

From: [REDACTED]
To: [PlanningPolicy](#)
Subject: WBC LPR Regulation 19 Objection - SP17
Date: 01 March 2023 21:26:41

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Dear Planning Department

I am writing to object to the Proposed WBC Regulation 19 Local Plan Review (LPR) 2022-2039, specifically the NE Thatcham development, as I believe it is **unsound and lacking in supporting evidence**. You state on your home page for the LPR under Support Evidence that *'the LPR must be supported by a robust evidence base'* but I do not think there is sufficient robust evidence to prove that the plan is sound.

I have referred back to my previous objection under the Regulation 18 consultation and I am convinced that **the response of WBC is, like the plan itself, flawed and lacking in evidence:**

1. In response to my objections on the environmental impact, WBC's response was that *'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 TVERC report was undertaken in 2018 and has not been updated since. The summary of the TVERC report stated that: *'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.'*
And WBC's response stated that: *'The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.'* Yet despite both WBC and TVERC stressing the need for further ecological work and mitigation measures being required, **there are no mitigation measures or ecological strategy in the LPR.**
2. The WBC response to my objection about the biodiversity net gain stated *'that prior to the commencement of a development, a biodiversity gain plan must be submitted to the relevant planning authority for approval.'* The LPR states: *'Where there is a reasonable likelihood that a protected or priority species may be present and affected by a proposal, comprehensive surveys will need to be undertaken to provide the evidence needed to allow a determination to be made and licenses to be sought where necessary. Appropriate compensation measures should be provided where development would disadvantage the conservation of a priority species.'* Bucklebury Parish Council undertook their own independent study by ecologists and found evidence of threatened birds and animals. There is **no evident plan in the LPR to compensate for the biodiversity loss other than undefined country parks**, on which there are no details apart from that it will link to Thatcham to the AONB.

HELAA concluded that there are *'high risk of adverse nature conservation impacts' with 'areas of ancient woodland and Local Wildlife Sites adjacent to the site.'*

The LPR goes against the Defra's biodiversity 2020 strategy which states: *'The mission for*

this strategy, for the next decade, is: to halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people.'

3. The response to my objections about significant increase in traffic through Upper Bucklebury and the surrounding roads was met with a response that *'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 Phase 2 Transport Assessment Report 2021 does not clearly evidence the mitigation measures and it even states in its executive summary that *'further details and analysis of the impact and suitability of such measures, including further revisions to the site trip rates, will be considered in the next phase of the assessment.'* We are therefore being asked to consult on yet another promise of **mitigation measures with no evidence**. The Transport Assessment Report does confirm that no improvements would have the effect of through traffic diverting off the A4 onto unsuitable local routes, such as that from Upper Bucklebury through to Cold Ash but there is very little evidence of these improvements. As a resident of Upper Bucklebury, I am very concerned about the inevitable increase in traffic through the village and the safety issues associated with this.

4. In response to my objection that the new development would lead to a huge increase in light pollution and that we, like most residents here, chose to live in a village to escape from the significant pollutants that living in a town creates, WBC's response included a comment stating *'The updated version of the proposed allocation policy in the next published version of the LPR also requires the submission of a lighting strategy'*. I could not, however, find this lighting strategy in the LPR evidence base.

The LPR and its inadequacy of a *'robust evidence base'* is highlighted perfectly by Appendix 5 of the Sustainability Appraisal (SA) which states the key effects of the SA objectives. The conclusions of this document seem to be based on absolutely nothing. As an example, Appendix 5 concludes that SP17 provides **a positive impact** on environmental sustainability and is **unlikely to impact** on air quality, noise levels, soil quality and water quality but there is no justification for this. The SA report itself states that the *'overall development of this site is likely to give a **neutral impact** on all elements of sustainability'* and that *'while there is an **unknown impact** on environmental sustainability in relation to impacts on air, water, noise and soil mitigation measures would be able to deliver an overall neutral impact.'* No information is provided on the mitigation measures.

The SP17 policy states that *'the development of the site will be supported by a Sustainability Charter which will establish how policy requirements will be achieved'* and then lists several strategies including energy, integrated water supply, ecology, lighting, biodiversity net gain that simply do not exist. How can the SA conclude therefore that there will be a positive impact?

What is this conclusion based on given that there are no such strategy documents?

In the overall summary of SP17 in the SA, it states (rating a high likelihood) that *'The policy is likely to have an overall positive impact on sustainability'* yet in the same section states: *'The site is a greenfield site and therefore, would result in a negative impact on environmental sustainability which would need to be mitigated.'* Again, as with so much in this plan, no

mitigation measures are in evidence.

Finally, it is my understanding that when WBC initially developed the LPR, there was a requirement to build a specific number of houses but, on 6th December 2022, Michael Gove stated that housing numbers would no longer be mandatory so I would recommend and request that WBC abandon this development plan which is so lacking in evidence to make it sound and justified. This will allow time to understand that building at least 1500 homes on greenfield land, which itself contains protected species (according to the recent Bucklebury Parish Council study) and is adjacent to the fragile ecosystems of the AONB is not a sensible option and will actually have a negative impact on the surrounding infrastructure and most importantly, the environment.

Yours sincerely

Sue Dobbins

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I wish to be notified of the following:

The submission of the Local Plan Review for Independent Examination

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

The adoption of the Local Plan Review