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20th February 2023

Dear West Berkshire Council Planning Officer

West Berkshire Council (WBC) Local Plan Review: Regulation 19 Consultation

This letter is to set out my strong **Objection** to the revised Local Plan because it is fundamentally **Unsound** and fails to deal with the following topics:

- **Democratic process and Timing**
- **Damage to the Environment**
- **Education provision**
- **Transport infrastructure**
- **Healthcare provision**

I set out further details which I hope will be fully taken into account in the sections below and wish to make **personal representation to the Planning Inspectorate** on each of the topics. My representations are made against the **tests of soundness** as set out in paragraph 35 of the NPPF. This states that plans are 'sound' if they are:

- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – 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; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

The LPR is **unsound** as it fails against each of the tests as set out above in numerous areas of the plan. The failings against the tests of soundness are summarised below

- The **LPR is not positively prepared** and would not achieve the goal of sustainable development for West Berkshire 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 either necessary or 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. The

process of assessing the impact of development under policy SP17 through the sustainability appraisal is fatally flawed and is not a matter which can be easily remedied through modifications to the plan. The process for selection of North East Thatcham as a development site is severely flawed and lacks evidence.

In addition all aspects of the plan where greenfield sites are used have a negative impact on the locations itself and surrounding areas.

It is extremely disappointing that this Plan has been produced in such an unprofessional way.

I am ready to answer any follow up questions yours faithfully

{signed}

Dr Deborah Reynolds CB

Overview of key subjects for my Objections are:

- **Democratic Process and Timing**
 - The consultation, selections process and appraisals have all been severely flawed, lacking in evidence
 - The decision making is undemocratic by failing to obtain full council sign off after Regulation 19 consultation and before submission to the Secretary of State
 - Government consultation for the NPF is currently underway, is likely to reduce housing requirements for councils and WBC are acting recklessly by proceeding when they should pause the development of the local plan
 - Number of houses for NE Thatcham is now “at least 1,500” – From an initial site assessment of 2,500 of which 1,250 were to be built in the Plan period, this has now in fact **increased** to 1,500 houses because the Plan extends to 2039 rather than 2036 (as originally proposed).
- **Environment**
 - Lack of strategic gap between Thatcham and Bucklebury – Thatcham and Upper Bucklebury will effectively merge and Upper Bucklebury will lose its identity
 - Consequential damage to Bucklebury Common – increased footfall; increasing damage to an ecosystem of national importance
 - Greenfield development abutting an AONB with no up-to-date evidence nor strategy for positive impact and overall biodiversity gain identity
 - A ‘Country park’ – this has a specific accepted definition which is not met in this Plan. The three small, isolated areas inside the proposed settlement boundary have no meaningful environmental value or commitment to exclude subsequent development
- **Education**
 - Unacceptable pressure on secondary schools – Kennet is already over-subscribed; accommodation for additional secondary school places has not been specifically stated
- **Transport**
 - A severe increase in traffic through Upper Bucklebury and other villages will be dangerous; WBC propose a new roundabout on Harts Hill to allow traffic in and out of the northern end of the development, and a car park, also on Harts Hill, both highly inappropriate;
 - Severe additional congestion on the A4 will be bad for citizens and business
- **Healthcare**
 - Unacceptable pressure on medical & complementary services – additional GP surgeries are not part of NHS strategy for the future

Specific Objections : WBC's process and timings

Government consultation on the NPPF

The NPPF consultation launched in December 2022 runs 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 it is unacceptable that West Berkshire are continuing to consult on the current version of the local plan, that councillors did not require the final version of the plan to be brought back to them for before it is submitted to the Planning Inspectorate for examination.

On the back of this announcement, several Local Authorities have paused their plan making process whilst they await the outcome of the consultation on the basis that a lower housing requirement could be applicable to the plans than the one currently being planned

We feel that the council should take the opportunity, as others have, to **pause the plan making** and to bring forward a revised plan in line with updated planning guidance when this comes in later in 2023.

Specific Objections : Healthcare provision

The North-East Thatcham development plan (SP17) proposes a 450 sq m primary healthcare facility with the suggestion that a **GP Surgery** be offered to the Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board or other such appropriate body. However, the document is **bereft of detail or insight** into strategic healthcare planning.

