

**From:** [REDACTED]  
**To:** [PlanningPolicy](#)  
**Subject:** WBC Local Plan review 2022-2039 Regulation 19 Consultation  
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27 February, 2023

### **West Berkshire Local Plan Review 2022-2039**

To whom it may concern

We are writing to express concerns about the Local Plan Review. We believe that the Local Plan Review is being undertaken in an unsound and possibly illegal way and represents a poor use of council resources. One of us would be prepared to appear at any enquiry.

The proposed submission (Reg 19) [local plan review document](#) is the outcome of an unsound process of consultation that was largely completed in 2020 before the revisions to the protected zones around Burghfield and Aldermaston. The proposal to site 2500 houses (now described as at least 1500 houses) appeared after the previous round of consultations closed. It is therefore an unsound submission and does not represent cooperation as defined in section 110 of the Localism Act.

The document presents a new build of 1500 houses throughout as though that were an upper limit. We would suggest that the number 1500 is preceded by the words at least 1500 houses. The aim of the North East Thatcham development is for 2500 houses as revealed by the initial planning documents.

The need for this number of houses is based on outdated guidance from Central

government. Following Michael Gove's statement to parliament the level of housing need is described as advisory and not a requirement.

### Inappropriate consultation process

All public bodies have duty to make public consultations available to all interested parties. This includes making reasonable adjustments for those parties who may have problems with complex language or reading. Implicitly the consultation should not be restricted to those parties who have greater resources. Restricting the consultation to online only means that those parties who do not use the internet or have difficulties with reading. It is Our view that the LPR consultation document excludes people with disabilities relating to language.

It is our view that the online only form of the consultation (the proposals have not been subject to any form of public meeting) discriminates against poorer and less able members of the community. The council could have protected themselves against these points by holding public meetings in the affected communities and by making easy to read versions of the documents available on request.

### Inadequate evidence

#### 1. Water

We have not found evidence that the council has considered the water run off issues identified in several objections such as those from Thames Water and Natural England. In this connection We note that it is not the council that is ensuring the water supply capacity. Instead the [Consultation Statements](#). Instead the statement refers to the "developers are aware of requirement for upgrades to the water supply network and water treatment works". In the case of other developments in the District the water supply and water treatment were required before the development commences.

#### 2. Transport

The transport modelling is incomplete. There is no evidence that can be examined on

the traffic flows due to the existence of additional entrances to Harts Hill Road and Floral Way. We also note that the estimated additional delays on the A4 and Floral Way of an extra 32% to 62% are likely to contribute to degradation in air quality along these roads.

There is no evidence to suggest that this development is sustainable in terms of a detailed public transport plan. The proposed development is relatively far from Thatcham Station and will promote car travel along the A4 corridor in particular.

There will also be an increased traffic density on the roads around Bucklebury which will endanger the lives of cyclists since many sight lines are short and traffic cannot manoeuvre easily around cyclists or indeed horse riders. Most of the roads have no pavements and the traffic already represents a danger to pedestrians.

In connection with the Highways Assessment there is no mention of a railway bridge to replace the level crossing at Thatcham Station. We do not believe that the Phase 1 Transport Assessment has considered the effects on queues at that point in Thatcham. We believe that the Transport Assessment is itself unsound. Our view is supported by the fact that the 2023 [West Berkshire Infrastructure delivery plan](#) does not mention the Thatcham Level Crossing at all.

West Berkshire Council has already shown that it is unable to plan for alternatives to the use of motorized transport. The cycle lanes provided by West Berkshire Council along the A4 are unpleasant to use and regularly intersected by vehicle access points. This represents a significant risk to cyclists.

### 3. Facilities including public services

Paragraph 7.47 of the local plan review requires that residential developments should be located “where there is already good access to key services and facilities”. The area being considered for housing is at the outer edges of Thatcham and is further from existing medical centres and schools. The current roads are already over crowded and in parts smaller than current standards.

The local plan review identifies sports fields as being part of the development.

However sports fields requires level ground and the area being considered for development is undulating and it is difficult to see where sports fields could be placed. No funding has been identified for the development of sports fields which would require considerable landscaping (removing hills and filling valleys).

#### 4. Natural Environment

The environmental assessment is lacking in the level of detail that would allow it to be considered fully. On this basis the local plan review is not suitable for consultation.

We have not been able to identify any mitigation measures for the rural character of public rights of way or for the biodiversity area of Bucklebury Common.

The consultation document identifies the « Thames Valley Environmental Research Centre” as providing an initial assessment. There is no such body that We can identify. There is a Thames Valley Environmental Record Centre which exists to “share knowledge”. It is not in a position to provide an environmental assessment for the purpose of large scale development unless some other body has already done the assessment. This is another piece of evidence which suggests that the plan is unsound.

Much of the development covers areas that are identified as biodiversity opportunity areas.

#### 5. Health Infrastructure

The current GP practices are not involved in the consultation nor are the Health Planning Authorities. Although the regulation 18 responses made clear that there were significant health issues that needed to be addressed the issues are not addressed in the regulation 19 assessment.

All three local practices are already restricting access by patients in order to cope with the demand from the existing population. Therefore the plan is not workable with existing resources.

The failure of the local authority to take account of the health needs of additional population indicates that the plan is not sound.

## 6. Education

The plan does not identify provision for early years education.

The information on primary schools is unclear.

The ability of the secondary schools in the area to cope with the demand is already stretched to breaking. The proposed secondary school would require considerable central government support and the nature of the phase 1 development is such that it is unlikely to attract the capital funding required. The size of the development is too small to attract support from central government. For the building of a new school. The education planning element is therefore unsound.

Yours faithfully

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