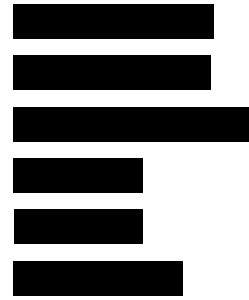


David Southgate



1st March 2023

West Berkshire Council | Local Plan Review | Regulation 19 Consultation

These comments are made by David Southgate in response to the regulation 19 Consultation for the West Berkshire Council Local Plan Review.

The main thrust of my representations are made against the tests of soundness as set out in paragraph 35 of the NPPF. For the reasons set out within my letter I consider that the plan is unsound and fails against each of the tests as set out in paragraph 35 of the framework in numerous areas of the plan. The failings against the tests of soundness are set out in each of the subsequent sections of my letter.

- The LPR is not positively prepared and would not achieve the goal of sustainable development for WBC and the wider Thatcham area.
- The LPR is not justified. Many of the grounds for assessment of impacts and benefits lack credibility and is not based on available evidence. Reasonable alternatives have not been adequately explored and there is no basis to demonstrate that the allocation of North East Thatcham represents an appropriate strategy for WBC.
- The LPR is not effective. There is no evidence that the development of 1,500 homes at North East Thatcham is deliverable within the plan period.
- The LPR is not consistent with national policy. In many instances the allocation for development of North East Thatcham under policy SP17 would directly conflict with national policy, particularly in relation to landscape character and impact upon the AONB.
- The process of assessing the impact of development under policy SP17 through the sustainability appraisal is fatally flawed and is not a matter which can be easily remedied through modifications to the plan.
- The process for selection of North East Thatcham as a development site is severely flawed and lacks evidence.

The information available to support the current consultation (Reg 19) being undertaken on the Local Plan has several major flaws.

These include:

- The housing numbers for northeast Thatcham – positioned in Reg 19 as a reduction from 2500 dwellings to 1500 - is not correct. The Regulation 18 Consultation envisaged that only 1250 dwellings would be built in the plan period, and this has increased to 1500. The 1500 number is stated as both a minimum and an approximate number and the supporting studies are still based on an eventual size of 2500 dwellings. The number of homes proposed for this site could therefore be increased to the original 2,500 when the Plan is reviewed after 5 years or in the next plan period.
- The update of the Housing and Economic Land Availability Assessment (HELAA), which was published only on 20th January 2023, includes a large number of sites that have been added since the last update, and which have been rejected. The WBC process is that the HELAA is at the start of the process not the end.

- The Air Quality Assessment that is part of the consultation documents is based on the LPR running to 2037, not to 2039 which it now should do. This affects the traffic levels forecast for the end of the LPR period and the resultant traffic pollution.
- There is no evidence WBC has complied with its legal duty to cooperate with Berkshire West Clinical Commissioning Group concerning the size of the GP surgery promised for north east Thatcham.
- There is no evidence that WBC has consulted properly with Thames Water over the time needed for provision of water and foul drainage, and therefore it does not know if the houses for north east Thatcham are deliverable in SP17 in the plan period.
- The Settlement Boundary background paper shows the Thatcham settlement boundary already extended to the line needed for the original 2500 houses, yet the plan now refers to a minimum of 1500 houses – this could be read that 2500 dwellings is still suitable and can be developed within the extended boundary.
- The new provision for secondary schools in north east Thatcham is not consistent with WBC guidelines for the minimum viable size of a secondary school. If the primary provision is 2.5 Forms of Entry, then so presumably is the secondary provision to meet the impact of the development. A Council policy 2013 states that the minimum viable size for a secondary school is 4 Forms of Entry.
- The Secretary of State’s Written Statement of 6th December 2022, which removed the need to maintain a 5-year housing supply for Local Authorities with up-to-date Local Plans, removed top-down housing targets (particularly for Local Authorities with constraints like AONBs etc.) and gave a two-year transition period for LAs in the final stages of preparing Local Plans and this statement should be taken into account by WBC.

