




**West Berkshire Local Plan Review 2022-2039 (LPR)
 Consultation on Proposed Main Modifications
 (6 December 2024 – 31 January 2025)**

Representation Form

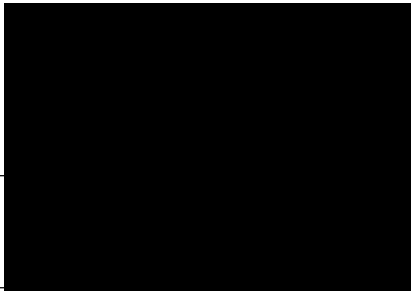
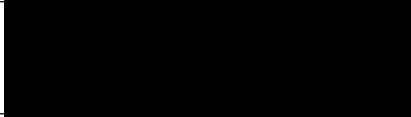
Ref:
 (For official use only)

Please complete and return this form:	By email: 
	By post: Planning Policy, Development and Housing, Council Offices, Market Street, Newbury, RG14 5LD
Return by:	11:59pm on Friday 31 January 2025

Please read the **Guidance Note**, available on the Council’s website <https://www.westberks.gov.uk/lpr-proposed-main-modifications>, before making your representations.

This form has two parts:
 PART A – Your details
 PART B – Your representation(s)

Please complete a new form for each representation you wish to make.

<u>PART A: Your details</u>		
<i>Please note the following:</i>		
<ul style="list-style-type: none"> <i>We cannot register your representation without your details.</i> <i>Representations cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.</i> 		
	1. Your details	2. Agent’s details (if applicable)
Title	Mrs	
First Name*	Antonia	
Last Name*	Elliott	
Job title <i>(where relevant)</i>		
Organisation <i>(where relevant)</i>		
Address* <i>Please include postcode</i>		
Email address*		
Telephone number		
Consultee ID <i>(if known)</i>		

*Mandatory Field

PART B – Your representation(s)

All comments made at previous stages of the LPR have been taken into account by the Inspector and there is no need to resubmit these. Publication of the proposed Main Modifications is a regulatory stage and any representations made should relate specifically to the legal compliance and soundness of the proposed Main Modifications and should not relate to parts of the Plan that are not proposed to be modified.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change.

Your name or organisation (and client if you are an agent):	
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Proposed Main Modifications and Proposed Changes to the Policies Map

1. Please indicate whether your representation relates to the Schedule of Proposed Main Modifications or the Schedule of Proposed Changes to the Policies Map and provide the modification/change number you are commenting on below:

Document name	WBC Local Plan Main Modifications
Modification/Change reference number (MM / PMC)	MM25 & MM26

2. Do you consider the Proposed Main Modification or Proposed Policy Map Change to be:
(please tick/mark 'X' one answer for a and one for b)

- a) **Legally compliant** Yes No
- b) **Sound** Yes No

Please refer to the guidance notes for a full explanation of 'legally compliant' and 'soundness'

If you consider the Proposed Main Modification or Proposed Policy Map Change not to be sound, please identify which test of soundness your representation relates to:
(please tick/mark 'X' all that apply)

Positively Prepared: The LPR should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements.	x
Justified: the LPR should be the most appropriate strategy, when considered against the reasonable alternatives	x
Effective: the LPR should be deliverable	x
Consistent with national policy: the LPR should enable the delivery of sustainable development in accordance with the policies of the NPPF	x

3. If you have answered 'No' to question 2a or 2b above, please provide details of why you consider the Proposed Main Modification or Proposed Policy Map Change is not legally compliant or is unsound, including any changes you consider necessary to make the Plan legally compliant or sound.

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.

