

From: [REDACTED]
To: [PlanningPolicy](#)
Subject: Response to Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Date: 01 March 2023 21:20:53

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Dear Planning Department,

I am writing to present my objection to the Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039, specifically Policy Sp17 - the Thatcham North-East development of at least 1500 homes on greenfield land, stressing that the plan is unsound and should be withdrawn from consideration in its current form.

I have been a resident of Upper Bucklebury for [REDACTED] years. I have objections that extend across many aspects of the plan, but you will see that the bulk of my assessment and submission focuses on the devastating environmental impact that policy SP17 will have on the AONB and its setting, and that claims of a positive environmental impact have no basis in fact.

Here are my main points of objection:

(1) **Transport:** The LPR itself states there will be an increase in traffic "onto wider rural routes such as Upper Bucklebury" - given the inevitable increase in congestion on the A4, it is a matter of near certainty that motorists heading east and seeking to avoid delays will add a significant burden and danger to these rural areas, along with the increase in traffic heading north. This view is further supported by a traffic study commissioned by Bucklebury Parish Council which not only found West Berkshire Council's trip rates to be unreliable, but that the distribution of traffic is unrealistic - with all evidence suggesting that the bulk of traffic will indeed seek to move away from the A4, not join it. In the LPR, there is a proposed exit at the top of Harts Hill, which will undoubtedly increase the volume of traffic heading north still further - however, there is no modelling by WBC for this Harts Hill junction in the evidence base - this is unacceptable in the public consultation.

(2) **Healthcare:** Local health services (principally GP surgeries and dentists) are already under extreme pressure, with many patients required to seek care outside the area. There is no evidence in the plan that provision of a new GP surgery or dental facilities will be made - nor that any of the existing healthcare providers were consulted in the preparation of the plan.

(3) **Environment:** This is where the bulk of my focus has been, trying to understand the plan as it relates to the natural environment. Consequently, you will find (below) a significant and detailed assessment of the background documentation provided by WBC in support of the draft LPR. It concludes that there is no evidence to support claims that SP17 will have a positive impact on the environment, both in the AONB setting and in the AONB itself. By contrast, there is every reason (with supporting evidence) to believe it will have a significantly negative impact. Read the following 'Detailed environmental study' for further information:

Detailed environmental study

- Over 4000 people are being encouraged into the AONB
 - The LPR states its intent for SP17 to drive additional traffic (people and cars) into the AONB. It

provides 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.'

- Given the housing plan, this means over 4000 people
- The management vision for Bucklebury Common (see below) is explicitly focused on not increasing human pressure on the fragile ecosystems they are working to restore and nurture.
 - Species on the Common are already known to have been impacted by existing visitors, including cyclists, dog walkers, and motorised vehicle users.
 - **KEY POINT:** SP17 provides a green infrastructure policy that is in direct opposition to the goals of the management team supporting restoration and management of Bucklebury Common.
- *Development which is likely to have any adverse impact on the notified features of a nationally designated site [e.g. AONB] will not normally be permitted.*
 - The LPR states various reasons in which such development may be permitted (policy SP11, p45), including that 'all appropriate mitigation measures have been proposed and secured through the development process'
 - **KEY POINT:** No mitigation measures have been provided as part of the LPR for SP17.
- *Development proposals affecting sites of local importance should always seek to contribute to their favourable management in the long term.*
 - The LPR states (p46):
 - *Where a proposal is likely to result in harm to sites of local importance (including habitats or species of principal importance for biodiversity, and sites that meet the criteria for designation as a Local Wildlife Site or designation as a Local Geological Site), developers will be required to accord with the following sequential approach:*
 - *Firstly, seek an alternative site in the District with a lesser impact than that proposed*
 - *Secondly, if the first is not possible, demonstrate mitigation measures can be taken on site*
 - *Thirdly, and as a last resort, seek appropriate compensation measures, on site wherever possible and off site where this is not feasible including long term management and maintenance.*
 - The land immediately adjacent to the proposed development area for SP17 contains 41 Local Wildlife Sites and is part of the Bucklebury Plateau Biodiversity Opportunity Area
 - This is the land that the LPR intends to attract over 4000 people to visit through its green infrastructure
 - This should be enough reason to feel the need to 'seek an alternative site' or 'demonstrate mitigation measures can be taken on site'
 - **KEY POINT:** There are no mitigation measures described anywhere in the LPR and supporting documents – how is a public consultation supposed to occur without the evidence to consider?
 - There is no Sustainability Charter establishing how LPR requirements will be achieved
 - The LPR states 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).
 - It states that this charter 'will be informed by' various strategy documents (including one on ecology)
 - **KEY POINT:** These strategy documents do not exist.
 - The LPR's own Sustainability Appraisal states that SP17 will have a negative impact on environmental sustainability
 - The Sustainability Appraisal (SA) document which contains the assessment of the SP17 site and makes claims of positive impact, states the following:
 - 'The site is a greenfield site and therefore, would result in a negative impact on environmental sustainability which would need to be mitigated.'
 - **KEY POINT:** There is no detail provided on any mitigation measures.
 - The same SA document states that the [SP17] policy is likely to have an overall positive impact on sustainability
 - The SA states that there is a 'high likelihood' of an overall positive impact on sustainability
 - The full appraisal for this is to be found in Appendix 5
 - **KEY POINT:**
 - This is contradictory and confusing...

score after development than before development.'

