

Comment

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Comment by	Simon Martin (1335175)
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1. Do you consider the Local Plan Review is legally compliant?

Please see the guidance note for an explanation of what 'legally compliant' means

Yes

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

Traffic

Given the number of homes proposed (although this seems unclear as to what the maximum number will be), even if each come had one car, this will equate to thousands of daily trips on the local road network, which is already busy. This does not include daily deliveries and visitors to these homes. The A4 through Thatcham is congested at peak times, and there are already large queues in and out of Thatcham via the railway crossing.

The homes are located in such a location that to access Thatcham's amenities, schools and doctors for example, people will drive in most cases rather than walking or cycling along the A4. The council have assessed a "Significant Positive Impact" with "The policy is likely to have a significant impact on walking, cycling and public transport as the development should be designed with these in mind." Having worked professionally on many such schemes it is quite clear that despite putting in token footpaths and cycle paths, the development is effectively separated from Thatcham by Floral Way and the A4, and people will drive almost everywhere. Despite what studies may demonstrate, they never account for human behaviour. You only have to see how hard it is to park in Thatcham Broadway for example, to see how everybody drives to Thatcham's shops and services.

The proposed junction on Harts Hill Road is particularly concerning. This will encourage people to travel up a narrow, twist and steep road towards Upper Bucklebury in order to use unsuitable lanes for their journeys. Living in The Slade, I am very concerned that people will head up Harts Hill Road, then turn left onto Broad Lane to travel towards Cold Ash and the A34 at Chieveley, or use very narrow lanes such as Briff Lane, The Slade and Tylers Lane to head towards Yattendon and other villages. These lanes are Bucklebury Quiet Lanes, and are used by walkers, horse riders, families etc. They are very narrow, often in poor condition and not suitable for an increased number of car journeys, let alone vans and LGVs.

The junction between Harts Hill Road and Broad Lane is accessed by driving past two car repair businesses and is usually in effect a single carriageway due to parked cars. The junctions from The Slade and particularly Holly Lane are difficult with limited visibility, and an increase in traffic at the national speed limit will be dangerous.

I cannot see how increasing the number of car journeys by a poorly developed scheme is consistent with West Berkshire Council declaring a climate emergency or being on a journey to net zero. This scheme shows no progression from the housing developments designed 20 or more years ago, where large numbers of houses were simply built in a field.

The Sustainability Appraisal (SA) / **Strategic Environmental Assessment (SEA)** which accompanies the Local Plan consultation assesses the allocation of North East Thatcham against key Sustainability Objectives. **Objective 4 is – To promote and maximise opportunities for all forms of safe and sustainable transport. The SEA makes the following assessments:**

'To Reduce Accidents and Improve Safety'

Council Assessment - *The policy is likely to have a Positive Impact on road safety as safe travel will be critical to the design of the site.*

How can increasing number of vehicle trips on the same roads improve safety can reduce accidents?
This is nonsense.

'To increase opportunities for walking, cycling and use of public transport'

Council Assessment – Significant Positive Impact

Council Commentary - *The policy is likely to have a significant impact on walking, cycling and public transport as the development should be designed with these in mind.*

Any study can show what you want it to show, but as discussed above, the location of the site will not have this positive impact and this study should be challenged.

Healthcare

Having lived previously in Thatcham and having family there, I am aware how oversubscribed and busy the dentist, GPs and pharmacies are. Furthermore, my son was recently taken ill and we were told to go the West Berkshire Community Hospital; however, we were told they could not see my son as no child specialist was available. We therefore had to drive to Basingstoke A&E.

One can only conclude that the current healthcare provision is at best stretched, and therefore given that this proposal for thousands of new homes contains no details on the provision of primary health care, the proposal is flawed and cannot be considered to be complete or viable. It is not acceptable to place an additional burden on existing healthcare providers, and to reduce the quality of care available to existing residents.

Environment

Firstly, it beggars belief that the proposal even considers siting so many homes on a hillside in front of the North Wessex Downs AONB, destroying the view forever.

Losing greenspace and farmland to this development flies in the face of current thinking on sustainability and sensitive development, and is clearly just an attempt to tick the box of providing a few thousand new homes, whatever the environmental cost. House building is environmentally damaging throughout the process and supply chain, and is a major contributor to carbon emissions. How does this align with council declaring a climate emergency and targeting net-zero? Given the proposal only proposes “community parks”, this hardly represents an effort to mitigate the lost views, ecology and habitats which will be caused by this development.