Proposals for a major development that is likely to have a significant health impact in relation to its size and location, should be accompanied by a fit for purpose **Health Impact Assessment (HIA)** in accordance with the current guidance from Public Health England. The HIA should include reference to how the proposals for development have been discussed with health service providers regarding impacts on primary health care services. The development proposals should demonstrate how the conclusions of the HIA have been considered in the design of the scheme because an unacceptable impact on the health and wellbeing of existing or new communities will not be permitted. It is of concern that **neither WBC nor the developers**, as public and private stakeholders respectively, **appear to have arranged or published a prospective HIA specific to the proposed North-East Thatcham development.**

Tackling health and wellbeing requires a **multi-agency approach**. The Berkshire West Health and Wellbeing Strategy 2017-2020 2021-2030, has been developed by the Reading, West Berkshire and Wokingham Health and Wellbeing Boards together with the Berkshire West Integrated Care Partnership. Developers are encouraged to engage with the healthcare providers at the earliest opportunity in order to determine the health care requirements associated with new development. It is of concern that **there appears to have been no direct engagement between the North-East Thatcham Development Consortium and local general practices.**

Few new GP practices are commissioned by NHS England, even where they consider there to be patient demand for improved services. NHS Digital figures of patients registered in the NHS Berkshire West Clinical Commissioning Group (CCG) confirm there is an even worse shortage of GPs in other areas of the country. There is therefore **no realistic prospect of a new GP practice being established** in Thatcham or West Berkshire in the foreseeable future.

GP practices look to create efficiencies and economies of scale to make general practice more financially sustainable and to increase access and extend the range of services and primary healthcare professionals available on a single site. It would make **no financial, organisational or geographic sense for an existing local GP practice to set up a branch surgery** on the proposed new development because of the additional administrative, computing and staffing costs and encumbrance working across two sites.

There has been **no approach by WBC or the developers to any local GP practice to discuss an appropriate site, floor-space or location** to which one or more practices could relocate. An enlarged primary healthcare site is required and might be better located close to the middle of Thatcham to improve access and minimise traffic as the proposed NE Thatcham development is peripheral to the centre of the population. This would be likely to be supported by Thatcham Town Council but has not been suggested in the sustainability appraisal of site options. Local practices did not have input with the inadequate 450 sq m floor size proposal which they only discovered with the SP17 Policy of December 2022, Appendix D.

The proposed North-East Thatcham development site is covered by the existing practice boundaries of Thatcham Medical Practice (west of Harts Hill Road), Burdwood Surgery (east of Harts Hill Road) and Chapel Row surgery (the whole area). **All three practices are already overstretched.** The two Thatcham doctors' surgeries run independently of each other, and their combined lists include approximately 27,800 patients that equates to just under 2,000 patients per GP. Newly registered patients moving into housing developments tend to make a greater demand on GP services because there are more young children, a higher maternity workload, less local extended family support and there is initially a higher housing turnover. One permanent and repeated temporary pharmacy closures in Thatcham have further exacerbated pressure on primary care locally.

Thatcham dental practices are unable to provide dental care for the whole population with a significant minority of patients needing to travel further afield for NHS and private dental care. Thatcham Vision, endorsed by WBC in 2016, confirmed only 60% of residents were registered at a Thatcham dentist (with 17.5% registered with a doctor outside Thatcham). There is no evidence provided that either WBC or the developers have approached any local dental practices regarding the potential impact of increased workload resulting from additional housing.

Reviewing the scanty healthcare recommendations within the Thatcham Strategic Growth Study (David Lock and Associates) - Stage 2: Thatcham Present, paragraph 4.10 states: '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.' The Stage 3: Thatcham Future report published in September 2020 includes no further detail except the outcome of a community representatives' workshop, that the existing GP facilities are at capacity and suggesting a new health centre.

Conclusion:

WBC and the developers appear to have neither arranged a relevant HIA nor provided evidence of having appropriately liaised with local health care agencies or providers. They are

proposing a healthcare site that is unsuitable for NHS primary care and so have not made provision to mitigate the burden that 1,500 or more new houses will make on a local NHS struggling to cope.

