

# Stratfield Mortimer Parish Council Response to Basingstoke and Deane Borough Council's Local Plan (LP) (2024- 2042) & updated Spatial Strategy (SS)

## Executive Summary

Stratfield Mortimer Parish Council (SMPC) submits this formal objection to the proposed allocation and development of land at the boundary of Stratfield Mortimer Parish ('the Site'), as set out in the emerging Basingstoke and Deane Borough Council (BDBC) LP and SS (Regulation 18 Consultation, November 2025).

The Site, lying immediately adjacent to Mortimer village, would function as a *de facto* extension of Mortimer, with profound implications for the local community, environment, infrastructure, and the integrity of adopted and emerging planning policy frameworks.

The Site is currently and has historically been used as farmland and is a green field site. The Government has committed to not developing green field sites where other alternatives (brown field or refurbishment of existing buildings) exist.

On 7 January, a question was asked in the House:

“Wendy Morton: The Prime Minister promised not to *bulldoze* the countryside...does he accept that his housing target can be met without destroying our farmland and countryside by reusing empty homes and brownfield land, or is that yet another promise that he never meant to keep?

The Prime Minister: We will not plough through farmland; we will make sensible proposals to build houses.”

**SMPC is fully committed to supporting well planned, sustainable and viable growth in or around Mortimer.** SMPC has a proven record of active and responsible cooperation with landowners and developers in planning and executing housing growth in the village. SMPC most recently supported and approved a site currently under construction within the settlement boundary of 110 homes at Tower House Farm.

However, the Site in BDBC's LP/SS for the reasons contained in this objection is not well-planned or sustainable. For BDBC to address all the concerns, the time and pecuniary burdens are almost certain to make the Site non-viable.

**SMPC therefore strongly urges BDBC to reconsider the Site and immediately remove it from the LP/SS entirely.**

## **Objection Structure**

This objection is structured to highlight all material planning considerations and then provide further details. Each section below introduces the relevance of the objection ground, and a summary of evidence, data, or areas of concern.

Each section contains recommendations specific to each objection ground. These recommendations are also collectively annexed for reference.

The letter draws on the National Planning Policy Framework (NPPF, December 2023), the Stratfield Mortimer Neighbourhood Development Plan (SMNDP), relevant case law, and statutory guidance. It also references the cross-boundary impacts, cumulative effects, and the need for robust, transparent, and lawful plan-making and consultation.

**It sets out where the evidence relied on by BDBC is absent, incomplete or has been misinterpreted.**

**It further identifies the community harms that BDBC is not legally required to address, so the BDBC cannot overlook the real social consequences the Site would impose on the residents of Mortimer and surrounding areas within West Berkshire.**

**The Annex is a table setting out all recommendations made throughout this document.**

## **References to West Berkshire Council (WBC)**

This objection makes repeated reference to WBC, even though BDBC is the determining authority for the Site. These references are both intentional and necessary. Mortimer lies within West Berkshire, and most healthcare, social-care, and community-care services used by Mortimer residents are commissioned, delivered, or overseen by WBC and Berkshire West ICB.

Any development at the Site will therefore have direct, immediate, and unavoidable impacts on WBC's statutory services, including primary care, community nursing, adult social care, children's services, education and SEND provision. These impacts fall squarely within the cross-boundary issues that arise from Mortimer's unusual position at the interface of two local authorities and two Integrated Care Boards.

SMPC therefore emphasises that references to WBC are made because:

- the Site will materially affect WBC's service capacity,

- WBC will bear the operational, financial and statutory responsibility for meeting the increased demand generated by the Site, despite having no control over the allocation or its scale, and
- cross-boundary impacts must be fully assessed and mitigated, regardless of which authority is processing the planning application.

The fact that BDBC is the determining authority does not diminish the obligation to consider the consequences for WBC. On the contrary, the cross-boundary nature of healthcare and social-care provision in Mortimer makes such consideration essential. Ignoring these impacts would result in a planning decision that is neither evidence-based nor compliant with the principle that development must not cause harm to neighbouring communities or essential public services.

# Objections

## 1. Conflict with the National Planning Policy Framework

### Introduction

- The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and is a material consideration in plan-making and decision-taking. Local Plans must be consistent with the NPPF, which requires sustainable development, effective cross-boundary cooperation, protection of the environment, and robust community engagement. Where a proposed allocation conflicts with the NPPF, it risks being found unsound at examination.
- The Site is stated by BDBC as an extension of Mortimer. This reliance was accepted by BDBC planning officers (at the consultation meeting on 7 January) as necessary to prevent the Site being ruled out by national planning policy.
- The Site is in Mortimer West End, and its settlement hierarchy has been explicitly excluded from suitability for development. It is a fact that the Site cannot be developed in this way under national planning policy.
- BDBC and the landowner are wrong to select this Site in the way they have justified it. The administrative zone within which it sits cannot lawfully be selected under national planning policy without attributing it to a settlement outside BDBC's administrative area.

### Areas of conflict with NPPF

- There is a range of NPPF-related concerns associated with the Site that are set out below that make it unsustainable and in some cases unlawful under the NPPF:
  - *The NPPF requires that all development contributes positively to the three interdependent objectives of sustainable development: economic, social, and environmental (NPPF para 8).*
    - The presumption in favour of sustainable development does not override the need to avoid significant adverse impacts, especially where protected areas, valued landscapes, or neighbourhood plans are involved (NPPF paras 11, 12, 14).
    - **The Site fails to meet these objectives due to its unsustainable location, environmental harm, infrastructure deficits, and conflict with local and neighbourhood plans.**
  - *The NPPF requires that significant development be focused on locations that are or can be made sustainable, with good access to services, employment, and transport (NPPF para 110).*

- The Site is on the edge of the borough, functionally extending Mortimer (a West Berkshire settlement), not Basingstoke or any sustainable Hampshire settlement.
- **The proposal undermines the settlement hierarchy and risks unsustainable patterns of growth.**
- *The NPPF requires that development provides safe, suitable, and convenient access for all users, prioritises sustainable transport, and does not have a severe adverse impact on the local highway network (NPPF paras 110, 115, 116).*
  - The Site is poorly served by public transport, with limited rail and bus services, and is likely to increase car dependency.
  - **No robust Transport Assessment has been provided to demonstrate that the impacts can be mitigated.**
- *The NPPF requires that development is supported by the timely provision of infrastructure, including education, health, utilities, and sewerage (NPPF para 20, 100, 105).*
  - There is no evidence in BDBC's LP/SS that local schools, GP surgeries, or utilities have the capacity to accommodate the proposed growth.
  - **The Infrastructure Delivery Plan identifies significant funding shortfalls and uncertainties regarding delivery.**
- *The NPPF requires a sequential, risk-based approach to flood risk, directing development to areas of lowest risk and applying the Sequential and Exception Tests (NPPF paras 170–174; PPG Flood Risk and Coastal Change).*
  - The Site is within a Source Protection Zone 2 and is at risk from groundwater flooding, with potential associated impacts on the Site and elsewhere.
  - **There is insufficient evidence that flood risk can be managed without increasing risk elsewhere.**
- *The NPPF requires that development protects and enhances biodiversity, avoids significant harm, and refuses development resulting in the loss or deterioration of irreplaceable habitats such as ancient woodland (NPPF paras 187–193).*
  - The Site is adjacent to ancient woodland and SINC, including Simm's Copse and Hundred Acre and Fifty Acre Pieces.
  - **The proposal risks direct and indirect harm to these habitats, with insufficient evidence of effective mitigation or compensation.**
- *The NPPF requires that valued landscapes are protected and enhanced, with great weight given to conserving landscape and scenic beauty (NPPF paras 187, 189).*
  - The Site is adjacent to the Pamber Forest Valued Landscape, a biodiversity hotspot and area of exceptional landscape quality.
  - **The proposal would cause harm to the rural character, visual amenity, and setting of the landscape.**
- *The NPPF requires that heritage assets are conserved in a manner appropriate to their significance, with great weight given to their conservation (NPPF paras 202–214).*

- The Site is close to the Scheduled Monument of Calleva Atrebatum (the Roman town of Silchester) and the Grade II listed Windabout Cottage.
- **The proposal risks harm to the setting and significance of these assets, with insufficient evidence of effective mitigation.**
- *The NPPF requires that development takes full account of risks from major hazards and that land-use planning decisions reflect the need to protect public safety (NPPF para 174(e), 188; Planning (Hazardous Substances) Regulations; ONR Land-Use Planning Guidance).*
  - The Site lies within the statutory consultation zone of the Atomic Weapons Establishment (AWE), where population growth, density, and land-use changes must be assessed against ONR safety requirements.
  - **No evidence has been provided that the necessary population-risk assessment, emergency-planning considerations, or statutory consultation processes have been undertaken. The absence of this assessment means the Site is not compliant with national policy on hazardous installations and cannot be considered sound.**
- *The NPPF requires effective strategic planning across local authority boundaries, with a duty to cooperate on strategic matters (NPPF paras 24–28).*
  - The proposal would have significant cross-boundary impacts on infrastructure, services, and the environment in West Berkshire. WBC leadership are opposed to this Site being developed – publicly stated by Jeff Brooks at WBC public meeting on 8 December.
  - **There is no evidence of effective joint working, funding guarantees, or a statement of common ground.**
- *The NPPF requires that plans and policies are deliverable and based on effective joint working (NPPF para 36).*
  - There are significant uncertainties regarding the deliverability and viability of infrastructure, mitigation, and biodiversity net gain.
  - **The proposal risks undermining the deliverability of the plan.**
- *The NPPF requires that local plans and site allocations are consistent with national policy and with neighbouring authorities' plans (NPPF para 36, 27).*
  - The proposal is inconsistent with the spatial strategy and development policies of both Stratfield Mortimer Parish and WBC.
  - **The Site conflicts with the Mortimer Neighbourhood Plan and community vision. The BDBC local plan has no design codes meaning that any type/scale of building would be permitted on the Site.**
  - **BDBC officers stated at the consultation meeting on 7 January that the SMNDP will be ignored.**
- *The NPPF requires that public rights of way and access are protected and enhanced, and that green infrastructure is integrated into development (NPPF para 105, 187).*
  - The Site contains or adjoins several public rights of way, which are valued by the community for recreation and access to the countryside.
  - **The proposal risks harm to these assets through increased pressure, loss of tranquillity, and fragmentation of green infrastructure.**

- *The NPPF requires that development does not contribute to unacceptable levels of air, water, or noise pollution, and that opportunities to improve health and well-being are taken (NPPF para 187, 198).*
  - The proposal would increase traffic on West End Road and surrounding routes, with potential impacts on air quality, noise, and road safety.
  - **There is insufficient evidence that these impacts can be mitigated.**
- *The NPPF and Planning Policy for Traveller Sites require that local planning authorities identify a supply of deliverable sites for Gypsies and Travellers, in suitable locations with access to services and infrastructure.*
  - The proposed Site is remote from key services and infrastructure, raising questions about its suitability for Gypsy and Traveller provision. There is existing Gypsy and Traveller site within one mile of this Site, and the concentration of sites locally already significantly exceeds the national average.
  - A Gypsy and Traveller site will be more vulnerable to issues arising from the AWE sites, generating an increased need to assess and potentially change emergency planning.
  - **There is no evidence that the Site meets the criteria for sustainable, inclusive, and well-served traveller sites or that emergency planning and safeguarding in case of a radiation event has been considered.**
- *The NPPF gives significant weight to community engagement, neighbourhood plans, and local objections, especially where a neighbourhood plan is in force (NPPF para 14, 30, 31).*
  - The proposal is strongly opposed by the local community, parish councils (including Mortimer West End Parish Council, within BDBC district), and WBC.
  - **The Site conflicts with the vision and policies of the SMNDP and the WBC.**
- *Recent appeal decisions (for example **APP/C1435/W/24/3353074 – Land at Bowhill, Hellingly (Wealden District)**, dismissed **June 2025**) have refused permission for large-scale development on the edge of rural settlements where harm to ancient woodland, biodiversity, landscape, and accessibility could not be adequately mitigated.*
  - Inspectors have given great weight to the protection of irreplaceable habitats, valued landscapes, and neighbourhood plans.
  - **The circumstances of the Site are directly comparable to these cases, and the same principles should apply.**

## Recommendations

- The Site should be removed from the LP/SS due to the number of conflicts with National Planning Policy

## Conclusion

- The NPPF requires that plans promote a sustainable pattern of development, align growth and infrastructure, improve the environment, and mitigate climate change. It also mandates that strategic policies address cross-boundary issues

and that local plans are positively prepared, justified, effective, and consistent with national policy. The Site at the Mortimer boundary conflicts with these requirements in several respects, including the absence of agreed, binding and robust cross-boundary cooperation, insufficient evidence of infrastructure capacity, and potential harm to the environment and settlement identity.

- The NPPF concerns are concisely summarised in this table for ease of reference:



<b>NPPF Policy Area</b>	<b>Relevant NPPF Paragraphs</b>	<b>Key Conflict at the Site</b>
Sustainable Development	8, 11, 12, 14	Fails to balance economic, social, and environmental objectives
Settlement Hierarchy	20, 77, 110	Unsustainable location, undermines settlement hierarchy; Mortimer West End cannot be developed
Transport and Accessibility	110, 115, 116	Poor public transport, increased car dependency
Infrastructure Capacity	20, 100, 105	No evidence of capacity or funding for schools, health, etc.
Flood Risk and Drainage	170–174, PPG	Inadequate Sequential/Exception Test, groundwater risk
Biodiversity and Ancient Woodland	187–193	Harm to irreplaceable habitats, insufficient mitigation
Landscape and Valued Landscapes	187, 189	Harm to Pamber Forest Valued Landscape
Heritage Assets	202–214	Risk to Calleva Atrebatum, listed buildings
Minerals and AWE/ONR	223	No evidence of safeguarding or safety assessment
Cross-Boundary Impacts	24–28	No effective cooperation or mitigation
Deliverability and Viability	36, 31	Uncertain infrastructure and mitigation delivery
Local Plan Conformity	36, 27	Inconsistent with local and neighbouring plans
Public Rights of Way/Green Infra	105, 187	Harm to recreation and green infrastructure
Noise, Air Quality, Health	187, 198	Increased pollution, road safety risks
Gypsy and Traveller Provision	PPTS, NPPF	Unsuitable, isolated location, vulnerable to AWE
Community Views/Neighbourhood	14, 30, 31	Strong local opposition, conflicts with NDP
Precedent Cases	N/A	Similar edge-of-village refusals

## 2. Conflict with Cross-District and Local Planning Policy

### Introduction

- Local Plans and Spatial Strategies (LP/SS) must be in general conformity with national policy and must be justified, effective, and based on proportionate evidence. The soundness of LP/SS is assessed against these criteria at examination by the Planning Inspector. Where a proposed allocation is inconsistent with adopted or emerging local policies, or is not supported by robust evidence, it is open to objection and exclusion at examination.
- Neighbourhood Development Plans (NDPs) form part of the statutory development plan and must be considered in plan-making and decision-taking. The SMNDP sets out locally agreed policies for development, infrastructure, and the protection of community identity and character. Any Local Plan allocation that conflicts with the NDP risks undermining local democracy and may be found unsound.
- A Local Plan allocation must be justified by clear evidence of need. If a site is not required to meet the five-year housing land supply (5YHLS) or wider plan-period housing requirement, its inclusion is not justified and risks undermining the soundness of the plan.
- BDBC has not demonstrated that this Site is necessary to meet its 5YHLS or that it is required to maintain delivery across the plan period. The Site was not previously identified as a preferred location and appears to have been introduced late in the process without a clear strategic rationale.

### Areas of conflict

- BDBC officers at the Regulation 18 consultation meeting on 7 January explicitly stated that the SMNDP would not have any effect on this Site at all. **This is unreasonable**, considering that BDBC explicitly rely on the Site being an extension of Mortimer **and it appears irrational** that on the one hand BDBC rely on Mortimer and its services, and on the other, reject entirely the plans that lawfully govern development in Mortimer.
- **BDBC is allocating higher growth numbers** and pushing sites directly onto the WBC boundary, while **WBC policy deliberately limits rural expansion** to protect settlement identity.
- **Mortimer is treated as a growth location by BDBC**, but as a **protected rural settlement by WBC**.
- WBC's adopted Local Plan, which classifies Mortimer as a Rural Service Centre under Policy SP3 which explicitly limits the scale of development that Mortimer can sustainably accommodate. The supporting text to SP3 confirms that Rural

Service Centres are suitable only for infill, changes of use, non-strategic housing and rural exception schemes, and that growth must be proportionate to the settlement's role, function, environmental constraints, and available infrastructure. Crucially, WBC did not allocate any strategic housing sites in Mortimer during its most recent plan review, and the Inspector endorsed this approach at examination.

- WBC strongly emphasises infrastructure delivery (schools, transport, health) tied to housing growth before construction planning takes place.
- There is a substantial risk of uncoordinated infrastructure provision if BDBC sites expand Mortimer without WBC's parallel investment. Investment planning has not taken place.
- No evidence has been provided that the Site is needed to maintain BDBC's 5-year housing land supply and BDBC has not shown that existing commitments, brownfield opportunities, or strategic allocations cannot meet BDBC's housing requirement.
- Housing need in Mortimer (and by association in the local area including the Site) has been demonstrated as **modest at best**, focused primarily on:
  - smaller homes for downsizing
  - affordable homes for local households
  - specialist accommodation for older residents
- The scale of need is **far below** the 350-home allocation proposed by BDBC. **Mortimer's own Housing Needs Assessment Report indicates that the area's true housing need is 42 dwellings up until 2032.**
- Mortimer has **already delivered** significant growth, including the 110-home Tower House Farm development that was brought within the settlement boundary as an infill development. This evidence demonstrates that Mortimer's needs are **localised and specific**, not strategic in scale.
- It is worth noting that Mortimer West End has no assessment of housing need, meaning that development within that settlement boundary is not justified. This Site represents an increase in Mortimer West End's population by approximately 480% which is unreasonable and irrational.
- The timing of the Site's introduction to BDBC's LP/SS and reliance on Mortimer (a settlement outside BDBC's area) indicates it is not part of a coherent spatial strategy. Allocating unnecessary sites increases environmental harm and infrastructure pressure without delivering strategic benefit.

## Recommendations

- The Site should be removed from the LP/SS unless BDBC can demonstrate:
  - it is required to meet the borough's 5YHLS or plan-period housing requirement

- that alternative, more sustainable locations cannot deliver the required supply
- that the scale and type of housing proposed aligns with the needs identified in Mortimer's Housing Needs Report.
- In the absence of such evidence, the Site is not positively prepared, not justified, and not consistent with national policy.
- BDBC agree to a coordinated (with WBC) spatial strategic approach to Mortimer, agreeing that it is a protected rural settlement and therefore remove it from the LP/SS.
- In the alternative, BDBC align with WBC and both collectively develop a coordinated and comprehensive infrastructure plan for Mortimer that properly assesses needs and requirements of the Site before reaching the Regulation 19 consultation.