In The Slade and Bucklebury Common, the impact of visitors is felt in numerous ways including (but not limited to):

- . Littering;
- . Setting fires (accidental and otherwise);
- . Dogs out of control disturbing ground nesting birds or attacking deer (I have witnessed this myself);
- . Dog fouling;
- . Car parking on verges;
- . Walking off public rights of way;
- . Trespassing on private property;
- . Illegal off-roading by vehicles.

The management vision for Bucklebury Common is explicitly focused on not increasing human pressure on the fragile ecosystems they are working to restore and nurture.

By placing these new homes closer to Bucklebury Common than the existing residential areas of Thatcham will only increase the above problems, given no proposals have been made to provide recreational areas that can be used without destroying fragile environments.

The development will only have a negative impact on the local environment, and in no way is it shown to be sustainable or sensitive to its position within the local landscape. This proposal should therefore be disregarded and a proper solution for housing in West Berkshire developed, one which incorporates better thinking than building thousands of homes on green space.

In fact, **the LPR’s own Sustainability Appraisal accepts that SP17 will have a negative impact on environmental sustainability**: ‘The site is a greenfield site and therefore, would result in a negative impact on environmental sustainability which would need to be mitigated.’ But there is no detail whatsoever on any such mitigation measures: the assumption is simply that they will somehow be found during the planning application process.

However, **the very same Sustainability Appraisal suggests that the SP17 policy is likely to have an overall positive impact on sustainability** –this does not make sense.

Education

The provision for education from Nursery, Early Years, through Infant to Secondary education is not clearly defined within the Local Plan Review (LPR). There is no coherent end-to-end plan: this therefore breaches the Council's obligations to provide education facilities for children.

Having young children currently at primary school age or below, I am extremely disturbed that the proposal does not demonstrate that adequate school provision will be provided.

We are in the Kennet and Downs schools catchments, but closer to Kennet. Should these homes be built without any provision, then pupils from the new development will take preference to children from Bucklebury for places at Kennet due to distance. This leaves no option but Downs, but as we are far from Downs, there is a chance we then end up with no place and our children could end up having to go anywhere for secondary education.

There is also no resolution as to the issue of school playing fields. As the site is on hillsides, the only flat and will be down near the A4, which is not acceptable due to traffic emissions.

Therefore this proposal is flawed as it does not demonstrate how school and playing provision will be made.

Timing of the Review

The NPPF consultation was launched just prior to Christmas 2022 and will run until 2nd March, 2023. The Consultation Version of the NPPF sets out that the Standard Method for calculating the housing requirement (as used by West Berkshire for the regulation 19 version of the plan) will be advisory not mandatory and should only be the starting point for local plan. There is a particular focus within the consultation NPPF on taking into account the character of an area when assessing how much housing can be accommodated.

Therefore the numbers need to be reassessed.

3. Do you consider the Local Plan Review complies with the Duty to Co-operate?

Please see the guidance note for an explanation of what 'Duty to Cooperate' means.

No

Please give reasons for your answer

Their own conclusion states:

".1 For many topic areas the Western Berkshire Councils Statement of Common Ground (WBCSoCG) is still a valid and up to date summary document. West Berkshire Council considers that it can meet its own local housing need.

However for employment uses there is still some work that needs completing before we submit the plan and it is hoped to enter into formal statements of common ground on the topic. Although not discussed in detail in this paper the input from and coordinated work with Natural England will continue with the intention to enter into a statement of common ground with them before the LPR is submitted to the Secretary of State. Their work with the council has covered responding formally to Regulation 18 draft plan consultations, green and blue infrastructure as well as the recently important nutrient neutrality and Habitats Regulations Assessments"

4. Proposed Changes

Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this change will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The LPR is unsound in many areas and the following need to be addressed:

- . Traffic/transport - proof that the development will positively improve walking, cycling and public transport, and improve safety.
- . Healthcare - the proposal needs to demonstrate the real strategy for delivering appropriate healthcare for the thousands of new residents.
- . Education - the proposal needs to demonstrate how education will be provided.
- . Environment - the Sustainability Appraisal needs to be consistent on impact of sustainability, and demonstrate a mitigation of environmental impacts.

5. Independent Examination

If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? No

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

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