From:	
To:	PlanningPolicy
Cc:	
Subject:	WBC LPR Regulation 19 Objection
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Nicola Jones

WBC LPR Regulation 19 Objection

Please find below my objections to the Local Plan Review & North East Thatcham SP17 development according to the current consultation (Reg 19).

I believe that the Local Plan Review is fundamentally defective in providing the required duty of evidence to back up the claims it makes as to the suitability and positive impacts of this development and Local Plan. Indeed, I am in no doubt that the unsound and vague nature of many of the positions put forward as positive reasoning are due to the lack of sufficient evidence having been found to date and continued inability to do so once the development progresses. The Local Plan & this development as it is presented will have a highly negative impact on myself and others in existing local communities and users of this countryside.

Additionally, given the recent announcement that housing numbers should now be an advisory starting point and not mandatory and be sensitive to and reflect local constraints and concerns, then WBC is rushing this through without sufficient impact assessment and missing the opportunity to gain this and seek alternatives and revise its plan with updated planning guidance and assessment on suitability of locations and housing numbers.

Most notably:

1. Environment

- I have grave concerns on the environmental sustainability impact and foresee a huge detrimental impact to the wildlife (including legally protected wildlife), local communities, Bucklebury Plateau Biodiversity Opportunity Area, the North Wessex Downs AONB and myself as a dog walker in the Common, AONB and living on Long Grove (a key access point from the development to the Common).
- I have not found any strategy documents setting out how the biodiversity net gains and any positive impact on environmental sustainability will be achieved. In fact, the LP states SP17 will have a negative impact and provides no sound measures to mitigate this but states it will be which if that was possible, then they should already be available and documented in the LP. It also says overall there will be a positive sustainability impact without any evidence as to how this is achieved given the vague economic assessments (especially for 1500 houses and also for 2500), questionable social benefits and negative environmental sustainability acknowledged. It does not come across as well deliberated with sound risk mitigation plans.
- There is no sound basis shown in this LPR as to how the community parks (is this a field, bench & swing set? which previously were more significant country parks at least implying wildlife may still frequent) will be sufficient green space for 2500 dwellings (nor for 1500 to start with) given the development issignificant reducing current greenfield area. The area and views will also be destroyed (only allowing for horizon view and no longer a valley view from the top of the proposed development and only views of houses from the valley instead of current views of green space) which will have a negative impact on the sense of space, wellbeing derived from seeing rolling green space, not to mention the poor impacted wildlife who will be displaced onto roads, losing nesting and hunting grounds and inevitability numbers will be reduced including of protected species.
- Traffic will also increase into the AONB which is a conflict with focus on limiting pressure on the fragile ecosystems within the AONB.
- No evidence of consultation between WBC and Thames Water that water provision and waste drainage requirements can be met for the volume of housing proposed.

2. Traffic/transport

- There is no Modelling provided that shows that there will be no problems caused to local village roads and users safety from the increased volume of traffic, in particular coming via a newly entered exit on Harts Hill Road and car park, the obvious increase in local residents and schooling. The position that this will be limited is unsound as an exit here will principally lead to traffic going up into Upper Bucklebury, Cold Ash and Chapel Row on top of that already diverting from A4 to go this way too making a 'rat run' through villages and increasing the danger.
- The increased traffic in villages will have a direct negative impact on those currently living there.

3. Housing volumes & Government directive

- The recent Secretary of State's statements concerning housing supply, targets and transition periods for local authorities does not appear to have been considered.
- The settlement boundary line for Thatcham shows the same line as for 2500 houses so does not align to 1500 and we see no evidence that the Developers and WBC plan to guarantee a country park larger to take up the space released and given the 1500 is stated as a minimum rather than maximum then it is obvious it is actually still 2500 dwellings which must be considered in the assessments of impact.
- Additionally, the LPR Regulation 19 wording positions the LP as delivering a reduction from 2500 dwellings to 1500 in the plan period (presumably to appearmore positive) whilst in reality the reg 18 consultation envisaged 1250 dwellings in the plan period and the studies are still based on 2500 so is actually increasing the provision for this LP period and maintaining the longer period plan for 2500. This is close to misrepresentation.
- There is still insufficient evidence of appropriate assessment with supporting evidence to back up rejection of other sites, in particular brownfield. The HELAA has been updated with additional rejected sites now at the end of the process rather than these sites being added at the start of the process so allowing for adequate impact analyses.