The increase of the dwellings allocated for the site to 2,500

- *There is no indication of how the increase will be accommodated? Where will these extra 1000 houses be built? Will it be coming closer to Upper Bucklebury.*

Highways Impact:

- *The rise in dwellings will significantly affect highways.*
- *Previous findings indicated that 1,500 dwellings **already had a detrimental impact.***

Access and Traffic Issues:

- *The allocation plan suggests access onto Harts Hill, potentially creating a rat run through Upper Bucklebury for access to M4 junctions J12, J13, and the Common.*
- *Floral Way is already backed up with the morning traffic. This was supposed to be a residential road but it is clear it is used more as a bypass.*

Community Infrastructure:

- *There is considerable ambiguity around the provision of community infrastructure, such as education and health facilities.*
- *These facilities might need to be provided off-site, increasing car journeys.*

Master planning Process:

- *Many aspects of mitigation, impact, delivery, and design are left to the Master planning process.*
- *WBC has provided little reassurance on how this process will be managed.*

Engagement with Parish Councils:

- *There are concerns about WBC's engagement with parish councils during the main modifications consultation.*
- *Invitations to a meeting were sent just 7 working days before the consultation's end, and no parish council councillors were allowed to attend in person.*

Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA)

4. Do you have any comments on the updated Sustainability Appraisal/Strategic Environmental Assessment Report – Proposed Main Modifications (November 2024)?
(Please be as precise as possible)

Page number	
Paragraph number	
Comments:	
<p>Biodiversity Concerns:</p> <ul style="list-style-type: none">• <i>There is significant concern about potential harm to biodiversity from the site's development.</i>• <i>BPC has shown that previous ecology surveys and evidence bases were incorrect and outdated for supporting 1,500 dwellings. No updates have been made for the increased dwellings or any development.</i> <p>Impact on National Landscape:</p> <ul style="list-style-type: none">• <i>The rise in dwellings will significantly affect the setting of the National Landscape (formerly AONB).</i> <p>Sustainability Appraisal:</p> <ul style="list-style-type: none">• <i>There have been no updates to the Sustainability Appraisal's impact assessment as a result of the increased dwellings.</i>• <i>The Environment Agency has just released their flood risk map and it shows that many of the sites the new development would be is at HIGH RISK of flooding. https://check-long-term-flood-risk.service.gov.uk/map</i>• <i>Flood risk and surface water drainage is a key consideration for Thatcham, following extensive surface water flooding in the summer of 2007 as a result of high intensity rainfall overwhelming storm drains and culverted streams. The flood event was considered to be in the order of a 1 in 200 year event. Following the flooding various studies and strategies were developed to identify opportunities for reducing flood risk in the town. The Thatcham Surface Water Management Plan (2010) sets out a number of proposed measures to reduce flood risk in Thatcham, focusing on retaining runoff upstream of Thatcham to reduce peak flows through the existing urban area and drainage system. A number of flood attenuation ponds have been constructed on the North East Thatcham site, and these are to be retained and enhanced in addition to Sustainable Drainage Systems (SuDS) provided on the site. An Integrated Water Supply and Drainage Strategy involving localised and strategic flood management measures will be required, in line with the requirements of the West Berkshire Sustainable Drainage Systems SPD (2018).</i>	

Habitats Regulations Assessment

5. Do you have any comments on the addendum to the Habitats Regulations Assessment of the Proposed Main Modifications (November 2024)?

(Please be as precise as possible)

Page number	
Paragraph number	
Comments:	
<p><i>Air Pollution</i></p> <ul style="list-style-type: none"><i>Additional highway movements from increase to 2,500 dwelling movements will have significant impact on the habitat in the area.</i> <p><i>Soil Pollution</i></p> <ul style="list-style-type: none"><i>No further evidence to suggest that soil quality would be maintained or improved this would have considerable impact on wild life.</i>	

Notification of Progress of the Local Plan Review

6. Do you wish to be notified of any of the following?

(please tick/mark 'X' all that apply)

<i>The publication of the report of the Inspector appointed to carry out the examination</i>	
<i>The adoption of the Local Plan Review</i>	

Please ensure that we have either an up-to-date email address or postal address at which we can contact you. You can amend your contact details by logging onto your account on the Local Plan Consultation Portal or by contacting the Planning Policy Team.

Signature		Date	
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