

## Comment

Consultee	John Brims (1335144)
Email Address	[REDACTED]
Address	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Comment by	John Brims (1335144)
Comment ID	PS723
Response Date	03/03/23 14:34
Consultation Point	Policy SP 17 North East Thatcham Strategic Site Allocation ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.4
Bookmark	Brims, John

### 1. Do you consider the Local Plan Review is legally compliant?

*Please see the guidance note for an explanation of what 'legally compliant' means*

No

### Please give reasons for your answer

I am not sure I am qualified to answer this question and why it is posed to a member of the public as it may dissuade someone from actually submitting a response. As there is no, Don't know, I have answered No. A Planning Inspector should be the person to make this decision.

### 2. Do you consider the Local Plan Review is sound?

*Please see the guidance notes for an explanation of what 'soundness' means.*

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF).

*Please tick all that apply:*

**Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated** . No

where practical to do so and is consistent with achieving sustainable development.

**Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.** . No

**Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.** . No

**Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.** . No

**Please give reasons for your answer**

We continue to strongly object to the proposal to build a revised number of 1500 homes in NE Thatcham (THA20).

Firstly, you highlight a revision has been made to THA20 reducing the number of homes to be built from 2,500 to 1,500. This is an incredibly misleading statement. In the previous consultation under REG18, the proposal was to build 1,250 homes in the first plan period, so this is effectively an increase of 250 homes. In addition to this, the site area for THA20 has not changed. Why is that? It demonstrates that WBC are not taking seriously the weight of objections to this site and has not used the time between receiving the REG18 responses and opening the REG19 consultation to develop a more detailed plan and design for the site. Notwithstanding this comment, we object to the whole proposed site under THA20.

You have responded in part to our objections raised in relation to the REG18 consultation. Sadly, most of the responses are cut and paste stock answers under each heading.

**Grazeley**

We do not think you have adequately answered our concerns over the removal of the garden town site at Grazeley. This is still given almost no attention in the local plan. Not only that, the plan doesn't address the proximity of the THA20 site to AWE and Burghfield.

**Housing allocation**

Your response to my points on housing allocation was answered thus

*In relation to housing requirement for the District, the local housing need (LHN) is calculated according to the government's standard method, which has been revised since the onset of the pandemic, but has not changed for West Berkshire (other than a small increase to 513 dwellings per annum due to slightly changed housing affordability ratios published in March 2022).*

*Para 61 of the 2021 NPPF states: To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard methodology in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. The Council does not consider there are exceptional circumstances to justify an alternative approach and the available evidence does not support any reduction of the local housing need figure.*

*The calculation of housing need does not take account of any of the potential sources of supply. That is a separate consideration. The housing requirement has been expressed as a range in order to allow for flexibility and ensure that the minimum LHN is met. The upper end of the range has been proposed to allow for approximately 5% additional homes. The use of a range helps the Council meet the objective of boosting housing supply but also ensures that the Council is not assessed for the Housing Delivery Test against substantially higher numbers than the housing need based on the standard methodology.*

Since this response was written, On 6 December 2022, Michael Gove, Secretary for Levelling Up, Housing and Communities, released a written ministerial statement which set out to end the obligation

on local authorities to maintain a rolling five-year supply of land for housing where their plans are up-to-date. WBC has a local plan to 2026 and whilst understanding the new rules have not been finalised, why aren't WBC waiting for the outcome of the current consultations before proceeding with the LPR and in particular with this plan for THA20 which received the highest

number of objections? The outcome of the Government consultation could easily provide the opportunity for WBC to reconsider the plan for this site and maybe others within the LPR.

### **Strategic Gap**

You failed to answer this point at all.

The Strategic gap between Thatcham and Upper Bucklebury will be all but removed. Floral Way was meant to be the northern boundary for development in Thatcham and this should be maintained.

The land in north Thatcham rises gently towards the ridge along Burdens Heath and Cold Ash towards the boundary of the AONB. This gradual change from the urban area of North Thatcham to the AONB must be maintained. Council planners have made much of this strategic gap when assessing plans for applications within THA20 in the past and yet choose to ignore what they have previously written within this LPR. The northern edge of this proposed development is within 600m of the AONB. This development will have a major adverse impact on the AONB and its setting.

### **Traffic**

Again, your response is wholly inadequate.

*In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA 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. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development).*

*However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for*

*both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.*

I repeat, we have lived in this area for over 40 years and there have been no improvements to the road network in the Thatcham area in all that time other than to build the Floral Way Road and the road from the A4 to the station for Seige Cross. They have provided access to the Siege Cross and Floral Way developments but absolutely no improvements to the A4.

