

From: [REDACTED]
To: [PlanningPolicy](#)
Subject: WBC LPR Regulation 19 Objection - SP17
Date: 03 March 2023 00:11:33

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I write with regard to the Local Plan Review, in particular the proposal to build 1500-2500 houses on land in NE Thatcham. As a resident of Upper Bucklebury, I am horrified and strongly object on the basis that the development would have an overwhelmingly negative impact on the quality of life of the residents and wildlife of the area and that many components of the plan are unsound. I note that my previous objections do not appear in the Consultation Statement document of December 2022 and would ask that the comments below are taken into account in this round of consultation.

Objection 1 – Environment

I note that in its responses to objections regarding the impact on the environment, the council frequently states that the development itself does not fall within an AONB. However a development of such a scale on the proposed site would have a devastating impact on the adjoining North Wessex AONB, the Bucklebury Plateau Biodiversity Opportunity Area and the surrounding ancient heaths, woodlands and Common. The site itself is also known to be home to a number of **legally protected species** which would surely mean that any action causing a detrimental impact on these would be illegal. I cannot understand how such a huge development would be anything other than large-scale, wilful, illegal damage to these species. WBC has in the past alluded to mitigation measures but this is unsubstantiated 'greenwashing'. There is no way of mitigating damage to protected species.

As part of this proposed 'mitigation', WBC has previously alluded to the creation of two 'country parks' which have more recently been referred to as 'community parks'. Such parks would need to be properly planned, funded and managed in order to attempt to significantly enhance biodiversity over existing levels - which would seem to be an impossible task. The absence of any detail is indicative of a total lack of commitment by WBC to protecting the local environment. (One is left to speculate that perhaps such parks may just be areas of tarmac, with perhaps a roundabout and a couple of swings?) No man-made park could in any way 'compensate' for the loss of habitat for local species – there is no compensating for this. Neither would they go any way at all to replacing an area which is enjoyed by local people and contributes considerably to their the mental and physical well-being. I include myself in this. I have walked the area with my children and dogs for the past fourteen years and have always found it a place of peace and relaxation, a place to remember that I am part of nature, not disconnected from it. (Those in favour of this proposal would do well to do the same.) I find it nothing less than devastating that this area might be destroyed – seemingly because some people want to make vast amounts of money, whatever the cost to the natural world.

WBC has stated in the LPR that a Sustainability Charter must be produced, outlining how policy requirements will be met, including legally-binding biodiversity net gains and an overall positive impact on environmental sustainability. The supporting documents which are supposed to inform this have not been made publicly available for the consultation. I would like to know if they exist and if so, why they have not been made available?

The LPR also states that it intends SP17 to drive more people (presumably including the 4000+ residents of the development) into the AONB. This again shows a staggering lack of understanding on the part of WBC. The management vision for Bucklebury Common is focused upon preventing additional pressure on ecosystems which need to be restored, nurtured and protected.

A great deal of money seems to have been spent by WBC preparing housing plans and attempting to justify such a huge development. I cannot see any evidence of a serious effort to understand the consequences for the local environment.

Objection 2 – Transport

The significant increase in cars on roads in the area which the development would cause is extremely worrying. WBC has previously communicated that traffic from the development would link to Floral Way and the A4 but I understand that the Phase 2 Transport Assessment also shows plans for an exit at the north of the site onto Harts Hill, together with a car park - the purpose of which is unclear. Traffic from this exit would flow both towards Cold Ash and through the village towards Chapel Row, significantly increasing the number of cars in the village. This would not only irrevocably change the character of the village but would also make Harts Hill (which is already a tricky road to navigate due to the number of blind bends) absolutely perilous, especially for those on foot or bike. The Sustainability Appraisal/SEA which accompanies the Local Plan Consultation assesses the development against Sustainability Objectives, of which No.4 is 'To promote and maximise opportunities for all forms of safe and sustainable transport.' In the absence of modelling data for this junction, how can WBC have concluded as it has that the LPC will have a positive impact on road safety? It states that 'safe travel will be critical to the design of the site' but where is its supporting evidence for this? Similarly WBC has assessed that there will be a 'Significant Positive Impact' on 'opportunities for walking, cycling and the use of public transport' but again no evidence has been published to support this and common sense would suggest the contrary.

