

Dave Parsons



Dear Sir/Madam

I am writing to register my objection to the West Berkshire Council's Local Plan Review – specifically the SP17 North East Thatcham allocation - for the following reasons:

1. WBC has failed to properly engagement with its residents across the County. A lack of provision for a physical exhibition and the over-reliance on the internet has meant that a sector of the community without access to the internet have not been properly engaged to present their views which is contrary to policies on inclusivity.
2. WBC has stated that the reason for the SP17 strategic allocation is, in part, due to the limitation on building in the AONB and AWE exclusion zones. Reference their Local Plan email on 24.2:

*“To meet West Berkshire's housing needs, a larger strategic development of 1,500 homes in north-east Thatcham is proposed, which can provide the necessary housing and supporting infrastructure. Given West Berkshire's restrictions in available development land (due to significant constraints such as the 'Area of Outstanding Natural Beauty'), this location has been identified as the best location for this type of development. The clear intention of the policy is to provide 1,500 homes on this site.”*

Given that the Secretary of State, on 6<sup>th</sup> December 2022, changed the housing allocation numbers from mandatory to advisory and provided a 2 year transition period for LPRs that are in flight it beggars belief that WBC are still pushing ahead with a plan that includes an allocation that they feel compelled to make due to AONB restrictions. WBC is therefore acting recklessly and against its principles of unbiased decision making.

3. Appendix 4 – Assessment of site HELAA. In the Stage 2b suitability tab of this spreadsheet for THA20 (SP17) it is stated that all of these sites contain Grade 3 agricultural land (some grade 2) yet it has not been validated if this is grade 3a or 3b land. Given that Agricultural land grade 3A is considered “best and most versatile” and therefore should not be developed, how is it possible that the correct grade of this land has not been established. Additionally, the report by David Lock Associates – Landscape Sensitivity & Capacity Study for Land NE of Thatcham states (pg86) the following:

*Soils are classified as 'Slowly permeable seasonally wet slightly acid but base-rich loamy and clayey soils' for the majority of the site north of Bath Rd, and 'Loamy and clayey floodplain soils with naturally high groundwater' for the southern section of the parcel of land south of Bath Rd (data from NSRI/Cranfield Soil and Agrifood Institute website). These soils contribute to a predominantly arable landscape.*

The evidence states that SP17 is most likely on Best & Most Versatile (BMV) agricultural land and the David Lock report confirms that the soil is highly valued. Government guidelines deter development on this type of valuable agricultural land.

4. Appendix 4 – Assessment of site HELAA. For THA20 the Stage 2b suitability tab of this spreadsheet classes the suitability of these sites as “Suitably Unknown”. How is it possible that the major allocation for the WBC LPR comprises sites where even by its own assessment the sites may yet be found to be unsuitable.
5. The Sustainability Environmental Assessment states that SP17 will reduce accidents and improve safety. There is a lack of detail on the transportation plan however what we do know is that there will be an increase in traffic on country roads. Country roads tend to be narrower with sharp corners, limited visibility and you’re as likely to encounter a horse-rider, cyclist, walker or tractor as you are a car. Deliberately increasing traffic on these roads is a reckless act that is exactly the opposite of “reducing accidents and improving safety”.
6. The increase in traffic on the A4 – which is already unable to handle the amount of traffic at peak times – will increase carbon emissions and is in direct conflict to WBC declaring a climate emergency. When WBC declared a climate emergency it stated that it would become carbon neutral by reducing carbon emissions within its scope of control (ref: environment Strategy 2020-20300). WBC is responsible for the A4. Cars, trucks etc... stuck on the A4 idling due to congestion will only increase carbon emissions.
7. With the location of SP17, there is little or no provision for public transport within walking distance. It is naïve to believe that adding 1500 houses in this cluster will do anything other than dramatically increase the number of car journeys in the county further increasing Carbon Emissions.
8. SP17 includes provision for a healthcare facility. There is no detail on this, indeed WBC have failed to engage with local general practices to ensure that a development of this size fully caters for the needs of future residents. It’s not just doctors, it’s also dental practices and complementary services. This lack of detail is concerning as it shows that WBC has not done an appropriate level of due diligence and is not invested in ensuring that the future needs of its residents are properly catered for. Without detailed information it is reasonable to be sceptical of any development in this area. The Health Practices that cover the SP17 area are already over-stretched. Of even more concern is that the Thatcham Strategic Growth Study (paragraph 4.10) states that ‘A dialogue with the relevant healthcare and education agencies should be established early in the master planning process to address concerns that social infrastructure may not be provided.’ This is akin to closing the door after the horse has bolted and then saying we didn’t realise the horse would bolt. Without a properly thought-out and financed provision for all the healthcare needs that this development will require, WBC will leave its residents in a poor state with insufficient healthcare provision.
9. WBC has a duty to make arrangements for suitable school provision. The Thatcham NE Development plan proposed funding for a 6-8 form entry secondary school which would be half funded by the developers. This development plan then goes on to state that the NE Thatcham development on its own is insufficient to fill a 6-8 form entry school. Given that the allocation has reduced from 2500 to 1500 it is inconceivable that a secondary school

could now be sustained at this site as government guidelines are that secondary schools with less than 6 form entry are not sustainable. Additionally, the data used in the development plan was from a study from 2011. It's fair to say that a lot has happened in the last 12 years. This is just another example of the WBC not doing its due diligence.