The objective of WBC and the North-East Thatcham Development Consortium to improve access to the health service component of community infrastructure has not been met as they have **not provided evidence for the provision of a viable primary care medical facility.**

Specific Objections: Transport

1 Increased Traffic

Reviewing the comments by Bucklebury residents submitted at Regulation 18 about North East Thatcham, a recurring theme is increased traffic through the villages. We sought assurances and were led to understand by WBC planners that traffic from the development would link to Floral Way and the A4. This is true but what they 'forgot' to mention was **a plan for an exit at the north of the site onto Harts Hill**. This only became apparent on Friday, 6th January when the Transport assessment was published: [Phase 2 Transport Assessment Report July 2021.pdf \(westberks.gov.uk\)](#). This is serious for us because traffic from, or to, the site is only going to go in one direction from this exit – **towards Upper Bucklebury** where it will split between the traffic going through Cold Ash and the traffic through Upper Bucklebury and Chapel Row.

The proposed development will funnel traffic from the development and, **WBC predicts**, - '**some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury**'. This would be where the roads are inadequate, without pavements and have the potential for serious accidents. See also point 4 below on increasing opportunities for walking and cycling – under '**Safe**' Transport.

2 Access and junctions

The Transport Assessment says at paragraph 3.26 : '*The access arrangements for the northern end of the NET site proposes **new priority junctions** (with right turn lanes where appropriate) on both Floral Way and **Harts Hill Road**. Results from the modelling suggest that these will not cause problems*'. However, the document has **no** modelling results for this. There are drawings for all the other proposed junctions but none for the Harts Hill one – why not?

3 Car Parks

We have also seen drawings showing **a new car park on Harts Hill**. The purpose is a mystery but will surely add more traffic to the same part of what is already a dangerous road and may also promote the night-time antisocial behaviour all too apparent in the car parks on the Common.

4 Safe and Sustainable Transport

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.

- '**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.*

Specific Objection: Education - Schools and Sports Fields Provision

1 Schools Provision

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. Without this provision, the Plan for a large new housing development is untenable.

The lack of a coherent Plan on Schools Provision across the various proposed developments also means that it is impossible to estimate the subsequent impact on traffic. The siting of a secondary school to the NE of Thatcham would result in a significant increase in traffic across the whole Thatcham area, not considered in the traffic plans and models in the LPR.

Pre-secondary School Provision:

There are **no details** in the LPR of the provision for **Nursery or Early Years** education. Policy SP17 NE Thatcham Strategic Site Allocation, merely states that 'the site will provide Early Years provision'.

The provision for **Primary** school education is **unclear and contradictory**. There is no data or evidence on the planned numbers of schools or Form Entry requirements. The LPR proposes that the sum of £12 million be contributed by the developers to primary education. However, with no recent data available (the only data referenced is from 2011), it is impossible to assess if this is sufficient. It also does not state the timing of this funding or school place provision. Clearly, schools need to be available before houses are built.

Secondary Education Provision:

The **current situation** for secondary school students from Bucklebury is that they have a choice of either The Downs School or Kennet School as they are in the catchment area for both.

Where schools are **oversubscribed** those children who live nearer to the school are given precedence. This means that children from the proposed NE Thatcham development would be able to opt for Kennet and those from Bucklebury would then be limited to The Downs.

The LPR is **inconsistent, incomplete and contradictory** on the provision of **secondary schooling** in and around Thatcham. The latest LPR is in contradiction to the *Supporting documentation. It proposes that the sum of £15 million be contributed by the developers to Secondary Education. There are **no details of the location of the land** to be provided and hence no possibility of assessing its suitability.

Please see the link below to **The Thatcham NE Development Plan 2020** (part of the LPR *Supporting documentation):

https://www.westberks.gov.uk/media/49799/Thatcham-Strategic-Growth-Study-Stage-3-Thatcham-Future/pdf/Thatcham_Strategic_Growth_Study_Stage_3.pdf?m=637910502456970000

The Thatcham NE development plan 2020, produced by David Locke Associates and Stantec on behalf of WBC, proposes funding for a 6-8FE (Form Entry) secondary school, half-funded by developer contribution.

Government guidelines are that Secondary Schools with less than a 6FE are not sustainable.

However, the Development Plan states that the **NE Thatcham development** (which proposed 2,500 houses), **is not sufficient to fill a 6–8 FE school**: Specifically :-

5.18 Provision of a new secondary school in North East Thatcham is an essential part of enabling growth in the town. However, the scale of growth proposed is not sufficient on its own to fill a 6-8FE secondary school.

5.19 Secondary schools need to be of sufficient scale to make them sustainable and able to provide suitable facilities for their students, so it is not considered feasible for a new school to be smaller than 6FE.