4. Safety

- There is no evidence that this development will provide a positive impact to Upper Bucklebury. It will negatively impact village life of villagers like myself.
- Harts Hill Road and parts of current housing areas have no footpaths or cycle paths and hence the increased traffic will have an impact on the level of risk of accidents – no studies have been offered by WBC or the Developers to show this would not be the case nor to show the significant positive impact purported in WBC assessment. A number of current public footpaths through countryside will be running through areas with dwellings and negatively impact the enjoyment and safety of local walkers, dog walkers, cyclists etc. already using them.
- Having an exit on Harts Hill Road will be risky to users of the road given the bending nature of the road and will create sitting traffic not easily seen from distance. We see no evidence presented to show the contrary.
- There will be an increased cost to us living on Long Grove as we pay to maintain the bridleway as the Council state that the damage is done by cars alone and provides no modelling to alleviate our concerns that the obvious increased footfall in pedestrians, cyclists, and scooters who already come up from Thatcham area will not increase/deepen the pot-holes and thus our cost, frequency and inconvenience of road maintenance.
- Additionally, there is no evidence submitted to counter the perceived increased risk to property and personal safety, & peace of mind related to potential antisocial behaviour on Long Grove/Upper Bucklebury as people travel to and fromthe public house thus detrimentally impacting the mental health of residents, many who are aged. Also, the impact on potential anti-social

behaviour is also not considered in respect to the proposed car park. I see no supporting evidence that the policy and any future site design is likely to have a positive impact on road safety – this, if at all feasible which is highly unlikely, would in any event require significant business case impacting funding so not occur when the time comes.

5. Education

- There is an inconsistency in the education level proposed between the primary school provision of 2.5 forms of entry and that shown for secondary school provision and to the WBC policy of 4 forms of entry, thus that proposed is not of minimum viable size and therefore unsound.
- It is not clear in the LPR that the provision to provide sports fields can be met, there is no evidence for funding, suitable flat location and as the LPR assumes that the sports fields will also be playing fields then the provision of playing fields must also be held unsound if the sports fields are not provided or accessibility guaranteed
- Details are incomplete and contradictory and provide no guarantee that the proposed funding by Developers is sufficient for the proposed schooling and, as there is no timing or site committed, that it will even be provided for the initial 1500 and it is impossible to know that the already stretched current facilities will not be over-subscribed impacting school age children. Additionally, the students from Bucklebury will be disadvantaged in obtaining places at Kennet School if the policy of those living nearer to the school is invoked.
- No detailed modelling has been provided to calculate the demographics and potential future demand for schooling so the sufficiency of the proposed schooling set out cannot be accurately assessed.

6. Health facilities - GP & dental

- There is no evidence of the required level of consultation and cooperation between WBC and Berkshire West Clinical Commissioning Group with respect to the GP surgery size proposed. Detail is lacking on any multi agency/service provider discussions or the outcomes of those having been taken place into account in planning the proposed facility, the timing, the sufficiency of its size, the feasibility of the business case for existing practices to site branch facilities on the SP17 plan (or provide increased low impact expanded facilities elsewhere), or that wellbeing and health of existing communities are not unacceptably impacted, and together with no inclusion of an Health Impact Assessment / modelling of thousands of increased patient numbers on GP and dental practices.
- For existing communities, it is already difficult and lengthy waits to obtain face to face GP appointments plus many like myself have not been able to secure NHS dental care in the locality.
- The LPR now runs to 2039 so all assessments must run to that period not to 2037. The air quality assessment is an example of inaccurate period of coverage which will directly impact the traffic level forecasts and pollution calculations.

Best regards Nicola Jones

Sent from my iPad