

Comment

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Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Comment by	Penny Pinkard (1334896)
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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 practical to do so and is consistent with achieving sustainable development. . No

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

The LPR is **not positively prepared** and would not achieve the goal of sustainable development for WBC and the wider Thatcham area.

The LPR is **not justified**. Many of the grounds for assessment of impacts and benefits lack credibility and is not based on available evidence. Reasonable alternatives have not been adequately explored and there is no basis to demonstrate that the allocation of North East Thatcham represents an appropriate strategy for WBC.

The LPR is **not effective**. There is no evidence that the development of 1,500 homes at North East Thatcham is deliverable within the plan period.

The LPR is **not consistent with national policy**. In many instances the allocation for development of North East Thatcham under policy SP17 would directly conflict with national policy, particularly in relation to landscape character and impact upon the AONB.

My Objections are:-

Education

The Local Plan Review (LPR) is scant on detail for provision though Nursery to Secondary education. It breaches the Council's obligation to provide education facilities for children. Without this how can such a large housing development be contemplated?

The LPR proposes a sum of £12million to be contributed by the developers for Primary Education. With no current data, I have no idea whether this is a reasonable number. It does not refer to timing of such development, which would need to be in place before families take up residence.

Current Secondary school place allocation is driven by distance from the school. Such a density close to the oversubscribed Kennet School would deny places to families from the surrounding rural villages and removing any choice.

The plan for secondary school provision is unsound:

No satisfactory evidence of the number of pupils the school is to cater for.

No clearly defined location for a proposed school.

Number of Form Entries in not defined , so how can it be declared that a new school will be developed , when at least 6 FE is required for such a school to be viable?

The timing and amount of funding is unclear as to whether it is sufficient?

Transport

The WBC accepts that there will be 'some displacement of A4 traffic onto wider rural areas such as Upper Bucklebury'. The Phase 2 Transport Assessment Report July 2021 shows an exit onto Harts Hill. Traffic exiting here will most certainly continue on the rural lanes of Upper Bucklebury, Cold Ash & Chapel Row and is in addition to 'some displacement'.

The new residents in the development will be commuting to Reading and Newbury so soon the Chapel Row – Cold Ash route will become the route of choice. This is a rural road with existing accident blackspots, with little pedestrian provision.

The Transport Assessment proposes priority junctions at each exit from the site, but show no modelling evidence, and offers incomplete junction drawings.

Safe and Sustainable Transport

The Strategic Environmental Assessment (SEA) , Objective 4 is "To promote and maximise opportunities for all forms of safe and sustainable transport"

Increasing traffic onto the surrounding rural roads is counter to Objective 4.

Public Transport to the rural villages will not be supported by the development as the desirable routing would be by existing A4 bus provision.

Healthcare.

Given the size of the proposed development, why is there no Health Impact Assessment (HIA)? How does the proposed healthcare site actually integrate into the existing provision? It is my understanding that it is unlikely that an existing GP practice would entertain the provision with the incumbent costs. Consequently, the demand will spill over into already overcrowded GP practices.

Environment

I can find no evidence in the WBC submission to support the claims that the development will have positive impact on the environment. The Sustainability Appraisal accepts that the development will have a negative impact on environmental sustainability, declaring this would have to be mitigated. No detail of such measures are provided.

I would estimate an additional 4,000 people will be looking to have access to green space for recreation and well being. The SP17 mentions 'community parks' which have no accepted definition and can hardly be interpreted as taking access to green space seriously.

The natural focus of the 4,000 inhabitants will be the Ancient and protected woodlands adjacent to the site, counter to the ongoing efforts to manage the fragile ecosystems of Bucklebury Common.

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

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| 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 |