You talk about mitigation measures, what are they? When we moved to Newbury 40 years ago we used to turn off the A4 at the Blue Coat School to drive through Upper Bucklebury to get to Reading and the M4 in the morning. Since that time, the houses referred to above have all be built with no mitigation measures in the villages apart from a bit of traffic calming and no improvements to the A\$ anywhere along its length from Thatcham to the M4 or Reading. Another 1,500 homes will generate at least that number of traffic movements per day and you admit there will be pinch points at Floral Way and the A4; it doesn't take a genius to work out where the traffic will go to avoid the pinch points.

*“The package should better accommodate the expected increase in traffic as a result of the development”.*

Should? What isn't the plan being developed so it WILL?

*“Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan”.* What are these measures?

There is absolutely nothing in this plan to support that statement. Firstly, the location of parts of THA20 are not in a particularly sustainable location. How does someone get from the far reaches of the proposed development to say, Thatcham Station or the town? If walking or cycling, you would have to cross the A4, this would cause more stoppages on the A4 and exacerbate the issues at the junctions. There is nothing in this plan to enable a more sustainable movement of people.

### **Bucklebury Common**

You woefully underestimate the impact on Bucklebury Common and your response again is wholly inadequate.

*In relation to the concerns on the potential impact on Bucklebury Common, the development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population). In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents.*

This development will conservatively be occupied by 4,000 or so people. The area's identified as open space will not be sufficient and with Bucklebury Common on your doorstep, where do you think the majority of the people will go? The AONB should be given the same protection as afforded to a National Park. Where is the thought process in your plan to achieve this? The plan is all but removing any protection with its proximity to the AONB shows a complete disregard of the environmental and ecological issues that the proposed development will have. I am not going to go into detail here as I know others have a will point out the issues in great detail which we wholly support.

### **Alternative Sites**

The continued dismissal of the Colthrop site is not sustainable. The Council talks about mitigation measures for THA20, why aren't mitigation measures being considered to positively assess the Colthrop site? This site is far more sustainable in its proximity to Thatcham Station and the A4. It will also deliver the required bridge over the railway to alleviate access to the A339 and the South. That could also give easier access to more green space on Greenham Common for the residents.

One of the best proposals I've heard during this whole process is to use the Kennet School and Francis Bailey school sites for housing and build a purpose-built school and leisure complex to the North of the A4. This could have so many advantages if thought through properly that the current plans will not and never deliver.

### **Summary**

We strongly object to the proposal for the above reasons but what depresses us even more about this part of the LPR and probably the LPR in general is the lack of thought and ambition in the plan to deliver a long term strategic plan for Newbury, Thatcham, the Villages and the AONB. Where is the regeneration strategy for Thatcham town centre to encourage people not to get into their cars and drive to Reading or Newbury? Where is the strategy to make the area sustainable with easy access to transport hubs? We live in a changing world where the requirements for the next 30 to 40 years will be very different from what we've known in the past. Global warming will mean 100-year events will happen far more frequently; we need to think now about what will be required by our children and their children. This plan takes us to 2039; we need to start to rethinking how we do things now or this is yet another opportunity lost.

### **3. Do you consider the Local Plan Review complies with the Duty to Co-operate?**

*Please see the guidance note for an explanation of what 'Duty to Cooperate' means.*

No

**Please give reasons for your answer**

I am not sure I am qualified to answer this question and why it is posed to a member of the public as it may dissuade someone from actually submitting a response. As there is no, Don't know, I have answered No. A Planning Inspector should be the person to make this decision.

#### 4. Proposed Changes

**Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).**

*You will need to say why this change will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.*

I believe many changes are required. A Planning Inspector is the person to make this judgement.

#### 5. Independent Examination

**If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?** Yes

*If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.*

*Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.*

The Planning Inspector needs to understand the weight of opposition to some of the plan proposals. You cannot necessarily demonstrate the passion you feel about the plan in a written document.

#### 6. Notification of Progress of the Local Plan Review

**Do you wish to be notified of any of the following?**

*Please tick all that apply*

- |  |   |     |
|--|---|-----|
| <b>The submission of the Local Plan Review for Independent Examination</b>                   | . | Yes |
| <b>The publication of the report of the Inspector appointed to carry out the examination</b> | . | Yes |
| <b>The adoption of the Local Plan Review</b>   | . | Yes |