

**West Berkshire Council (WBC) LPR Review:
Regulation 19 Consultation
20th January – 3rd March, 2023**

Summary of Topics to be raised at the **EGM of West Berkshire Council (WBC) on 2nd March
on the flaws in the Local Plan review (LPR)**

See also the attached WBC Public Reports Pack

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.

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