



## West Berkshire Local Plan Review

Proposed Submission (Regulation 19)  
Consultation

### Representations on behalf of Bucklebury Parish Council

March 2023





## Introduction and Executive Summary

- 1.1 These representations are made on behalf of Bucklebury Parish Council (BPC) in response to the regulation 19 Consultation for the West Berkshire Council Local Plan Review.
- 1.2 At the time of these submissions, a consultation is taking place (until March 2023) for proposed changes to the National Planning Policy Framework (NPPF). The potential impact of those changes in respect of the Local Plan are discussed in subsequent sections of these representations. However, the main thrust of these representations is made against the tests of soundness as set out in paragraph 35 of the NPPF. This states that plans are 'sound' if they are:

***Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*

***Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*

***Effective** – 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; and*

***Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.*

- 1.3 For the reasons set out within these representations, it is considered 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 these representations.
- 1.4 The LPR is **not positively prepared** and would not achieve the goal of sustainable development for WBC and the wider Thatcham area.
- 1.5 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.
- 1.6 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.
- 1.7 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.

- 1.8 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.
- 1.9 The process for selection of North East Thatcham as a development site is severely flawed and lacks evidence.

### **Timing of Consultation**

- 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.
- Surprising that WBC has not sought to pause consultation on local plan (others have).
- Surprising that WBC will not be taking plan back to full council for sign off before final submission to Secretary of State for Examination (other councils do this)

### **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.

### **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.
- Thatcham Growth Study flawed and serious questions about how this was paid for and produced.
- Selection of Site at North East Thatcham would lead to development in the countryside and important Strategic Gap between Thatcham and Bucklebury.
- 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.

### **North East Thatcham Strategic Allocation**

- 1.10 The full policy wording of policy SP17 is set out below with some comments made against each section.

#### **North East Thatcham Strategic Site Allocation**

***Land as shown on the Policies Map is allocated for a sustainable low carbon, urban extension comprising of distinct neighbourhoods defined by their landscape and connected and contributing to Thatcham, and woven through with natural habitats and links. The site will be masterplanned and delivered as a whole to achieve a comprehensive development.***

- 1.11 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.***

- 1.12 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.

#### **Homes**

***The site is to be allocated for approximately 1,500 dwellings which will be completed within the period of the plan. These dwellings will comprise of a housing mix which complies with the housing mix contained in Table 3 of Policy SP18. In addition at least:***

***40% of dwellings will be affordable housing; and  
3% of dwellings will be delivered via serviced custom/self-build plots.***

#### **Community**

***The site will provide:***

***Local centres providing local retail facilities and small-scale employment for community use (approximately 1,100 sq. metres Class E and F2);  
450 sq. metres GP Surgery to be offered to the Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board or other such appropriate body;***

- 1.13 Further consideration on the viability and deliverability of the GP Surgery is set out within subsequent sections of these representations.

***Early years provision;  
A 2.5 FE primary school on site and sports infrastructure requirements of the school, land***



***to be provided and build costs to be met by the applicant;  
Secondary provision - Land to meet the impact of the development. The nature and cost of the mitigation will be informed by a feasibility study, undertaken at the applicants expense and prepared in collaboration with the Council and local stakeholders;***

- 1.14 It is noted that the school provision has not been costed within the viability appraisal and therefore the deliverability of this element of the allocation is unjustified.

***1,200 sq m community indoor facility to be used for sport and community uses with a variety of room sizes (currently use classes E and F);***

- 1.15 This is a substantial size for a community indoor facility and no details or costings are provided for this within the evidence base.

***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;***

- 1.16 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.

#### **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;***

- 1.17 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.

***A comprehensive network of other accessible routes and connections within the development which provide walking and cycling links along desire lines;***

***Existing and new Public Rights of Way; and***

***Retained and new trees, hedgerows and other appropriate native planting which contribute to biodiversity net gain.***

#### **Transport**

***Measures will be included to improve accessibility by, and encourage use of, non-motorised transport modes. A Transport Strategy will provide detail on how this will be achieved, including:***

***Active travel improvements on routes between the site, Thatcham town centre and the railway station;***

***A vehicular through route;***

***Sustainable transport through routes;***

***Mitigation of the development's impacts on the highways network with improvements to existing junctions where they are needed and delivery of new access points for all forms of movement and transport to the site at locations to be agreed with the planning authority; and***

***How adverse impacts on air quality will be minimised.***

**1.18** Commentary to be inserted from Transport Consultant.

**Sustainability**

***Development of the site will be supported by a Sustainability Charter which will establish how policy requirements will be achieved. This will be informed by:***

***An Energy Strategy which sets out measures to achieve a model low carbon development (following the energy hierarchy) in accordance with Policies SP5 and DM4, including:***

***net zero carbon (regulated and unregulated energy) emissions for dwellings;***

- 1.19 It is highly unlikely that the dwellings will be brought forward as net zero carbon and no allowance has been made for this within the viability appraisal for the site.

***BREEAM 'excellent' non residential buildings;***

***on-site renewable energy to assist in the delivery of a net zero carbon neutral development; and carbon off-setting.***

***An Integrated Water Supply and Drainage Strategy which will set out:***

***measures to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site; and***

***surface water management approaches that could deliver net gain for Thatcham town, including use of on-site sustainable drainage systems (SuDS).***

- 1.20 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.

