

Mr Hope

01 March 2023

Dear Sir/Madam,

West Berkshire Council Local Plan Review 2022-2039 – Regulation 19 Objection

Following the West Berkshire Council's publication of the Local Plan Review 2022-2039 Proposed Submission, I wish to register my **OBJECTION** to all development sites noted under the Harts Hill Farm area(s) as I believe the plan to be unsound. Information is either lacking or contradictory. The development is in breach of many policies outlined within the NPPF and WBC's own documentation. The proposed development will ultimately cause a negative impact on the open countryside it will replace, the neighbouring AONB, ancient woodlands, and Bucklebury Plateau, overwhelm an already congested highway network and increase the risk of minor and fatal accidents in the process.

I therefore object on the following items:

Settlement Boundary

Thatcham Settlement Boundary follows Floral Way from the A4 north towards Lawrence Lane. Land to the north-east of Floral Way is currently located outside of the Settlement Boundary. West Berkshire Local Plan Review to 2036 – Regulation 18 Consultation, Policy 2, C1 Location of New Housing in the Countryside stated, *"a presumption in favour of development and redevelopment within settlement boundaries and a presumption against new development outside of settlement boundaries"*.

Local Plan Review 2020-2037 states that;

- **Policy SP 1** *"Opportunities will be taken to maintain and enhance the identity of Thatcham separate to that of Newbury and its surrounding rural settlements."*
- **Policy SP 1** *"The villages in the surrounding area will retain their existing role and separate identity, with settlement boundaries and Policies SP8 and DC1 ensuring that physical separation is maintained."*
- **5.42** *"The separate and distinctive identity of these individual settlements helps to define communities and is an important feature of the local character of West Berkshire... Much of the pressure for development is around the edges of settlements, which can physically lead to coalescence or introduce an increase in activity which has an urbanising effect. Despite this, a key feature of even the larger settlements is the way in which few have coalesced in recent times and so the blurring of physical distinction between places has largely been avoided. The retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character."*

By extending the Settlement Boundary north towards Upper Bucklebury, the development will not only put undue pressure on the AONB and Bucklebury Ancient Woodland, but clearly contradict the council's statement made within the Regulation 18 Consultation document in addition to

contradicting numerous policies stated within the LPR. Any development north of Thatcham will physically and geographically merge Thatcham and Upper Bucklebury into one conurbation.

The LPA's Housing Site Allocations – Newbury and Thatcham Spatial Area, Table 2, Site Options Considered and Rejected; THA007 Land at Harts Hill states that the site was rejected based on *“rural character, site separated from built form by Floral Way, potential for flooding, high archaeological potential”* and *“overhead power lines”*.

As stated in Thatcham Strategic Growth document instructed by the Local Authority provided by David Lock Associates, *“Thatcham’s historical development is affected by the surrounding relief. Apart from a small amount of development towards Henwick Park and Cold Ash, the town has remained in the valley bottom... The only submitted sites affected by relief constraints are located to the north of the town, particularly those to the north-east of Thatcham”*. Due to the site's topography, any proposed development will appear overbearing to existing properties along Farmhouse Mews in both scale, mass, and bulk. Any development sited on higher ground would have direct views into existing properties.

The Strategic Growth document further mentions that the, *“land at Harts Hill Farm... are closer to the AONB boundary and higher on the slopes above Thatcham, and are more constrained for development in terms of topography, landscape sensitivity and ecology.”*

Thatcham's Strategic Growth Study by David Lock Associates and Stantec for West Berkshire Council states that THA10 Land at Siege Cross Farm has previously received 2 major planning applications that were both, *“refused ultimately for being outside of Local Plan, and being beyond the edge of existing settlement boundaries”*. Both applications were further refused by the Secretary of State.

I therefore believe that North East Thatcham is of poor siting with regard to any proposed development, causing detrimental impact on both the historical importance of ancient woodland, Bucklebury Plateau and AONB, alongside the segregation from Thatcham's built form. I also believe that any development to the north-east of Thatcham will contradict the outlined policy noted above regarding separation between individual settlements, as any development will adversely amalgamate Thatcham, Bucklebury and Cold Ash. Were the LPA to amend the Settlement Boundary to include the development areas, this amendment would solely be to facilitate the proposed development, undermining the intrinsic values outlined within the LPA's own policy.

