility but there is no clear proposal for how this will be developed, operated, and integrated into the existing healthcare network. A major development such as that proposed by SP17 is likely to have a significant health impact which should be from the outset be informed by a detailed Health Impact Assessment (HIA) in accordance with the current guidance from Public Health England. This HIA should include detail how the proposals for development have been discussed with health service providers regarding impacts on primary health care services and the development proposals should demonstrate how the conclusions of the HIA have been considered in the design of the scheme to ensure it can be appropriately accommodated and to ensure that an unacceptable impact on the health and wellbeing of existing or new communities will not be permitted. I am not aware that such an HIA exists and the absence of such a key document is a key failing of the proposed SP17 allocation.

The proposed NET development is covered by three existing medical practice boundaries, Thatcham Medical Practice, Burdwood Surgery and Chapel Row surgery. All three practices are already overstretched. The two Thatcham doctors' surgeries run independently of each other, and their combined lists include approximately 27,800 patients that equates to just under 2,000 patients per GP. New residents of NET will bring a further significant demand on GP services that the existing practices could not cope with. NHS England commissions few new GP practices, even where they consider there to be patient demand for improved services. There is a chronic shortage of shortage of GPs nationally and I understand from figures produced by the NHS Berkshire West Clinical Commissioning Group (CCG) that this position is even worse here than in other areas of the country.

Now more than ever, GP practices need to create efficiencies and economies of scale to make

general practice more financially sustainable and to increase access and extend the range of services and primary healthcare professionals available on a single site. It would make no financial, organisational or geographic sense for an existing local GP practice to set up a branch surgery on the proposed new development because of the additional costs associated with such a move.

It is also likely to be unviable for one of the existing GP practices to relocate even to an expanded practice in NET. Even if it were viable, such a move would displace the surgery away from its existing patients creating greater travel demands. It is therefore highly unlikely that a new GP could be established or operated sustainably as part of the NET development.

A further healthcare issue is that the existing dental practices in Thatcham are unable to provide care for the whole population with a significant number of patients needing to travel further afield for NHS and private dental care. Thatcham Vision, endorsed by WBC in 2016, confirmed only 60% of residents were registered at a Thatcham dentist (with 17.5% registered with a doctor outside Thatcham). There is no evidence provided by WBC that the impact on local dental practices regarding the potential impact of increased patient numbers resulting from additional housing has been considered.

The proposal to include 450 sqm primary health facility within Policy SP17 appears to simply be a mathematical exercise to pay lip service to an issue of critical importance. The failure to prepare an appropriate HIA nor consult appropriately with the exiting community or medical practitioners in the area is a fundamental failing of the LPR and the proposed Policy SP17. The impact an additional 4000 plus new patients that will be introduced to the area has simply not been appropriately considered or mitigated for against a backdrop of an already struggling NHS service.

Schools Provision

The NPPF (Paragraph 97) states that *'it is important that a sufficient choice of school places is available to meet the needs of existing and new communities.'* It is therefore incumbent on WBC to comply with these requirements of the NPPF.

However, the provision for education from Nursery, Early Years, through Infant to Secondary education is not clearly defined within the LPR and there is no coherent plan set out for how the children from the NET development will be educated. Without this provision, the proposals to introduce over 4000 new residents to the area is both untenable and fails to comply with the requirements of the NPPF.

There are no details in the LPR of the provision for Nursery or Early Years education. Policy SP17 merely states that *'the site will provide Early Years provision'*. The provision for primary school education is also unclear and contradictory and there is no information provided about the potential number of school entry requirements. Draft Policy SP17 suggests that a **2.5 FE primary school on site and sports infrastructure requirements of the school will be provided, but the only obligation on the developer is to provide the land and the build costs, which is some way off actually providing a functioning school. The reality is that there is likely to be a significant funding gap which must question the deliverability of the proposals.** Any school provision needs to be in place before a development is occupied and there is no evidence that this will be the case.

The LPR is again unclear, and contradictory on the provision of secondary schooling. Draft Policy SP17 suggests that the developers should provide land to meet the impact of the development, but that the nature and cost of the mitigation will be informed by a feasibility study, undertaken at the applicants' expense, and prepared in collaboration with the Council and local stakeholders. There are no details of the location of the land to be provided and hence no possibility of assessing its suitability. By leaving the confirmation of actual requirement for the provision to the chance of a developer led study in due course, WBC is failing in its duty to ensure that sufficient school places exist. This is a fundamental requirement of the NPPF.

SP17 refers to the the provision of sports fields within the NET development, but there is no obligation for this to be delivered, the location of the land is not identified, and no funding is earmarked for the delivery of the facilities. The existing sports facilities in the area are already overstretched and availability for local teams is limited. The introduction of an additional 4000 plus new residents will compound this issue. WBC appear to suggest that the school playing fields could also be available as public sports field but, not only is this questionable because of safeguarding and conflicting user group issues, it is the case that the secondary school is unlikely to be delivered and as such the playing fields will not materialise.

Conclusion

For the reasons outlined above and as set out in my previous objection, I am opposed to several of the policies and proposals of the LPR, in particular Policy SP17 and the proposed NET development. I consider aspects of the LPR to conflict with the NPPF and as such to be unsound. WBC should take the opportunity afforded to it by the SoS to pause the LPR process and to review its approach.

I reserve the right to follow up on these objections should further information become available, and I wish to have the opportunity to be heard at any public inquiry that might be held to consider the LPR. In the meantime, I would be grateful if these objections could be acknowledged and that I be kept informed of any further progress with the LPR.

Yours faithfully

Sarah Grincell

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