## Conclusion

- The BDBC must demonstrate that site allocations are justified, effective, and consistent with the overall spatial strategies. The Site at the Mortimer boundary was not previously identified as a preferred location and its allocation is not supported by proportionate evidence that it is viable within the local community or that Mortimer's existing services can be scaled to meet the additional demand (e.g., plans and earmarked funds for infrastructure capacity, and impact on the environment). This makes the draft LP/SS unsound.
- The BDBC plan must address within it, cross-boundary impacts and ensure that development does not undermine the strategies of neighbouring authorities – it does not do this and therefore on this basis the Site should be removed from the plan.
- The SMNDP was developed through extensive community consultation and reflects the local vision for sustainable, sensitive development. It includes policies to maintain the village's compact form, protect green spaces, and ensure that new development is well-integrated and supported by infrastructure. The Site at the Mortimer boundary has been accepted by BDBC officials to conflict with these policies, particularly regarding settlement identity, infrastructure provision, and the scale and location of development.
- BDBC have stated openly that for the Site to be sustainable (on financial and other grounds) the SMNDP will be ignored. **This is an unreasonable and irrational decision**, since BDBC in its plan relied on the Site being an extension of Mortimer to justify inclusion of the Site within the NPPF.

### **3. Impact on Health Services**

#### **Introduction**

- Assessing whether a housing development is viable, deliverable and sustainable requires a thorough evaluation of its impact on healthcare provision under national and local planning policy. National policy expects development to be supported by sufficient healthcare capacity, ensuring that growth does not undermine access to primary or secondary care or place unreasonable pressure on already stretched services. A site must therefore demonstrate that local GP practices, primary care networks and wider NHS services have the capacity to accommodate additional patients, or that new provision can be delivered in a timely, funded and feasible manner. This requires a proportionate, evidence-based assessment of patient yield, practice capacity, workforce constraints, travel distances and accessibility.
- Planning Practice Guidance reinforces this by requiring early engagement with NHS bodies, clear evidence of existing and forecast capacity, and realistic assumptions about the scale and timing of new provision. Mitigation—whether through practice expansion, new premises, digital capacity or financial contributions—must be technically feasible, fundable and deliverable within the plan period. Local Plans typically add further requirements, including ensuring that healthcare capacity is available at the point of occupation, that development does not exacerbate health inequalities, and that safe and accessible routes exist for patients travelling to appointments.
- Deliverability also depends on whether land or premises for expanded healthcare facilities are secured, whether funding is viable, and whether infrastructure can be phased appropriately. Healthcare capacity is central to the NPPF soundness tests: a site must be justified, effective, positively prepared and consistent with national policy. Where healthcare capacity is constrained, uncosted, or reliant on speculative mitigation, the Site cannot be considered sustainable or deliverable.
- The Site will cause severe, unmitigated, and unsafe pressure on healthcare and social-care services serving Mortimer and the surrounding area. The LP/SS fails to provide any assessment of healthcare impact, offers no mitigation, and disregards the complex cross-border commissioning environment that defines healthcare provision in this part of West Berkshire and North Hampshire.
- The Site is not infrastructure-led, is not sustainable, and is incompatible with national and local planning policy. It must be removed from the LP/SS unless and until comprehensive healthcare assessments and infrastructure commitments are secured.

## Cross-Border Healthcare Realities

- Mortimer occupies a uniquely complex position within the NHS commissioning landscape. It sits directly on the boundary between **Berkshire West Integrated Care Board (ICB)** and **Hampshire & Isle of Wight ICB**, both of which commission different elements of healthcare provision. This geography creates a structural fragmentation that the Site entirely fails to acknowledge.

## Fragmented commissioning responsibilities

- Residents routinely access services across both counties, including:
  - GP services in Berkshire West
  - Community nursing and social-care services in West Berkshire
  - Acute hospital care in Reading (RBH)
  - Acute hospital care in Basingstoke
  - Minor injury units in both counties
  - Mental-health services commissioned by different NHS providers
- No single ICB has full oversight of the patient journey. Any development that increases population must therefore be assessed jointly, **yet no joint assessment has been undertaken.**

## Cross-border patient flows complicate capacity planning

- Patient flows in Mortimer do not follow administrative boundaries. Residents choose services based on:
  - proximity
  - transport routes
  - waiting times
  - historical registration patterns
- This creates unpredictable demand across two ICBs. **Without modelling these flows, neither ICB can quantify the impact of the Site or secure mitigation.**

## Lack of cross-border governance mechanisms

- There is no formal governance structure between the two ICBs to:
  - coordinate developer contributions
  - plan joint estates investment
  - share data on demand and capacity
  - align workforce planning
- This is a known national issue in border communities. **BDBC has made no attempt to address it.**

## Consequences of ignoring cross-border complexity

- If the Site proceeds without cross-border planning:
  - GP services in Berkshire West will be overloaded
  - acute services in both counties will experience increased pressure
  - ambulance response times will worsen
  - community-care teams will face unmanageable caseloads

- social-care responsibilities will fall disproportionately on WBC
- This is not a theoretical risk; it is a fully predictable outcome. **Planning and allocation of funding must take place between BDBC and WBC before the Site can lawfully be included**, since without this it cannot be considered compliant with NPPF requirements.

## Lack of Healthcare Infrastructure: No Capacity, No Plan, No Mitigation

- The LP/SS provides **no healthcare infrastructure**, no land, no funding, and no assessment. This is a fundamental failure.

## Primary care is already operating beyond safe capacity

- Mortimer Medical Practice:
  - serves an already very large rural catchment
  - has an ageing estate with no room for expansion
  - faces recruitment challenges typical of rural practices
  - is already struggling to meet demand
- The NHS has repeatedly stated that primary-care estates across Berkshire West are **not fit for future population growth**. Adding hundreds of new residents without investment is unsafe.

## No physical space for healthcare expansion

- The Site layout includes **no safeguarded land** for:
  - a branch surgery
  - a community-care hub
  - a social-care base
  - flexible space for future healthcare use
- The Site as proposed cannot accommodate any of these facilities due to the necessary density of housing planned. Once the Site is built out, the opportunity to provide healthcare facilities will be permanently lost.

## Community-care services are already stretched

- Community-care teams in West Berkshire report:
  - high caseloads
  - difficulty recruiting staff
  - increasing complexity of need
  - long travel times between rural patients
- The Site would increase demand for:
  - district nursing
  - reablement
  - palliative care
  - safeguarding
  - mental-health support
- There is no assessment of these impacts in the LP/SS making the Site incompatible with NPPF requirements.

## Social-care pressures will increase significantly

- WBC's social-care services already face:
  - rising demand
  - workforce shortages
  - increasing complexity
  - budget pressures
- The Site would increase demand for:
  - domiciliary care
  - children's social-care services
  - SEND support
  - early-help services
  - safeguarding interventions
- None of this has been assessed in advance of its inclusion in the LP/SS making it incompatible with NPPF requirements.

## No assessment of urgent and emergency care

- Mortimer residents rely on:
  - Royal Berkshire Hospital (Reading)
  - Basingstoke & North Hampshire Hospital
  - minor injury units in both counties
- Both acute trusts face:
  - long A&E waits
  - bed shortages
  - workforce pressures
- The Site would increase demand on these services, yet the LP/SS has not yet provided **an analysis of this increased demand, the locations that require funding or infrastructure to manage those increases, or a future cross-border funding agreement.**

## Impact on Mortimer's GP Services: A Critical Breaking Point

- Mortimer Medical Practice is the primary point of healthcare access for the village. It is already under severe pressure.

## Workforce shortages are acute

- The practice faces:
  - difficulty recruiting GPs and nurses
  - reliance on locums
  - limited administrative capacity
  - increasing patient complexity
- Rural practices struggle to attract staff due to:
  - travel distances
  - limited career development opportunities
  - smaller clinical teams
  - higher workload intensity



- Adding hundreds of new patients without workforce funding is unsafe.

### Estates constraints are severe

- The practice building:
  - is small and ageing
  - has no room for additional consulting rooms
  - cannot accommodate additional treatment rooms
  - lacks space for administrative expansion
  - cannot support additional clinical staff
- The NHS has identified primary-care estate constraints as a major barrier to service improvement. This Site exacerbates that barrier.

### Appointment availability will deteriorate further

- Residents already report:
  - long waits for routine appointments
  - difficulty accessing same-day care
  - limited face-to-face availability
  - reduced continuity of care
- The Site would worsen all these issues.

### Increased clinical risk

- Choosing to develop this Site without planning, funding and infrastructure will overload the practice and will:
  - reduce continuity of care
  - increase the risk of missed diagnoses
  - increase pressure on urgent care
  - worsen outcomes for vulnerable patients
- This is unreasonable, irresponsible and unacceptable.

### Failure to Comply with National and Local Planning Policy

- The proposal conflicts with multiple planning policies.

### National Planning Policy Framework (NPPF)

- The NPPF requires developments to:
  - provide the infrastructure needed to support communities
  - promote healthy and safe places
  - avoid placing undue pressure on existing services
  - ensure that development is sustainable
- This Site fails to meet the NPPF requirements for all these points.

### WBC Local Plan

- The Local Plan emphasises:
  - infrastructure-led growth
  - protection of rural communities
  - sustainable development

- The Site is not infrastructure-led. It is infrastructure-blind. It is irrational to include the Site in the LP/SS.

## Health and Care Act 2022

- ICBs have statutory duties to:
  - reduce health inequalities
  - integrate services
  - plan for population health needs
- Approving a development that impedes the ICB statutory duties and worsens access to healthcare undermines and runs contrary to the principle of responsible governance and taking relevant consideration on services and infrastructure into account.

## Duty to Co-operate and the Continuing Obligation to “Do No Harm”

- Although national planning reforms have removed the formal **Duty to Co-operate**, this does **not** remove the underlying legal and ethical obligations on local planning authorities to ensure that development does not cause demonstrable harm to neighbouring areas or to essential public services.
- SMPC emphasises that:
  - The removal of the Duty to Co-operate **does not absolve councils of responsibility** for understanding cross-boundary impacts.
  - Councils remain bound by long-standing principles of **sound, evidence-based planning**, including the requirement that development must not create **unacceptable harm** to communities or essential infrastructure.
- Planning authorities must still comply with the overarching requirement in planning law that decisions must be made in a way that is **reasonable, rational, proportionate, and consistent with the objective of avoiding harm** to public health, safety, and wellbeing.

## “Do No Harm” remains a core planning principle

- Even without the Duty to Co-operate, councils must still:
  - assess cross-border impacts where they are relevant
  - consult neighbouring authorities and service providers where harm may arise
  - ensure that development does not overload essential services
  - demonstrate that decisions are based on robust evidence
- These obligations arise from:
  - the **Town and Country Planning Act**,
  - the **principles of sustainable development** embedded in the NPPF,
  - the **Health and Care Act 2022**,
  - and the public-law duty to act reasonably and avoid foreseeable harm.

- A planning authority cannot lawfully approve a development that it knows will cause **avoidable harm** to healthcare provision, social-care capacity, or community wellbeing.

### Cross-border healthcare impacts must still be assessed

- The removal of the Duty to Co-operate does not remove the need for:
  - joint working between ICBs
  - cross-border healthcare impact assessments
  - coordinated planning for GP, community-care, and hospital services
  - mitigation where harm is identified
- In a location like Mortimer, where patient flows cross county boundaries every day, failing to assess cross-border impacts would be a **serious procedural flaw**.

### Approving the Site without cross-border evidence breaches the “no harm” principle

- If BDBC were to approve the Site without:
  - a joint primary-care impact assessment
  - a cross-border healthcare capacity report
  - a social-care impact assessment
  - a Health Impact Assessment
  - and a Statement of Common Ground between the two ICBs
- then BDBC would be deciding **without understanding the foreseeable harm** to essential services.

### BDBC’s obligations

- Regardless of the regulatory changes:
- **BDBC still has a duty to ensure that development does not cause harm to the health, safety, or wellbeing of existing or future residents.**
- The removal of the Duty to Co-operate does not remove:
  - the obligation to gather evidence
  - the obligation to consult relevant bodies
  - the obligation to mitigate impacts
  - the obligation to refuse development where harm cannot be mitigated
- BDBC must not include the Site in the LP/SS until all cross-border healthcare impacts have been fully assessed and mitigated.

### Failings in BDBC’s Planning Policy Framework Regarding Healthcare

- Current BDBC plans contain significant structural weaknesses that prevent the authority from properly assessing, planning for, or mitigating the healthcare impacts of major development. These failings are not minor technical gaps; they represent fundamental omissions that undermine the BDBC’s ability to deliver sustainable development and protect the health and wellbeing of rural communities.

## Absence of a Rural Healthcare Infrastructure Policy

- BDBC's LP/SS contains **no dedicated policy** addressing healthcare provision in rural settlements, even though rural communities face:
  - reduced access to urgent and emergency care
  - limited public transport
  - fragile GP estates
  - recruitment challenges in primary care
  - higher proportions of older residents
- The Local Plan treats healthcare as a generic infrastructure category, without recognising the **unique vulnerabilities of rural populations**. This omission means:
  - major developments in rural areas are not required to demonstrate healthcare capacity
  - no thresholds exist for when new healthcare facilities must be provided
  - no mechanism exists for safeguarding land for future GP or community-care expansion
- This is a significant policy failure, particularly in a district with large rural areas and cross-border patient flows.

## No Mechanism for Cross-Border Healthcare Planning

- Mortimer sits at the boundary of two ICBs, yet BDBC's planning framework:
  - does not require cross-border consultation
  - does not recognise cross-border patient flows
  - does not provide a mechanism for securing contributions for out-of-area healthcare services
  - does not require developers to assess impacts on neighbouring authorities' health systems
- This is a critical omission. In practice, it means:
  - developments near the border can overload services in neighbouring counties
  - ICBs cannot secure contributions because BDBC does not require the necessary evidence
  - healthcare impacts fall through the cracks between administrative boundaries
- Given that many Mortimer residents rely on services in both Berkshire and Hampshire, the lack of cross-border policy is a serious failing.

## No Health Infrastructure Delivery Strategy (HIDP)

- Many local authorities now publish a **Health Infrastructure Delivery Plan (HIDP)** to:
  - map existing healthcare capacity
  - identify estate constraints
  - forecast population growth impacts
  - set out required capital investment

- guide developer contributions
- BDBC has no **such strategy**.
- Without a HIDP:
  - BDBC cannot demonstrate that it understands local healthcare capacity
  - developers are not required to contribute to healthcare infrastructure
  - ICBs cannot quantify the impact of new development
  - planning decisions are made without a clear evidence base
- This leaves communities like Mortimer exposed to unplanned, unmitigated development. This is irresponsible and arguably unreasonable given the location of the Site.

### No Requirement for Health Impact Assessments (HIAs)

- National guidance encourages the use of HIA for major developments, particularly where:
  - large populations are affected
  - vulnerable groups may be impacted
  - **healthcare capacity is already constrained**
  - **rural inequalities exist**
- Despite this, BDBC:
  - does not require HIAs
  - does not screen applications for health impacts
  - does not provide local HIA guidance for developers
  - does not integrate health considerations into its validation checklist
- As a result, developers routinely submit applications with **no healthcare evidence**, and the BDBC accepts them as valid. This is a procedural weakness that undermines the integrity of the planning process and can be argued as an unreasonable or irrational policy stance.

### Over-Reliance on Unsubstantiated Developer Assertions

- In the absence of clear policy requirements, BDBC frequently accepts developer statements such as:
  - “existing services can absorb demand”
  - “no significant impact on healthcare is anticipated”
  - “the NHS has not objected”
- These statements are often:
  - unquantified
  - unsupported by evidence
  - based on no engagement with ICBs
  - contradicted by local experience
- The Council’s failure to challenge or verify these claims results in:
  - developments being approved without mitigation
  - GP practices being overloaded
  - social-care services absorbing unplanned demand
  - worsening health inequalities

- This is not consistent with evidence-based planning and the NPPF.

### No Policy Safeguards for GP Estate Expansion

- The Local Plan does not:
  - protect land for future healthcare use
  - require developers to allocate space for GP or community-care facilities
  - set out triggers for when new healthcare provision is required
  - identify any strategic healthcare sites
  - include healthcare in its infrastructure delivery schedule
- This omission is particularly problematic given that:
  - Mortimer Medical Practice has no physical space to expand
  - the local population is growing
  - the NHS has identified primary-care estate constraints across the region
- Without policy safeguards, the BDBC cannot ensure that primary-care estates grow in line with population growth.

### No Integration of NHS Data or Strategies into the LP/SS

- The LP/SS does not reference:
  - ICB primary-care strategies
  - NHS estate plans
  - local Joint Strategic Needs Assessments (JSNAs)
  - population health forecasts
  - community-care capacity assessments
- This lack of integration means the LP/SS is **not aligned with NHS planning**, leaving a disconnect between housing growth and healthcare provision. This runs contrary to responsible and sustainable planning principles in the NPPF.

### Failure to Address Cumulative Healthcare Impacts

- BDBC does not require cumulative healthcare impact assessments, despite:
  - multiple developments coming forward in the region
  - known GP capacity constraints
  - increasing social-care demand
  - cross-border patient flows
- Without cumulative assessment:
  - each development is assessed in isolation
  - the true scale of impact is concealed
  - healthcare deficits accumulate over time
- This is a major procedural weakness that undermines the veracity of the evidence available to BDBC and ultimately the Planning Inspector.

### No Monitoring or Enforcement Mechanism for Healthcare Mitigation

- Even where contributions are secured, BDBC lacks:
  - a monitoring framework
  - a delivery timetable
  - enforcement mechanisms

- transparency on how healthcare contributions are used
- This undermines public confidence and reduces the effectiveness of any mitigation that is secured.