Site Selection Process

- Lack of evidence on methodology to select North East Thatcham.
- Obviously made following decision to no longer allocate the garden village at Grazeley. Lack of reference to this.
- Selection of Site at North East Thatcham would lead to development in the countryside and important Strategic Gap between Thatcham and Bucklebury would be lost.
- WBC resisted previous application for development at Siege Cross. Lack of consistency to approach here.

Sustainability Appraisal

- Lack of justification for conclusions to the Sustainability Appraisal on impacts from development.
- Lack of any consideration of reasonable alternatives to development on other sites.

Because of these points, and many more, the Reg 19 LPR Submission in its entirety should be considered as unsound.

The site will be masterplanned and delivered as a whole to achieve a comprehensive development. It is highly surprising that Masterplanning is yet to take place for the site and that there is no vision for how the homes will be accommodated on the site. The provision of all infrastructure, services, open space and facilities will be timely and co-ordinated. The Thatcham Strategic Growth Study provides guiding principles for the delivery of the site therefore proposals will demonstrate that these guiding principles have been positively responded to. There is no detail on the infrastructure or other facilities. It is also clear from the viability work undertaken that the infrastructure has not been costed adequately and there is no available evidence that the site is deliverable.

Specific Objection: Traffic

Bucklebury Parish Council commissioned a Traffic Study and this was undertaken by Yes Engineering. The Headline Conclusions of the Study are:

- The trips rates used by WBC are unreliable and not robust.
- The trip distribution is unrealistic (all evidence suggests traffic will be diverted from the A4).
- The mitigation measures are improbable at best.

- The location of site means car-borne travel will dominate.
- Significant impact on highway network.
- Unsustainable location with limited alternatives to car use.
- Likely to lead to rat running through the village to access M4.
- Highway network in the vicinity of Thatcham Northeast is already over capacity.
- No assessment has been made of the routes most likely to be affected by an increase in traffic.
- Increase in traffic through Bucklebury will pose highway safety issues.
- SID studies have shown most of the Upper Bucklebury main routes are already above the ACPO action levels for speeding

Specific Objection: Infrastructure

Thames Water have raised capacity concerns regarding this proposed Thatcham development.

Specific Objection: Heritage Impact

- The allocation at North East Thatcham surrounds the Grade II listed Colthrop Manor.
- There is no evidence that the WBC has taken into account the setting or significance of Colthrop Manor as a designated heritage asset in the allocation of North East Thatcham nor has WBC considered the impact of the development or the way in which the capacity of the site would be affected by it.
- A Mineral Resource Assessment (MRA). A Historic Environment Strategy to demonstrate how the listed buildings in the area will be conserved and how the impact of the development on their settings has been considered. Consideration of heritage impact should have been undertaken as part of the site selection process and subsequent assessment of site capacity. It is not considered appropriate that this is left to later stages of the planning application process. A Construction and Operations Management Plan (COMP) shall accompany any planning application on the site. The COMP shall safeguard the oil pipeline from operational works, including the provision of an appropriate buffer. The Oil Pipeline is shown in figure 39 of the Thatcham Growth Study and runs along the entirety of the southern boundary and there is reference to a 6m easement either side. Assuming that this also includes a restriction on building roads then this could lead to significant impediments to the implementation of any development on the site.

Specific Objection: Climate Change and Flood Risk

- The proposal allocates two bullet points to “Net Zero Carbon Development” and again is woefully inadequate in this area. There is no evidence that a net zero carbon development would be viable or has been costed as part of the viability appraisal produced for the site.
- Flood risk is a significant threat to Thatcham, and lack of evidence to suggest this has been adequately considered. The recent severe Thatcham flood started well above the site and were already a river at the top level of the development on Harts Hill Road from my own personal experience of the event.
- It is unclear how any development on this site would deliver a ‘net gain’ for Thatcham Town in terms of drainage and there is no allowance for this within the viability report for the site.