Moreover, the lack of a detailed plan for the provision of education and the siting of new schools makes it impossible to estimate the impact on traffic in the area – see below.

Objection 3 – Education

WBC has an obligation to provide education for children in the county but there is no clearly defined plan in the LPR. For nursery or early years education SP17 states that 'the site will provide Early Years provision' and gives no detail at all. For primary education provision the LPR proposes the sum of £12million be contributed by the developers but the number of schools and Form Entry requirements are unspecified, there is no time frame given (clearly such provision needs to be in place before houses are built) and no sites are specified. Furthermore as the data the LPR references with regard to this is from 2011, how does WBC know that this provision will be enough? Surely WBC has an obligation to use current data for such planning, not data produced over a decade ago? The NE Thatcham Development Plan even 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'. Why not?

The LPR is similarly incomplete with regards to secondary provision in Thatcham and the surrounding area. It proposes the developers contribute £15million towards the provision of secondary education but again no locations and nor timescales are specified. And since government guidelines are that secondary schools with less than a 6 Form Entry are untenable and the data used is out of date, how does WBC know that any school planned would be viable or that the proposed level of funding would be sufficient?

It is my belief that the LPR is scant and unsound in respect of educational provision within Thatcham and the surrounding area.

Objection 4 – Recreational Facilities / Sports Fields

The LPR mentions the provision of sports fields but no sites or funding appears to have been allocated for these. Such sites would also require flat ground and the only flat area of the site is adjacent to the A4 and would be liable to high levels of traffic fumes.

It should also be noted that the only leisure facility currently available to the public in Thatcham is at Kennet School and this is already heavily used by both the school and the public.

Objection 5 – Healthcare

I note that SP17 proposes a primary healthcare centre which it suggests would be offered to a suitable public health body. However very few new GP centres are commissioned by the NHS, even where there is need, and information in the public domain shows that there are worse shortages of GPs in other areas than there are in West Berkshire. It would seem therefore that there is no likelihood whatsoever of a new NHS-funded practice being built. Nor would it make any sense for an existing local practice to set up a branch on the proposed site because of the additional costs involved and the impracticalities of working across two sites. All three existing practices which cover the site are already overstretched with figures showing that each GP looks after just under 2000 patients and this workload has been further impacted by the recent closures of a number of pharmacies in Thatcham.

Similarly dental practices in the area are already stretched with many residents travelling outside of the area for either NHS or private dental care.

There is no evidence in the plan that WBC has communicated with healthcare agencies or providers nor has it produced a Health Impact Assessment for the North-East Thatcham development. I am extremely concerned about the potential for a severe lack of healthcare provision for both existing and new residents of the area should the development go ahead, which would without doubt put lives at risk. I find WBC's uninformed and seemingly cavalier attitude towards this aspect of the plan particularly shocking and deeply worrying.

Objection 6 – Updated Planning Guidance

On 6th December the Secretary of State for Levelling Up, Housing and Communities released a statement detailing that housing numbers should no longer be mandatory but serve as a starting point and that the Planning Inspectorate should no longer overrule local decision making. This

decision making should itself reflect local concerns and constraints.

Several Local Authorities have subsequently paused their planning and I do not understand why WBC has not taken the same approach. The consultation NPPF which runs until 2nd March this year not only states that the housing requirement figure will now be advisory but also that **the character of an area must be considered in any assessment**. The development area proposed by SP17 is rural and loved as such by local residents. Housing development on it – particularly of the extraordinary size proposed – would forever change this.

In conclusion

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I understand that there is a great need for more affordable housing, especially for young people and young families. However I think if one were looking for a case study in how not to plan a housing development, this could be it. It seems to be a ill-conceived, lazy and greedy way of hitting a housing target which is no longer even valid, by dumping a huge number of houses on the edge of an existing town without giving any thought to creating a sustainable infrastructure so people can live well there with minimum impact on the local environment or planet. I think it's unsound on every level and frankly I think WBC should be embarrassed to have produced it.

On a personal level I'm dismayed and horrified by the potential loss of countryside which is dear to myself and my family, the impact on the flora and fauna in the area, the potential for multiple forms of pollution (air, light, soil etc) and flooding, and by the prospect of many years of construction work so close to our family home.

Yours sincerely
Melanie Gerdes

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