Countryside, Greenfield and Brownfield Sites

Required under The Town and Country Planning (Brownfield Land Register) Regulations 2017, publicly available data provided by West Berkshire Council Brownfield Land Register (Part 1)_2022 update states that, when published, there were 79 brownfield sites within the district with a minimum net dwelling total of 3,592 houses across a total of 59.87 hectares. Further, as published by MHCLG, West Berkshire currently have 802 long-term empty homes. The NPPF also promotes the use of brownfield sites prior to any development within open countryside or green field locations.

Thatcham's Strategic Growth Study for West Berkshire Council stated that, *“Thatcham’s attractiveness as a place to live is strongly rooted in its high quality surrounding countryside”*. It goes on to state, *“it is important to note that Thatcham has few examples of hillside development and so extending the urban grain and pattern of the immediate surroundings is unlikely to achieve a positive result”*. The

Strategic Growth Study was instructed, prepared, and obtained by West Berkshire Council though it appears the proposed development's siting is a brazen contradiction to a principle finding, referenced above, either being ignored or disregarded by the WBC LPR.

Section 4.2 of the West Berkshire Local Plan Review 2022-2039 states, *"The NPPF promotes the effective use of land including re-using previously developed land, encourages higher densities in urban areas of high housing demand and refers to the need to release small and medium sized sites for development"*.

The NPPF also states under paragraph 119 that planning policies should promote an effective use of land, *"while safeguarding and improving the environment"*. Under paragraph 120 the NPPF states that policies should, *"give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land"*.

The North East Thatcham development site is outside the settlement boundary, rural, within open countryside and of high quality agricultural land. I therefore disagree that the site could ever follow the existing grain of Thatcham built form, does not promote effective use of land, and does not safeguard or improve the environment.

Although the LPR mentions it will mitigate against any environmental impact, most Local Authorities do not have sufficient SANG allocations. To improve the biodiversity of an already thriving natural habitat, one that benefits from mature hedgerows, ancient woodlands, agricultural and wild fields, natural ponds, streams to name but a few, I'd argue that the development would never be able to meet any biodiversity net gains required.

Further, the proposed site makes no attempt to utilise the Local Authority's existing empty and brownfield stock which are far in excess of the unit numbers proposed within the WBC LPR and already have infrastructure. More appropriate sites are therefore available for redevelopment.

The Masterplan Concept also failed to depict the location of an existing Public Right of Way, walked frequently by Thatcham residents. Although a footpath may be redirected under a Public Path Diversion Order governed by requirements set out in Section 119 of the Highways Act 1980, it is believed that any built form or diversion of this public footpath would be detrimental to public enjoyment, distance and views.

Transport

The A4 is a major road connection between Reading and Newbury, with connections to the M4 at J12 and J13 respectively. Based on data obtained from the 2011 Census, Thatcham Strategic Growth Study, Stage 1 Report, Table 8 stated that 79% of people travelling from Thatcham and 70% travelling to Thatcham use a car, with large delivery lorries frequently travelling to and from Harrods and Forterra depots within the Colthrop Industrial Estate. This, in addition to through traffic means that the A4 is an extremely busy highway.

West Berkshire Council's Local Plan Review Transport Assessment Report Phase 1, Table 5.3 outlined traffic forecasts and scenarios for the junctions close to the new development. An assumption can only be made that the data was obtained around the time that the report was dated and thus during

the COVID pandemic, as the information disclosed is a misrepresentation of reality. The forecast and scenario table within the Transport Assessment provides a disingenuous representation of pre-COVID congestion issues in addition to the table being void of east bound data at Bath Road – Piper’s Way and Bath Road – Floral Way. During peak times, vehicles along Floral Way attempting to travel east bound on the A4 always experience delays far greater than 50+ seconds, with instances of congestion, not caused by accidents, exceeding 15-minute delays and traffic backing up to Harts Hill road roundabout. The development will link to Floral Way and the A4, roads that are already exceeding capacity.

The Highway Strategy states that traffic will be directed towards the A4, relieving the ‘rat run’ of traffic through Cold Ash and Bucklebury. However, historically during high congestion, Harts Hill road becomes the main thoroughfare for many vehicles avoiding the A4 traffic. In addition, the proposed development locates an exit at the north of the site leading directly onto Harts Hill road. The Transport Assessment states, *“the access arrangements for the northern end of the NET site proposes new priority junctions on both Floral Way and Harts Hill road... Results from the modelling suggest that these will not cause problems”*. However, the document has no modelling results for this junction. Due to Harts Hill Road being a narrow and steep highway, with high embankments and hedgerows, it is a fast and already dangerous road, especially for cyclists and pedestrians due to no pavement. An increase in traffic onto Harts Hill road will not only directly affect the existing residents in The Spinney and Farmhouse Mews, but greatly affect those in Upper Bucklebury due to heightened numbers of commuters using the network of rural roads as a thoroughfare. This is extremely concerning for young families such as myself, as a dangerous, over congested road will become even more dangerous.