## Recommendations

- The Site is removed from BSBC's LP/SS based on the absence or gaps in planning service delivery and infrastructure on the points above.
- In the alternative, at pace and before Regulation 19, assessments are made, plans and funding are agreed and a full and robust delivery plan is provided (involving all partners including but not limited to WBC, ICBs and the NHS) covering at a minimum:
  - **Primary Care Impact Assessment** (joint ICBs)
  - **Cross-Border Healthcare Infrastructure Capacity Report**
  - **Social-Care Impact Assessment**
  - **Health Infrastructure Delivery Plan (HIDP)**
  - **Statement of Common Ground** (ICBs + local authorities)
  - **Full Health Impact Assessment (HIA)**

## Conclusion

- The cumulative impact of this proposal is clear and severe:
  - Mortimer Medical Practice cannot absorb the additional demand.
  - Residents will face longer waits and reduced continuity.
  - WBC will face unplanned and unfunded demand.
  - Both RBH and Basingstoke hospitals will experience increased pressure.
  - Rural communities already face inequalities. This Site will worsen them.
  - Neither ICB can secure contributions without evidence. BDBC has provided none to either ICB.
- Until the required assessments are completed and the necessary healthcare infrastructure is secured, this Site is unsafe, unsound, and contrary to the public interest.
- SMPC consider that the Site:
  - fails to assess its impact on healthcare and social-care services
  - provides no mitigation
  - ignores cross-border commissioning complexities
  - places unsustainable pressure on Mortimer's GP practice
  - exacerbates rural health inequalities
  - conflicts with national and local planning policy

## **4. Impact on Education Services**

### **Introduction**

- Assessing whether a housing development is viable, deliverable and sustainable requires a robust evaluation of its impact on education provision under national and local planning policy. National policy expects development to be supported by sufficient school places, ensuring that growth does not undermine access to high-quality education or place unreasonable pressure on existing facilities. A site must therefore demonstrate that primary and secondary schools have the capacity to accommodate additional pupils, or that new provision can be delivered in a timely, funded and feasible manner. This requires a proportionate, evidence-based assessment of pupil yield, catchment impacts, travel distances and safe routes to school.
- Planning Practice Guidance reinforces this by requiring early engagement with the education authority, clear evidence of existing and forecast capacity, and realistic assumptions about the scale and timing of new provision. Mitigation, whether through expansions, new schools or financial contributions, must be technically feasible, fundable, and deliverable within the plan period. Local Plans typically add further requirements, including ensuring that school places are available at the point of occupation, that safe walking and cycling routes exist, and that development does not create unsustainable travel patterns or reliance on car-based school trips.
- Deliverability also depends on whether land for new or expanded schools is secured, whether funding is viable, and whether infrastructure can be phased appropriately. Education capacity is central to the NPPF soundness tests: a site must be justified, effective, positively prepared and consistent with national policy. Where school capacity is constrained, uncoded, or reliant on speculative mitigation, the Site cannot be considered sustainable or deliverable.
- The Site will cause severe, unmitigated, and unsafe pressure on schools in West Berkshire, particularly Mortimer and the surrounding area as well as have deleterious impact on families that need to access these services. The LP/SS fails to provide any assessment of that impact, offers no plans for mitigation, and disregards the minimal transport infrastructure that exists in the relevant areas in West Berkshire and North Hampshire.
- The Site is not infrastructure-led, is not sustainable, and is incompatible with national and local planning policy. It must be refused unless and until comprehensive assessments and infrastructure commitments are secured.

### **Provision of education**

- Education provision for children living in Hampshire falls under the responsibility of Hampshire County Council (HCC). The local Hampshire schools serving the



Site are Silchester Primary School (Reception to Year 6) and Hurst Community College (Years 7–11). While both schools may, in principle, have capacity to support the proposed level of development, the LP/SS fails to address the significant geographic and transport constraints that render this provision unsustainable.

- The LP/SS appears to acknowledge the unsuitability of Hampshire education provision by stating that services would instead be provided across the border in West Berkshire, utilising Mortimer St John's Church of England Infant School (Reception to Year 3), Mortimer St Mary's Junior School (Years 4–6), and The Willink School (Years 7–11) in Burghfield.
- While access to St John's School may be marginally viable on foot at approximately 0.8 miles (20–25 minutes), St Mary's School is located at the opposite end of Mortimer, approximately 1.7 miles away, equating to a walking time of around 45 minutes. This distance is excessive for younger children and would inevitably require private car use.
- Furthermore, schools in West Berkshire have already identified concerns regarding insufficient infrastructure funding to upgrade facilities to accommodate additional pupils, particularly the anticipated increase in pupils with Special Educational Needs and Disabilities (SEND) arising from a development of this scale.
- The failure of BDBC to adequately set out plans to fund such infrastructure through Community Infrastructure Levy (CIL), Section 106 (S106) funding and ongoing council tax contributions is addressed elsewhere within this document, but it critical and absent, meaning that the Site is unsustainable.

## Transport

- There is no public transport provision to either Silchester Primary School or Hurst Community College, nor does the LP/SS provide any indication of assessing the need for this and plans to address gaps.
- Access to Silchester Primary School will require either private car use or a dedicated school bus. A school bus is not appropriate for younger children, meaning that families would be forced to drive the 2.1-mile journey.
- Walking would take approximately 45 minutes and, due to the distance, narrow country roads, and absence of footpaths, would be unsafe and impractical.
- Hurst Community College is located approximately 5.1 miles from the Site and would necessitate the provision of a school bus service. Unless a child qualifies for free school transport, this would be costly for families or require additional private car journeys.
- For the West Berkshire schools, traffic congestion in Mortimer and Burghfield Common during school drop-off and pick-up times is already severe, frequently rendering roads close to impassable. There have been occasions where

complete grid lock is possible. The additional traffic generated by this Site would significantly exacerbate these existing issues.

- The Site is therefore unsustainable in education terms, given the lack of infrastructure planning for transport and as a result, it puts unreasonable heavy reliance on private car transport for school travel.
- This issue is further compounded by the proposed provision of approximately 140 affordable and social housing units, where residents may have limited access to private vehicles and may find the cost of public transport, even if it were available, which it is not and neither planned for, prohibitive.

### Impact on the AWE DEPZ

- There are moral, logical and substantial safety concerns regarding the bussing of children into a school located within the AWE Detailed Emergency Planning Zone (DEPZ), where further housing development is severely restricted. If additional children are not permitted to live within this area, it is unreasonable and irrational to expect them to spend their school day within it.

### The views of affected schools

- The following summarises the concerns put forward in statements obtained from the affected schools in line with the NPPF Paragraph 35 – Tests of soundness.

### Soundness

- The Site is unsound. It fails to meet the NPPF tests of soundness as it is not positively prepared, justified, effective, or consistent with national policy. In particular, the Plan does not demonstrate that education (including SEND), transport, and emergency planning impacts can be mitigated or delivered in a timely and lawful manner.

### Positively Prepared

- The Site is not positively prepared. Evidence from affected schools indicates that a development of this scale is likely to generate additional demand for Education, Health and Care Plans (EHCPs).
- Schools are required to fund the first £3,000 per EHCP pupil before Local Authority top-up funding applies, yet the BDBC's LP/SS does not identify any funding mechanism to meet this statutory obligation. The absence of CIL or S106 contributions further undermines the deliverability of education and SEND mitigation.
- Statutory SEND placement operates on radial distance rather than administrative boundaries, meaning cross-boundary impacts are unavoidable.
- The LP/SS is silent and fails to demonstrate how these impacts would be addressed. In addition, the Site lies within the AWE Detailed Emergency Planning Zone, yet no evidence is provided that emergency preparedness and evacuation

capacity without substantial and costly changes, can accommodate the increased population.

### Justified

- The Site is not justified by proportionate evidence. Local schools operate close to capacity and report increasing complexity of pupil needs. There is no detailed assessment of cumulative education, SEND, transport, or emergency planning impacts.
- Evidence indicates a substantial risk that new residents may be unable to access local village schools due to catchment and boundary constraints, undermining community cohesion and sustainable settlement patterns.
- Existing traffic congestion, parking pressures, and pedestrian safety issues around schools already exist and are acknowledged, but BDBC's LP/SS has no plans to fund changes or improvements nor does it contain a deliverable mitigation strategy.

### Effective

- The Site is not effective. Delivery relies on unresolved funding arrangements and cross-authority cooperation.
- Education infrastructure in both West Berkshire and Hampshire would be affected, yet there is no clear mechanism to secure coordinated mitigations. BDBC's LP/SS contains unreasonable generic policy statements such as "existing primary and secondary schools in several settlements are expected to accommodate additional pupils arising from new development" with no backing in evidence, funding phasing or feasibility. No pupil modelling is included either rendering it impossible to demonstrate that site-specific impacts can be addressed or infrastructure delivered at the right time.

### Consistent with National Policy

- The Site is not consistent with national policy. The NPPF requires plans to ensure infrastructure is available to support development and to promote inclusive, safe, and healthy communities. The failure to demonstrate deliverable education and SEND provision, safe access to schools, and robust emergency planning conflicts with these objectives.

### Recommendations

- The Site is removed from BSBC's LP/SS based on the absence or gaps in:
  - Planning, modelling and funding education service delivery
  - Planning, assessments and funding of transport infrastructure to ensure that schools are genuinely accessible
  - Assessment of the impact of moving substantial numbers of children into schools within the AWE DEPZ

- In the alternative, at pace and before Regulation 19, all planning and assessments are undertaken and funding is agreed, with a full and robust delivery plan to address these needs.

## Conclusion

- The Site fails all four tests of soundness in NPPF paragraph 35. Without a clear, funded, and deliverable strategy to address education (including SEND), transport, emergency planning, and cross-boundary impacts, the Site cannot be considered sound and should be removed or deferred.

## **5. Transport and Traffic Concerns**

### Introduction

- Assessing whether a housing development is viable, deliverable and sustainable requires a rigorous evaluation of transport and road-traffic impacts under national and local planning policy. National policy expects development to promote genuinely sustainable travel, prioritising walking, cycling and public transport over private car use. Sites must be located where everyday services are accessible by safe, direct and attractive routes, and where sustainable modes are a realistic choice. Transport impacts must also be acceptable: development cannot create highway-safety risks or lead to severe residual cumulative impacts on the road network. These judgments must be supported by a proportionate Transport Assessment that includes trip generation, junction modelling, cumulative impacts, safety audits and realistic modal-shift assumptions.
- Planning Practice Guidance reinforces this by requiring early engagement with the highway authority, evidence-based modelling, and mitigation that is technically feasible, fundable and deliverable within the plan period. Local Plans typically add further requirements, including safe and suitable access, adequate network capacity, sustainable transport infrastructure, compliance with parking standards, and appropriate servicing and emergency access arrangements.
- Deliverability also depends on whether access can be achieved within the Site boundary, whether mitigation is financially viable, and whether infrastructure is phased so that essential improvements are in place before occupation. Transport considerations are central to the NPPF soundness tests: a site must be justified, effective, positively prepared and consistent with national policy. Remote, car-dependent or poorly connected sites, or those reliant on speculative or unfunded mitigation, fail these tests and cannot be considered sustainable or deliverable.

## Schools transport

### Hampshire

- The nearest primary school in Hampshire is Silchester Primary school. This is 2.2 miles via road. As this school is not in county for Mortimer there is no requirement for school transportation. No Bus exists. The impact on families needing to access this school will be substantial.
- The nearest secondary school in Hampshire is “the Hurst” secondary school. This is 5.4 miles via road. As this school is not in county for Mortimer there is no requirement for school transportation. There is a bus service that collects at the Calleva Arms and goes to the Hurst. That bus stop location is approximately 2 miles from the Site and cannot safely be walked due to the absence of footways on the roads. This coach is almost full at present so would require a new service to be supplied.

### Berkshire

- The nearest primary schools are Mortimer St Mary’s (Junior) and Mortimer St Johns (infants). They are 1.4 miles and 0.6 miles via road. There is a need for a footpath to be on the south side of West End Road from the Site as none exists at present. There are no plans or funding agreed to provide this. There is no public transport available to reach either school from the Site and no plans or funding agreed to initiate a new service.
- The nearest secondary school is “The Willink” Burghfield Common. This is 2 miles via road – there are no safe walking routes. There are several options for school transportation.
  - Lime green 2 & 2A run routes that are 30 mins apart at school time and drop off at the library entrance to the school.
  - There is a private service which collects from Glennapp grange.
- To allow access to either service would require a footpath to be built on the south of West End Road. There are no plans or funding agreed to provide this.

## Public Transportation Links to Surrounding Towns

### Reading - Berkshire

- The lime Green 2 & 2A depart from and return to Glennapp Grange. This stop is 0.3 miles from the Site.
- There is train service from Mortimer train station located 1.8 miles via road to the east. To allow access to either service would require a footpath to be built on the south of West End Road. There are no plans or funding agreed to provide this.
- This is a 40-minute walk, and this is well outside the generally accepted reasonable walking distance of 0.5 to 0.75 miles. There are no other options available to reach the station and therefore this is not a sustainable solution.

## Basingstoke – Hampshire

- There is no bus route from Mortimer to Basingstoke.
- There is a train service from Mortimer train station located 1.8 miles via road to the east. To allow access to either service would require a footpath to be built on the south of West End Road. There are no plans or funding agreed to provide this.
- This is a 40-minute walk, and this is well outside the generally accepted reasonable walking distance of 0.5 to 0.75 miles. There are no other options available to reach the station and therefore this is not a sustainable solution.

## London

- Trains depart from Mortimer station 1.8 miles to the east to either Reading or Basingstoke with connections onward to London. The same concerns exist for the Site occupants to access the train station as set out above.
- Additionally, Mortimer station is not an ‘accessible station’ as access to Platform 1 is via a footbridge. Anyone who is unable to use the footbridge must travel to Bramley or Reading Green Park. This means that there is no realistic access to this public transport for disabled residents.

## Traffic concerns

- The Site would generate significant (c.3,500) additional vehicle movements (based on TRICS data), hugely exacerbating existing congestion and safety issues on local roads.
- The rural road network around Mortimer is already constrained, with limited capacity for further traffic growth.
- Public transport options are limited, and the village is remote from the railway station as set out above.
- Without substantial investment in sustainable transport infrastructure, the Site will certainly increase car dependency, congestion, and air pollution.
- The NPPF requires that development is located and designed to promote sustainable transport and minimise adverse impacts. BDBC’s LP/SS contains unreasonable generic policy statements such as **“the existing rural road network can support the level of development proposed”**, with no evidence to support this except for a Preliminary Transport Impacts Review, which is for the Borough and not specifically for the Site. There is accordingly no evidence that the Site’s impact locally can or will be mitigated.
- There is no bus service to Mortimer Station from Mortimer village and as set out above, it is not a reasonable walking distance to the station. There is a Park and Ride bus transport hub c. 5 miles away from the Site, but there are no public

transport options to reach it. This will create an inevitable increase in traffic and car parking demand.

- Parking at the station is already woefully insufficient for existing demand. There is already regular substantial illegal parking on The Street which, at school drop off/pick-up times at Mortimer St. Mary's creates significant safety concerns for the children and families.
- GWR and SMPC have investigated the possibility of creating a second car park at the station to meet demand and mitigate the risks associated with parking on The Street. However, the estimated cost to deliver this was (in 2022) estimated to be more than £1.2 million. This will become essential if the Site is developed. There are no plans for this in BDBC's LP/SS or agreement for funding it.

## Other transport concerns

### People with mobility restrictions

- To enable less-mobile pedestrians to access local infrastructure, such as shops, GPs, Churches and other community meeting points there the Site and its surrounding road and footway infrastructure will require significant upgrades. following needs to be considered
- Continuous footways on both sides of the road throughout Mortimer and to the train station with:
  - Minimum widths of 1.5–2.0m (wider where wheelchairs or mobility scooters are expected)
  - Dropped kerbs at every crossing point
  - Smooth, even surfaces with no trip hazards
  - Minimal gradients
- Safe crossing points which are:
  - Clearly marked
  - Well lit
  - Located where desire lines naturally fall
  - Equipped with tactile paving
  - Designed so wheelchair users can cross safely without long detours

### Ambulance call outs to this Site

- At present a 999 call to Mortimer is usually fed from the Theale ambulance station. Typically, unless demand is too high casualties would be taken to a Berkshire hospital (Thatcham or Royal Berkshire Hospital) since these are part of the trust for the village of Mortimer.
- The Site is in Hampshire, and it is unclear on where patients would be taken. This has impact on how cross border healthcare is managed and may adversely impact urgent or emergency care if patient records are held by an ICB other than where they are taken.

## Policing complexity

- The Site lies within Hampshire, yet immediately adjoins Mortimer in West Berkshire. This creates a significant policing complexity. Mortimer and its surrounding villages are served by Thames Valley Police, with callouts typically dispatched from Pangbourne or Newbury. By contrast, the Site falls under Hampshire Constabulary's jurisdiction, most likely covered from Basingstoke.
- This boundary division means that two separate forces will be responsible for incidents arising in a single, continuous community. Residents of Mortimer will inevitably experience the impacts of the development, increased traffic, antisocial behaviour, and demand for visible policing, yet their calls will be answered by Thames Valley Police, while incidents within the Site itself will be handled by Hampshire Constabulary. In practice, this risks confusion, slower response times, and duplication of effort, particularly where incidents cross the boundary or involve both sets of residents.
- Neighbourhood policing relies on clear accountability and consistent engagement. A development of this scale, positioned directly on a county border, undermines that principle. Without robust cross-force coordination, the community will face fragmented policing provision, with neither force fully resourced to manage the cumulative impact. This complexity adds to the case that the allocation is premature and unsustainable, and should not proceed without comprehensive assessment of policing capacity and boundary effects.

## Recommendations

- The Site is removed from BSBC's LP/SS based on the absence or gaps in:
  - Planning, modelling and funding of transport infrastructure delivery
  - Modelling and assessment of cross boundary emergency services response and community policing.
- In the alternative, at pace and before Regulation 19, all planning and assessments are undertaken and funding is agreed, with a full and robust delivery plan to address these needs.

## Conclusion

- BDBC's LP/SS suggests that a developer should submit a Transport Assessment, but there is no commitment by BDBC to provide, fund, or deliver any transport infrastructure.
- BDBC's LP/SS states that BDBC will allocate no additional funding to improve transport infrastructure and this must be delivered by the developer. The scale of improvements required to mitigate the Site's impact on wider infrastructure is likely to run to millions of pounds if it is to adequately address the improvements needed to roads, footpaths/footways and other mitigations from the Site to the



train station and to larger roads or motorways. This renders the Site financially unviable at this stage.

