



West Berkshire Local Plan Review 2022-2039
Proposed Submission Representation Form

Ref:

(For official use only)

Please complete online or return this form to:	Online: http://consult.westberks.gov.uk/kse
	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cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.*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:	Mrs	
First Name:*	Isabel	
Last Name:*	Ember	
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):	Isabel Ember
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Please indicate which part of the Local Plan Review this representation relates to:

Section/paragraph:	
Policy:	Policy SP17 North East Thatcham strategic site allocation
Appendix:	
Policies Map:	
Other:	

1. Legally Compliant

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

Do you consider the Local Plan Review is legally compliant?

Yes

No

 NO

Please give reasons for your answer:

The 2021 Environment Act states that by the end of 2023, all new developments in England are meant to be providing a 10% biodiversity net gain.

This means that, before any development begins, there is a legal requirement for WBC to submit a biodiversity net gain plan to measure the existing and proposed biodiversity values of the sites. The SP17 Northeast Thatcham site has a much higher biodiversity value than the WBC might appreciate with ponds and woodland areas within the site and immediately on its perimeter. But there no firm plans within the LPR to retain, protect or monitor these locations, nor to implement wildlife and meadow buffer zones around the development or within the site.

Once built on, this greenfield land will be removed for perpetuity, and the next generation would not thank us for that.

In addition to the issue of legal non-compliance, the soundness of the LPR is questionable for reasons given below.

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

Please give reasons for your answer:

The LPR is unsound because:

ENVIRONMENT.

- Given the UK is one of the least biodiverse countries in Europe, there is no plan within the LPR as to how a 10% biodiversity net gain (a legal requirement) will be achieved. There is no probability of a biodiversity net gain because SP17 is a greenfield site.
- The LPR is inconsistent with national policy (NPPF, section 15, page 50) for 'protecting and enhancing landscapes, biodiversity and soils' and 'recognising the intrinsic character and beauty of the countryside'.
- There is no reference within the LPR for an Ecological/Biodiversity plan to include wildlife corridors and buffer zones to protect animals and wildflowers and prevent collateral damage to woodland.
- There is no reference within the LPR for a 'Net Zero Carbon' report detailing carbon and methane emissions during the construction (from brick, concrete, steel, and tarmac manufacture, and construction vehicle emissions). These are likely to constitute hundreds of thousands of tonnes of CO₂-equivalent emissions and there is no plan to offset these either through tree-planting or a carbon offset levy on the developers (as other councils are doing).
- The LPR is inconsistent with WBC's own Core Strategy (2006 - 2026) to '*maximise the use of brownfield land and access to facilities and services*'.
- Lord Deben (Chairman of the UK Independent Committee on Climate Change, and former Conservative Party Chairman) stated in January 2023 that '*planning laws should assert that every decision should be made with climate and sustainability in mind*'. The LPR WBC has given little thought to climate and/or sustainability. Why can't West Berkshire be a Climate and Sustainability Leader rather than bowing to pressure from national government to meet housing quotas?
- Bucklebury Common is a fragile woodland and heathland infrastructure. Siting 1,500 homes in the immediate vicinity and allowing it to be part of a 'community park' would cause significant degradation to the wildlife population and significantly increase the risk of woodland and heath fires during the hot summers (there were two brush fires on the Common in 2022).

8. Significant biodiversity loss, habitat fragmentation, and loss of local carbon sinks (meadows, wetlands and woodland) would take place during construction with collateral damage occurring in and around the site. There is no plan in the LPR to monitor and mitigate this.
9. No reasonable alternatives for the site have been presented: the SP 17 Policy has not shown that it has considered reasonable alternatives which are beneficial to the community and less onerous for biodiversity and the environment such as modest-sized wind farms, solar farms or a wildlife park. Why can't West Berkshire be a 'Climate Leader'?
10. There is no discussion in the LPR detailing how it would limit further residential and industrial sprawl along the A4 towards Reading. Or perhaps further urban sprawl is part of the plan.
11. The development will raise surface runoff into the Kennet River valley which will increase flooding risk along the A4 towards Thatcham.



NEWBURY TOWN CENTRE REGENERATION.

12. In my view, West Berkshire Council should be stimulating residential growth within Newbury town centre to mitigate demise of the centre. At the current time the Kennet Centre near the original Debenhams (rather than the more recent Parkway site) is empty and unused. Why can't sites like that be reinvigorated with high quality apartments with roof gardens and courtyards to attract people to live in that part of the town and potentially rejuvenate the southern end of Northbrook Street? Otherwise, Newbury town centre will begin to fail. Locating 1,500 families in Thatcham NE will not encourage the use of Newbury amenities.

TRAFFIC AND POLLUTION.

13. There is no plan for how the additional traffic (the heavy vehicle traffic during construction and 4,000 cars per day after construction) will be routed through the villages of Bucklebury and The Ridge, Cold Ash. In fact, there is no detail in the LPR on the duration of construction, how many construction vehicles will be involved, where the access will roads be, and how construction will be monitored and controlled to limit collateral damage.
14. To counteract the increased traffic and vehicle pollution on the A4, Floral Way and Harts Hill Road, and in line with the Government's 2021 Zero Emissions strategy, WBC needs to issue a plan for the use of Zero Emission Vehicles on the site.

