

## Comment

Consultee	Colin Duff (1257736)
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Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Comment by	Colin Duff (1257736)
Comment ID	PS424
Response Date	01/03/23 14:49
Consultation Point	Policy SP 12 Approach to Housing Delivery ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.1
Bookmark	Duff, Colin

### 1. Do you consider the Local Plan Review is legally compliant?

*Please see the guidance note for an explanation of what 'legally compliant' means*

Yes

### 2. Do you consider the Local Plan Review is sound?

*Please see the guidance notes for an explanation of what 'soundness' means.*

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF).

*Please tick all that apply:*

**Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.** . No

**Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.** . No

**Effective: the plan is 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.**

**Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.**

#### **Please give reasons for your answer**

Given that only a small percentage of land in West Berkshire is free of planning restrictions, this places an enormous burden on the area and its residents of the small area that can be developed. New developments will fundamentally change the nature of the area in a way residents do not welcome, plus bring disturbance not only during building phases but forevermore because of the significantly increased population. This expansion is manifestly unfair on the residents of Newbury and Thatcham whilst the West Berkshire population outside of the two towns are unscathed. Surely the number of new houses required should be proportional to the area that is free of restrictions to take them? We should not be fitting the number of houses specified for a large district into such a small part of it. The result will be widening the divide between town and countryside that is not so great at the moment and will irrevocably change the ambience of West Berkshire. It should be taken into account that unless a considerable part of West Berkshire land is released from planning restrictions in the future there will be further pressure to build large number of houses around Newbury and Thatcham in the plan beyond 2039, and thus the size of new development needs to smaller and taken slower - in proportion to the amount of land free of planning restrictions.

### **3. Do you consider the Local Plan Review complies with the Duty to Co-operate?**

*Please see the guidance note for an explanation of what 'Duty to Cooperate' means.*

Yes

### **4. Proposed Changes**

**Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).**

*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 plan will become sound if the amount of development is proportional to the ratio of land available for development compared to the overall area of the district.

### **5. Independent Examination**

**If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?** No

### **6. Notification of Progress of the Local Plan Review**

**Do you wish to be notified of any of the following?**

*Please tick all that apply*

**The submission of the Local Plan Review for Independent Examination** . Yes

**The publication of the report of the Inspector appointed to carry out the examination** . Yes

**The adoption of the Local Plan Review** . Yes

**West Berkshire Local Plan Review 2022-2039****Proposed Submission Representation Form****Ref:***(For official use only)*

<b>Please complete online or return this form to:</b>	<b>Online:</b> <a href="http://consult.westberks.gov.uk/kse">http://consult.westberks.gov.uk/kse</a>
	<b>By email:</b> <a href="mailto:planningpolicy@westberks.gov.uk">planningpolicy@westberks.gov.uk</a>
	<b>By post:</b> Planning Policy, Development and Regulation, Council Offices, Market Street, Newbury, RG14 5LD
<b>Return by:</b>	<b>4:30pm on Friday 3 March 2023</b>

This form has two parts:

- Part A - Your details: need only be completed once
- Part B - Your representation(s): please fill in a separate sheet for each representation you wish to make

**PART A: Your Details**

*Please note the following:*

- *We cannot register your representation without your details.*
- *Representations cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.*
- *All information will be sent for examination by an independent inspector*
- *All personal data will be handled in line with the Council's Privacy Policy on the Development Plan. You can view the Council's privacy notices at <http://info.westberks.gov.uk/privacynotices>*

	<b>Your details</b>	<b>Agent's details (if applicable)</b>
Title:	Mr	
First Name:*	Colin	
Last Name:*	Duff	
Job title <i>(where relevant):</i>		
Organisation <i>(where relevant):</i>		
Address* <i>Please include postcode:</i>		
Email address:*		
Telephone number:		

\*Mandatory field

**Part B – Your Representation*****Please use a separate sheet for each representation***

The accompanying guidance note available at: <https://www.westberks.gov.uk/lpr-proposed-submission-consultation> will assist you in making representations.