- The LP/SS contains a series of strategic aspirations and no commitments to improving transport or even ensuring it meets minimum standards. Language such as “improvements to transport choice”, walking and cycling networks will be “enhanced” and public transport will be “promoted” mean nothing without rigorously assessing needs and risks, committed funding and actionable delivery plans. None of these exist.
- The gaps or absence of assessing or planning for transport for the Site means that inclusion of the Site in BDBC’s LP/SS is based on assertion, assumption and not evidence and fails the NPPF’s soundness test. Specifically, there is no:
  - Site-specific transport modelling
  - Assessment of rural lane capacity
  - Safety analysis
  - Identified mitigation
  - Funding or phasing plan
  - Sustainable transport strategy
- The Local Plan relies on generic statements that infrastructure “can support growth”, but none of the supporting documents demonstrate how SPS5.15’s traffic impacts will be managed. This is a clear conflict with:
  - NPPF paragraphs 104–106 (sustainable transport)
  - NPPF paragraph 110 (safe and suitable access)
  - NPPF paragraph 111 (severe residual impacts)
  - NPPF paragraph 35 (soundness tests)

## **6. Environmental and Landscape Harm**

### **Introduction**

- Assessing whether a housing development on a greenfield site is viable, deliverable and sustainable requires a robust evaluation of its environmental and landscape impacts under national and local planning policy. National policy expects development to protect and enhance the natural environment, safeguard valued landscapes, and avoid significant harm to biodiversity, heritage settings and rural character. A site must therefore demonstrate that its landscape sensitivity, ecological value, and visual openness have been properly assessed, and that development can be accommodated without unacceptable adverse effects. This requires proportionate, evidence-based analysis of landscape character, views, tranquillity, dark skies, habitats, species, and the cumulative impact of growth on rural settings.

- Planning Practice Guidance reinforces this by requiring early engagement with environmental bodies, clear evidence of baseline conditions, and realistic mitigation strategies. Measures such as buffers, green infrastructure, habitat creation and sensitive layout design must be technically feasible, fundable and deliverable within the plan period. Local Plans typically add further requirements, including conserving local distinctiveness, protecting settlement gaps, maintaining rural approaches, and ensuring development does not erode the character or function of the countryside.
- Deliverability also depends on whether mitigation land is secured, whether ecological enhancements are viable, and whether landscape impacts can be reduced to an acceptable level. Environmental and landscape considerations are central to the NPPF soundness tests: a site must be justified, effective, positively prepared and consistent with national policy. Where landscape harm is significant, biodiversity impacts are unmitigated, or rural character is fundamentally altered, the Site cannot be considered sustainable or deliverable.
- The Site is unsound when assessed against:
  - The **National Planning Policy Framework (NPPF, December 2023)**
  - The **Environment Act 2021**
  - Adopted **Basingstoke and Deane Local Plan 2011–2029** policies, which remain material
  - Emerging Local Plan strategic objectives for climate change, biodiversity, landscape, and sustainable development
- The proposal would result in significant and demonstrable harm that conflicts with policy at both national and local level.

## Environmental and Landscape Harm

### Landscape Character and Visual Impact

- The Site lies within a highly sensitive and constrained landscape setting, characterised by rural farmland, ancient woodland, watercourses, and proximity to nationally and internationally designated habitats. The development would fundamentally alter the existing rural character and result in significant landscape harm.
- Relevant nearby designated landscapes and habitats include:
  - Pamber Forest SSSI – an internationally important ancient woodland complex
  - Padworth Common SSSI – a sensitive lowland heath and wetland system
  - Thames Basin Heaths Special Protection Area (SPA) – protected for its vulnerable bird species
  - Aldermaston Bagshot Beds Water Body / SSSI – a protected geological and hydrological feature

- Local SINCs, including Simm’s Copse Ancient Woodland, Hundred Acre Piece, and Fifty Acre Piece (Sites of Importance for Nature Conservation)
- These designations form part of a wider, connected ecological landscape extending beyond local boundaries and contributing to a UK-wide network of natural habitats.
- The Site lies within a sensitive rural landscape identified in the Basingstoke and Deane Landscape Character Assessment as forming part of the wooded lowland and rural edge character around Mortimer. The area is characterised by pasture, ancient woodland, mature hedgerows, and watercourses which contribute strongly to local distinctiveness.
- Development of 350 dwellings would result in substantial adverse effects contrary to:
  - NPPF paragraph 135(c) – requirement to ensure development is sympathetic to local character and landscape setting
  - NPPF paragraph 180(a) – protecting and enhancing valued landscapes
  - Local Plan Policy EM1 (Landscape) – which seeks to conserve and enhance landscape character and scenic quality
- The scale, massing, and suburban form of the Site would urbanise an open countryside setting, introduce visually intrusive built development, and permanently erode the rural separation of Mortimer from its surrounding landscape.
- No site-specific Landscape and Visual Impact Assessment (LVIA) has been published to demonstrate that such impacts could be mitigated to an acceptable level, rendering the allocation premature.

## Designated and Protected Landscapes

- The Site lies within the functional setting of multiple designated landscapes and ecological designations, including:
  - Pamber Forest and Silchester Common Special Area of Conservation (SAC)
  - Padworth Common Local Nature Reserve
  - Thames Basin Heaths Special Protection Area (SPA)
  - Silchester Roman City Walls and Amphitheatre Site of Special Scientific Interest (SSSI)
  - Aldermaston Bagshot Beds Water Body, a protected groundwater and surface water resource
- The cumulative impact of the proposed development, alongside other allocations, conflicts with:
  - NPPF paragraph 184 – protection of habitats of international importance
  - Local Plan Policy EM3 (Biodiversity)

- The Council's Thames Basin Heaths SPA Avoidance and Mitigation Strategy, due to increased recreational pressure

## Biodiversity, Ancient Woodland, and Net Gain

### Ancient Woodland and SINC

- The Site contains Simm's Copse, designated as a Site of Importance for Nature Conservation (SINC) and identified as Ancient Woodland. This habitat is irreplaceable and afforded the highest level of protection under national policy.
- Development affecting Simm's Copse would directly conflict with:
- NPPF paragraph 180(c) – which states that development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland, should be refused unless there are wholly exceptional reasons.
- Local Plan Policy EM4 (Trees and Woodland) – which protects ancient woodland, veteran trees, and hedgerows.
- Simm's Copse is ecologically linked to Hundred Acre and Fifty Acre Pieces SINC, forming part of a wider, strategically important habitat network. Development would cause fragmentation, edge effects, and long-term ecological degradation, contrary to NPPF paragraph **180(b)** and **Local Plan Policy EM3**.

### Biodiversity Net Gain

- The Environment Act 2021 (Sections 98–101) introduces a mandatory minimum 10% Biodiversity Net Gain (BNG). However, ancient woodland and high-value SINC
- The Site therefore fails to demonstrate compliance with:
  - NPPF paragraph 174(d) – minimising impacts and providing net gains for biodiversity
  - Environment Act 2021, as genuine BNG cannot be achieved where irreplaceable habitats are harmed
- No comprehensive, seasonally robust ecological surveys (including protected species assessments) have been published to support the Site.

### Ground Conditions, Hydrology, and Contamination

- The Site overlies the Aldermaston Bagshot Beds Water Body, making it particularly sensitive to ground disturbance, drainage alteration, and contamination.
- The West End Brook, which runs through or adjacent to the Site, has been subject to studies identifying reduced water quality and evidence of contamination. Development would increase risks of:
  - Polluted surface water runoff
  - Disturbance of potentially contaminated soils
  - Adverse impacts on downstream water-dependent habitats

- This raises conflict with:
  - NPPF paragraph 174(e) – preventing new and existing development from contributing to unacceptable levels of water pollution
  - Local Plan Policy EM7 (Managing Water Resources)
- At present, there is no publicly available evidence that a full Phase 1 and Phase 2 Land Contamination Assessment has been completed, rendering the Site inconsistent with the precautionary principle.

## Agricultural Land Loss

- The Site is classified as Agricultural Land Grade 2 – Best and Most Versatile (BMV). The NPPF is clear that development on BMV land should be avoided unless there are no reasonable alternatives. This is a material consideration in plan-making and must be assessed at the allocation stage.
- The permanent loss of this land conflicts with:
  - NPPF paragraph 180(b) – recognising the economic and environmental value of BMV land
  - Local Plan Policy SS1 (Sustainable Development) – which seeks to balance development needs with long-term environmental sustainability
- No ALC survey has been provided to justify the loss of farmland.
- The Site represents permanent loss of productive agricultural land at a time of national food-security concern.
- BDBC's LP/SS does not demonstrate that lower-grade agricultural land has been prioritised ahead of this Site.

## Cultural Routes

### Camino de Santiago – Cultural and Touristic Value

- The Camino de Santiago pilgrimage route passes by the Site, forming part of a historic, internationally recognised cultural route linking Mortimer to Silchester.
- Development would significantly harm the setting, experience, and authenticity of this route, contrary to NPPF paragraph 203 and Local Plan Policy EM11 and would undermine its recreational and tourism value.

## Overall Policy Conflict and Soundness

- The Site is inconsistent with the tests of soundness set out in NPPF paragraph 35, as it is:
  - Not justified – less environmentally harmful alternatives have not been demonstrated
  - Not effective – impacts on biodiversity, water, and landscape cannot be adequately mitigated

- Not consistent with national policy – particularly in respect of ancient woodland, BMV land, and biodiversity protection

## Recommendations

- The Site is unsound and therefore the Site should be removed from BSBC's LP/SS based on:
  - Significant and irreversible landscape and visual harm
  - Risks to protected water bodies and ground conditions
  - Loss of Grade 2 Best and Most Versatile agricultural land
  - Severe impacts on ancient woodland, SINC's, and habitat connectivity
  - Failure to show deliverable biodiversity net gain
  - Impacts on the Camino de Santiago cultural route
  - Conflict with both local and national planning policy

## Conclusion

- The Mortimer area is characterised by its rural setting, distinctive landscape, and network of green spaces and habitats. The Site would result in the loss of open countryside, harm to landscape character, and potential impacts on biodiversity and ecosystem services. The NPPF and Environment Act 2021 require measurable net gains for biodiversity and the application of the mitigation hierarchy (avoid, minimise, mitigate, compensate). The Site fails to demonstrate compliance with these requirements and would result in irreversible environmental harm.

# 7. Flood Risk, Drainage, and Water Management

## Introduction

- Assessing whether a housing development on a greenfield site is viable, deliverable and sustainable requires a comprehensive evaluation of flood risk, drainage and water management impacts under national and local planning policy. National policy expects development to avoid areas at risk of flooding, to reduce, not increase, flood risk elsewhere, including Foundry Brook, and to incorporate sustainable drainage systems that mimic natural processes. The SMNDP contains specific flood risk mitigation policies, that BDBC have confirmed will be ignored for this Site.
- A site must show, through proportionate and evidence-based assessment, that it is safe for its lifetime, that surface water runoff can be managed without increasing downstream flood risk, and that foul drainage and water supply infrastructure can accommodate the added demand. This has not been undertaken. As the proposed developments would impact on the risk of flooding in Mortimer, the flood risk assessments in accordance with WBC LPR Policy SP6

and the SMNP. This shall take into account the potential impacts of climate change.

- Planning guidance reinforces this by requiring early engagement with the Lead Local Flood Authority, the Environment Agency and water companies, alongside detailed modelling of surface water flows, groundwater conditions, infiltration potential and climate change allowances. Mitigation measures—such as attenuation basins, swales, infiltration features, upgraded sewers or offsite reinforcement—must be technically feasible, fundable and deliverable within the plan period. Local Plans typically add further requirements, including ensuring that greenfield runoff rates are maintained or reduced, that development does not overload existing drainage networks, and that water management solutions are integrated into the landscape to support biodiversity and amenity.
- Deliverability also depends on whether land for drainage infrastructure is secured, whether long term maintenance arrangements are viable, and whether the proposed strategy can operate effectively under future climate conditions. Flood risk and drainage considerations are central to the NPPF soundness tests: a site must be justified, effective, positively prepared and consistent with national policy. Where flood risk is uncertain, drainage capacity is constrained, or mitigation is unproven or unfunded, the Site cannot be considered sustainable or deliverable.

## The spring and West End Brook

- The Site poses unacceptable environmental and hydrological risks to the spring that forms the headwater of West End Brook, a sensitive component of the River Kennet chalk stream system. This spring provides stable baseflow, supports downstream water quality, and underpins the ecological integrity of a nationally significant freshwater environment. Any disturbance, pollution, or alteration of drainage pathways at this location would have disproportionate and irreversible impacts on the brook and the wider catchment.
- A wide range of statutory and specialist bodies emphasise the importance of protecting headwater springs. The Environment Agency highlights their role in maintaining ecological status, preventing pollution, and supporting flood and drought resilience. Natural England, the Wildlife Trusts, ARK (Action for the River Kennet), and local conservation groups all recognise that spring fed brooks support priority habitats, specialist invertebrates, riparian plants, and chalk stream species that are acutely vulnerable to changes in flow, sedimentation, or water quality. Fisheries organisations similarly stress that clean, cool, oxygen rich spring inflows are essential for spawning grounds and invertebrate communities throughout the Kennet system.
- Local planning policy reinforces these concerns. BDBC's own environmental policies require protection of water quality, avoidance of increased flood risk,

and conservation of biodiversity. The NPPF requires planning decisions to prevent unacceptable water pollution, safeguard sensitive habitats, and improve environmental conditions in line with river basin management plans. This Site is in the immediate catchment of a vulnerable spring and conflicts with these obligations and introduces credible risks of runoff, contamination, drainage modification, and ecological deterioration.

- Given the spring's strategic environmental function, the sensitivity of the chalk aquifer, and the strong alignment of stakeholder opinion, the site cannot be considered sustainable or environmentally acceptable.
- The BDBC LP/SS does not demonstrate compliance with statutory environmental duties, the National Planning Policy Framework (NPPF), and the environmental policies of the adopted and emerging Basingstoke & Deane Local Plan.

## Recommendations

- The Site is removed from the LP/SS unless BDBC can show clear evidence that it is safe from flooding and will not increase flood risk for Mortimer or surrounding areas.
- A full flood-risk assessment is carried out now, at plan-making stage and before Regulation 19 commences, rather than being left to a future planning application that includes:
  - Groundwater risk is properly assessed, including seasonal high-water levels and historic flooding, so that the true level of risk is understood.
  - A simple, workable drainage plan is produced showing how rainwater will be managed on the Site without pushing water towards Mortimer or nearby homes.
  - Runoff from the Site is kept at natural (greenfield) levels, with clear evidence that this can be achieved.
  - Safe overflow routes are identified so that, in heavy rainfall, water does not flow towards Mortimer's roads, homes, or footpaths.
  - Natural features and green buffers are used to slow and absorb water, protecting downstream areas.
  - Cross-boundary impacts on West Berkshire are fully assessed, including the risk of increased surface-water flows into Mortimer.
- In the absence of this evidence, the Site cannot be considered safe, sustainable, or compliant with national policy.

## Conclusion

Parts of the Mortimer area are known to be at risk of flooding, with historic incidents of surface water and groundwater flooding. The Site must be subject to a robust, site-specific Flood Risk Assessment, demonstrating that it can be made safe for its lifetime without increasing flood risk elsewhere. Sustainable drainage systems must be



incorporated, and the cumulative impact of development on local watercourses and drainage infrastructure must be assessed. These requirements have not been adequately addressed.

## **8. Heritage and Conservation**

### **Relevance**

- The NPPF and local policies require that development conserves and enhances the historic environment, including designated and non-designated heritage assets, conservation areas, and the distinct identity of settlements. Harm to heritage assets or the erosion of settlement identity is a material ground for objection.
- The Environment Act 2021 and NPPF require that development delivers measurable net gains for biodiversity, protects irreplaceable habitats, and applies the mitigation hierarchy (avoid, minimise, mitigate, compensate). Harm to protected species or habitats is a material ground for objection.

### **Introduction**

- The Site presents significant heritage, archaeological, landscape-setting and contextual constraints, (as evidenced by the November 2025 archaeological and heritage appraisal) and ecological, environmental and policy-compliance risks, particularly due to its relationship with Simm's Copse, a woodland displaying characteristics of long-established or potentially ancient woodland and connection to the functional ecological envelope of the Pamber Forest & Silchester Common Site of Special Scientific Interest (SSSI).

### **Heritage and Archaeological Constraints**

- The site lies 0.77 miles from Calleva Atrebatum (Silchester) and 0.4 miles from Holdens Firs Bronze Age barrow cemetery.
- Contains two Middle Iron Age ditched enclosures warranting preservation in situ.
- Cropmarks indicate probable Bronze Age barrow remains.
- Linear cropmarks may relate to Iron Age boundary systems connected with the Silchester oppidum.
- Evidence of Mesolithic/Neolithic flint scatter and potential Bronze Age cremation burials.

### **Harm to Designated and Non-Designated Heritage Assets**

- Development would cause significant setting harm to Grade II listed Windabout Cottage.
- Rose Cottage, although unlisted, is an 18th-century heritage asset of local importance and would also be harmed.

- The Site forms an important component of Mortimer’s historic landscape context.

### A need for a ‘Full Site Evaluation’ before allocation

- Given confirmed Iron Age and potential Bronze Age features, full site evaluation, geophysics, test pitting, and intrusive investigation are required prior to allocation. Their absence renders the Site unsound.

### Risk of Harm to Assets of National Significance

- The Middle Iron Age enclosures and Bronze Age features may meet criteria for national importance. Their destruction would be contrary to national policy.

### Visual and Setting Impacts

- Potential inter-visibility with Calleva Atrebatum has not been assessed. Development risks damaging the wider archaeological landscape setting.

### Landscape and Character Impacts

- The Site lies within an historic heathland enclosure landscape with surviving field boundaries. Development would erode this local historic character, contrary to NPPF principles.

### Evidence of Long-Term Woodland Continuity

- Archaeological investigations describe Simm’s Copse as oak–hazel dominated ancient, coppiced woodland. Excavations also reveal Iron Age enclosures beneath current woodland cover, indicating centuries of ecological continuity.

### Policy Context

- Paragraph 180(c) of the NPPF requires refusal of development resulting in loss or deterioration of irreplaceable habitats. Natural England guidance confirms that absence from the Ancient Woodland Inventory (AWI) does not preclude ancient or long-established woodland status.

### Ecological Impacts

#### Nightjar

- The wider Silchester–Pamber landscape contains suitable nightjar habitat, including heathland, open woodland edges, and clear-fell areas. Silchester Common supports nightjar activity, and the habitat network linking Simm’s Copse to the SSSI provides foraging and roosting continuity. Development threatens these by increasing disturbance, lighting, and habitat fragmentation.

## Dormouse

- Pamber Forest is a hazel-coppice dominated ancient woodland highly suitable for dormice. The continuous woodland network extending through Silchester toward Simm's Copse provides connectivity essential for dormouse dispersal. Development would sever habitat corridors, increase predation risk, and reduce food availability.

## Bats

- The Silchester–Pamber Forest landscape supports prime bat habitat, including mature woodland, hedgerow corridors, wetland edges and dark flight lines linking Simm's Copse with Pamber Forest and Silchester Common. Likely species include pipistrelles, brown long-eared bats, Natterer's bats, serotines, noctules and Daubenton's bats. Development risks loss of roost trees, fragmentation of foraging corridors, and severe light pollution impacts.

