

Comment

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Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Comment by	Wendy Holden (1334885)
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1. Do you consider the Local Plan Review is legally compliant?

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

No

Please give reasons for your answer

2. Do you consider the Local Plan Review is sound?

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

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

Please tick all that apply:

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. . No

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 plan has taken absolutely no account of alternative sites, in particular alternative brownfield sites in Thatcham which would not totally and irreversibly destroy an AONB.

Bucklebury Says No has identified a number of **serious environmental threats** posed by the proposed Thatcham North-East strategic development site (SP17). These include:

- 1 **Collateral damage** to the **Bucklebury Plateau Biodiversity Opportunity Area** (*see map at end) [*map not included*] 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 thorough professional review of the background documentation provided by WBC in support of the draft LPR, we have concluded that **there is no evidence to support claims that SP17 will have a positive impact on the environment. By contrast, 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 publicly available for the Regulation 19 consultation.**

We estimate that at least **4,000 people will be concentrated in the development site**. They of course must have access to green space for recreation and general wellbeing. We 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. Our own feasibility study showed the complete lack of preparation for such country parks, not least that they should be merged, and properly managed and funded to deliver that stated biodiversity enhancement. Now, in the updated SP17 text, the country parks have been **downgraded to undefined '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.

Indeed, the LPR 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.' But there is no detail whatsoever on any such mitigation measures: the assumption is simply that they will somehow be found during the planning application process.

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 anyway highly questionable (see other articles herein) *[articles not included]*.

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. Everything will be all right because their own unsubstantiated policies say it will be.**

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

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

No

Please give reasons for your answer

WBC have only taken account of information provided by the developers on one site. The developers have not been asked to support a proposal on brownfield areas

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 Local Plan Review 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.

There should be a proper assessment of alternative brownfield sites in the local area.

5. Independent Examination

If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? No

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

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