

From: [REDACTED]
To: [PlanningPolicy](#)
Subject: FW: WBC LPR Regulation 19 Objection
Date: 27 February 2023 16:28:51

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To whom it may concern:

I would like to object to the plan to build new houses in North East Thatcham under the Regulation 19 consultation phase.

My objection focuses on the negative impact that this development would have on me personally, the locality, the environment and the population. I am also concerned that there are components of the plan that are unsound.

I have grouped my objects in themes:

The Environment

I have 3 main areas of concern:

1. The damage to the Bucklebury Plateau Biodiversity Opportunity Area 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 but 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 review of the background documentation provided by WBC in support of the draft LPR, I have concluded that there is no evidence to support claims that SP17 will have a positive impact on the environment. In fact, 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 available for the Regulation 19 consultation.

With an estimate that at least 4,000 people will be concentrated in the development site and will need access to green space for recreation and general wellbeing, I do not believe that the claimed provisions for green space will 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 and there was a complete lack of information about the preparation of the parks, how they will be managed and funded to deliver that stated biodiversity enhancement. However, it now looks as though the country parks have been downgraded to an undefined category of

‘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. The LPR also 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.’ However, there is no detail whatsoever on any such mitigation plans. This is not acceptable. 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 highly questionable. 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. Do you want me to assume that everything will be all right because your own unsubstantiated policies say that it will be? I am afraid I cannot do that.

Transport

There is no doubt that building so many houses will increase the amount of traffic using the roads, especially in the surrounding villages and lanes.

The immediate links into Floral Way and Harts Hill means that the construction traffic from, or to, the site will adversely impact Upper Bucklebury and Chapel Row. Two very small villages and Cold Ash, which is already busy with traffic at peak times of the day. In all these locations, the current roads are inadequate even with current traffic flow; they do not have pavements and therefore have the potential for serious accidents. Adding to this, the terrible condition of the roads, the increased noise and pollution, it will be disastrous for the villages and the people who live in them. This same conclusion can also be applied to the increase in traffic once the development has been built. Research has shown that the ‘average’ British family has 1.24 cars. With an estimate that at least 4,000 people living on this site, this is a considerable increase in traffic in a very small and unsuitable area.

The Sustainability Appraisal and Strategic Environmental Assessment which accompanies the Local Plan consultation assesses the allocation of North East Thatcham against key Sustainability Objectives. Objective 4 aims to promote and maximise opportunities for all forms of safe and sustainable transport. The Council Assessment concluded that the policy is likely to have a positive impact on road safety as ‘safe travel’ will be critical to the design of the site. Where is the evidence of this? How can an increase in all forms of traffic, walking and cycling journeys contribute to a safer and more sustainable traffic environment?

The Transport Assessment says in 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 shows no modelling results for this. There are drawings for all the other proposed junctions but none for the Harts Hill junction. Why is this not available? I also understand that there are drawings showing a new car park on Harts Hill. This 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.

Education

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

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 and are not considered in the traffic plans and models in the LPR. 3.4.2 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.

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.

The Thatcham NE development plan 2020, produced by David Locke Associates and Stantec on behalf of WBC, proposes funding for a 6-8 form entry secondary school, half-funded by developer contribution. Government guidelines are that Secondary Schools with less than a 6 FE 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. The 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 6-8 FE secondary school.

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 indicated 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 totally inadequate. The Development Plan states that ‘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.’ The LPR Review to 2039, Policy SP17, states that land (but not the Secondary school itself) will be provided for the development.

In summary, 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, and 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.

Sports Fields Provision

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

1. 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 and pollution.
2. There is no funding earmarked for these facilities.

I am not clear if 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.

Healthcare

It appears that WBC and the developers 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 therefore have not made provision to mitigate the burden that 1,500+ new houses will make on a local NHS struggling to cope.

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 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 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. 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). My understanding is that 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 scant 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. 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.

Finally, On 6th December 2022, Michael Gove (Secretary of State for Levelling Up, Housing and Communities) released a Written Ministerial Statement detailing that the housing numbers should now be an advisory starting point and not mandatory. The statement went on to say that the Planning Inspectorate should no longer override sensible local decision making, which is sensitive to and reflects local constraints and concerns.

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 considering the character of an area when assessing how much housing can be accommodated. 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 for. I 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.

Brian Cook

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