- The data being used to establish the presence of species is out of date:
 - In 2020, Bucklebury Parish sought environmental records for the 41 LWSs impacted by SP17:
 - 80% of surveys were conducted more than 15 years ago
 - 50% were more than 20 years old
 - 44% were over 30 years old
 - Bucklebury Parish appointed ecologists to conduct an independent study of the impacted area:
 - The findings from a single day walk on public access routes indicated that the site had a much higher biodiversity value than previously appreciated, including the presence of seven species of threatened breeding birds and one threatened migratory species, several bat species and abundant badger setts. The hedges, old trees and gullies serve as important corridors linking up different habitats within and beyond the site boundaries. These initial findings imply that a full study will show the required mitigation measures and BNG will be far more complex for the development than was anticipated by the planners.
 - **KEY POINTS:**
 - This one study has provided more information about the site than has been presented in the whole of the LPR and its available evidence base
 - The area has a higher biodiversity value than previously thought
 - Protected species are present and will be impacted – no detail on mitigation measures has been presented
 - Critical habitat network features are under threat from the development and will severely impact distribution of key species.

SP17 Environmental Objections – Additional Detail

Damage to Bucklebury Common

As it relates to Bucklebury Common, specifically, consider the following:

- Bucklebury Common is one of the largest Commons in Southern England, containing the largest heathland in the North Wessex Downs AONB. It includes the historic Avenue of Oaks at Chapel Row, notable ancient woodlands, and other important habitats. It is a designated Local Wildlife Site, part of the Bucklebury Plateau Biodiversity Opportunity area, and as such is considered to include 'important and rare habitats and species', including one of the country's most important adder communities, and numerous other protected animals and plants.
 - Management of the Common is entering a new phase and has presented its vision for the enrichment and on-going maintenance of this extremely rare and precious environment. The management team for the Common includes Natural England, BBOWT, NWD AONB and the Forestry Commission, along with members of the local community and ecological consultants.
- At a presentation of the vision to the broader community, it was acknowledged that the Common is an open area, accessible by all. As such, it requires very careful management to protect it. It is a key part of the Bucklebury vision for the Common not to increase the number of visitors, but to place the emphasis firmly on providing nature with a chance to restore itself and thrive, both in terms of the diversity and abundance of its fragile ecosystem.
- By contrast, the WBDC LPR is exclusively a human-centric plan whose green infrastructure is principally provided for leisure. The SP17 plan actively encourages people to visit the AONB, and therefore the Common, causing disturbance to wildlife and adding an additional burden to the community and landowner through litter, fires and parking.

- Based on the housing mix described in the LPR, the proposed development represents an additional 4000+ people being actively encouraged into the AONB, which includes the irreplaceable habitats found in Bucklebury Common, with its ancient woodlands and heaths, pastures, greens and historic ponds. The Common is already struggling to balance accessibility and leisure usage with the needs of the environment, with increased usage from cyclists and dog walkers particularly impacting ground-nesting birds, notably woodcock, and other wildlife.

Greenfield Development in an AONB Setting

- During the last public consultation, there was a significant number of objections based on the development's potential impact to the AONB. West Berks responded to these objections by stating:

- *'In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.'*

The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.

With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.'

- **KEY POINTS:**
 - The development is in the setting of the North Wessex Downs (NWD) AONB
 - A landscape and visual impact assessment (LVIA) 'will be undertaken' – once again, there is vital information missing that would usefully inform a public consultation
 - There is an expectation of a Masterplan – again, this does not exist.
 - It is our belief that the absence of any such detail at this stage displays an unacceptable level of complacency and implicit bias towards the allocation of SP17, rendering the plan unsound.
- The National Planning Policy Framework (NPPF - para 176) states:
 - *'Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues'*
 - *'development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.'*
 - **KEY POINT:** Development needs to minimise adverse impacts on the AONB
- The North Wessex Downs AONB statement on development in the setting of the AONB states that *'examples of adverse impacts on the setting of the North Wessex Downs AONB include:*
 - *development which would have a significant visual impact on views in or out of the AONB*
 - *breaking the skyline, particularly when this is associated with developments that have a vertical emphasis and / movement (chimneys, plumes or blades for example)*
 - *loss of tranquility through the introduction or increase of lighting, noise, or traffic movement or other environmental impact like dust, vibration, spatial associations and historic relationships*
 - *introduction of abrupt change of landscape character*
 - *loss of biodiversity, particularly of habitats or species of importance to the AONB*
 - *loss of features of historic and natural landscape interest, particularly if these are contiguous with the AONB;*
 - *change of use of land such that to cause harm to landscape character*
 - *development individually or cumulatively giving rise to significantly increased traffic flows to and from the AONB, resulting in loss of tranquillity and erosion of the character of rural roads and lanes*
 - *Increase in air and water pollution.'*
 - **KEY POINT:** There is no evidence to suggest most of these adverse impacts would not happen – particularly loss of tranquillity, loss of biodiversity, abrupt change of landscape character, and