## Hydrology and Drainage Impacts

- The dry valley running toward Simm's Copse represents a sensitive hydrological system supporting woodland soils, ground flora, and wet-edge microhabitats. Development risks altering run-off patterns, increasing surface water flow, changing groundwater levels, and introducing pollutants, threatening both ecological integrity and long-term hydrological stability.

## SSSI Functional Linkage

- Simm's Copse lies within the functional ecological envelope of the Pamber Forest & Silchester Common SSSI. Woodland connectivity, shared species assemblages, hydrological pathways, and contiguous habitat structures demonstrate that impacts to Simm's Copse would directly influence the SSSI's ecological resilience. Habitat fragmentation, lighting, drainage changes, and recreational pressure at the Site would degrade supporting habitats essential to the SSSI, undermining site integrity.

## Environmental Impact Assessment (EIA) / Ecological Impact Assessment (EcIA)

- Given the presence of:
  - Potential ancient woodland,
  - Direct functional linkage to a nationally designated SSSI,
  - Priority species including bats, nightjar and dormouse,
  - Hydrological risks affecting protected habitats,
- **The proposal meets clear thresholds for mandatory assessment under the EIA Regulations. A full Ecological Impact Assessment (EcIA) is required** to quantify impacts on protected species, habitat networks, and SSSI-supporting

structures. Without these assessments, the Site cannot be considered sound or legally compliant.

## Precautionary Principle

- Given multiple indicators of irreplaceable habitat, priority species presence, hydrological vulnerability, and statutory site linkage, the precautionary principle must be applied. Harm cannot be ruled out in the absence of comprehensive evidence.

## Recommendations

- The Site is removed from BSBC's LP/SS based on:
  - A full EIA and ECIA-supported assessments are required before the Planning Inspector can decide and this has not been completed.
- Conduct comprehensive species-specific surveys and hydrological modelling.
- Delay allocation pending verification of woodland status, species use and SSSI functional connectivity.

## Conclusions

- The Site poses unacceptable risks to irreplaceable habitats, hydrological systems, protected species, and a nationally designated SSSI. The Site should be removed or deferred pending full EIA and ECIA assessment.
- The Site may support priority habitats, protected species, or contribute to local ecological networks. The Site does not demonstrate how it will achieve at least a 10% net gain in biodiversity, as required by law, or how it will avoid, minimise, and mitigate ecological impacts. The absence of robust ecological assessment and mitigation measures is a serious deficiency.
- Mortimer is a historic rural village with a distinctive character, heritage assets, and a strong sense of community identity. The NPPF requires that the significance of heritage assets is conserved, and that development is sympathetic to local character and history.
- Based on the evidence in the heritage appraisal, the Site is highly constrained and forms part of a nationally significant archaeological landscape. The Site should be removed from the Local Plan at the Regulation 18 stage.

# **9. Sustainability and Climate Change**

## Introduction

- National planning policy requires Local Plans to support the transition to a low-carbon future, reduce greenhouse-gas emissions, and ensure that new development is resilient to the impacts of climate change. These duties apply at

the plan-making stage, not simply at planning application stage. The NPPF expects local authorities to direct growth to sustainable locations, minimise reliance on private cars, promote energy-efficient design, and avoid placing development in areas vulnerable to climate-related risks such as flooding, overheating, and water scarcity.

- The LP/SS does not demonstrate how the Site at the Mortimer boundary meets these requirements. The Site is car-dependent, environmentally sensitive, and lacks the infrastructure needed to support low-carbon living. No evidence has been provided to show that the development can achieve meaningful carbon reduction or climate resilience.

## Failure to Support Low-Carbon Travel

- The NPPF requires development to reduce the need to travel and to prioritise sustainable transport. The Site fails this test because:
  - Mortimer has limited bus services and no realistic prospect of significant service uplift
  - The railway station is over 1.8 miles away with no safe, continuous walking or cycling route
  - Daily trips will be overwhelmingly car-based, increasing emissions and congestion
  - No evidence has been provided of viable active-travel infrastructure or modal-shift measures
- The Site will inevitably significantly increase car use/dependency and cannot be considered consistent with national carbon-reduction objectives.

## Lack of Climate-Resilient Infrastructure

- The Site lies in an area with known climate-related vulnerabilities, including:
  - groundwater flood risk
  - pressure on water supply and wastewater networks
  - proximity to ancient woodland sensitive to heat and drought stress
- No climate-risk assessment has been published. The LP/SS does not demonstrate that:
  - drainage systems can cope with more intense rainfall
  - water supply and wastewater treatment can meet future demand
  - the development can avoid increasing flood risk elsewhere
  - green infrastructure will be sufficient to mitigate heat and biodiversity impacts
- Without this evidence, the Site cannot be considered climate-resilient.

## Absence of Carbon-Reduction Strategy

- The LP/SS provides no information on:

- energy-efficient building standards
- renewable-energy integration
- heat-network feasibility
- carbon-neutral or net-zero design principles
- construction-phase carbon reduction
- long-term monitoring or enforcement mechanisms
- This omission is significant. The NPPF requires Local Plans to set out clear policies for reducing carbon emissions. BDBC has not shown how this Site will contribute to borough-wide carbon-reduction targets or how it will avoid locking in high-carbon patterns of development.

## Conflict with Local and Neighbourhood Policy

- West Berkshire's climate and environmental policies emphasise:
  - protection of rural landscapes
  - safeguarding of green infrastructure
  - reduction of car dependency
  - climate-resilient design
- The SMNDP also prioritises sustainable, small-scale growth that supports active travel and protects the rural environment. The Site conflicts with these principles and would undermine local climate-action objectives.

## Recommendations

- The Site should be removed from the LP/SS unless BDBC can demonstrate, through proportionate and published evidence, that:
  - the development can support low-carbon travel and significantly reduce car dependency
  - climate-related risks (flooding, water supply, heat, biodiversity stress) can be safely mitigated
  - the Site can deliver meaningful carbon-reduction measures consistent with national and local policy
  - the Site contributes positively to BDBC's climate-change strategy rather than undermining it
- In the absence of such evidence, the Site is not justified, not effective, and not consistent with national policy.

## Conclusion

- The UK is committed to achieving net zero greenhouse gas emissions by 2050, and planning policy plays a critical role in delivering this target. The Site must demonstrate how it will minimise emissions, promote sustainable transport, and incorporate climate-resilient design. The Site does not include sufficient

measures to address climate change, and may increase car dependency, energy use, and vulnerability to extreme weather events.

## **10. Noise, Air Quality, and Health Impacts**

### **Introduction**

- National planning policy requires that development is appropriate for its location and does not expose existing or future residents to harmful levels of noise, pollution, or poor air quality. Local Plans must show that new sites can be delivered without creating unacceptable impacts on health, wellbeing, or quality of life. Where a site is close to an existing community, the burden is on the planning authority to demonstrate that noise, traffic emissions, and other environmental effects can be safely managed.
- The Site at the Mortimer boundary fails to meet these requirements. The LP/SS contains no meaningful assessment of noise or air-quality impacts, no modelling of increased traffic emissions, and no evidence that the health effects on Mortimer residents have been considered. Without this information, the Site cannot be judged sustainable or suitable for allocation.
- The Site would introduce new traffic, service vehicles, construction activity, and lighting into an area currently defined by rural quietness and clean air. These changes would have direct consequences for the health and wellbeing of Mortimer residents, particularly children, older people, and those with existing respiratory or cardiovascular conditions. The absence of evidence or mitigation makes the Site unsound.

### **Existing Local Conditions**

- Mortimer is a rural-edge village with:
  - low background noise levels
  - clean air and minimal traffic emissions
  - limited through-traffic
  - strong community expectations for a quiet, healthy environment
- These characteristics are recognised in the SMNDP and in West Berkshire's wider environmental policies. They form part of the village's identity and are central to residents' quality of life.
- Any major development immediately over the boundary risks eroding these qualities unless carefully assessed and mitigated. BDBC has not conducted this assessment.

## Noise Impacts

### Increased traffic and road noise

- The Site would significantly increase traffic on West End Road, The Street, and surrounding routes. These roads are narrow, rural, and not designed for high volumes of vehicles. More cars, delivery vans, and service vehicles will raise noise levels throughout the day and evening.
- National guidance recognises that rural soundscapes are highly sensitive and that planning must protect the character of quiet areas. The Site would permanently alter Mortimer's soundscape, even if technical noise limits were met.
- No noise assessment has been provided to show:
  - how much noise will increase
  - which homes will be affected
  - whether noise levels will remain within acceptable limits
  - what mitigation (if any) is possible
- Without this information, the Site cannot be considered appropriate for its location.

### Construction noise

- A development of this scale would involve years of construction activity, including heavy machinery, piling, groundworks, and vehicle movements. Mortimer residents would be exposed to prolonged noise disturbance with no mitigation plan in place.
- Construction noise impacts must be assessed at the allocation stage, especially for proportionately large-scale developments (which the Site is one). National guidance expects these to be considered at plan-making stage, and this has not been done.

### Loss of tranquillity

- Mortimer's rural tranquillity is a valued feature of the village. National policy requires councils to protect tranquil areas. The Site would introduce continuous background noise where currently there is very little, permanently changing the character of the area.

## Air Quality Impacts

### Increased traffic emissions

- The Site would generate hundreds of additional daily car journeys. Mortimer has limited public transport, meaning most new residents will rely on private vehicles. Increased traffic will raise levels of nitrogen dioxide (NO<sub>2</sub>) and



particulate matter (PM), both of which are linked to respiratory and cardiovascular illness.

- No air-quality assessment has been provided. BDBC has not shown:
  - how much emissions will increase
  - whether pollution levels will remain safe
  - how vulnerable groups (children, older people, people with asthma) will be protected
  - whether the road network can safely absorb the additional traffic
- This is a fundamental gap in the evidence base.

### Impact on sensitive receptors

- Schools, nurseries, and residential streets in Mortimer lie close to the likely traffic routes from the Site. These are sensitive locations where air quality must be carefully managed.
- The Site would increase noise and emissions along routes used daily by children and older residents. These are recognised as sensitive receptors requiring enhanced protection, yet no assessment has been provided.
- Without modelling or mitigation, the Site risks worsening air quality in places where children and vulnerable adults spend significant time.

### Impact on Protected Sites and Sensitive Habitats

- National bodies (Natural Resources Wales, Natural England) emphasise that even modest increases in traffic emissions can harm protected habitats such as ancient woodland, SINC, and priority habitats.  
This is directly relevant because:
  - Simm's Copse and the wider Pamber Forest complex are highly sensitive to nitrogen deposition.
  - Traffic from the Site would route past or near these habitats.
- No assessment has been provided to show whether critical loads would be exceeded.

## Health and Wellbeing Impacts

### Increased pressure on health services

- Poor air quality and increased noise are known to worsen:
  - asthma
  - heart disease
  - anxiety and stress
  - sleep disturbance
- These impacts would add further pressure to already overstretched GP and community-care services in Mortimer and West Berkshire. No assessment has been conducted to understand or mitigate these effects.

## Safety concerns from increased traffic

- Higher traffic volumes increase the risk of:
  - road accidents
  - pedestrian safety issues
  - reduced walkability and active travel
- This undermines national policy objectives to promote healthy, active communities.

## Cumulative impacts

- Noise, air pollution, traffic, and loss of tranquillity do not occur in isolation. Together they create a cumulative burden on health and wellbeing. The LP/SS does not acknowledge or assess these combined effects.
- National guidance requires cumulative impacts to be assessed, yet the LP/SS provides no modelling of combined traffic, noise, or emissions from this and other planned developments.

## Recommendations

- The Site should be removed from the LP/SS due to the absence of any noise, air-quality, or health-impact assessment.
- If BDBC intends to retain the Site, it must first provide:
  - a full noise assessment covering construction and operation
  - air-quality modelling for all affected routes and receptors
  - a health-impact assessment addressing vulnerable groups
  - clear, funded, and deliverable mitigation measures agreed with WBC
- No allocation should proceed until cross-boundary impacts on Mortimer residents are fully understood and addressed.

## Conclusion

- The Site at the Mortimer boundary is not supported by the evidence required under national planning policy. There is no assessment of noise, air quality, or health impacts, despite the clear risk of harm to an existing rural community. The Site would introduce significant new noise and pollution into an area currently defined by quietness and clean air, with predictable consequences for residents' health and wellbeing.
- Without robust evidence and mitigation, the Site cannot be considered sustainable, justified, or appropriate for its location. It should be removed from the draft LP/SS.

# 11. Social impacts

## Introduction

- Planning decisions must be made in accordance with the development plan unless material considerations indicate otherwise. The “planning balance” involves weighing the benefits and harms of a proposal, taking into account all material considerations, including policy compliance, infrastructure, environment, and community views.

## Social Housing and Community Cohesion

- The Site raises significant social-impact concerns, particularly for lower-income households and residents in affordable or social housing. The Site lies immediately adjacent to the boundary with West Berkshire, meaning that future residents will rely on services; schools, healthcare, community facilities, and public transport; located in a different local authority area. Eligibility for these services is not guaranteed, and cross-boundary provision has not been assessed or secured. This creates a material risk that new residents will face uncertainty or exclusion from essential services, contrary to the principles of sustainable and inclusive development.
- The rural location compounds these issues. The Site is distant from major shops, Hampshire schools, Hampshire-based healthcare and employment. It lacks safe, continuous walking or cycling routes to Mortimer or Silchester. Public transport is limited meaning that residents without access to a private car – disproportionately those in social or affordable housing – would experience social isolation, reduced access to education and healthcare, and increased living costs. This conflicts with national policy requiring developments to promote social inclusion, reduce inequalities, and provide safe and convenient access for all users.
- Furthermore, placing a large population with diverse needs into an area with limited existing infrastructure, local services, and no realistic sustainable-transport options risks creating a socially fragmented community. Residents may be forced into long, costly, car-dependent journeys simply to meet basic needs, undermining quality of life and disproportionately affecting vulnerable groups.
- In the absence of secured cross-boundary service provision, viable transport options, or accessible local facilities, the Site cannot be considered socially sustainable or compliant with national or local planning policy.
- SMPC have lived experience of this phenomenon:
  - The Strawberry Fields development in Mortimer demonstrates the significant social harm that can arise when affordable housing is placed in an isolated rural location without access to essential services or public

transport. That estate was approximately one-third the size of the Site, and under cross-border arrangements some affordable units were allocated to families from Reading. There is no evidence that the affordable housing will be shared with WBC, so the presumption is that ALL allocations (c.140 dwellings) will be from BDBC.

- SMPC witnessed first-hand the difficulties faced by these households, many of whom were single mothers with young children and no access to a car. Many previously lived in Whitley Wood, where frequent bus services and walkable facilities met their daily needs – in contrast to the Site.
- These families found themselves suddenly cut off from support networks, extended family, and basic services. Mortimer has no substantial public transport connection to Reading, no reasonable bus route to a supermarket, and only small local shops with significantly higher prices. For low-income households, this created acute financial strain and made it difficult to provide for their children. Social isolation was severe, with limited opportunities for community integration or suitable activities for children accustomed to an urban environment.
- This experience illustrates a well-recognised issue: rural social housing can be profoundly unsuitable for households displaced from urban areas, particularly those without access to private transport. The same problems would inevitably arise at the Site.
- The Site is remote, car-dependent, and lacks safe walking routes to shops, schools, healthcare, employment or public transport. For families on low incomes, this location would not support a decent quality of life and would risk replicating the social hardship already observed in Mortimer.

## Recommendations

- The Site is unsound and therefore the Site should be removed from BSBC's LP/SS as it conflicts with national and local policy.
- Conduct a Social Sustainability Assessment that should assess thoroughly:
  - access to services
  - transport deprivation
  - risk of social isolation
  - suitability for low-income household
  - cross-boundary service eligibility
- Include safeguards to prevent repeating past social-harm outcomes which may include (but are not limited to) realistic access to:
  - supermarkets
  - family support networks
  - youth and social facilities

- realistic transport options

## Conclusion

- The cumulative harms of the Site conflict with policy, have substantial infrastructure deficits, environmental and landscape harm, loss of settlement identity, and procedural failings, significantly and demonstrably outweigh any potential benefits. The Site is currently not justified, effective, or consistent with national and local policy, and should be removed from the plan.

## **12. Infrastructure Funding, Viability, and Developer Contributions**

### Introduction

- A sound Local Plan or Spatial Strategy must demonstrate that development is deliverable, properly serviced, and supported by a clear and funded infrastructure strategy. For cross-boundary locations such as this Site, this requires explicit mechanisms for addressing impacts on neighbouring authorities, because Community Infrastructure Levy (CIL) receipts will be retained entirely by BDBC, while WBC and SMPC will receive none. Without a defined approach to cross-boundary mitigation, the plan fails to show how essential services, education, healthcare, transport, drainage, and community facilities, will be funded or expanded to meet the needs of new residents.
- The LP/SS must therefore set out how Section 106 obligations will be used to address impacts outside BDBC's administrative area, supported by robust evidence that meets the Regulation 122 tests of necessity, direct relevance, and proportionality. This requires coordinated infrastructure planning between BDBC, WBC and local service providers, including agreed pupil-yield calculations, transport assessments, drainage capacity studies, and healthcare impact evidence. Without this, cross-boundary mitigation risks being legally unenforceable or insufficient.

### Planning for infrastructure and service improvement

- Given Mortimer's existing infrastructure constraints, limited public transport, inadequate road network, school capacity, ageing utilities, and overstretched medical services, the Local Plan must include a clear, costed and deliverable strategy for securing contributions from development at the Site. This should include formalised cross-boundary agreements, joint infrastructure priorities, and transparent governance arrangements.

- In the absence of such provisions, the plan cannot demonstrate that development at the Site is deliverable, sustainable, or compliant with national policy requirements for infrastructure-led growth.

## Infrastructure Funding, Viability, and Developer Contributions

### Absence of Cross-Boundary Funding Mechanisms

- The LP/SS provides no explanation of how developer contributions collected by BDBC would be transferred to West Berkshire Council (WBC) or how cross-boundary infrastructure would be funded, delivered, or governed. This is a critical omission.
- For the Site not to be ruled out completely by the NPPF on grounds that it is part of Mortimer West End, BDBC clearly state that it is an extension of Mortimer.
- Because the Site relies almost entirely on WBC-commissioned services; schools, GP provision, community care, social care, highways, and public rights of way; BDBC must demonstrate a lawful and workable mechanism for transferring funds across the boundary.
- No such mechanism is identified in the LP/SS and at the meeting on 7 January officers stated openly that BDBC would not be doing so, explaining that it was for WBC and SMPC to identify any needs and “bid for funding”. This is not acceptable and conflicts with NPPF principles.

