

## WBC LPR REGULATION 19 OBJECTION BY B C DICKENS

### General

This Local Plan(LP) bears all the hallmarks of being a rushed and ill-considered piece of work. With the unexpected loss of the Grazeley option WBC had to search around for an alternative large scale development and alighted on SP17-1500 houses in NE Thatcham. Notwithstanding the many and varied shortcomings in this option it has been pursued on the basis of flawed logic, lack of supporting evidence and unlawful and unsound conclusions.

There was an opportunity when WBC was unexpectedly required to produce a 30 year vision as part of the LP process. This delayed the LP timetable and could have provided the opportunity for a reset. This opportunity was not grasped probably due to senior staff turbulence in the planning (Place) department of the Council.

### Housing Numbers

The LP says 9146 new houses are needed in the plan period. This is based a 9yr old ONS Housing Projection and amounts to 513 houses per year. Central Government will be publishing new advisory housing targets based on the 2021 Census which will provide a much more realistic picture. Furthermore WBC has over-achieved in its housing delivery in the current plan period but no allowance has been made for this.

Many other councils have chosen to put a hold on their LPs until Central Government planning policy on housing numbers is finalised. The strong likelihood is that fewer houses will be needed up to 2039 but WBC have decided to plough on regardless and impose a scheme for 1500 houses in NE Thatcham(SP17) many of which could well not be needed.

On the basis of the foregoing rationale the LP is unsound.

### Strategic Gap

The LP has reviewed and endorsed strategic gaps between settlements in a number of parts of West Berks save that between Upper Bucklebury and Thatcham. The site selection background paper in Regulation 18 (not included at Regulation 19) said that only the HELAA sites in Thatcham rather than the whole of West Berks would be considered. WBC expressed concern a development of 36 houses south of Lower Way would breach the strategic gap between Newbury and Thatcham. However, the proposal to develop 1500 homes in North East Thatcham breaching the strategic gap between the communities is accepted by WBC as having very few negative impacts. WBC's logic behind protecting the Newbury/Thatcham strategic gap has not been carried across to the North East Thatcham development.

In like vein, WBC in 2015/16 opposed the Siege Cross development saying it would erode the landscape between Upper Bucklebury and Thatcham amongst several other opposing comments. However, when the Siege Cross 500 home proposal has been incorporated into the significantly larger North East Thatcham development impacting the setting of the AONB, WBC provide no evidence to contradict their earlier conclusions on Siege Cross and are silent about harm to the AONB and the impact of the development on the landscape character and historic environment.

### Health

The Local Plan is unlawful in that there is no evidence a Health Impact Assessment was carried out nor any consultation took place between the developers or WBC with the Integrated Care Board. This is a mandatory requirement.

#### Education

Whilst details on early years and primary provision in support of SP17 are thin, those on secondary education lack substance and are contradictory. WBC determined that a 2500 home development was insufficient to fill a 6-8 FE. With the reduction to 1500 houses, this is even more the case. No account has been taken of Government guidance that secondary schools with less than 6 FE are not sustainable or deliverable. Finally the developers will now only provide the land for the secondary school. Where will the funding for a secondary school now come from? Education provision in support of SP17 in the LP is unsound.

#### Environment

The impact of SP17 on the environment will be devastating. It will have an adverse effect on legally protected wildlife and be building on a completely greenfield site when possible brownfield sites have been ignored. SP17 will also do damage to Bucklebury Common which would see a major influx of visitors upsetting the balance between human presence and environmental needs. The LP does not contain a preliminary ecological assessment although this is a statutory requirement.

#### Sustainability Appraisal

The LP says a Sustainability Charter is needed to demonstrate how the legally required biodiversity net gains will be achieved. There is no evidence in Regulation 19 of any supporting documentation to inform this Charter. The SA in the LP makes completely unsubstantiated claims about the sustainability of SP17. The positive or neutral claims about the impact of SP17 are not supported by any evidence and in some cases are contradictory. The SA does not meet relevant legal requirements in that it does not give full consideration to environmental effects alongside social and economic issues. Furthermore the SA, as it is required to do, makes no attempt to consider and compare reasonable alternatives such as a reduced number of houses spread along Floral Way and the A4.

#### Transport

The NPPF says transport issues should be considered at the earliest stage of development proposals. It is therefore surprising that scant attention has been given to transport in the Regulation 19 document. The LP admits there will be displacement of traffic through villages like Upper Bucklebury resulting from SP17. Para 3.42 of the Phase 2 report says there will be a significant increase in traffic on the local road network, such as that through Upper Bucklebury, resulting from SP17. Recent analysis of am and pm peak traffic has shown that the quickest route to Reading is via Harts Hill Rd and Cold Ash Lane and this is before the proposed development at NE Thatcham is built. That can only exacerbate the situation. The idea proposed in the LP that there would be a shift to other modes of transport does not stand up because of the steep topography of the site and the distance of the SP17 site from Thatcham railway station. The bottom line is that SP17 would generate significant additional car journeys many of which would find a way through Upper Bucklebury. The LP takes no account of the resultant highway safety issues.