10. The LPR provides no information on provision for Nursery or Early Years education. Indeed with the data being used from a report from 2011 it is justified to be sceptical as to whether WBC actually know what schools provision there should be. How can decisions of this magnitude be made using old and out of date information.
11. Finally with regards to schools, there is no provision for sports fields – which clearly require flat land. There is no funding allocated for sports fields – with an ongoing initiative to ensure that our children have access to green space and spend time outside it is a concern that this has not been deemed important enough to be included in the LPR. This again points to lack to completeness in the documentation and determination of the SP17 allocation.
12. In my regulation 18 response I submitted concerns about the loss of identity for Upper Bucklebury echoing WBC's similar concerns given when refusing the Siege Cross Proposal. WBC did not answer these concerns in their reg18 response to me. They also didn't respond to the statement that they considered there to be no loss of identify if SP17 was allowed to proceed yet for a much smaller development (Siege Cross) they said that there would be a loss of identity. This gives grave concern as to the reason and underpinning logic and data being applied when proposing the SP17 allocation with WBC seemingly able to change their minds at will. My regulation 18 submitted concerns were as follows:

1. *Loss of identity of Upper Bucklebury.*

*As a resident of Upper Bucklebury this concerns me greatly. The proposed development would end up incredibly close to Upper Bucklebury and would reduce if not remove the rural aspect of this village. The Bucklebury Vision and Plan detail that a strong greenbelt should be maintained between Upper Bucklebury and Thatcham. These documents were approved by WBC. Additionally, the Siege Cross proposal was refused by WBC because of similar concerns. The reason WBC gave for refusal included: (taken from the WBC Decision notice to refuse outline planning):*

*3 (c) The proposed development would result in harm to the character and identity of Thatcham and erode the open landscape between Thatcham and Upper Bucklebury.*

*3 (d) The development would have an adverse impact on the distinctive local landscape character and appearance of the landscape north of Thatcham, which contributes to the setting of the AONB the boundary of which runs some 575 metres to the north of the site.*

*It is extremely concerning that WBC now considers this loss of identity acceptable. I.e.: recommendation from Site Assessment on CA16: Due to the scale of development that could take place on THA20, it is considered that there should be no further allocations in Thatcham in the period to 2037 particularly as development of both north east and north Thatcham would result in the loss of the separate identifies of Cold Ash and Bucklebury, and would harm the setting of the AONB settlement pattern*

*In haste to find a single convenient solution it seems that it is acceptable that villages should lose their separate identity and all merge together. Where does this stop? Why not merge all villages and towns together and be done with it? Such a narrow-minded attitude is short-sighted and abhorrent.*

13. The Sustainability Appraisal / Strategic Environmental Assessment report makes positive statements in its justification for SP17 but is short on data or proof. In fact whilst it makes justifications because of purported new educational and community infrastructure, WBC has itself said that these may not be delivered.

Page 1085 of the *Consultation Statement for the Proposed Submission LPR Dec 2022 v2* document states:

*...this option may not deliver all of the education provision originally envisaged on the site, or the additional improvements to community infrastructure within Thatcham.*

How can the SA/SEA provide a positive assessment based on infrastructure that will never materialise?

14. As this site allocation is in the setting of the AONB it will have a great negative impact on it. The LPR states that it will create a green infrastructure network that will facilitate connection to the AONB. With a proposed development size of 1500 houses this will mean up to 4000 people could potentially be encouraged onto the AONB – onto Bucklebury Common. Bucklebury Common is an important Local Wildlife Site and one of the largest commons in Southern England. It already suffers from overuse and has a fragile ecosystem. Further pressure on the Common will irreparably damage the ecosystem here. There is no evidence citing any mitigation for this despite the Bucklebury Common being in AONB which means WBC have statutory requirements around its safeguarding.

In summary, there are a number of areas where it is shown that the WBC LPR is based off old, inaccurate or incomplete information. Additionally there are a number of areas where the LPR is contradicted – either in its supporting information or in contrast to previous WBC statements. Finally WBC has been given the opportunity to pause this process and review the LPR (statement made by the Secretary of State on Dec 6<sup>th</sup> 2022) but has ignored it even knowing such issues as stated above exist. All this evidence shows that the SP17 allocation is unsound and must be removed from the LPR.

Regards,

Dave Parsons