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To: [PlanningPolicy](#)
Subject: WBC LPR Regulation 19 Objection
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West Berkshire Council (WBC) Local Plan Review: Regulation 19 Objection

I wish to formally object to the proposed Thatcham North East Housing Development as I believe that the approved plans are unsound for many reasons.

Healthcare

As I understand it, only vague references have been made towards the provision of infrastructure to support such a large development, e.g. schools, medical services, etc.

On the subject of healthcare, a 450 sq/m primary healthcare facility with the suggestion that a GP surgery be offered to the Bucks, Oxon & Berks West Integrated Care Board but the document contains no details into strategic healthcare planning. A development of this size should be accompanied by a fit for purpose Health Impact Assessment (HIA) according to current guidelines from Public Health England. The three local GP practices are already overstretched so obviously there would be serious negative impact on both existing and new residents. The only reason I can see for the lack of an HIA is that the inevitable conclusion would be an acceptably high negative impact on existing and new communities and the development would therefore not be permitted. Again, the proposals for this development are fundamentally unsound as any required documentation on this subject has been deliberately ignored. None of the local GP practices have been consulted and none would be prepared to take the unrealistic offer of the proposed branch surgery on economic/practical grounds.

The same argument applies to the provision of dental services in the Thatcham area.

Transport

There would be serious traffic management issues with the major trunk route of the A4 (single carriageway and currently under severe stress) being utilised for the majority of the traffic. The plan includes an exit from the development onto Harts Hill Road, a single track and twisty road leading to the village of Upper Bucklebury. With the inevitable congestion caused along the A4, this will lead to much of the traffic seeking the alternative route through the unlit villages eastwards through Upper Bucklebury, Chapel Row and Bradfield Southend. Potentially, much of the traffic would also pass through the Bradfield College area. Any traffic heading in a westerly direction would inevitably make its way through Cold Ash and Hermitage to access the M4 junction 13, passing by the schools of St Finian's Catholic Primary School and Downe House School. The scant consideration of this in the plan seems unsound and unsafe to the point of

being dangerous. Furthermore, WBC claim that modelling suggests that these newly created junctions will not cause problems. However, they not produced any modelling results to this effect. For some reason WBC have also failed to produce drawings for the Harts Hill junction. This again would seem to be unsound as scant thought appears to have been applied.

Environmental

The land that it is being considered for development is currently on a green field site and is prime agricultural land. As a country we should be attempting to become more self-sufficient in our foodstuff production and less reliant on imported goods. Furthermore, the land abuts an area of AONB (Bucklebury Common) and such a large development would have a huge detrimental effect on such a fragile and diverse eco-system. I do not believe that due consideration has been given to the negative impact on this valuable resource.

Much of this land also lies in the Kennet river valley which at present floods regularly down stream – a situation which is only going to create a disastrous situation for the neighbouring communities.

I do not believe that WBC has given serious consideration to brown field sites that are currently available for development, for example Colthrop.

Education

WBC as an Education Authority has a duty to make arrangements for suitable school provision. How this obligation will be met across all school years is not defined or evidenced in the LPR. It is therefore clear that the plan for secondary school provision is unsound for the following reasons:

1. There is no satisfactory evidence of the number of pupils the school is to cater for.
2. The location of the school is not clear.
3. The number of Form Entries is not defined but it is noted that anything less than a 6FE school is unsustainable.
4. The timing of the funding is not clear.
5. There is no evidence that the proposed funding is sufficient to meet the Council's obligations to provide education. There is no satisfactory evidence of the number of pupils the school is to cater for.

Timing of the LPR Consultation

At the outset, one of the reasons given for this development was to fulfil WBC's obligation to meet certain Government targets. The reason given to use this particular area was that there was nowhere else suitable due to the high percentage of AONB and nuclear fall out zones of AWRE and Burghfield. At the time, it was acknowledged that the siting was far from ideal. Since the latest announcements from Michael Gove (Secretary of State for Levelling Up, Housing and Communities) a Written Ministerial Statement was released setting out forthcoming amendments to the National Planning Policy Framework (NPPF).

The Statement set out the following (inter alia):

I will retain a method for calculating local housing need figures, but consult on changes. I do believe that the plan-making process for housing has to start with a number. This number should, however, be an advisory starting point, a guide that is not mandatory. It will be up to local authorities, working with their communities, to determine how many homes can actually be built, taking into account what should be protected in each area - be that our precious Green Belt or national parks, the character of an area, or heritage assets. It will also be up to them to increase the proportion of affordable housing if they wish.

My changes will instruct the Planning Inspectorate that they should no longer override sensible local decision making, which is sensitive to and reflects local constraints and concerns. Overall this amounts to a rebalancing of the relationship between local councils and the Planning Inspectorate, and will give local communities a greater say in what is built in their neighbourhood.

Obviously none of this has been taken into consideration. Local communities have been totally ignored. The precious green belt will be concreted over. The AONB will be severely impacted. The fact that the site was not ideal at the outset and the mandatory requirement has been greatly watered down, it is unsound to go ahead and develop on an unsatisfactory site.

Furthermore, the information available to support the current consultation (Reg 19) being undertaken on the Local Plan has several major flaws and factual inaccuracies.

The housing numbers for northeast Thatcham – positioned in Reg 19 as a reduction from 2500 dwellings to 1500 - is not correct. The Regulation 18 Consultation envisaged that only 1250 dwellings would be built in the plan period, and this has increased to 1500. 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 number of homes proposed for this site could therefore be increased to the original 2,500 when the Plan is reviewed after 5 years or in the next plan period.

The update of the Housing and Economic Land Availability Assessment (HELAA), which was published only on 20th January 2023, includes a large number of sites that have been added since the last update, and which have been rejected. The WBC process is that the HELAA is at the start of the process not the end.

The Air Quality Assessment that is part of the consultation documents is based on the LPR running to 2037, not to 2039 which it now should do. This affects the traffic levels forecast for the end of the LPR period and the resultant traffic pollution.

There is no evidence WBC has complied with its legal duty to cooperate with

Berkshire West Clinical Commissioning Group concerning the size of the GP surgery promised for north east Thatcham.

There is no evidence that WBC has consulted properly with Thames Water over the time needed for provision of water and foul drainage, and therefore it does not know if the houses for north east Thatcham are deliverable in SP17 in the plan period.

The Settlement Boundary background paper shows the Thatcham settlement boundary already extended to the line needed for the original 2500 houses, yet the plan now refers to a minimum of 1500 houses – this could be read that 2500 dwellings is still suitable and can be developed within the extended boundary.

The new provision for secondary schools in north east Thatcham is not consistent with WBC guidelines for the minimum viable size of a secondary school. If the primary provision is 2.5 Forms of Entry, then so presumably is the secondary provision to meet the impact of the development. A Council policy 2013 states that the minimum viable size for a secondary school is 4 Forms of Entry.

The Secretary of State's Written Statement of 6th December 2022, which 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 and this statement should be taken into account by WBC.

Because of these points, and many more, the Reg 19 LPR Submission in its entirety should be considered as unsound.

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