With an apparent 40% reduction in the housing allocation in the 2023 LPR (2022 to 2039) to 1500 houses, a secondary school simply cannot be sustainable in this location.

Earlier in this same Thatcham NE Development Plan it was noted that the education provision exercise was based on **WBDC data** on pupil yield from **a study in 2011**. Clearly the use of 11 year old data is inadequate. The Development Plan states:

4.83 This study has not engaged in a detailed demographic prediction and modelling exercise to determine future primary and early years educational demand across the town, and has not attempted to predict the long-term capacities of existing schools. Inevitably educational provision will be examined in more detail as any development comes forward.

The LPR Review to 2039, Policy SP17, now states that land (but not the Secondary school itself) will be provided for the development.

In summary, it is therefore clear that the plan for secondary school provision is 'unsound':

- there is no satisfactory evidence of the number of pupils the school is to cater for;
- the location of a school is not clear;
- the number of Form Entries is not defined, but it is noted that anything less than a 6FE school is unsustainable;
- the timing of the funding is not clear; and
- there is no evidence that the proposed funding is sufficient to meet the Council's obligations to provide education.

Conclusion on Schooling :

West Berkshire Council, as an education authority, has a duty to make arrangements for **suitable school provision**. How this obligation will be met across all school years is **not defined or evidenced in the LPR**.

2 Sports Fields Provision

The LPR talks of the provision of sports fields. This raises two issues not answered in the LPR:

- Sports fields require flat ground. The only flat area of ground in the proposed site is that which is closest to the A4 and therefore in an area with the most traffic fumes.
- There is no funding earmarked for these facilities.

Although unclear, the LPR appears to assume that the school playing fields would also be available as Sports Fields. If the school itself is not viable, then the playing fields will not materialise. Additionally, many schools are reluctant to open their playing fields to the public due to safeguarding and other concerns.

The objective of WBC and the North-East Thatcham Development Consortium to provide **sports fields has not been met** as they have **not provided evidence for funding or for a suitable location**.

Specific Objections : Environmental Issues

There are a number of **serious environmental threats** posed by the proposed Thatcham North-East strategic development site (SP17). These include:

1. **Collateral damage** to the **Bucklebury Plateau Biodiversity Opportunity Area** (*see map at end) and its ancient woodlands and heaths, **in particular the Common**;
2. Siting a **major greenfield development** in the broader landscape setting of **the North Wessex Downs AONB** that will forever impair enjoyment of the open countryside by local communities;
3. Causing **detrimental impacts to legally protected wildlife** known to be present on the site, whilst erroneously assuming that sufficient mitigation measures can be taken after development e.g. through the vague promise of a 'community park'.

Taken together, and after a thorough professional review of the background documentation provided by WBC in support of the draft LPR, it is clear **there is no evidence to support claims that SP17 will have a positive impact on the environment. By contrast, there is every reason to believe it will have a significantly negative impact.**

For example, the WBC states in the LPR that **a Sustainability Charter is required** to establish how '*policy requirements will be achieved*' (including the legally required biodiversity net gains and the anticipated overall positive impact on environmental sustainability). It maintains that the Charter '*will be informed by*' various strategy documents (including one on ecology). **Yet, the strategy documents either do not exist or have not been made publicly available for the Regulation 19 consultation.**

At least **4,000 people will be concentrated in the development site**. They of course must have access to green space for recreation and general wellbeing. The claimed provisions for green space cannot satisfy this demand on site. The original Thatcham Growth Plan had **a vague proposal for two 'country parks'** spaced across the top of the slope, inside the Biodiversity Opportunity Area, claiming the potential for significant biodiversity enhancement over its current land use. No details were provided about how they would be formed. The feasibility study by Bucklebury Parish Council showed the complete lack of preparation for such country parks, not least that they should be merged, and properly managed and funded to deliver that stated biodiversity enhancement. Now, in the updated SP17 text, the country parks have been **downgraded to undefined 'community parks'** which only proves how little commitment WBC has given to protecting the natural environment and public enjoyment of it.

Since SP17 has no proven plans for providing adequate green space and protecting biodiversity, there will inevitably be spill-over of people visiting adjacent areas.

