



2nd March 2023

WBC LPR Regulation 19 Objection - SP17

Dear Sir/Madam,

As a resident of [REDACTED] I would like to OBJECT to the SP17 proposal as contained in the WBC LPR.

I would also reiterate my comments to the Regulation 18 consultation, as very little appears to have changed in the WBC mindset from that time.

I would add the following objections at this time. The plan is unsound because:

a. Traffic. There will be a significant, and potentially dangerous, increase in the traffic on the rural roads through Bucklebury parish. There will be an exit from the site onto Harts Hill, and traffic modelling carried out for Bucklebury Parish Council (BPC) shows that significant numbers of road users will be displaced from major roads onto wholly unsuitable rural roads. WBC assesses that there will be some displacement of traffic onto these rural roads, but this will have a positive impact on road safety. Given the nature of these roads it is hard to reconcile a vastly increased traffic flow through local villages with a positive safety impact. Traffic flows over areas such as the Thatcham level crossing, through the villages along the A4, and to the M4 and A34 will just cause gridlock in all areas. The proposal offers no plan as to how this traffic will be mitigated, nor how the associated pollution will be managed. The plan falls dramatically short in this area.

b. Healthcare. There is no detail into strategic healthcare planning included in the proposal. Given the development's proposed size, the proposal should include a Health Impact Assessment (HIA), but this does not appear to have been completed. There is little chance of a new GP practice being commissioned, so the households within the site will have to be merged into already overstretched local practices. There appears to be no sign of a plan as to how this integration would be successfully achieved. A similar overstretch exists within dental practices in the Thatcham area. The proposal fails to address any form of primary healthcare provision requirement, and is woefully inadequate in this area.

c. Environment. The proposed site will cause permanent damage to the Bucklebury Plateau Biodiversity Opportunity Area, site a major greenfield development in the setting of the North Wessex AONB, and cause detrimental impacts to legally protected wildlife. The proposal does nothing to mitigate these far reaching and irreversible effects, and the

LPR's own sustainability appraisal accepts that SP17 will have a negative impact on environmental sustainability. It is shameful that WBC entertain a proposal with no concrete mitigations for the devastation that would be unleashed, and does nothing to meet legal requirements to improve biodiversity aspects.

The management vision for Bucklebury Common necessitates the minimising of extra human pressures upon it. By way of contrast, SP17 would necessarily cause an overspill of people to reek havoc with the fragile ecosystems of the Common. The site would forever be a scar on the environment of the AONB, and there appears to be no strategy to meet the requirement to achieve the required biodiversity net gains.

The proposal fails in all areas of protecting the environment generally, and in legally required areas to improve biodiversity. There is no evidence of serious attempts to investigate, analyse and address the consequences of this proposal. It is completely unsound in this area.

d. Education. There is no end to end plan for education within the plan. The plan does not provide evidence of the education requirement, a secondary school location, the number of Form Entries at any school, timing of funding, and whether any funding is sufficient to meet the Council's obligations to provide education.

It appears that less than a 6FE school is unsustainable, so it not clear as to what the education plan is. The current SP17 proposal does not provide for enough houses to justify a new secondary school, so pupils would have to be crammed into already overstretched facilities. SP17 would dramatically add to Thatcham's education problems rather than provide any form of answer. It is sadly laughable that the plan fails to detail any form of recent demographic predictions for education demand, or predictions of the long term capacities of local schools. Obviously, if the schools are not built then their associated facilities (such as sports fields) would also not be available to the community, leading to another failure in the delivery promises of SP17.

WBC has a duty to make arrangements for suitable school provision. The proposal fails to provide evidence as to how this obligation would be met. As such, the plan is unsound in another major area.

e. Removal of the Strategic Gap. Until this proposal was tabled, the land north of Floral Way has provided the gap between Thatcham and Bucklebury, and breach of the strategic gap has been cited by WBC to refuse planning applications in the recent past. WBC planning policies state that planning permission will not be granted where a proposal harms or undermines the existing relationship of a settlement within the open countryside, where it does not enhance the character and distinctiveness of the rural area, including the special qualities and natural beauty of the landscape of the AONB.