### Section 106 (S106) Cross-Authority Agreements

- Where development in one authority area creates impacts in another, national guidance expects the use of cross-authority S106 agreements. These require:
  - 
  - WBC to be a signatory to the S106
  - clear identification of the infrastructure to be funded
  - ring-fenced contributions for WBC-delivered services
  - enforceable triggers and delivery milestones
- BDBC has not proposed any cross-boundary S106 structure, nor confirmed that WBC has agreed to participate. Without this, the Site is not deliverable.

### Community Infrastructure Levy (CIL) Incompatibility

- BDBC will receive CIL; WBC will not. This creates a structural barrier to appropriately planning and funding required infrastructure:
  - CIL receipts cannot automatically be transferred to another authority
  - CIL cannot be used to fund infrastructure outside the charging authority unless explicitly agreed and governed
- Parish councils (including SMPC) only receive a neighbourhood portion of CIL where development occurs within their own authority area, and therefore SMPC

will receive no funding to use within the settlement BDBC openly rely on that prevents the Site from being ruled out.

- This is a direct conflict with the principle that development should support the communities it affects.

### Requirement for a Cross-Boundary Infrastructure Funding Agreement

- To comply with national policy, BDBC must produce a formal Infrastructure Funding Agreement with WBC setting out:
  - the scale of contributions required
  - the infrastructure to be funded
  - the delivery body for each item
  - the timing and triggers for payment
  - governance and accountability arrangements
- No such agreement exists. Without it, the LP/SS cannot demonstrate that essential services; schools, GP capacity, social care, highways; can be funded or delivered.

### Parish-Level Impacts and Lack of Funding Route to SMPC

- The Site will place additional pressure on:
  - Mortimer's public and shared space
  - footpaths and rights of way
  - community facilities
  - local road safety interventions
- Yet there is no mechanism for SMPC to receive funding to mitigate these impacts. Because the development sits outside West Berkshire, SMPC is excluded from:
  - CIL neighbourhood funding
  - parish-level S106 contributions
  - local infrastructure grants tied to development
- This leaves SMPC with new responsibilities but no funding, contrary to the NPPF requirement that development should not burden existing communities.

### Viability Concerns and Risk of Undelivered Mitigation

- The LP/SS acknowledges that the Site requires significant infrastructure investment, yet provides no viability testing to show that:
  - cross-boundary contributions are affordable
  - healthcare, education, and transport mitigation can be funded
  - the developer can deliver the required works within the plan period
- Without viability evidence, there is an unacceptably high risk that cross-boundary contributions would be reduced or removed at application stage, leaving WBC and SMPC to absorb unfunded impacts.

## Council Tax

- The proposal also raises a significant and unresolved issue regarding the distribution of council tax revenue. Although the development would be physically and functionally dependent on services provided by WBC, the council tax generated by these dwellings would, as a matter of course, flow to BDBC. This structural misalignment creates a clear and ongoing funding deficit for the host community.
- Under the current arrangements, WBC would be responsible for delivering or supporting the majority of services used by future residents of the site, most likely including:
  - Highways maintenance, traffic management, and road safety interventions required to accommodate thousands of additional daily vehicle movements
  - Education services, including school place planning, transport obligations, and potential required capital expansion
  - Waste collection, environmental services, and community safety provision
  - Social care services for both adults and children, which represent the largest and most financially pressured areas of local authority expenditure
- However, the council tax uplift generated by the development would not accrue to WBC, despite these being the services most directly affected by the increased population. Instead, the revenue would be received by BDBC, which would not bear the corresponding service burden. This creates a permanent structural funding gap, where the locality absorbs the impacts of growth without receiving the financial resources required to support it.
- The result is a development that is fiscally unsustainable for Mortimer, the wider parish areas and WBC. Without a mechanism to ensure that council tax revenue is aligned with service responsibility, the proposal risks undermining the long-term viability of essential local services, exacerbating existing pressures, and placing an unfair and ongoing financial strain on WBC and the community it serves.
- For these reasons, the council tax implications of the Site must be fully considered. As currently structured, the development would impose significant recurrent costs on WBC and Mortimer while diverting the associated revenue to another authority, rendering the proposal neither equitable nor sustainable.

## Recommendations

- The Site is unsound and therefore the Site should be removed from BSBC's LP/SS based on:



- The absence of any cross-border planning and agreement on CIL, S106 and ongoing council tax funding allocations to support infrastructure and services needed to make the Site sustainable and viable.
- Provide a cross-boundary infrastructure strategy
- Commit to cross-boundary Section 106 agreements
- Produce joint evidence with WBC
- Establish a formal governance mechanism to oversee planning and funding allocations
- Demonstrate funding realism and timing
- Address the loss of neighbourhood CIL
  - BDBC officer have acknowledged that Stratfield Mortimer will receive no neighbourhood CIL from the Site and must therefore identify compensatory mechanisms through S106 or bespoke agreements.

## Conclusion

- Developer contributions arising from the Site may not be sufficient to fund necessary infrastructure or may not be allocated to the communities most affected by the Site. Cross-boundary developments often result in funding imbalances, with one authority receiving contributions while neighbouring communities bear the costs. The plan must include robust mechanisms to ensure fair and effective infrastructure funding.
- The LP/SS does not identify any lawful or workable mechanism for transferring developer contributions from BDBC to WBC or SMPC. Without cross-boundary S106 agreements, a formal Infrastructure Funding Agreement, and clear viability evidence, the Site cannot be considered deliverable, effective, or compliant with national policy. The Site should therefore be removed from the draft plan.

## **13. Alternative sites - Sequential Site Assessment and Flaws in BDBC's Approach**

### Introduction

- Local Plans must demonstrate that site allocations have been selected through a clear, transparent, and proportionate sequential process, consistent with the NPPF. This includes prioritising brownfield land, directing growth to the most sustainable locations, avoiding areas of environmental constraint, and ensuring that cross-boundary impacts are properly considered. The NPPF requires that site selection is justified, effective, and based on reasonable alternatives that have been robustly assessed.
- BDBC's approach to sequentially examining sites for its Local Plan and Spatial Strategy does not meet these requirements. The process lacks transparency, does not follow a logical hierarchy of sustainable locations, and appears to have

introduced the Mortimer boundary site late in the process without proper comparative assessment.

## Key Failures in the Sequential Approach

### Failure to Prioritise Brownfield and Previously Developed Land

- The NPPF requires councils to give substantial weight to the reuse of brownfield land and to avoid unnecessary development of greenfield sites. BDBC has not demonstrated that all brownfield opportunities within the borough have been exhausted before selecting a large greenfield site on the edge of a neighbouring authority's settlement. No evidence has been published showing a borough-wide brownfield review or why less sensitive sites were discounted.

### Inconsistent Application of the Settlement Hierarchy

- The NPPF expects growth to be directed to the most sustainable settlements. BDBC's own spatial strategy identifies Basingstoke and other Hampshire settlements as the focus for development. The Mortimer boundary site does not relate to any BDBC settlement and relies entirely on a West Berkshire village for services. This contradicts both the NPPF and BDBC's own hierarchy. No justification has been provided for departing from the established strategy.

### Late Introduction of the Site Without Proper Comparative Assessment

- The Site was not part of earlier iterations of the Local Plan and appears to have been introduced without a full comparative assessment against other reasonable alternatives. The NPPF requires councils to demonstrate that alternatives have been considered and rejected on evidence. BDBC has not shown that this Site performs better than other options, nor has it published a transparent audit trail explaining its selection.

### Failure to Apply Environmental Constraints Sequentially

- The NPPF requires a sequential approach to flood risk, biodiversity constraints, heritage assets, and landscape sensitivity. The Site is affected by groundwater risk, lies adjacent to ancient woodland and SINC's, and sits within a valued landscape setting. These constraints should have ruled it out early in the process. Instead, BDBC has selected one of the most environmentally sensitive locations available, contrary to national policy.

### No Sequential Assessment of Cross-Boundary Impacts

- The NPPF requires effective cross-boundary planning and expects councils to avoid exporting harm to neighbouring authorities. BDBC has not assessed the impacts on West Berkshire's healthcare, education, transport, drainage, or social-care services. A lawful sequential process would have excluded sites that

impose unmitigated burdens on another authority. This omission renders the selection process unsound.

### Lack of Transparency and Published Evidence

- A sound Local Plan must show its working. BDBC has not published a clear methodology, scoring system, or comparative assessment demonstrating why this Site was selected over others. Without this, the process cannot be considered justified or evidence-based.

### Recommendations

- The Site should be removed from the LP/SS unless BDBC can demonstrate, through a transparent and proportionate sequential assessment, that:
  - all brownfield and less sensitive greenfield alternatives have been exhausted
  - the Site aligns with the borough's settlement hierarchy
  - environmental and cross-boundary constraints have been properly applied
  - the Site performs better than other reasonable alternatives
  - the selection process is consistent with NPPF requirements for justification and effectiveness
- In the absence of this evidence, the Site is not positively prepared, not justified, and not consistent with national policy.

### Conclusion

- Taken together, these shortcomings show that BDBC's approach to identifying and selecting sites has not followed a lawful or transparent sequential process, nor one that reflects the principles set out in the NPPF. The failure to prioritise brownfield land, to apply the settlement hierarchy consistently, to assess reasonable alternatives, or to exclude environmentally constrained and cross-boundary sites at an early stage means the selection of the Mortimer boundary site cannot be considered justified or evidence-based.
- Until BDBC can demonstrate a clear, proportionate and policy-compliant methodology for site selection, this Site cannot form part of a sound Local Plan.

## 14. Other considerations

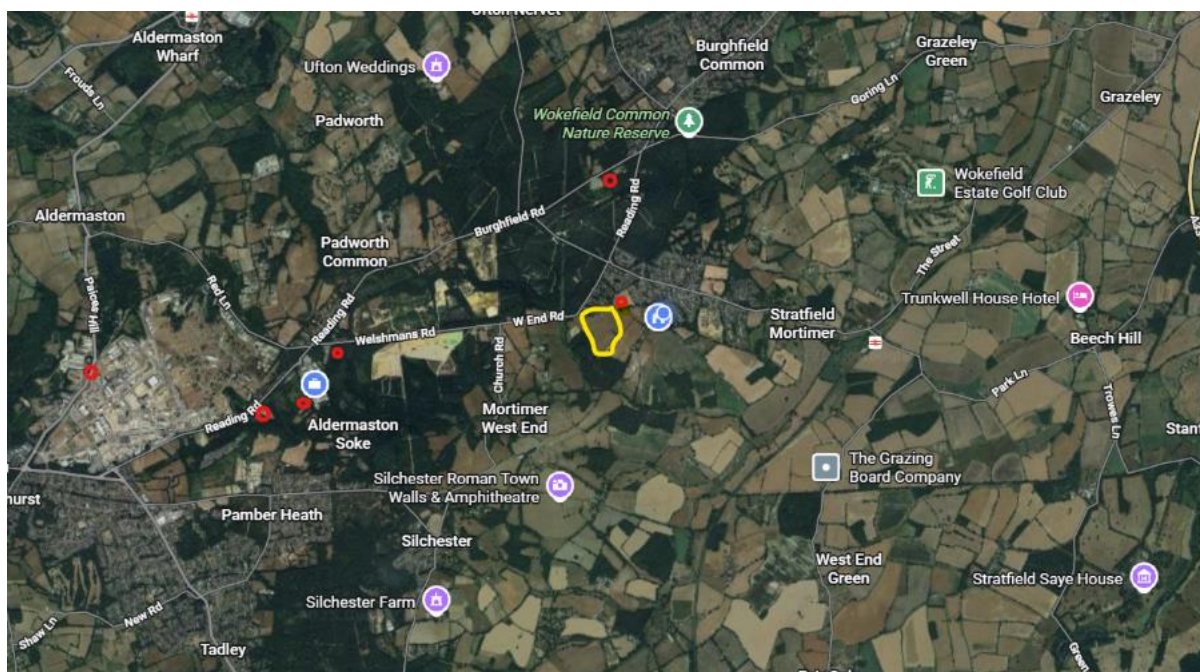
### Gypsy and traveller sites within 5-mile radius of proposed Site

#### Introduction

- Assessing whether a large housing allocation is socially sustainable requires careful consideration of how it will meet the needs of all groups, including Gypsy

and Traveller households. National policy, including the Planning Policy for Traveller Sites (PPTS), requires that sites are located where residents have safe and reasonable access to schools, healthcare, shops, employment and community facilities, and where they can integrate into the wider community without experiencing isolation or disadvantage. The proposed Site does not meet these requirements.

- National planning policy requires local authorities to avoid creating isolated, segregated or disproportionately concentrated communities, particularly for minority groups such as Gypsy and Traveller households. The Equality Act 2010 and the Public Sector Equality Duty oblige councils to advance equality of opportunity and foster integration, which includes ensuring that Traveller accommodation is not clustered in ways that reinforce social exclusion or disadvantage.



Yellow indicates proposed site; Red dots indicate Gypsy Traveller sites

- Population as census 2021

	Population	Dwellings
Stratfield Mortimer	3934	1671
West End Mortimer	420	164
Burghfield Common	6214	2341

- While there is no national planning policy ratio for the number of pitches required, NPPF requires authorities to assess local need. Nevertheless, there is a typical requirement of around 1 pitch per 2-3000 residents
- When assessing the Site BDBC have based “local need” on the requirement for the borough and appear to have ignored true local need.
- Based on census data in the table above, within a 5-mile radius of the Site there are 10,568 residents. This equates, using the benchmark above (of per 2,000 residents), to 5.3 required pitches within that area.
- The table below sets out the locations and number of pitches that exist in the area.

Location	Number of pitches	Owner
4 Houses Corner	34 (17 dual)	WBC
Paices Hill	39	WBC
MayFai (Beenham)	10	WBC
Oaklands View (Woolhampton)	7	WBC
West end Rd (next to The Turners arms)	20	Private
AWE site	Est. 40 (to 100)	Private
Pinelands	34	Private
Total	184	

- Based on the known number of pitches (and taking the lower estimate at AWE), this means that within the 5-mile radius of the Site there are 34.7 times (or 3,470%) the number of expected pitches. The Site clearly risks making the area worse in terms of creating isolated, segregated or disproportionately concentrated communities.
- The Site raises significant concerns regarding the suitability for any Gypsy and Traveller accommodation. National policy requires such sites to be located where residents have safe and reasonable access to schools, healthcare, shops, employment and community facilities. The Site fails these basic criteria as a whole and therefore in respect of a Gypsy and Traveller site.
- The location is remote, car dependent and lacks public transport. There is no bus service to supermarkets, secondary schools, medical facilities or employment centres. For Gypsy and Traveller households, who statistically have lower car ownership rates and higher reliance on local services, this isolation would create

substantial barriers to daily life, access to education, and healthcare continuity. It would also undermine the Government's aim of supporting settled, integrated and sustainable communities.

- Cross boundary issues further complicate matters. The Site sits on the edge of West Berkshire, yet Basingstoke & Deane cannot guarantee eligibility for schools, healthcare or support services in the neighbouring authority. This uncertainty risks placing Gypsy and Traveller families in a position where essential services are either inaccessible or oversubscribed, contrary to the Planning Policy for Traveller Sites (PPTS) requirement for "fair and equal treatment".

## Recommendation

- The Site should have the plans for a Gypsy and Traveller site within it removed.

## Conclusion

- The Site is not a socially sustainable location for Gypsy and Traveller accommodation. Its isolation, lack of transport, and unclear access to services would place vulnerable households at a clear disadvantage and would not meet national or local policy requirements for suitable, inclusive provision.

## Impact on the Equine Assisted Therapeutic Service

- The Site will have a detrimental impact on the Equine Assisted Therapeutic Service on Simms Farm, which provides essential services to vulnerable children.

## Noise, Vibration, and Acoustic Disturbance

- Children attending therapy are often hypersensitive to noise. The construction phase and the subsequent intensification of use on this Site will create acoustic environments that make therapeutic intervention impossible. This represents a significant loss of "amenity" for the current occupants.

## Impact on Privacy and Confidentiality

- Therapy sessions require a high degree of privacy. The proximity and scale of the proposed development would enable for overlooking into treatment areas including the field adjacent to the Site and the presence of others within Simms Copse itself which is also currently a treatment area. This compromises the clinical confidentiality and the sense of safety required for children to engage in therapy.

## Air Quality and Health

- The proximity of construction dust and increased traffic emissions poses a direct health risk to children with respiratory vulnerabilities who frequent the centre.



## Conflict with Existing Land Use

- National and local planning policies generally protect "community infrastructure." This development threatens the viability of an established healthcare provider. If the therapy centre is forced to relocate due to the external environment becoming unsuitable, it results in a net loss of vital community services.

## Breach of Public Sector Equality Duty (Equality Act 2010)

- BDBC has legal obligations under Section 149 of the Equality Act 2010. The children treated at Stable Futures have significant vulnerability.
- The proposed development threatens to create an environment that is inaccessible to these children. By approving a development that produces excessive noise/visual distress and loss of privacy, BDBC may be failing in its duty to:
  - Eliminate discrimination and harassment against disabled service users.
  - Advance equality of opportunity by ensuring vulnerable children can continue to access essential healthcare in a safe environment.
- If the environmental impact of this development forces the centre to cease operations or reduces the efficacy of the therapy provided, it would constitute a failure to account for the 'protected characteristics' of the children.

## Recommendations

- The Site is unsound and therefore the Site is removed from BSBC's LP/SS based on:
  - The absence of an Equality Impact Assessment (EqIA) under the Public Sector Equality Duty (PSED)
- In the alternative BDBC must undertake a site-specific Equality Impact Assessment (EqIA) that addresses impacts resulting from construction and impacts on the Service after construction has been completed and residents occupy the Site.
- before any determination is made on this application. Under Section 149 of the Equality Act 2010, the Council has a non-delegable duty to have 'due regard' to the need to eliminate discrimination and advance equality of opportunity. Given that the Equine Assisted Therapeutic Service provides essential clinical services to children with protected characteristics (specifically disability), a standard planning assessment is insufficient. The EqIA must specifically address the following:
  - Sensory Impact Analysis: How the noise, vibration, and light pollution from both the construction and operational phases will impact these vulnerable children.

- Access and Displacement: Whether the intensification of the Site will create physical barriers that prevent disabled children from safely accessing their therapy.
- Mitigation Measures: If impacts are identified, the EqIA must prove that 'reasonable adjustments' have been made to the design to remove those barriers.

