

Comment

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Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Comment by	Mr Gordon Heslop (1270721)
Comment ID	PS346
Response Date	28/02/23 15:27
Consultation Point	Policy SP 17 North East Thatcham Strategic Site Allocation (View)
Status	Processed
Submission Type	Web
Version	0.1
Bookmark	Heslop, Gordon

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

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

Yes

Please give reasons for your answer

I believe legal requirements have been complied with.

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 where . No

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

Community:- The Development Plan (SP17) proposes a new primary healthcare facility, however there does not appear to be a Health Impact Assessment (HIA), without which the impact on existing communities and suitability for a new developments is unclear and likely detrimental.

The proposed plan for secondary education defined in SP17 is unsound. There is no evidence to estimate the number of pupils the proposed secondary school is to serve, no evidence the proposed funding is sufficient to meet the Council's obligation to provide education, no clear guidance on location of the school, no definition for the number of Form Entries and no clarity on timeframe for funding.

Green Infrastructure:- SP17 provides no evidence that the development will have a positive impact on the environment. The proximity of the proposed development to Bucklebury Plateau Biodiversity Opportunity Area within the North Wessex Downs AONB, which includes Irreplaceable Habitat and Ancient Woodland, does not allow for adequate protection of these areas and no evidence has been provided to suggest they will not come to harm, contrary to national planning policy.

Transport:- The Sustainability Proposal (SA) and Strategic Environmental Assessment (SEA) at the proposed Thatcham NE site has been assessed as likely to have a positive impact on road safety and to increase opportunities for walking, cycling and public transport, but no justification for this assessment has been provided. Specific details of plan and proposals should be provided to accurately assess this claim.

Sustainability:- SP17 states a Sustainability Charter is required which will be informed by strategy documents which have either not been published or have not been produced. Further there are no proven plans for providing adequate green space or protecting or improving biodiversity. The Sustainability Appraisal contradicts itself by accepting that SP17 will have a negative impact on environmental sustainability, whilst also suggesting it will have an overall positive impact on sustainability. Much greater clarity is required and more detailed comprehensive assessments need to be completed to properly assess the impact of the proposed development on the environment and sustainability.

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.

Yes

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.

Proper detailed assessments of impact to environment, completion of HIA, full assessment of educational needs and a detailed plan to fulfil these, far better proposals to ensure protection of protected habitats and green space.

5. Independent Examination

If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? No

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

The submission of the Local Plan Review for Independent Examination . Yes

The publication of the report of the Inspector appointed to carry out the examination . Yes

The adoption of the Local Plan Review . Yes