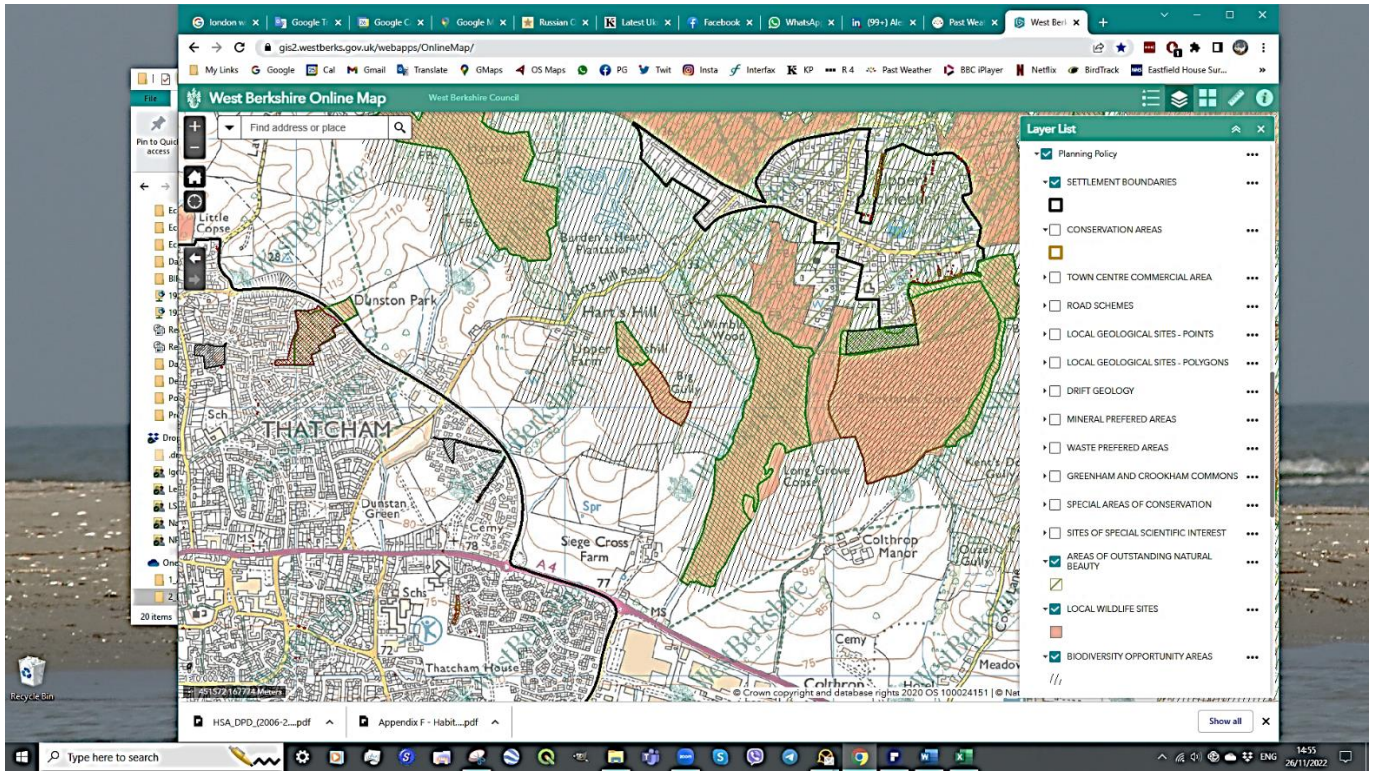
Indeed, the LPR states its intent for SP17 to drive additional traffic (people and cars) into the AONB. It provides a green infrastructure network which will *'take advantage of the landscape'* to *'facilitate connection to the AONB, and include leisure routes accessible to all users.'*

Meanwhile, 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.

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** – largely by absurdly ignoring the environmental consequences in favour of social and economic benefits that are anyway highly questionable (see other articles herein).

The overall thrust of **the SP17 policy** is clearly to build as many houses as possible in a small area of countryside, while making empty promises about how the environment – human and natural – will be improved or, if not, mitigated. Despite all the money spent on consultants to prepare the housing plans and justify the 'growth' requirement, **there is no evidence of any serious attempt to investigate, analyse and systematically address the consequences. Everything will be all right because their own unsubstantiated policies say it will be.**



Map of the ***Biodiversity Opportunity Area** (green hatching), and ancient / protected **woodlands** (red hatching)