## Conclusion

- For the reasons stated above, the proposed development is incompatible with the neighbouring land use.
- Under the Public Sector Equality Duty, BDBC must give 'due regard' to the need to protect the rights of these disabled children.
- A failure to adequately mitigate the noise, dust, and privacy intrusions, or a failure to recognise the unique sensitivity of this Site, could leave the planning process open to challenge on the grounds of non-compliance with the Equality Act 2010. BDBC must prioritise the protection of this vital community asset.

## Atomic Weapons Establishment

### Introduction

- The Site lies within the statutory consultation zone for both Atomic Weapons Establishment (AWE) sites at Aldermaston and Burghfield, where development is subject to strict controls due to public safety requirements and emergency planning obligations.
- The presence of the adjacent Detailed Emergency Planning Zone (DEPZ) imposes additional constraints on land use, population density, access routes and the ability of emergency services to implement evacuation or shelter in place procedures. Any increase in population within this zone must therefore be justified, risk assessed and shown to be compatible with the Off-Site Emergency Plan.

### Proximity to AWE sites

- A significant concern is the Site's position within the Outer Consultation Zones (OCZs) of two nuclear installations – AWE Aldermaston and AWE Burghfield. This dual-constraint is highly unusual and materially elevates the level of public-safety scrutiny required.
- BDBC has not undertaken any prior engagement with the Office for Nuclear Regulation (ONR), AWE, the Ministry of Defence (MoD), or WBC's Emergency Planning team before proposing this Site. This omission is critical: without early consultation, BDBC cannot know whether the Off-Site Emergency Plan (OSEP)



can safely accommodate the substantial increase in population that this Site would generate.

- BDBC has previously rejected smaller Mortimer West End sites (MWE001 and MWE003) on the grounds of countryside location and proximity to AWE. Nothing has changed in policy terms since those decisions. It is therefore irrational and inconsistent for BDBC to now promote a far larger site – 350 homes – within the same nuclear-consultation zones, and in a location even closer to the DEPZ boundary for AWE Burghfield.
- WBC’s adopted Local Plan Policy SP4 is explicit that development within the OCZs must not undermine the operation of the OSEP or adversely affect the defence-related capability of the AWE sites. It also requires consultation on any proposal likely to increase the residential or non-residential population entering the DEPZ. The proposed Site would introduce hundreds of new residents who would routinely travel into the DEPZ for school, employment, and services. This is precisely the type of cumulative population increase that SP4 identifies as requiring early and detailed assessment by ONR and AWE. BDBC has not undertaken this assessment.
- BDBC’s own 2020 methodology treated Tadley as unsuitable for assessment at that time due to AWE constraints, yet BDBC is now proposing a major allocation in Mortimer West End with similar or greater nuclear-safety constraints. This inconsistency undermines the credibility of the site-selection process and raises fundamental questions about whether the Site is deliverable at all.

## Impact of population increases

- Introducing approximately 900 new residents into this regulated area significantly increases the population at risk during an emergency event.
- Additionally, it places additional pressure on evacuation routes, communication systems and emergency response capacity.
- BDBC’s LP/SS provides no evidence that the implications of this population uplift have been assessed in consultation with the Office for Nuclear Regulation (ONR), AWE or WBC in its capacity for emergency planning, nor does it demonstrate that the required emergency planning infrastructure can safely accommodate such growth.
- Furthermore, residents of the Site would rely on schools, healthcare, childcare, community facilities and transport links located within the DEPZ in West Berkshire. This raises two critical issues: first, whether these services have the capacity to absorb a large cross boundary population increase; and second, whether placing additional demand on facilities within the DEPZ is compatible with emergency planning requirements, which depend on controlled population levels and predictable movement patterns.

## Recommendations

- Publish a full AWE/DEPZ impact assessment before Regulation 19. BDBC must provide a comprehensive assessment of how the Site interacts with:
  - the AWE consultation zone
  - the DEPZ
  - the Off-Site Emergency Plan
  - evacuation and shelter-in-place requirements
  - Without this, the Local Plan cannot demonstrate that the Site is safe, deliverable or compliant with national emergency-planning policy.
- Obtain formal input from the Office for Nuclear Regulation (ONR). ONR is a statutory consultee for development in AWE zones. BDBC must secure:
  - written confirmation that the proposed population uplift is acceptable,
  - advice on evacuation routes,
  - and confirmation that emergency-planning capacity can accommodate 900 additional residents.
  - This evidence must be published as part of the Local Plan evidence base.
- Demonstrate that emergency-planning infrastructure can support the increased population. BDBC must show:
  - how evacuation routes will function with additional traffic
  - how communication and alert systems will reach new residents
  - and how vulnerable groups (children, elderly, disabled) will be protected
  - This requires modelling, not assumptions.
- Assess cross-boundary service impacts within the DEPZ because new residents will rely on West Berkshire's schools, GP services and community facilities, many of which lie inside the DEPZ. BDBC must demonstrate:
  - that these services can safely absorb additional population
  - that emergency-planning requirements for controlled population levels are not breached
  - and that cross-boundary agreements are in place
- Avoid allocating high-density housing in areas where emergency-planning constraints limit safe evacuation
  - If modelling shows that SPS5.15 would compromise emergency-planning capacity, the Site should be removed or its scale significantly reduced.
- In the absence of a full AWE impact assessment, crossboundary service analysis and confirmation from ONR that the Site is acceptable, the Site cannot be considered safe, deliverable or compliant with national policy on emergencyplanning zones and must be removed from the LP/SS.

## Conclusion

- Taken together, these factors demonstrate that the Site is subject to fundamental public-safety constraints that should have ruled it out at the earliest stage of the Local Plan process. The absence of consultation with nuclear statutory bodies, the dual-OCZ location, the proximity to the DEPZ, and the inconsistency with both BDBC's and WBC's established nuclear-safety policies all point to the same conclusion:
  - The Site cannot be considered a safe or appropriate location for major residential development, and its deliverability is highly uncertain.

## Water supply and wastewater

### Introduction

- The proposed 350-home development at West End Farm raises significant concerns regarding both water supply and wastewater treatment capacity. Thames Water operates in an area formally designated by the Environment Agency as being under “serious water stress”, meaning available water resources are already heavily constrained.

### Issues with Supply

- Under BDBC Policy ENV12, new homes must meet a water-efficiency standard of 110 litres per person per day. For approximately 1,000 residents, this equates to 110,000 litres of potable water per day, or over 40 million litres per year.
- When accounting for an additional c. 60 residents associated with Gypsy and Traveller accommodation, total demand rises to 116,600 litres per day, a substantial new burden on an already ‘seriously stressed’ supply network.

### Issues with wastewater

- Wastewater capacity presents an even more critical constraint. The Stratfield Mortimer Sewage Treatment Works (STW), which serves the area, was upgraded in 2025 but still operates at a permitted Flow to Full Treatment (FFT) of 35 litres per second.
- Independent analysis by the Oxford Rivers Improvement Campaign (ORIC) and calculations undertaken locally show that the actual current required FFT for Mortimer is approximately 50 litres per second, meaning the works are already under-capacity even before new development is considered.
- Adding 1,000 new residents would increase domestic flow by a further 4.85 l litres per second, pushing the required FFT to around 55 l/s, significantly beyond the current permitted and physical capacity.
- Without major further upgrades, the STW would be unable to treat the additional load, increasing the likelihood of unauthorised discharges into the Foudry Brook,

with associated environmental and regulatory risks. On both water supply and wastewater grounds, the proposed development cannot be considered sustainable or compliant with national and local policy unless significant infrastructure investment is secured in advance.

## Recommendations

- Given the area is officially designated as being under ‘serious water stress’, BDBC must publish a Water Cycle Study demonstrating:
  - that potable water can be supplied without harming the wider network
  - that demand from 350 homes + Traveller pitches can be met sustainably
  - that abstraction impacts and drought-resilience have been assessed
  - Without this, the Local Plan cannot be considered “positively prepared” or “justified”.
- Thames Water must provide written confirmation that:
  - the local network can deliver an additional 116,600 litres/day
  - upgrades are funded, deliverable and timed
  - the development will not reduce supply resilience for existing residents
  - This evidence is currently absent.
- The Stratfield Mortimer Sewage Treatment Works is already operating ‘below the required FFT’. BDBC must require:
  - a full hydraulic modelling assessment
  - confirmation that the STW can meet a required FFT of ~55 l/s
  - evidence that no increase in untreated discharges will occur
  - If the STW cannot meet the required FFT, the Site should not be allocated.
- The BDBC LP/SS must show:
  - what upgrades are needed
  - who will pay
  - when they will be delivered
  - how they will be secured (S106, Grampian conditions, or infrastructure phasing)
  - Unspecified strategic aspirations like “future upgrades” are not compliant with national policy.
- Apply a Grampian-style restriction so that no development should proceed until:
  - water-supply upgrades are complete
  - wastewater-treatment capacity meets the required FFT
  - This is standard practice where infrastructure is already failing.

- Remove the Site from the LP/SS if the above upgrades are not feasible, if Thames Water cannot guarantee:
  - supply capacity
  - wastewater treatment capacity
  - and environmental compliance
- since that make the Site an neither a deliverable nor sustainable allocation.

## Conclusion

- The currently available evidence shows that neither the local water-supply network nor the Stratfield Mortimer Sewage Treatment Works can accommodate the additional demand created by 350 homes.
- The area is already designated as being under serious water stress, and the STW is operating below the required treatment capacity even before any new development is added.
- The Site introduces c.1,000 new residents would significantly increase both potable-water demand and wastewater flows, heightening the risk of supply constraints and further untreated discharges into the Foudry Brook.
- Without fully funded, deliverable infrastructure upgrades in place before development begins, the proposal cannot be considered sustainable or compliant with national policy.

## Electricity Supply and Grid Capacity\*\*

### Introduction\*\*

- The proposed 350-home development at West End Farm raises significant concerns regarding the capacity, resilience, and deliverability of local electricity infrastructure. National planning policy requires that development is supported by adequate utilities at the point of occupation, and that Local Plans demonstrate that essential infrastructure can be delivered in a timely and viable manner. Electricity supply is a critical component of this requirement.
- The Site lies in a rural area served by a constrained distribution network operated by Scottish and Southern Electricity Networks (SSEN). This network already experiences capacity limitations, voltage-drop issues, and limited headroom for new large-scale residential loads. The LP/SS provides no evidence that the existing network can accommodate the substantial increase in demand generated by 350 homes, associated electric-vehicle charging, heat pumps, and the proposed Gypsy and Traveller pitches.
- No assessment has been published, no reinforcement plan has been identified, and no funding mechanism has been secured. Without this evidence, the Site cannot be considered deliverable, sustainable, or compliant with national policy.

## Issues with Electricity Supply

### Significant Increase in Electrical Demand

- Modern residential development is increasingly electricity-intensive due to:
  - widespread adoption of heat pumps
  - mandatory EV-charging infrastructure
  - increased digital and home-working loads
  - higher baseline consumption from modern appliances
- A development of 350 homes, plus Traveller pitches, is likely to require in excess of 1.5–2.0 MVA of additional capacity. This is a substantial load for a rural 11kV distribution network with limited spare capacity.
- The LP/SS provides no evidence that SSEN has confirmed:
  - available headroom
  - required reinforcement
  - substation upgrades
  - new cabling routes
  - timescales for delivery
  - funding responsibilities
- This omission is material and renders the Site unsound.

### Existing Network Constraints

- Local experience and SSEN's own published capacity maps indicate that the Mortimer–Silchester–Pamber Heath area is characterised by:
  - ageing 11kV infrastructure
  - limited spare capacity at local substations
  - voltage-drop issues during peak demand
  - rural overhead lines vulnerable to weather-related outages
  - no strategic reinforcement planned in the current investment cycle
- These constraints already affect existing residents. Adding a development of this scale without confirmed upgrades risks:
  - voltage instability
  - increased frequency of outages
  - inability to connect heat pumps or EV chargers
  - unsafe loading of existing assets
- The LP/SS does not address any of these issues.

### Heat Pumps and EV Charging: A Step-Change in Demand

- Government policy and building regulations require:
  - low-carbon heating (typically air-source heat pumps)
  - EV-charging points for every new dwelling

- Heat pumps typically require 2–4 kW per dwelling at peak. EV chargers require 7–11 kW per dwelling. For 350 homes, this equates to:
  - 700–1,400 kW of heat-pump load
  - 2,450–3,850 kW of EV-charging load
- This is before accounting for:
  - domestic appliances
  - lighting
  - digital infrastructure
  - Traveller-site demand
- The cumulative load is far beyond the capacity of the existing rural network unless major reinforcement is undertaken.

### No Evidence of SSEN Engagement or Reinforcement Plans

- The LP/SS contains no:
  - SSEN capacity statement
  - reinforcement feasibility study
  - costed upgrade plan
  - delivery timetable
  - mechanism for securing funding through S106 or other means
- This is a fundamental omission. National policy requires early engagement with utilities and evidence that infrastructure can be delivered. BDBC has not provided this.

### Cross-Boundary Implications

- Although the Site lies within BDBC, the electricity network serving Mortimer and Mortimer West End is interconnected across the Berkshire–Hampshire boundary. Reinforcement works may therefore require:
  - upgrades to substations in West Berkshire
  - new cabling routes through Mortimer
  - works on highways and verges maintained by WBC
  - cross-authority coordination for road closures and wayleaves
- No cross-boundary assessment has been undertaken. No Statement of Common Ground exists. No funding mechanism has been identified. This is inconsistent with national policy on cross-boundary infrastructure planning.

### Risk of Delayed or Undeliverable Connections

- SSEN routinely advises that reinforcement works for rural developments can take:
  - 3–7 years for design, approvals, and construction
  - longer where land acquisition or wayleaves are required
  - longer still where cross-boundary works are needed

- The LP/SS provides no evidence that:
  - reinforcement is feasible
  - reinforcement is fundable
  - reinforcement can be delivered within the plan period
- Without this, the Site cannot be considered deliverable.

## Recommendations

- BDBC must publish, before Regulation 19:
  - a full Electricity Network Capacity Assessment
  - written confirmation from SSEN that the required load can be accommodated
  - a costed reinforcement plan
  - identification of required substation and cabling upgrades
  - a delivery timetable aligned with the development trajectory
  - a cross-boundary infrastructure agreement with WBC where required
  - a clear funding mechanism (S106, developer-funded works, or Grampian conditions)
- If SSEN cannot guarantee capacity, or if reinforcement is not viable within the plan period, the Site should be removed from the LP/SS.
- A Grampian-style restriction must be applied so that no development can proceed until all required electricity-network upgrades are completed and operational.

## Conclusion

- The currently available evidence shows that the local electricity network does not have the capacity to support a development of this scale. The LP/SS contains no assessment, no engagement with SSEN, no reinforcement plan, and no funding mechanism. The Site would introduce a substantial new electrical load into a constrained rural network already experiencing capacity and resilience issues.
- Without fully funded, deliverable upgrades in place before development begins, the proposal cannot be considered sustainable, deliverable, or compliant with national policy. The Site should therefore be removed from the draft LP/SS.

# 15. Procedural and Consultation Concerns

## Introduction

- The Town and Country Planning (Local Planning) (England) Regulations 2012 and the NPPF require that plan-making is transparent, inclusive, and based on effective engagement with communities and stakeholders. Failure to consult



affected communities or statutory consultees, or to provide adequate information, may render a plan unsound or unlawful.

- There are several clear and material flaws in BDBC's Regulation 18 consultation process as it relates to the Site and the wider Spatial Strategy. These flaws go beyond simple omissions, they undermine the ability of residents, neighbouring authorities and statutory bodies to make informed representations, and they raise questions about whether the consultation meets the legal tests of **soundness, transparency and procedural fairness**.

### Lack of essential evidence at the point of consultation

- A Regulation 18 consultation must present enough information for the public to understand the implications of proposed allocations. BDBC has not provided:
  - transport modelling
  - education capacity evidence
  - healthcare capacity assessments
  - drainage and flood risk analysis
  - Cross boundary service impact assessments
  - deliverable infrastructure funding strategy
- Without this, consultees cannot meaningfully evaluate the Site.

### No cross-boundary impact assessment

- Given SPS5.15 relies almost entirely on West Berkshire's schools, healthcare, roads, drainage and community facilities, BDBC should have published:
  - a joint impact assessment
  - agreed mitigation measures
  - a cross-boundary infrastructure plan
- None of this exists, making the consultation incomplete and procedurally deficient.

### No explanation of how infrastructure will be funded

- BDBC has not explained beyond strategic aspiration:
  - how S106 will be used to mitigate impacts outside its boundary
  - how cross border contributions will be secured
  - or how the loss of neighbourhood CIL to Stratfield Mortimer will be addressed
- A Local Plan must be **infrastructure led**; this consultation is not.

### Failure to assess social sustainability

- There is no assessment of:
  - the suitability of the Site for low-income households
  - the risks of rural isolation

- the absence of public transport
  - or the consequences of placing vulnerable families far from services
- This is a major omission given the documented issues in Mortimer.

## No assessment of cumulative Traveller site concentration

- Despite an 3,470% above average density of Gypsy and Traveller sites within 5 miles, BDBC has not assessed:
  - over-concentration,
  - equality impacts,
  - or compliance with the Planning Policy for Traveller Sites.
- This is a legal requirement under the Equality Act and PPTS.

## Consultation documents do not meet the “reasonable alternatives” test

- Regulation 18 requires councils to present and assess reasonable alternatives. BDBC has not:
  - explained why the Site was chosen over less constrained sites,
  - provided comparative scoring,
  - or shown how environmental, social and infrastructure constraints were weighed.
- This undermines the plan’s justification.

## Insufficient clarity on service eligibility

- Because the Site sits on the border, residents may not be eligible for West Berkshire schools, GP practices or support services.
- BDBC has not addressed this, leaving consultees unable to judge the Site’s deliverability.

## Recommendation

- The Site has not properly been consulted and therefore the Site should be removed from BSBC’s LP/SS to prevent the strategic risk that the entire plan fails.

## Conclusion

- The consultation lacks the evidence, assessments and cross-boundary coordination required for a lawful and meaningful Regulation 18 process. These omissions prevent informed public participation and undermine the plan’s ability to meet the NPPF soundness tests of being **positively prepared, justified, effective and consistent with national policy**.
- The Regulation 18 consultation has not provided sufficient opportunity for affected communities to participate meaningfully in the plan-making process. There may have been inadequate notification, lack of accessible information, or

failure to engage with statutory consultees and neighbouring authorities. These procedural deficiencies undermine the legitimacy and soundness of the plan.