Specific Objection: Environmental Issues

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 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, I conclude 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.

Green Infrastructure The site will provide a comprehensive green infrastructure network which will take advantage of the landscape features of value within and around the site. This network will comprise: A new community park linking Thatcham to the North Wessex Downs AONB; Greenways which connect through the site to the park, facilitate connection to the AONB, and include leisure routes accessible to all users; It is unclear why links to the AONB are being encouraged as part of the proposed allocation. Given the sensitivity of the common and the wider AONB then impact through an increase in access should not be encouraged. This is expanded on within further sections of these representations.

They 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. I 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).

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.

Specific Objection: Ecology / Biodiversity Impact

- Significant impact on ecology / biodiversity as a lack of proposed allocation.

- The land immediately adjacent to the proposed development area for SP17 contains 41 Local Wildlife Sites and is part of the Bucklebury Plateau Biodiversity Opportunity Area.
- The data being used to establish the presence of species is out of date. In 2020, Bucklebury Parish sought environmental records for the 41 LWSs impacted by SP17:
 - 80% of surveys were conducted more than 15 years ago
 - 50% were more than 20 years old
 - 44% were over 30 years old
- BPC has appointed ecologists to conduct an independent study of the impacted area. The findings from a single day walk on public access routes indicated that the site had a much higher biodiversity value than previously appreciated, including the presence of seven species of threatened breeding birds and one threatened migratory species, several bat species and abundant badger setts. The hedges, old trees and gullies served as important corridors linking up different habitats within and beyond the site boundaries. These initial findings imply that a full study will show the required mitigation measures and BNG will be far more complex for the development than was anticipated by the planners.
- This one study has provided more information about the site than has been presented in the whole the LPR and its available evidence base. The area has a much higher biodiversity value than assessed by WBC.
- Protected species are present across the site and will be impacted. No detail on mitigation measures has been presented by WBC. Critical habitat network features are under threat from the development and will severely impact distribution of key species.

Specific Objection: Landscape and Character Impact

- Significant impact to character of landscape – not adequately assessed by WBC
- Development would have significant impact on AONB and is in the direct setting.
- Development would lead to increase in visitors to the common.
- The proposed country park is inadequate and lacks justification.
- A Lighting Strategy which will include consideration of dark skies, particularly in relation to the nearby North Wessex Downs AONB, and measures to mitigate the impact on biodiversity. It is clear from the wording of this section of the allocation policy that WBC accept that the site is within the setting of the AONB and that there will be an element of harm (in respect of lighting) which requires mitigation. This position conflicts the position in the Sustainability Appraisal which assesses the impact as being neutral in this respect. It is considered that the harm to the AONB extends to a far greater impact than just lighting and is a severe failing in the conclusions of the Sustainability Appraisal.
- A Landscape and Visual Impact Assessment (LVIA) in accordance with the Landscape Institute Guidelines for Landscape and Visual Impact Assessment 3rd ed. 2013. This will inform the final capacity, development, design and layout of the site and requirements for green infrastructure and the provision of public open space. The LVIA will be informed by the Landscape Sensitivity Assessment (2021) of the site. Given the highly sensitive location of the site it is highly surprising that an LVIA has not already been carried out for the proposed allocation.

Specific Objections: Schools Provision

The provision for education from Nursery, Early Years, through Infant to Secondary education is not clearly defined within the Local Plan Review (LPR). There is no coherent end-to-end plan: this therefore breaches the Council's obligations to provide education facilities for children. Without this provision, the Plan for a large new housing development is untenable.

The lack of a coherent Plan on Schools Provision across the various proposed developments also means that it is impossible to estimate the subsequent impact on traffic. The siting of a secondary school to the NE of Thatcham would result in a significant increase in traffic across the whole Thatcham area, not considered in the traffic plans and models in the LPR.