The strategic gap between Bucklebury and Thatcham is an important one. Bucklebury is a rural parish within the AONB, whilst Thatcham is an urban town, with Floral Way the boundary between them. WBC policies require the maintenance of these as separate entities, though SP17 would destroy this feeling of separateness. The mitigations included in the proposal are ultimately meaningless and ineffective in maintaining the gap between the settlements. As Upper Bucklebury is lost into Thatcham, so too is the

edge of the AONB. The proposal is unsound because it fails to adequately protect the rural environment and specifically fails to protect the setting of the AONB.

f. Site selection. All through this 'process' there has appeared to be different criteria applied to different sites. The process has been flawed throughout, and is marked by U-turns, confused thinking, and making a developer-led 'solution' fit. The Site Selection Background Paper (SSBP) stated that "The Core Strategy was clear that Thatcham was to receive a lower allocation than other Urban Areas given the rapid expansion that had taken place in the town over recent years. This was to allow a period of consolidation, ensuring the infrastructure and town centre facilities could be upgraded to meet the demands of the existing population." Was this assessment completely wrong, because suddenly there is a requirement for thousands of houses in Thatcham?

WBC were obviously left blindsided by the failure of the Grazeley proposal, but it appears that rather than thoroughly investigate alternative plans, the developer-led proposal at Thatcham North East was seen as the answer to all the problems. Never mind the damage developing the site would do, its lack of suitability on almost all fronts, and the WBC strategies that would have to be ignored for it to be taken forward, but somehow WBC still manage to see this site as the answer to their problems.

The entire site selection process appears flawed throughout. Suitable sites have been ignored or discounted, whereas similar discounting criteria have been ignored when Thatcham North East has been considered. There are numerous examples within the SSBP where sites are "not recommended for allocation" because of traffic, AONB, environmental, and flooding reasons. As each of these points relate to smaller developments, it is not unreasonable to assume that give the proposed size of the development within SP17, the size of the response and consideration within them would be proportionately larger. Instead the report on the Thatcham North East site simply states that there are very few negative impacts that developing the site would have. Thatcham North East would have disproportionately larger adverse effects than the sites discounted during the selection process, but these appear to have just been glossed over. One only has to consider proposed site THA9, where there were concerns that development would reduce the open countryside between Thatcham and Newbury / Greenham, and introduce built form to south of Lower Way, as the site is a buffer to development, and development would not be appropriate in the context of the existing settlement form and character of the landscape. It is strange that similar comments were not written relating to Thatcham North East, in the context of Thatcham/ Upper Bucklebury, built form to the north of Floral Way, the site being a buffer to development, and development being inappropriate to settlement form and landscape character. These comment areas were considered noteworthy for a 36 house development, but were not mentioned for a multi-thousand house one.

This confused thinking is prevalent throughout the plan process. In 2015, WBC were, rightly, relentless in their arguments that development at Siege Cross would have an adverse effect on the local area. It is somewhat strange that, as Thatcham was to be left alone and now gains 1500 houses, so Siege Cross would be badly affected by 500 houses, but a multiple in the same vicinity would now be beneficial.

To the layman, the site selection process appears woefully inadequate in its execution. The criteria used appear not to have been universally applied. The only reasonable

conclusion is that WBC has chosen an answer to its perceived housing problems, as put forward by a development consortium, and that any sensible evaluation process appears to have been ignored. The plan again is unsound in its strategic development.

For me as an individual, execution of the SP17 proposal would have devastating effects on the Bucklebury area. The increased traffic would lead to gridlock on the major routes, and local roads would then be unable to accommodate the overspill from those major routes. There is no mitigation that will reduce the impact of traffic through the local villages.

The Common itself and its delicate ecosystems will just become overrun. Its species and biodiversity will never cope, and will never recover. Neither will the separate village community of Upper Bucklebury. As the strategic gap is removed, so the rural AONB village of Upper Bucklebury will be subsumed into the urban environment of Thatcham. The village might have some limited separation but it will become for all purposes a satellite of Thatcham.

All these elements should be protected within the frameworks that WBC works to, but to its shame they appear conveniently forgotten. The proposal is unsound, and should be confined to history.

On 6th December 2022, the Secretary of State for Housing and Communities detailed that the housing number should now be an advisory starting point and not be mandatory, and that Planning Inspectors should no longer override sensible local decision making which is sensitive to and reflects local constraints and concerns.

The NPPF consultation which ran until yesterday also focused on the need to take into account the character when assessing a realistic ability to accommodate housing. Many sensible local authorities paused their plan making process accordingly. It would make sense for WBC to do the same, as this proposal might be trying to fit, and appearing to do so badly, a need that is no longer present.

In summary, I would like to lodge my objections to the SP17 proposal. The NPPF requires that “great weight must be given to conserving and enhancing landscape and scenic beauty in Areas of Outstanding Natural Beauty” and “local wildlife-rich habitats should be protected.” This proposal would cause irretrievable damage to the local area, its wildlife, and the AONB. Roads would become gridlocked, and education and healthcare provision chaotic and inadequate at the very best. I urge WBC to reconsider this unsafe plan. It is unsound in too many areas with too many questions unanswered.

Yours faithfully

T K Slatford