## 16. Overall Conclusion and Summary Request

- The Site at the Mortimer boundary is not supported by the evidence required under national policy, cross-boundary planning principles, or BDBC's own stated approach to sustainable development. The Site is dependent on Mortimer for its identity, services, and functionality, yet the LP/SS provides no lawful, deliverable, or evidence-based framework to support such an allocation. The result is a proposal that is neither justified nor effective and cannot be considered sound.
- Across every major planning discipline – NPPF compliance, cross-boundary strategy, infrastructure capacity, healthcare provision, environmental protection, transport, viability, and community impact – the evidence base is incomplete, inconsistent, or absent. The cumulative effect is a proposal that would impose significant and avoidable harm on Mortimer and West Berkshire while failing to deliver a sustainable or coherent pattern of growth for Basingstoke and Deane.
- The following overarching conclusions arise from the evidence presented.

### The Site is not compliant with the National Planning Policy Framework

- The Site conflicts with multiple core NPPF requirements, including sustainable development, settlement hierarchy, infrastructure alignment, environmental protection, and cross-boundary cooperation. These conflicts are material and unresolved. The Site cannot be considered positively prepared, justified, effective, or consistent with national policy.

### The Site is dependent on Mortimer but disregards Mortimer's adopted planning framework

- BDBC relies on Mortimer's services and identity to justify the Site yet dismisses the Stratfield Mortimer Neighbourhood Development Plan entirely. This is irrational and contrary to the statutory status of neighbourhood plans. A Local Plan cannot selectively rely on a neighbouring settlement while ignoring the policies that govern it.

### Cross-boundary impacts have not been assessed or mitigated

- The LP/SS contains no agreed mechanism for managing the substantial impacts on West Berkshire's schools, healthcare, social care, highways, rights of way, and community facilities. No Statement of Common Ground exists. No cross-authority funding mechanism has been identified. Without these, the Site is not deliverable.

### Infrastructure capacity is unproven and unfunded

- There is no evidence that essential services—primary care, community care, education, transport, drainage, utilities—can accommodate the additional

demand. No land is safeguarded for healthcare or education. No costed infrastructure plan exists. The Infrastructure Delivery Plan identifies funding gaps that directly affect Mortimer.

### Healthcare impacts are severe, predictable, and unmitigated

- Mortimer Medical Practice and West Berkshire's community-care services are already operating beyond safe capacity. The LP/SS provides no assessment, no mitigation, and no funding route. This is a fundamental failure of plan-making.

### Environmental and landscape harm is unavoidable

- The Site sits adjacent to ancient woodland, SINC's, and the Pamber Forest Valued Landscape. No evidence has been provided to demonstrate that harm can be avoided or mitigated. The Site fails the NPPF's requirements for protecting irreplaceable habitats and valued landscapes.

### Transport impacts are untested and likely to be severe

- No Transport Assessment has been provided. Mortimer's rural road network cannot safely absorb the additional traffic. Increased congestion, air pollution, and road-safety risks are inevitable without mitigation that has not been identified or costed.

### Noise, air-quality, and health impacts have not been assessed

- The LP/SS contains no modelling of emissions, no noise assessment, and no health-impact assessment. Sensitive receptors—including schools, nurseries, and residential streets—have not been considered. This omission is incompatible with national policy.

### Viability is unproven and high-risk

- The Site requires substantial infrastructure investment, yet no viability testing has been published. Without clear evidence that cross-boundary contributions are affordable and deliverable, the Site cannot be viable or deliverable under National Planning Policy.

### The Site undermines coherent spatial planning

- The Site is an isolated, edge-of-borough proposal that does not support BDBC's own settlement hierarchy. It represents an unplanned extension of a settlement outside BDBC's administrative area, contrary to the principles of strategic, plan-led growth.

## Final Recommendations

- Considering the extensive evidence gaps, unresolved cross-boundary impacts, and clear conflicts with national and local policy, Stratfield Mortimer Parish Council respectfully requests that:
  - **The Site is removed from the draft Local Plan and Spatial Strategy at this stage.** The Site is not supported by proportionate evidence, is not deliverable, and is not compliant with the NPPF.
  - **BDBC undertakes a comprehensive set of full cross-boundary assessments in partnership with West Berkshire Council and Stratfield Mortimer Parish Council before commencing Regulation 19.** This must include healthcare, education, transport, social care, environmental impacts, and infrastructure funding mechanisms.
  - **BDBC must ensure that before Regulation 19 is commenced that the Site is supported by a comprehensive, jointly agreed and fully costed infrastructure delivery plan.** This must include costed, deliverable, and enforceable commitments for healthcare, education, transport, utilities, and environmental mitigation.
  - **The statutory status of the Stratfield Mortimer Neighbourhood Development Plan is fully recognised for the Site and any future plan-making.** For any proposal to reasonably and rationally rely on Mortimer must be consistent with the policies that govern Mortimer.

## SMPC Overall Position

- The Site, as currently proposed, is not sustainable, not evidence-based, and not deliverable. It would impose significant harm on Mortimer and West Berkshire while offering no credible or costed mitigation. The Site does not meet the tests of soundness and should be withdrawn from the Local Plan.
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## **Annex**

<b>Section Title</b>	<b>Recommendations</b>
Conflict with the National Planning Policy Framework	The Site should be removed from the LP/SS due to the number of conflicts with National Planning Policy.
Conflict with Cross-District and Local Planning Policy	<p>The Site should be removed from the LP/SS unless BDBC can demonstrate:</p> <ul style="list-style-type: none"> <li>- it is required to meet the borough's 5YHLS or plan-period housing requirement</li> <li>- that alternative, more sustainable locations cannot deliver the required supply</li> <li>- that the scale and type of housing proposed aligns with the needs identified in Mortimer's Housing Needs Report.</li> </ul> <p>In the absence of such evidence, the Site is not positively prepared, not justified, and not consistent with national policy.</p> <p>BDBC agree to a coordinated (with WBC) spatial strategic approach to Mortimer, agreeing that it is a protected rural settlement and therefore remove it from the LP/SS.</p> <p>In the alternative, BDBC align with WBC and both collectively develop a coordinated and comprehensive infrastructure plan for Mortimer that properly assesses needs and requirements of the Site before reaching the Regulation 19 consultation.</p>
Impact on Health Services	<p>The Site is removed from BSBC's LP/SS based on the absence or gaps in planning service delivery and infrastructure on the points above.</p> <p>In the alternative, at pace and before</p>

	<p>Regulation 19, assessments are made, plans and funding are agreed and a full and robust delivery plan is provided (involving all partners including but not limited to WBC, ICBs and the NHS) covering at a minimum:</p> <ul style="list-style-type: none"> <li>- Primary Care Impact Assessment (joint ICBs)</li> <li>- Cross-Border Healthcare Infrastructure Capacity Report</li> <li>- Social-Care Impact Assessment</li> <li>- Health Infrastructure Delivery Plan (HIDP)</li> <li>- Statement of Common Ground (ICBs + local authorities)</li> <li>- Full Health Impact Assessment (HIA)</li> </ul>
Impact on Education Services	<p>The Site is removed from BSBC's LP/SS based on the absence or gaps in:</p> <ul style="list-style-type: none"> <li>- Planning, modelling and funding education service delivery</li> <li>- Planning, assessments and funding of transport infrastructure to ensure that schools are genuinely accessible</li> <li>- Assessment of the impact of moving substantial numbers of children into schools within the AWE DEPZ</li> </ul> <p>In the alternative, at pace and before Regulation 19, all planning and assessments are undertaken and funding is agreed, with a full and robust delivery plan to address these needs.</p>
Transport and Traffic Concerns	<p>The Site is removed from BSBC's LP/SS based on the absence or gaps in:</p> <ul style="list-style-type: none"> <li>- Planning, modelling and funding of transport infrastructure delivery</li> <li>- Modelling and assessment of cross boundary emergency services response and community policing.</li> </ul> <p>In the alternative, at pace and before Regulation 19, all planning and assessments are undertaken and funding is agreed, with a full and robust delivery plan to address these needs.</p>



Environmental and Landscape Harm	<p>The Site is unsound and therefore the Site should be removed from BSBC's LP/SS based on:</p> <ul style="list-style-type: none"> <li>- Significant and irreversible landscape and visual harm</li> <li>- Risks to protected water bodies and ground conditions</li> <li>- Loss of Grade 2 Best and Most Versatile agricultural land</li> <li>- Severe impacts on ancient woodland, SINC's, and habitat connectivity</li> <li>- Failure to show deliverable biodiversity net gain</li> <li>- Impacts on the Camino de Santiago cultural route</li> <li>- Conflict with both local and national planning policy</li> </ul>
Flood Risk, Drainage and Water Management	<p>The Site is removed from the LP/SS unless BDBC can show clear evidence that it is safe from flooding and will not increase flood risk for Mortimer or surrounding areas.</p> <p>A full flood-risk assessment is carried out now, at plan-making stage and before Regulation 19 commences, rather than being left to a future planning application that includes:</p> <ul style="list-style-type: none"> <li>- Groundwater risk is properly assessed, including seasonal high-water levels and historic flooding, so that the true level of risk is understood.</li> <li>- A simple, workable drainage plan is produced showing how rainwater will be managed on the Site without pushing water towards Mortimer or nearby homes.</li> <li>- Runoff from the Site is kept at natural (greenfield) levels, with clear evidence that this can be achieved.</li> <li>- Safe overflow routes are identified so that, in heavy rainfall, water does not flow towards Mortimer's roads, homes, or footpaths.</li> <li>- Natural features and green buffers are</li> </ul>

	<p>used to slow and absorb water, protecting downstream areas.</p> <ul style="list-style-type: none"> <li>- Cross-boundary impacts on West Berkshire are fully assessed, including the risk of increased surface-water flows into Mortimer.</li> </ul> <p>In the absence of this evidence, the Site cannot be considered safe, sustainable, or compliant with national policy.</p>
Heritage and Conservation	<p>The Site is removed from BSBC's LP/SS based on:</p> <ul style="list-style-type: none"> <li>- A full EIA and ECIA-supported assessments are required before the Planning Inspector can decide and this has not been completed.</li> <li>- Conduct comprehensive species-specific surveys and hydrological modelling.</li> <li>- Delay allocation pending verification of woodland status, species use and SSSI functional connectivity.</li> </ul>
Sustainability and Climate Change	<p>The Site should be removed from the LP/SS unless BDBC can demonstrate, through proportionate and published evidence, that:</p> <ul style="list-style-type: none"> <li>- the development can support low-carbon travel and significantly reduce car dependency</li> <li>- climate-related risks (flooding, water supply, heat, biodiversity stress) can be safely mitigated</li> <li>- the Site can deliver meaningful carbon-reduction measures consistent with national and local policy</li> <li>- the Site contributes positively to BDBC's climate-change strategy rather than undermining it</li> </ul> <p>In the absence of such evidence, the Site is not justified, not effective, and not consistent with national policy.</p>
Noise, Air Quality and Health Impacts	<p>The Site should be removed from the</p>

	<p>LP/SS due to the absence of any noise, air-quality, or health-impact assessment.</p> <p>If BDBC intends to retain the Site, it must first provide:</p> <ul style="list-style-type: none"> <li>- a full noise assessment covering construction and operation</li> <li>- air-quality modelling for all affected routes and receptors</li> <li>- a health-impact assessment addressing vulnerable groups</li> <li>- clear, funded, and deliverable mitigation measures agreed with WBC</li> </ul> <p>No allocation should proceed until cross-boundary impacts on Mortimer residents are fully understood and addressed.</p>
Social Impacts	<p>The Site is unsound and therefore the Site should be removed from BSBC's LP/SS as it conflicts with national and local policy.</p> <p>Conduct a Social Sustainability Assessment that should assess thoroughly:</p> <ul style="list-style-type: none"> <li>- access to services</li> <li>- transport deprivation</li> <li>- risk of social isolation</li> <li>- suitability for low-income household</li> <li>- cross-boundary service eligibility</li> </ul> <p>Include safeguards to prevent repeating past social harm outcomes which may include (but are not limited to) realistic access to:</p> <ul style="list-style-type: none"> <li>- supermarkets</li> <li>- family support networks</li> <li>- youth and social facilities</li> <li>- realistic transport options</li> </ul>
Infrastructure Funding, Viability and Developer Contributions	<p>The Site is unsound and therefore the Site should be removed from BSBC's LP/SS based on:</p> <ul style="list-style-type: none"> <li>- The absence of any cross-border</li> </ul>

	<p>planning and agreement on CIL, S106 and ongoing council tax funding allocations to support infrastructure and services needed to make the Site sustainable and viable.</p> <ul style="list-style-type: none"> <li>- Provide a crossboundary infrastructure strategy</li> <li>- Commit to crossboundary Section 106 agreements</li> <li>- Produce joint evidence with WBC</li> <li>- Establish a formal governance mechanism to oversee planning and funding allocations</li> <li>- Demonstrate funding realism and timing</li> <li>- Address the loss of neighbourhood CIL</li> </ul> <p>BDBC officer have acknowledged that Stratfield Mortimer will receive no neighbourhood CIL from the Site and must therefore identify compensatory mechanisms through S106 or bespoke agreements.</p>
Alternative Sites – Sequential Assessment	<p>The Site should be removed from the LP/SS unless BDBC can demonstrate, through a transparent and proportionate sequential assessment, that:</p> <ul style="list-style-type: none"> <li>- all brownfield and less sensitive greenfield alternatives have been exhausted</li> <li>- the Site aligns with the borough's settlement hierarchy</li> <li>- environmental and cross-boundary constraints have been properly applied</li> <li>- the Site performs better than other reasonable alternatives</li> <li>- the selection process is consistent with NPPF requirements for justification and effectiveness</li> </ul> <p>In the absence of this evidence, the Site is not positively prepared, not justified, and not consistent with national policy.</p>

Gypsy and Traveller Sites	The Site should have the plans for a Gypsy and Traveller site within it removed.
Equine Assisted Therapeutic Service	<p>The Site is unsound and therefore the Site is removed from BSBC's LP/SS based on:</p> <ul style="list-style-type: none"> <li>- The absence of an Equality Impact Assessment (EqIA) under the Public Sector Equality Duty (PSED)</li> </ul> <p>In the alternative BDBC must undertake a site-specific Equality Impact Assessment (EqIA) that addresses impacts resulting from construction and impacts on the Service after construction has been completed and residents occupy the Site.</p> <p>The EqIA must specifically address the following:</p> <ul style="list-style-type: none"> <li>- Sensory Impact Analysis: How the noise, vibration, and light pollution from both the construction and operational phases will impact these vulnerable children.</li> <li>- Access and Displacement: Whether the intensification of the Site will create physical barriers that prevent disabled children from safely accessing their therapy.</li> <li>- Mitigation Measures: If impacts are identified, the EqIA must prove that 'reasonable adjustments' have been made to the design to remove those barriers.</li> </ul>
Atomic Weapons Establishment (AWE)	<p>Publish a full AWE/DEPZ impact assessment before Regulation 19. BDBC must provide a comprehensive assessment of how the Site interacts with:</p> <ul style="list-style-type: none"> <li>- the AWE consultation zone</li> <li>- the DEPZ</li> <li>- the Off-Site Emergency Plan</li> <li>- evacuation and shelter-in-place requirements</li> </ul>

	<p>Obtain formal input from the Office for Nuclear Regulation (ONR). ONR is a statutory consultee for development in AWE zones. BDBC must secure:</p> <ul style="list-style-type: none"> <li>- written confirmation that the proposed population uplift is acceptable,</li> <li>- advice on evacuation routes,</li> <li>- and confirmation that emergency-planning capacity can accommodate 900 additional residents.</li> </ul> <p>Demonstrate that emergency-planning infrastructure can support the increased population.</p> <p>Assess cross-boundary service impacts within the DEPZ.</p> <p>Avoid allocating high-density housing in areas where emergency-planning constraints limit safe evacuation.</p> <p>If modelling shows that SPS5.15 would compromise emergency-planning capacity, the Site should be removed or its scale significantly reduced.</p> <p>In the absence of a full AWE impact assessment, cross-boundary service analysis and confirmation from ONR that the Site is acceptable, the Site cannot be considered safe, deliverable or compliant with national policy on emergency-planning zones and must be removed from the LP/SS.</p>
Water Supply and Wastewater	<p>Given the area is officially designated as being under 'serious water stress', BDBC must publish a Water Cycle Study demonstrating:</p> <ul style="list-style-type: none"> <li>- that potable water can be supplied without harming the wider network</li> <li>- that demand from 350 homes + Traveller pitches can be met</li> </ul>

	<p>sustainably</p> <ul style="list-style-type: none"> <li>- that abstraction impacts and drought-resilience have been assessed</li> </ul> <p>Thames Water must provide written confirmation that:</p> <ul style="list-style-type: none"> <li>- the local network can deliver an additional 116,600 litres/day</li> <li>- upgrades are funded, deliverable and timed</li> <li>- the development will not reduce supply resilience for existing residents</li> </ul> <p>The Stratfield Mortimer Sewage Treatment Works is already operating 'below the required FFT'. BDBC must require:</p> <ul style="list-style-type: none"> <li>- a full hydraulic modelling assessment</li> <li>- confirmation that the STW can meet a required FFT of ~55 l/s</li> <li>- evidence that no increase in untreated discharges will occur</li> </ul> <p>Apply a Grampian-style restriction so that no development should proceed until:</p> <ul style="list-style-type: none"> <li>- water-supply upgrades are complete</li> <li>- wastewater-treatment capacity meets the required FFT</li> </ul> <p>Remove the Site from the LP/SS if the above upgrades are not feasible, if Thames Water cannot guarantee:</p> <ul style="list-style-type: none"> <li>- supply capacity</li> <li>- wastewater treatment capacity</li> <li>- and environmental compliance</li> </ul>
Electricity Supply and Grid Capacity	<p>BDBC must publish, before Regulation 19:</p> <ul style="list-style-type: none"> <li>- a full Electricity Network Capacity Assessment</li> <li>- written confirmation from SSEN that the required load can be accommodated</li> <li>- a costed reinforcement plan</li> <li>- identification of required substation and cabling upgrades</li> </ul>

	<ul style="list-style-type: none"> <li>- a delivery timetable aligned with the development trajectory</li> <li>- a cross-boundary infrastructure agreement with WBC where required</li> <li>- a clear funding mechanism (S106, developer-funded works, or Grampian conditions)</li> </ul> <p>If SSEN cannot guarantee capacity, or if reinforcement is not viable within the plan period, the Site should be removed from the LP/SS.</p> <p>A Grampian-style restriction must be applied so that no development can proceed until all required electricity-network upgrades are completed and operational.</p>
Procedural and Consultation Concerns	<p>The Site has not properly been consulted and therefore the Site should be removed from BSBC's LP/SS to prevent the strategic risk that the entire plan fails.</p>