Pre-secondary School Provision:

There are no details in the LPR of the provision for Nursery or Early Years education. Policy SP17 NE Thatcham Strategic Site Allocation, merely states that ‘the site will provide Early Years provision’.

The provision for Primary school education is unclear and contradictory. There is no data or evidence on the planned numbers of schools or Form Entry requirements. The LPR proposes that the sum of £12 million be contributed by the developers to primary education. However, with no recent data available (the only data referenced is from 2011), it is impossible to assess if this is sufficient. It also does not state the timing of this funding or school place provision. Clearly, schools need to be available before houses are built.

Secondary Education Provision:

The current situation for secondary school students from Bucklebury is that they have a choice of either The Downs School or Kennet School as they are in the catchment area for both.

Where schools are oversubscribed those children who live nearer to the school are given precedence. This means that children from the proposed NE Thatcham development would be able to opt for Kennet and those from Bucklebury would then be limited to The Downs.

The LPR is inconsistent, incomplete and contradictory on the provision of secondary schooling in and around Thatcham. It proposes that the sum of £15 million be contributed by the developers to Secondary Education. There are no details of the location of the land to be provided and hence no possibility of assessing its suitability.

The Thatcham NE development plan 2020, produced by David Locke Associates and Stantec on behalf of WBC, proposes funding for a 6-8FE (Form Entry) secondary school, half-funded by developer contribution.

Government guidelines are that Secondary Schools with less than a 6FE are not sustainable.

However, the Development Plan states that the NE Thatcham development (which proposed 2,500 houses), is not sufficient to fill a 6–8 FE school:

Specifically

- 5.18 Provision of a new secondary school in North East Thatcham is an essential part of enabling growth in the town. However, the scale of growth proposed is not sufficient on its own to fill a 6-8FE secondary school.
- 5.19 Secondary schools need to be of sufficient scale to make them sustainable and able to provide suitable facilities for their students, so it is not considered feasible for a new school to be smaller than 6FE.
- With an apparent 40% reduction in the housing allocation in the 2023 LPR (2022 to 2039) to 1500 houses, a secondary school simply cannot be sustainable in this location.
- Earlier in this same Thatcham NE Development Plan it was noted that the education provision exercise was based on WBDC data on pupil yield from a study in 2011. Clearly the use of 11 year old data is inadequate. The Development Plan states:
- 4.83 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. Inevitably educational provision will be examined in more detail as any development comes forward.
- The LPR Review to 2039, Policy SP17, now states that land (but not the Secondary school itself) will be provided for the development.

In summary, it is therefore clear that the plan for secondary school provision is ‘unsound’ :

- there is no satisfactory evidence of the number of pupils the school is to cater for;
- the location of a school is not clear;
- the number of Form Entries is not defined, but it is noted that anything less than a 6FE school is unsustainable;
- the timing of the funding is not clear; and

- there is no evidence that the proposed funding is sufficient to meet the Council's obligations to provide education.

Conclusion on Schooling :

West Berkshire Council, as an education authority, has a duty to make arrangements for suitable school provision. How this obligation will be met across all school years is not defined or evidenced in the LPR.

Specific Objections: Sports Fields Provision

The LPR talks of the provision of sports fields. This raises two issues not answered in the LPR:

- Sports fields require flat ground. The only flat area of ground in the proposed site is that which is closest to the A4 and therefore in an area with the most traffic fumes.
- There is no funding earmarked for these facilities.

Although unclear, the LPR appears to assume that the school playing fields would also be available as Sports Fields. If the school itself is not viable, then the playing fields will not materialise. Additionally, many schools are reluctant to open their playing fields to the public due to safeguarding and other concerns.

Outdoor formal and informal sports pitches and areas to meet the identified need of the development; Open space to meet the needs of the development in accordance with Policy DM41; Given that most of the site is on a gradient it is unclear how formal or informal sports provision will be brought forward on the site.

