

Peter Spours

By email to planningpolicy@westberks.gov.uk

WBC LPR Regulation 19 OBJECTION

Dear sirs,

This letter is an OBJECTION to the LPR, particularly those aspects related to SP17. The writer finds the LP proposed to be UNSOUND for the reasons set out below. I am prepared to appear and make addition submissions to the Planning Inspectorate is asked.

Legal Issues

1. The Reg 19 consultation period is 6 weeks starting on Friday 20th January. However, WBC's website was partially unavailable because planned maintenance took place on 21st and 22nd January. Hence the 6-week consultation was short by 2 days. In addition, the council offices were closed on those days making any review of evidence impossible. The consultation is flawed.
2. The local authority has a duty to consult and cooperate in the preparation of its LPR. WBC has failed to do so in some areas and where it has consulted has done so begrudgingly. WBC failed to consult Bucklebury Parish Council on boundary changes and has ignored the submission volunteered. There is nothing in the evidence to suggest that WBC has consulted the relevant authorities on medical provision or dental care for the new residents.
3. The site has two pipelines crossing it; one for oil and the second gas. There is a need to consult the pipeline authorities but there is no evidence that WBC has done so. Land surrounding these pipes is a sterile zone to protect the pipes from damage. This area is not shown on the maps and the impact on the access points on Floral Way and the A4 is not considered.
4. The provision of secondary education is inconsistent with WBC's own guidelines, being too small to be viable.
5. WBC has a duty to consult and prepare a Health Impact Assessment. This has not been done and the plans for health provision for residents are not properly described or viable.
6. The choice of Thatcham Northeast was driven by a HELLA study the cost of which was paid by the Thatcham Northeast developers. This key document is missing from the evidence. The new HELLA in the evidence pack post-dates the plan approval by WBC councillors who cannot have considered it in reaching their decision to approve and delegate authority to submit the LPR to public inspection.
7. A vision for Thatcham was belated prepared but this was contingent on THA20 being the selected site and is woefully poor in providing any vision for the town. It too is missing from the evidence. It is notable that the vision should have been to starting point followed by the site selection. It is inescapable that WBC reversed this process thereby frustrating logic and hence is not positively prepared.

Traffic

1. Throughout the Reg 18 period and in public meetings between Bucklebury Parish Council and WBC planners' assurances were given that all traffic ingress and egress would be to and from the A4 and Floral Way. Hidden within the evidence pack offered at Reg 19 a junction on Harts Hill is referenced. There are no drawings of its position or topography. This late addition, lacking any analysis demonstrates a lack of positive preparation and consultation with the communities affected. The addition of this junction is both a danger and will have a significant detrimental effect on 'the villages'. It is dangerous because Harts Hill is narrow, winding and the junction's necessary position is shielded by a blind bend in the downhill direction.
2. The addition of 1500 or more houses will result in more car movements. There are no identified employment opportunities within the development and few within walking distance. Additional traffic is inevitable.
3. The A4 is already gridlocked at peak times and residents will seek to avoid jams. The junction with Harts Hill provides that opportunity. Indeed, satnavs tested show that traffic for the A34 and M4 west will route via Cold Ash and that for Theale, Reading and the M4 east will use Upper Bucklebury, Chapel Row and Bradfield South End. This will be detrimental to village life and dangerous for residents.
4. Traffic through the villages, Upper Bucklebury and Cold Ash will increase – this is acknowledged by WBC – but no mechanism to manage this is shown. The roads are quiet lanes without pavements, narrow and used by children to walk to school or to the school bus. Horses use the roads to access the Common and to bridleways. Cyclists use the lanes for recreation.
5. No credible account of traffic is included in the evidence this being a demonstration unsoundness.

Site Selection

1. It is the writer's understanding that all possible sites be considered on their merits, that preference be given to brownfield sites and the community benefits be properly assessed. WBC failed in this task. The abandonment of Grazeley as the preferred site prompted a knee jerk reaction at WBC which was exploited by the THA20 promoters. They provided WBC with funds to prepare a HEELA. However, that work was tainted in that it over promoted the benefits of the funder's site, THA20 and seriously underrepresented the competitors. Since then, each step taken by WBC has suffered from confirmatory bias. Critical thinking is absent and demonstrated throughout the evidence with the sustainability analysis making complimentary assumptions lacking any supporting evidence.
2. A key feature of a competing site, that at Colthorp Mill, was the provision of a bridge over the railway to replace a busy level crossing. The flawed HEELA failed to mention this even though the bridge is sorely needed and high on the wish list for residents. This error was brought to WBC's attention many times but was not addressed. This failure to consider alternatives makes the LPR unsound.

The Environment

1. The proposed development is 'in the setting of the AONB'. This is accepted by WBC yet there is no evidence that this development will enhance the environment. WBC has an obligation to enhance environmental sustainability and biodiversity, but no evidence is presented on how this could be achieved. This subject must be in WBC's mind because it

was so vocal on these subjects when it opposed development at Siege Cross. Yet this scheme, much larger and containing the Siege Cross site is said, without support, to have a positive impact. This is simply not credible.

2. The long-term plan for the maintenance and enhancement of Bucklebury Common relies on modest numbers of visitors to avoid damage to the fragile infrastructure. WBC plans to increase the vehicle traffic – by providing an additional carpark – and ‘facilitating leisure routes accessible to all users’. This is the antithesis of what is needed and demonstrates that WBC has not consulted with or cooperated with adjoining landowners.

Conclusion

The choice of Thatcham Northeast for development of 1500 or 2500 homes is a poor choice. The process used for selection is fundamentally flawed because of the involvement and funding of the work by those who financially benefit. This fails any test of propriety. It is sad that WBC seeks to distance itself from this by failing to include the flawed HELLA and vision documents even though these were the core decision making documents.

The LPR is unsound, undeliverable and was not prepared in a cooperative way. It fails to reflect the needs of the community.

Yours faithfully



Peter Spours

25th February 2023