***An Ecology Strategy which will set out:***

***a Biodiversity Net Gain Strategy to show how net gain will be achieved including through habitat restoration and linkages;***



***how priority habitats and ecological features will be protected and enhanced;  
the creation of new ecological features; and  
a site-wide management plan.***

- 1.21 Further comments are made on the ecology of the site within these representations.

***A Green Infrastructure Strategy which will show how a network of multifunctional green infrastructure will be delivered across the site.***

***A Public Rights of Way Strategy to demonstrate how existing Public Rights of Way will be protected and enhanced and how new ones will be established, including bridleway links and safe crossing points.***

***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.***

- 1.22 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.

- 1.23 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.***

- 1.24 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.

***A Mineral Resource Assessment (MRA).***

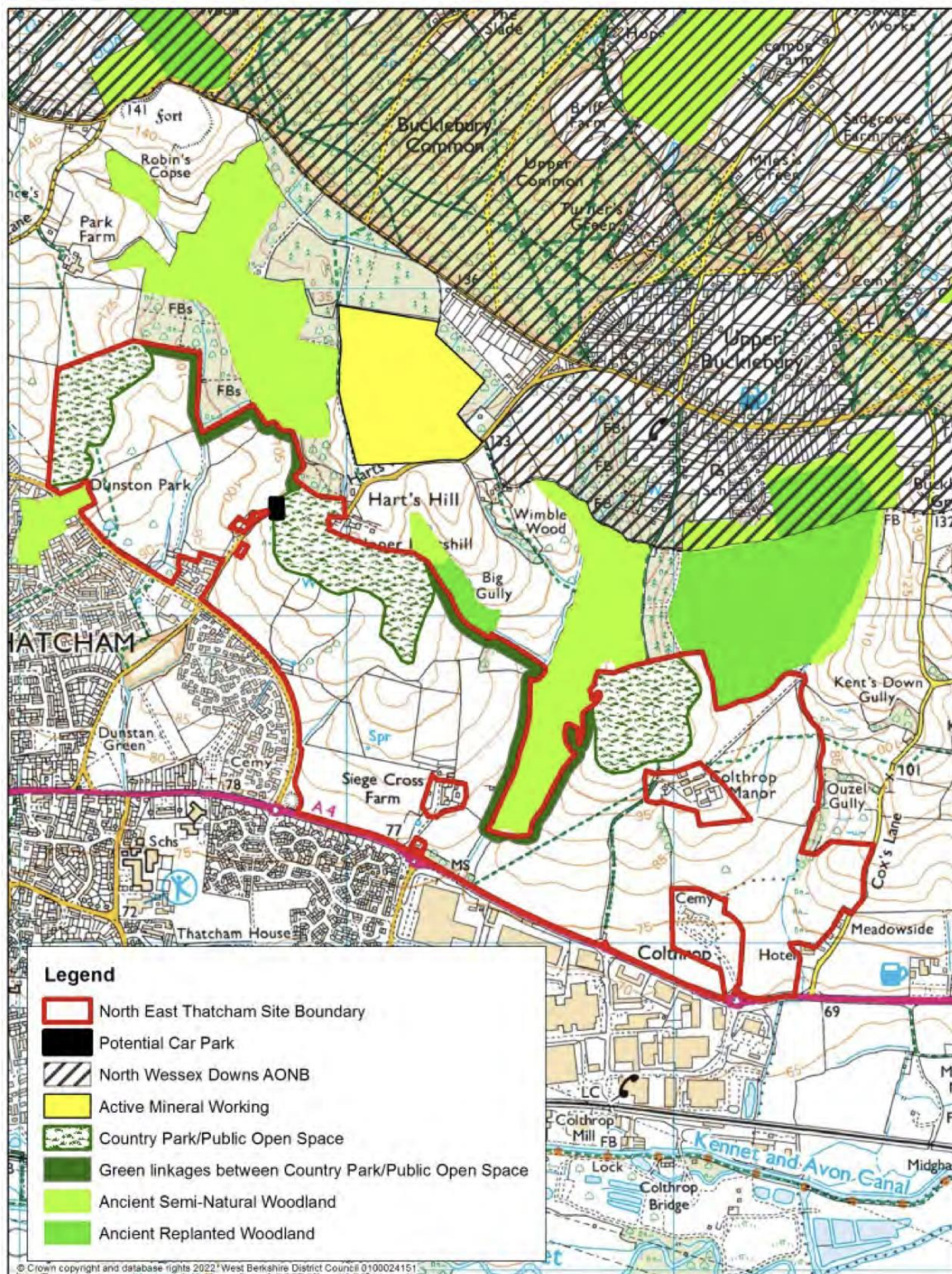
***A Historic Environment Strategy to demonstrate how the listed buildings in the area will be conserved and how the impact of the development on their settings has been considered.***

- 1.25 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.***

- 1.26 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.



## 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.

### **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.

### **Highway Impact**

- 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.

### **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.

### **Infrastructure and Services**

- 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 LPR is bereft of detail or insight into strategic healthcare planning.
- Lack of information on provision of education
- No evidence that provision of community facilities or sports pitches has been looked at in detail or is deliverable.

### **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.