

West Berkshire Local Plan Review 2022-2039

Proposed Submission Representation Form

Ref:

(For official use only)

Please	Online: http://consult.westberks.gov.uk/kse
complete online or return this form to:	By email: planningpolicy@westberks.gov.uk
	By post: Planning Policy, Development and Regulation, Council Offices, Market Street, Newbury, RG14 5LD
Return by:	4:30pm on Friday 3 March 2023

This form has two parts:

- Part A Your details: need only be completed once
- Part B Your representation(s): please fill in a separate sheet for each representation you wish to make

PART A: Your Details

Please note the following:

- We cannot register your representation without your details.
- Representations cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.
- All information will be sent for examination by an independent inspector
- All personal data will be handled in line with the Council's Privacy Policy on the Development Plan. You can view the Council's privacy notices at http://info.westberks.gov.uk/privacynotices

	Your details	Agent's details (if applicable)
Title:	Mr	
First Name:*	Mathew	
Last Name:*	Cooke	
Job title (where relevant):		
Organisation (where relevant):		
Address* Please include postcode:		
Email address:*		
Telephone number:		

*Mandatory field

Part B – Your Representation

Please use a separate sheet for each representation

The accompanying guidance note available at: https://www.westberks.gov.uk/lpr-proposed-submission-consultation will assist you in making representations.

Your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change(s) as there will **not normally** be a subsequent opportunity to make further representations, **further submissions will ONLY** be at the request of the Inspector, based on the matters and issues they identify for examination.

Your name or organisation (and client if you are an agent):	
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Please indicate which part of the Local Plan Review this representation relates to:

Section/paragraph:	Local Plan Review 2022-2039. Sites allocated for residential and mixed - use development in Newbury and Thatcham. With reference to SP17 North East Thatcham development in particular.
Policy:	Local Plan Review 2022-2039.
Appendix:	
Policies Map:	
Other:	

1. Legally Compliant

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

No

Do you consider the Local Plan Review is legally compliant?

Yes

Please give reasons for your answer:

2. Soundness

Please see the guidance notes for an explanation of what 'soundness' means.

Do you consider the Local Plan Review is sound?

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF)

Please tick all that apply:

NPPF criteria	Yes	No
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		x
Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		X
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		x
Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		x

Please give reasons for your answer:

I find the LPR unsound for a number of reasons with particular reference to SP17, the proposed North East Thatcham development. These reasons are listed below.

- 1. **Traffic Impact:** I'm very concerned about the amount of increased traffic that the development will bring to Upper Bucklebury and other nearby villages. A significant number of homeowners in the proposed development will use the village roads as alternatives to the A4 for commuting. In particular, I am extremely concerned about the plan for an exit at the north of the proposed development onto Harts Hill Road as this will further promote the use of the village routes. There are no modelling results for this junction in the Transport Assessment and no drawings either. Considering there are drawings for all the other proposed junctions, I find it very worrying that the proposed junction on Harts Hill Road does not appear to have been researched fully. This road is completely inadequate for larger amounts of traffic, has no pavements in some areas and has a high potential for serious accidents. We have a village school with many children walking to school along these routes so this needs to be given serious attention for their ongoing safety. I believe the increased traffic through Upper Bucklebury will have an impact on the standard of life to those that currently live within it.
- 2. Environmental Impact: It is clear that the proposed development on a greenfield site and so close to the AONB and which currently provides a home to legally protected wildlife will have a huge detrimental effect to the local environment and public enjoyment of it. This whole area of greenfield land is of such an asset to our community that I'm passionate that we do all to protect if for future generations. There is no evidence in the proposed plans to indicate that there is a strategy to protect the AONB and the biodiversity within. We should look to develop brownfield sites as a priority rather than build this overbearing development. This should be a very important consideration within West Berks Council's sustainability pledges.
- **3.** Schooling Impact: There are no details in the LPR for the provision of nursery, early years and primary education. There is no data or evidence on the planned number of schools or

form entry requirement, with referenced data being 12 years old, I fail to see how this can be relevant. With regard to secondary education, many children from Bucklebury attend Kennet School (nearest catchment school), which is oversubscribed every single year. As children who live nearer to the school are given precedence, this would mean that children from the proposed NE Thatcham development would take priority. Children from Bucklebury would have to go to The Downs, which firstly they are only in a secondary catchment for, and secondly is a 45 minute bus ride away compared to the very short journey to Kennet. The LPR is incomplete and contradictory on the provision of secondary schooling in the area. 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. I would urge that a more detailed planning approach needs to be taken to the overall provision of education for the Thatcham area before and decisions on housing can be fully assessed.

- 4. Adequate Consideration of Alternative Sites: I'm not comfortable that enough consideration has been given to the use of alternative sites to accommodate housing options across West Berkshire. Since this consultation was initiated there has been a dramatic shift to hybrid working and an acceleration in the demise of Town Centre use. I believe that there will be a vast number of brown field sites that could be redeveloped to meet West Berkshire requirements as a result. The re-development of these sites for housing should be given priority ahead of developing so close to ANOB/village land.
- **5.** *Timing:* Michael Gove announced in Dec 22 the launch of an NPPF consultation running until 2nd Mar 2023. Whilst this consultation is running, many councils have decided to pause their plan making. I don't understand why West Berks isn't applying similar prudence. It's important as it's likely that this consultation could change the calculated housing requirement for West Berkshire, which is currently a stretching target due to high percentage of ANOB and land. This outcome could dramatically reduce the requirement for housing and the need for this overbearing development within our community.

3. Complies with the Duty to Co-operate

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

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

No

Yes

Please give reasons for your answer:



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 LPR 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.

5. Independent Examination

If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?

Yes		No	
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If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

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:	Tick
The submission of the Local Plan Review for Independent Examination	
The publication of the report of the Inspector appointed to carry out the examination	
The adoption of the Local Plan Review	

Please ensure that we have either an up to date email address or postal address at which we can contact you. You can amend your contact details by logging onto your account on the Local Plan Consultation Portal or by contacting the Planning Policy team.

Signature		Date	27 th Feb 2023

Your completed representations must be received by the Council by 4:30pm on Friday 3 March 202 3.