The objective of WBC and the North-East Thatcham Development Consortium to provide sports fields has not been met as they have not provided evidence for funding or for a suitable location.

Specific Objections: Healthcare provision

The North-East Thatcham development plan (SP17) proposes a 450 sq m primary healthcare facility with the suggestion that a GP Surgery be offered to the Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board or other such appropriate body. However, the document is bereft of detail or insight into strategic healthcare planning.

- Proposals for a major development that is likely to have a significant health impact in relation to its size and location, should be accompanied by a fit for purpose Health Impact Assessment (HIA) in accordance with the current guidance from Public Health England. The HIA should include reference to how the proposals for development have been discussed with health service providers regarding impacts on primary health care services. The development proposals should demonstrate how the conclusions of the HIA have been considered in the design of the scheme because an unacceptable impact on the health and wellbeing of existing or new communities will not be permitted. It is of concern that neither WBC nor the developers, as public and private stakeholders respectively, appear to have arranged or published a prospective HIA specific to the proposed North-East Thatcham development.
- Tackling health and wellbeing requires a multi-agency approach. The Berkshire West Health and Wellbeing Strategy 2017-2020 2021-2030, has been developed by the Reading, West Berkshire and Wokingham Health and Wellbeing Boards together with the Berkshire West Integrated Care Partnership. Developers are encouraged to engage with the healthcare providers at the earliest opportunity in order to determine the health care requirements associated with new development. It is of concern that there appears to have been no direct engagement between the North-East Thatcham Development Consortium and local general practices.
- Few new GP practices are commissioned by NHS England, even where they consider there to be patient demand for improved services. NHS Digital figures of patients registered in the NHS Berkshire West Clinical Commissioning Group (CCG) confirm there is an even worse shortage of GPs in other areas of the country. There is therefore no realistic prospect of a new GP practice being established in Thatcham or West Berkshire in the foreseeable future.

- GP practices look to create efficiencies and economies of scale to make general practice more financially sustainable and to increase access and extend the range of services and primary healthcare professionals available on a single site. It would make no financial, organisational or geographic sense for an existing local GP practice to set up a branch surgery on the proposed new development because of the additional administrative, computing and staffing costs and encumbrance working across two sites.
- There has been no approach by WBC or the developers to any local GP practice to discuss an appropriate site, floor-space or location to which one or more practices could relocate. An enlarged primary healthcare site is required and might be better located close to the middle of Thatcham to improve access and minimise traffic as the proposed NE Thatcham development is peripheral to the centre of the population. This would be likely to be supported by Thatcham Town Council but has not been suggested in the sustainability appraisal of site options. Local practices did not have input with the inadequate 450 sq m floor size proposal which they only discovered with the SP17 Policy of December 2022, Appendix D.
- The proposed North-East Thatcham development site is covered by the existing practice boundaries of Thatcham Medical Practice (west of Harts Hill Road), Burdwood Surgery (east of Harts Hill Road) and Chapel Row surgery (the whole area). All three practices are already overstretched. The two Thatcham doctors' surgeries run independently of each other, and their combined lists include approximately 27,800 patients that equates to just under 2,000 patients per GP. Newly registered patients moving into housing developments tend to make a greater demand on GP services because there are more young children, a higher maternity workload, less local extended family support and there is initially a higher housing turnover. One permanent and repeated temporary pharmacy closures in Thatcham have further exacerbated pressure on primary care locally.
- Thatcham dental practices are unable to provide dental care for the whole population with a significant minority of patients needing to travel further afield for NHS and private dental care. Thatcham Vision, endorsed by WBC in 2016, confirmed only 60% of residents were registered at a Thatcham dentist (with 17.5% registered with a doctor outside Thatcham). There is no evidence provided that either WBC or the developers have approached any local dental practices regarding the potential impact of increased workload resulting from additional housing.
- Reviewing the scanty healthcare recommendations within the Thatcham Strategic Growth Study (David Lock and Associates) - Stage 2: Thatcham Present, paragraph 4.10 states: 'A dialogue with the relevant healthcare and education agencies should be established early in the master planning process to address concerns that social infrastructure may not be provided.' The Stage 3: Thatcham Future report published in September 2020 includes no further detail except the outcome of a community representatives' workshop, that the existing GP facilities are at capacity and suggesting a new health centre.