*Your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change(s) as there will **not normally** be a subsequent opportunity to make further representations, **further submissions will ONLY be at the request of the Inspector, based on the matters and issues they identify for examination.***

Your name or organisation (and client if you are an agent):	Colin Duff
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**Please indicate which part of the Local Plan Review this representation relates to:**

Section/paragraph:	North East Thatcham Strategic Site Allocation
Policy:	SP17
Appendix:	
Policies Map:	
Other:	Specifically Transport Section

**1. Legally Compliant**

*Please see the guidance notes for an explanation of what 'legally compliant' means.*

**Do you consider the Local Plan Review is legally compliant?**

Yes

No

*Please give reasons for your answer:*

## 2. Soundness

Please see the guidance notes for an explanation of what 'soundness' means.

### Do you consider the Local Plan Review is sound?

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF)

Please tick all that apply:

NPPF criteria	Yes	No
<b>Positively Prepared:</b> The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development		<b>N</b>
<b>Justified:</b> the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		<b>N</b>
<b>Effective:</b> the plan is 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		
<b>Consistent with national policy:</b> the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		

Please give reasons for your answer:

Regarding the following criteria:

- 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.

The Strategic Study acknowledges that Thatcham has developed over many centuries overwhelmingly on an east-west axis for movement. It acknowledges that the large majority of movement for Thatcham's population is by motor transport due to poor public transport. At peak times there is already traffic congestion and the A4 is busy for other parts of the day. It notes that access to and from the north (mainly for the M4 east or west and A34 north), if avoiding already congested and busy Newbury, is via Cold Ash. It acknowledges that access to and from the south is much restricted due to the level crossing adjacent to Thatcham Station, the barriers being closed to road traffic for the majority of an hour during daytimes Monday to Saturday.

Yet in the development of Thatcham strategy there are no proposals at all to address these two issues to the extent it looks like being put on the "too difficult pile". Additionally the strategy for NE Thatcham actually proposes limiting access to and from north. Nor does the strategy propose how to accommodate increased traffic on already busy roads, instead only focussing on details of road junctions. To which there will be an impact on air quality along the A4 and Floral Way for which no mitigation is proposed. Add to which given that Thatcham is a hub for distribution industries this is a massive error.

There is no public transport north out of Thatcham save for a very infrequent minibus service to local villages. There is no public transport south out of Thatcham and requires a change of bus in Newbury, making such journeys unviable unless you can spare a large part of the day just to travel. Yet in the development of Thatcham strategy there are no proposals at all to address this.

If Thatcham is to be expanded by a third of its current size there is no guarantee there will be sufficient local employment and the poor routes north and south make employment opportunities in these directions, i.e. Basingstoke, Andover, Chilton, Abingdon, Wallingford and Oxford, etc, not very difficult for travelling.

Additionally, aside from traveling to and from work, for a whole host of reasons on occasions the population of Thatcham need to travel out of the vicinity and this also suffers from impairment north and south.

The healthy development of Thatcham will be impaired, and will adversely impact Newbury and local villages, without unimpaired transport links north and south. Thus I do not think the plan is sound, or competent in this respect.

### 3. Complies with the Duty to Co-operate

*Please see the guidance note for an explanation of what 'Duty to Cooperate' means.*

**Do you consider the Local Plan Review complies with the Duty to Co-operate?**

Yes

No

*Please give reasons for your answer:*

### 4. Proposed Changes

**Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).**

*You will need to say why this change will make the LPR 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.*

Major regional investment is required to give Thatcham independent and unimpaired transport corridors north and south and is not sound without such provision.

### 5. Independent Examination

**If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?**

Yes

No

N

*If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:*

*Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.*

### 6. Notification of Progress of the Local Plan Review

**Do you wish to be notified of any of the following?**

*Please tick all that apply:*

*Tick*

The submission of the Local Plan Review for Independent Examination	Y
The publication of the report of the Inspector appointed to carry out the examination	Y
The adoption of the Local Plan Review	Y

*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.*

<b>Signature</b>		<b>Date</b>	<b>1<sup>st</sup> March 2023</b>
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**Your completed representations must be received by the Council by 4:30pm on Friday 3 March 2023.**