HEALTHCARE.

15. No substantive discussion is included in the LPR to indicate that thought has been given to the impact on Chapel Row and Thatcham surgeries when a significant proportion of 4,000 new patients are enrolled. Furthermore, a new healthcare facility is mentioned, but there is no mention of the location, when it will be operational, nor how it will be staffed given a shortage of medical professionals in the area.

EDUCATION.

16. There is no reference in the LPR as to how increased nursery, primary and secondary education will be provided, in which schools and which new education facilities will need to be built and where?

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?

Yes

To some
extent

No

Please give reasons for your answer:

The Duty to Cooperate places a legal duty on WBC to engage actively and regularly with the community with respect to the LPR. The LPR plan has omitted a good deal (see above). It remains to be seen how, going forward, the WBC will act on view and recommendations of those in the community who oppose the LPR SP17 Policy. Hopefully recommendations will be acted upon and there will be opportunities for continued engagement with the Bucklebury and Thatcham communities rather than WBC ignoring the views of the communities in favour of pressure from national government to meet local housing quotas.

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.

1. The LPR needs to incorporate a Biodiversity Net Gain Plan and Environmental Impact Assessment (EIA) to measure the existing and proposed biodiversity values of the sites and prove that there will be a biodiversity net gain which must then be monitored.
2. It seems there is little likelihood of a demonstrable biodiversity net gain because SP17 is a greenfield site. Building on open countryside adjacent to an AONB would be severely detrimental for existing and future communities, animals, and plants in the county and does not comply with the NPPF. More likely there will be a significant biodiversity loss in an area already under threat. This needs to be addressed.
3. There needs to be an Ecological/Biodiversity plan within the LPR to include 500 metre wildlife corridors and green buffer zones surrounding the site (between the edge of the site and the development; and throughout the site).
4. WBC needs to issue a ‘Net Zero Carbon’ report detailing all emissions during construction, carbon generated through materials production, and CO2 mitigation and offset.

5. This LPR is *inconsistent* with the NPPF on protecting landscapes, biodiversity and soils; recognising the intrinsic character and beauty of the countryside; providing net gains for biodiversity; establishing resilient ecological networks; improving air and water quality; and mitigating degraded land. The LPR is *inconsistent* with WBC's own Core Strategy (2006 - 2026) because the SP17 Thatcham NE development is planned for a greenfield, not brownfield site.
6. West Berks Council in its SP17 Thatcham NE development proposal has given virtually no thought to climate and sustainability. This needs to be addressed
7. WBC needs to generate a report, in conjunction with Royal Berkshire Fire and Rescue Service, assessing the fire risk when 4,000 more people have access to Bucklebury Common (which is tinder-dry in Summer and prone to woodland fire), and how this will be mitigated.
8. Account needs to be taken of the loss of local carbon sinks through the destruction of the soils, meadows, wetlands, and woodlands within the SP 17 area. This need to be addressed in the EIA and a mitigation plan put in place.
9.
 - a) WBC needs to demonstrate that it has considered alternative uses for the SP17 land which are more ecologically and environmentally beneficial to the community and biodiversity. For example, did they consider a modest-sized wind, solar farm or rewilded country park? A report needs to be generated detailing the alternatives considered for the land.
 - b). Further, it needs to show that brownfield sites within the town centre (such as the Kennet Centre and the old Debenhams site on Northbrook Street) will be used for additional accommodation with the intent of helping to regenerate the southern part of town Newbury Town Centre.
10. The WBC needs to generate a report detailing how it would plan to prevent further urban sprawl along the A4 towards Reading.
11. A drainage plan needs to be generated to show how the additional surface runoff generated on the flanks of a hill will be discharge into and around the A4 and Floral Way.
12. More consideration and lateral thinking needs to be demonstrated by WBC in considering sites for 'green urban regeneration' within brownfield areas for example, the southern part of Newbury town centre.
13. There is no plan for how the additional traffic (the heavy vehicle traffic during construction and an estimated 4,000 extra cars per day after construction) will be routed through the villages of Bucklebury and The Ridge, Cold Ash. More detail is required on the duration of construction, the expected number of construction vehicles involved, where the access will roads be, and how construction will be monitored and controlled to limit collateral damage.
14. To counteract the increased traffic and vehicle pollution on the A4 and Harts Hill Road, and in line with the Government's 2021 Zero Emissions strategy, WBC needs to issue a plan for the use of Zero Emission Vehicles on the site.
15. A **Healthcare Impact Assessment** needs to be generated to assess the impact on Chapel Row and Thatcham surgeries when a significant proportion of 4,000 new patients are enrolled; and how and where a new healthcare facility will be installed, operational and staffed.
16. A **Pre-Secondary and Secondary Education Plan** needs to be produced to cover items such as: number of expected pupils, location of new schools, the timing of funding, staffing, breadth of curriculum, facilities, traffic impacts etc.

5. Independent Examination

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

Yes YES No

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	YES
The publication of the report of the Inspector appointed to carry out the examination	YES
The adoption of the Local Plan Review	YES

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	01/03/2023
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Your completed representations must be received by the Council by 4:30pm on Friday 3 March 2023.