increased flow of traffic.

- NWD AONB did not oppose SP17 at Reg 18 stage, but they did express concerns, stating (p1092 in the Consultation Statement – Proposed Submission LPR Dec 2022 v2):
 - *'However, we would feel more comfortable if the parameters of the site and green open space were set in a masterplan rather than a policy which merely requests that the development positively respond.'*
 - **KEY POINT:** As noted throughout this document, there is no detail and certainly no masterplan.
- The previous plan for SP17 included an allocation of 2500 homes in the planning period. In the 'Consultation Statement – Proposed Submission LPR Dec 2022 v2', it states (p1091):
 - *'In response to the large number of objections to this site covering a range of issues important to local people, but largely around the environmental impact of the proposal and the impact on local infrastructure, the Council has taken the decision to reduce the number of dwellings on the site and to allocate it for 1500 dwellings for delivery over the plan period.'*
- Despite this, the settlement boundary remains in the same place as the 2500 proposal. The consultation statement has this response:
 - *'Should the site, or any part of it, be removed from the LPR the boundary for Thatcham would be adjusted to exclude it. It is acknowledged that the settlement boundary is currently drawn around the whole of the proposed allocated site at North East Thatcham whilst Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'*
 - It further states: *'As a strategic level study the LCA assessed the site as a single tract of landscape and so whilst the study makes clear that there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it does not assess the capacity of individual components of the site in relation to individual planning proposals. At this stage it is therefore not possible to draw the settlement boundary any tighter. As the LPR progresses and more detailed work is done on the sensitivity and capacity of different parts of the site to accommodate development the boundary will be amended accordingly.'*
 - **KEY POINTS:**
 - The settlement boundary line has not been redrawn despite a reduction in housing number
 - The stated reason for this is that the LCA does not contain sufficient detail to allow them to see the area as anything other than a 'single tract of landscape'.
 - Until further landscape studies are carried out, it is impossible to know where anything will be sited based on the current proposal of 1500 homes.
 - This level of detail, supposedly enough for the public to make its decision on whether to object or accept this proposal, is completely unacceptable.
- Regarding the reduction from 2500 homes to 1500 within the planning period, there is no detail as to why 1500 homes are any more acceptable than the original proposal of 2500. The Sustainability Appraisal / Strategic Environment Assessment (SA / SAE) sheds some light on the thought processes behind the decision:
 - *'[The option to develop 2500 homes] was originally to be taken forward and was included in the Reg 18 consultation. Despite providing a considerable number of new homes and community infrastructure to support these homes and the wider Thatcham community the potential impact [on] the local community is considered too high, and politically a reduced number on the site is considered to be more acceptable. Therefore, this option will no longer be taken forward.'*
 - **KEY POINTS:**
 - Despite acknowledging elsewhere the high level of environmental concerns expressed by the community, the decision to reduce the number was based on political reasons.
 - Once again, there is no evidence to suggest that 1500 homes is any more acceptable, in this case, from an environmental perspective, than 2500 homes
 - Until detailed assessments are carried out, documenting the existing environmental context and the measures that will be taken to improve it, the public is unable to make a decision in favour of this proposal.
- As mentioned previously, the detailed assessment concluding that SP17 provides positive impact on environmental sustainability is provided in Appendix 5 of the SA / SAE. The circular logic contained in this Appendix is perhaps the most confusing and profoundly depressing element of the entire SP17 proposal. It can be summarised as something like, it is positive because we've said it needs to be positive. Specifically:
 - Appendix 5 contains a table which lists all the LPR policies, including SP17, and assesses how negative, neutral or positive (or significantly positive) each one is in delivering against key objectives. Here are some of the important ones relating to environment:
 - Objective 5: Ensure that the character and distinctiveness of the natural, built and historic environment is conserved and enhanced.
 - Sub-objective 5a: *To conserve and enhance the biodiversity and geodiversity of West*

Berkshire:

- Response: *The policy is likely to have a significantly positive impact on biodiversity as it sets out specific ecological requirements for the development*
- **KEY POINT:** There is no evidence anywhere to support this claim – how can building at least 1500 homes on greenfield land, which itself contains protected species and is adjacent to the fragile ecosystems of the AONB, and introducing over 4000 people into its immediate vicinity, have a ‘*significantly positive impact?*’
- Sub-objective 5b: *To conserve and enhance the character of the landscape*
 - Response: *‘The policy is likely to have a positive impact on landscape character as consideration of the landscape is written into the policy.’*
 - **KEY POINT:** Much the same as above – greenfield versus housing estate? Neither common sense nor WBC evidence exists to suggest it will be positive - for a document of this significance to state that it will be both disturbing and insulting, and further informs my belief that this plan is unsound.
- Overall response to objective 5:
 - *‘The policy is likely to have a significantly positive impact on environmental sustainability as it seeks to conserve and enhance the natural, built and historic environment.’*
 - **KEY POINT:** There is no evidence to suggest it will have a ‘*significantly positive impact*’, and a lot of evidence to suggest it won’t.
- Objective (6): *To protect and improve air, water and soil quality, and minimize noise levels throughout West Berkshire.*
 - The sub-objectives for this objective relate to each part in turn – here, the author of this assessment shows some caution and states that *‘the policy is unlikely to impact air quality / noise levels / soil quality / water quality’*
 - **KEY POINT:** The idea that the development of 1500+ homes is ‘*unlikely*’ to impact noise levels or soil quality is also insulting – it’s a green field versus a 1500-home housing estate.
- Not only does the ‘Local Plan Review Evidence Base’ webpage contain insufficient information to support a public consultation, the information it does provide relating to environmental matters is unhelpful and out of date.
 - The evidence base contains two sections relating to the environment:
 - Landscape – providing landscape character and its sensitivity to future development:
 - Landscape Character Assessments
 - Natural Environment - Information on ecology, biodiversity and nature conservation:
 - Link to Nature Conservation (not specific to SP17, but useful context about local environmental management)
 - A desktop study carried out by the Thames Valley Environmental Records Centre (TVERC) in 2018
 - A link to further information on biodiversity areas in south-east England
- Landscape
 - This contains a link to a 2021 study on the North-East Thatcham site.
 - The study, carried out on behalf of David Lock Associates, states the following constraints:
 - The site has largely been assessed from publicly accessible viewpoints including the local road network, public rights of way, public open space and other publicly owned land.
 - Site photographs included in this study are representative of key views of the site. This does not represent a comprehensive record of all views that can be gained.
 - Views from the surrounding countryside or urban areas have been assessed by noting intervisibility from within or adjacent to the site, but the Study does not include an assessment of the potential zone of visual influence of any development on the site.
 - Study fieldwork was undertaken in late Spring / Summer, with deciduous vegetation in full leaf.
 - Assumptions have been made in relation to land use type, building height and form, to advise this sensitivity study. No public consultation has taken place in preparing the Study.

- **KEY POINTS:**
 - No private land was accessed for the assessment
 - The study was conducted in full vegetation, limiting visibility of the landscape (which was already limited by inability to access private land)
- Natural Environment
 - The 2018 TVERC study (*'BIODIVERSITY SITE ASSESMENT FOR WEST BERKSHIRE LOCAL PLAN'*) found all HELAA sites to be either Red (high risk of adverse effects on biodiversity) or Amber (medium risk of adverse impacts)
 - It states: *'We recommend appropriate survey work based on the results of the assessment for each site.'*
 - Nearly 5 years after the study was carried out, this has still not been done.
 - Furthermore, the data used for the desk study will have been similar to the data obtained to support Bucklebury Parish Council assessments of the adjacent Local Wildlife Sites:
 - 80% of surveys were conducted more than 15 years ago
 - 50% were more than 20 years old
 - 44% were over 30 years old
 - The survey states:
 - *'Up to date ecological surveys are needed to establish current site conditions and the presence of any protected species at the site. Where protected species, sites or habitats are present on the proposed development site, avoidance and mitigation measures must be proposed. Amber sites with the lowest impact scores, as the most suitable for future development, are good targets for future survey work. Development on red sites should be avoided, subject to ecological survey and implementation of appropriate mitigation where practical. Any development that would impact a statutory site requires Natural England to be first consulted.'*
 - *'Sites that have a high opportunities score should be prioritised for the improvement of biodiversity, habitat connectivity and the enhancement of nearby Local Wildlife Sites.'*
 - **KEY POINTS:**
 - Further work is required.
 - This was a desk study - an Amber site can easily be more appropriately identified as a Red site once the site is accessed and its biodiversity established.

As stated above, and with all these points as evidence, I urge you to withdraw the SP17 policy - it is unsound, poorly prepared and (also) unnecessary, given recent Government comments about housing numbers needing to be flexible and must 'reflect local circumstances'.

Regards,

Julian Dobbins