Conclusion:

WBC and the developers appear to have neither arranged a relevant HIA nor provided evidence of having appropriately liaised with local health care agencies or providers. They are proposing a healthcare site that is unsuitable for NHS primary care and so have not made provision to mitigate the burden that 1,500 or more new houses will make on a local NHS struggling to cope.

The objective of WBC and the North-East Thatcham Development Consortium to improve access to the health service component of community infrastructure has not been met as they have not provided evidence for the provision of a viable primary care medical facility.

Specific Objection: WBC's timings on the Local Plan Review Consultation

On 6th December, Michael Gove (Secretary of State for Levelling Up, Housing and Communities) released a Written Ministerial Statement setting out forthcoming amendments to the National Planning Policy Framework (NPPF).

The Statement set out the following (inter alia):

I will retain a method for calculating local housing need figures, but consult on changes. I do believe that the plan-making process for housing has to start with a number. This number should,

however, be an advisory starting point, a guide that is not mandatory. It will be up to local authorities, working with their communities, to determine how many homes can actually be built, taking into account what should be protected in each area - be that our precious Green Belt or national parks, the character of an area, or heritage assets. It will also be up to them to increase the proportion of affordable housing if they wish.

My changes will instruct the Planning Inspectorate that they should no longer override sensible local decision making, which is sensitive to and reflects local constraints and concerns. Overall this amounts to a rebalancing of the relationship between local councils and the Planning Inspectorate, and will give local communities a greater say in what is built in their neighbourhood.

The NPPF consultation was launched just prior to Christmas 2022 and will run until 2nd March, 2023. The Consultation Version of the NPPF sets out that the Standard Method for calculating the housing requirement (as used by West Berkshire for the regulation 19 version of the plan) will be advisory not mandatory and should only be the starting point for local plan. There is a particular focus within the consultation NPPF on taking into account the character of an area when assessing how much housing can be accommodated.

Government Consultation for NPPF currently underway

- Likely to reduce overall housing requirement for councils.
- Will take into account historic oversupply – evidence that WBC has overdelivered on housing in recent years.
- Unlikely to need to take into account unmet need from Reading Borough Council (230 dwellings)
- Likely that development of North East Thatcham would not be required.

On the back of this announcement, several Local Authorities have paused their plan making process whilst they await the outcome of the consultation on the basis that a lower housing requirement could be applicable to the plans than the one currently being planned for.

On this basis, it is unclear why West Berkshire are continuing to consult on the current version of the local plan and also why councillors did not require the final version of the plan to be brought back to them for approval (i.e. at the 2nd December vote at the full council meeting) before it is submitted to the Planning Inspectorate for examination.

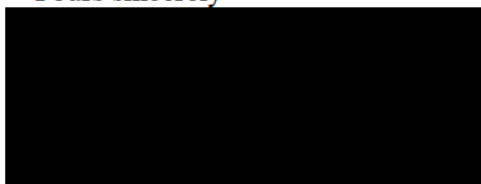
I feel that the council should take the opportunity, as others have, to pause the plan making and to bring forward a revised plan in line with updated planning guidance when this comes in later in 2023.

Consultation and Duty to Co-operate

- Lack of evidence that WBC have complied with duty to consult with local residents and take representations into account.

I trust that my comments are considered and that the proposed Thatcham NE Development in the LP is considered unsound.

Yours sincerely

A large black rectangular redaction box covering the signature area.

David Southgate