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To: [PlanningPolicy](#)
Subject: WBC LPR Regulation 19 Objection – SP17
Date: 01 March 2023 15:32:14

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WBC LPR Regulation 19 Objection – SP17 (NE Thatcham Development)

I wish to strongly oppose the proposed north-east Thatcham housing development (SP17) on the basis that the plan is unsound for the following reasons:

Timing of the Local Plan Review Consultation

Following Michael Gove's statement on 6th December 2022, the consultation version of the National Policy Planning Framework (NPPF) is advisory, not mandatory. Updated guidance comes later this year and therefore many Local Authorities have chosen to pause their plans, particularly as a lower housing level may be possible and so preserve our green fields. Why did WBC not choose this option? There would have been overwhelming support to do so.

Education

There are no details for the provision of Nursery and Preschool education. There is no site proposed and no assessment of the numbers of pupils. Primary school provision is based upon out-of-date costs and, importantly, does not specify when during the plan period any primary schools would be built. There is no estimate of pupil numbers or the number or size of any schools. The Development Plan states that NE Thatcham development is not sufficient to fill and sustain a 6-8 FE secondary school. The data used by WBC is out of date (2011). There is no detail of the land's location, so it is not possible to assess its suitability as an educational facility. There is no indication that any of the schools would be built before the housing. The only flat land available for any school sports fields is directly beside the A4, as the development site is on a hillside. There is a particular sensitivity to locating any new outdoor child sports facility beside busy main roads because of pollution and traffic fumes. I can find no evidence of funding for sports field provision. The NE Thatcham is likely to result in the Kennet School being oversubscribed. This may mean that children completing Year 6 at Bucklebury Primary School will need to travel 9 miles to Downs School in Compton rather than 1-2 miles to the Kennet School. The arrangements made for nursery, preschool and primary and secondary schools are unsound.

Environment

There is a real and obvious impact upon wildlife in ribbon development. Firstly, by destroying wildlife corridors provided by in the rills and streams between Bucklebury Common and the River Kennet. Secondly, by surrounding the various ancient woods, Harts Hill Copse, Wimbles Wood, Big Gully, Blacklands Woods and Ouzel Wood, the fauna will disappear as the green fields surrounding the woods disappear. Importantly, there will be the impact on nearby Bucklebury Common and the North Wessex Downs Area of Outstanding Natural Beauty (AONB). I could find no evidence that SP17 will have a positive impact on the environment. There are no strategy documents to support a Sustainability Charter. For information, I note that in a recent planning application to extend the completion date for gravel extraction at Harts Hill Copse (23/00387/MINMAJ), an area of small ponds is being set aside that will increase biodiversity. This land is owned by the Wasing Estate who are also one of the four developers. Is this relevant to achieving biodiversity net gain? If so, why is it not mentioned within any plan documents? Why the paucity of evidence? I can find no record of individual plant or animal species in any of the WBC council and Stantec documentation. There are maps and descriptions of landscape, and records of the grading of

agricultural farmland, hedgerows, and woodland. How is it possible not to conduct and publish an up-to-date wildlife survey of bats, badgers, dormice, great crested newts, or orchids? For example, there are at least six old farmhouses or buildings that probably have pipistrelle bats with implications for the construction of adjacent housing.

Healthcare

The proposal for a healthcare facility within the NE Thatcham Development appears not to take account of local healthcare needs, the size of site that is realistic or to have involved adequate liaison with healthcare providers and agencies in West Berkshire.

There has been no published relevant Health Impact Assessment (HIA) demanded by Public Health England guidance. There has been no direct engagement between the NE Thatcham Development Consortium and the local GP surgeries whose practice areas cover the site and WBC contact has been cursory.

A new GP practice would not be permitted to be set up in Thatcham with current NHS England prioritisation guidance. A 450 sq m floor size is inadequate for a modern-day GP surgery. The three existing GP practices would not establish a branch surgery because the resulting split site would result in difficulties in administration, IT links, staff working across sites it would impact on their financial viability.

Local pharmacies and dental practices are already struggling. The Lloyds pharmacy in the Kingsland Centre has recently closed and others have capacity and staffing problems. 40% of Thatcham residents must travel outside the town for dental services. There is no provision in the plan to provide for this shortfall. Local GP practices are at or beyond capacity – the Burdwood surgery had to close its doors to all patients, including emergencies, in December as a force majeure because of unmanageable demand.

There is no evidence that WBC or the developers have involved Berkshire West Integrated Care Partnership in offering a significantly larger facility on the proposed development site, say 1,500 to 2,000 sq m that would involve the relocation of an existing practice.

In summary, the 450 sq m site suggested is too small to be viable, and there seems to have been inadequate consultation with healthcare providers, so the proposal is unsound.

Transport

The plan for an exit at the north of the site onto Harts Hill Road will have a significant impact on traffic load and road safety in Upper Bucklebury, Cold Ash, Chapel Row and Bradfield Southend. Most cars have traffic SatNavs that will quickly redirect them away from an inevitably more congested A4 each morning and evening. There is no allowance for traffic calming measures, pavements, or a change in speed limit on Harts Hill Road which is unlit, has frequent bends, ice patches in winter and witnesses multiple accidents, some fatal.

The inclusion and siting of a car park on Harts Hill Road will result in yet more traffic as well as night-time anti-social behaviour.

Because the whole NE Thatcham Development site is a ribbon development at a distance from Reading, Newbury as well as Thatcham, transport will be overwhelmingly by car. Public transport only accounts for an exceedingly small fraction of commuting to work and shopping. The railway station is further away than from most parts of Thatcham and the bicycle stand at Thatcham station is always underutilised.

Concerns about Process

There have always been alternatives to the proposed NE Thatcham Development. For example, restricting the site area to Siege Cross (refused on a technicality by the Panning Inspector in 2015) and adding Henwick Park (acknowledged by WBC to have been overlooked as a sustainable site to be fully assessed in the current plan) and multiple village sites (there are 60 villages in West Berkshire, many of which are losing or have lost their public house, village shop, post office, bus service or church). I suspect that WBC have taken the easy option of agreeing to

a vast estate as an easy option.

The Thatcham Strategic Growth Study was commissioned by WBC and contracted to David Lock Associates and Stantec for £100,000. A freedom of information (FOI) request from a parishioner in 2021 established that £100,000 was, in turn, paid to WBC by the Development Consortium, the Wasing Estate, A2Dominium, Donnington New Homes, and Ptarmigan. WBC acknowledged that they had not previously accepted similar payments where there is an obvious conflict of interest. I have since spoken to a Stantec professional who confirmed my suspicion that independent studies are unbiased but only 'all things being equal', 'he who pays the piper'. How was the decision made to allow a back payment? Why was the payment kept from the public domain?

Dr Michael Morgan