Statista Data 2017/18 states that on average there are 1.4 cars per household, therefore a development of 2,500 households will provide an increase of circa. 3,500 cars on an already overloaded local road network. Where West Berkshire’s Parking Standards are adhered to, any development would be greatly over the estimated figure of 3,500 cars noted above.

The Strategic Environmental Assessment (SEA) notes under SA Objective 4 that any development should, *“promote and maximise opportunities for all forms of safe and sustainable travel”*. Thatcham Strategic Growth Study also indicated that, *“walking, cycling and public transport must become the natural choices for getting around”*, though this contradicts Stage 1 Report Table 8, noted above; reports also show that car usage has increased within West Berkshire therefore the statement is not accurate. Noted within West Berkshire Council’s Local Plan Review 2020-2037, Item 4.9 *“both towns have significant employment provision and Newbury provides many of the major services, including retail and leisure facilities. There is significant movement between the two towns and transport linkages, by rail and road are vital.”* This further contradicts the Strategic Growth Study. Additionally, although the Colthrop Industrial Estate will be within walking distance of any proposed development, the ‘thriving’ estate is not the sole source of employment with the majority of any new development commuting to a place of work, typically and as stated in the evidence above, by car.

To improve the safety of the roads, additional traffic lights will need to be introduced of safe means of crossing. This will slow down traffic causing further congestion on the roads, especially during work commuting, school drop off and pick up times.

The Thatcham train line is a major connection between Newbury and Reading, towards the south-west and London respectively. The line is also frequently used for freight trains, and with only a level crossing this is already a major cause for congestion throughout the day. There is no plausible location

to introduce a bridge at Thatcham station therefore an excessive increase in vehicles will only further antagonise this issue.

The proposal also identified a new bus route to run immediately behind the properties of Farmhouse Mews. The gardens of Farmhouse Mews were designed and covenanted to be a sympathetic transition between residential built form and agricultural land beyond, as such all the properties only benefit from post and rail low level fences. Were a new road and bus route proposed, all privacy and security to the garden and rear facing rooms would be significantly compromised. This covenant also highlights the Local Authority's previous understanding of the setting, that being rural countryside, thus the proposed development is a further contradiction to their reasoning and views.

Flooding

Tributaries to the River Kennet, flowing south through Thatcham, have historically increased surface water run-off to a point of excess, causing the river banks to burst, flooding extensive areas of residential and agricultural land to both the north and south of the river. The Risk of Flooding from Surface Water map B2 drafted from 2018 data, denotes localised 1 in 30 year flooding along all tributary streams, especially those located to the west of Farmhouse Mews and The Spinney. Although measures have been implemented by means of the Flood Prevention Scheme to prevent future flooding to Dunston Park, existing agricultural land between Floral Way and Park Farm are periodically water-logged.

The properties along Farmhouse Mews that border the fields to the north, [REDACTED] were constructed with land drains along the field boundary to try and prevent run-off from the fields entering the curtilage. Gardens however frequently become sodden, with garden retaining walls showing signs of significant water retention.

Although any new development would benefit from Sustainable Drainage Systems (SuDS), these systems only lower flow rates by means of increasing water storage or diverting to lower risk areas. Where partial percolation of surface water delays the immediate impact on local waterways, extensive periods of rainfall will overwhelm the systems. Drainage systems must either discharge into local waterways or into the ground. With global warming causing flash floods to happen more frequently, systems will not be able to discharge due to waterways being at full capacity in addition to high water tables (caused by prolonged rainfall), ultimately causing flooding.

There is no mention within the LPR or publicly available evidence to support that the previously implemented flood prevention scheme north of Farmhouse Mews would have the capacity to cope with the increased number of houses and surface water. Thames Water have also not confirmed that they could accommodate the increase in both surface water and foul drainage.

The LPR notes under 5.27 that green roofs and permeable surfaces should be used though in principle, neither are a viable option on a large scale development. Seldom is the case that 'permeable paving' is porous itself, rather the joints are left permeable therefore the vast area of hardstanding is still impermeable.

An extensive increase in hardstanding generated by any new development, the discharge of surface water will only increase in both speed and thus volume, putting the properties along the northern

boundary of Floral Way at severe risk of flooding. Flood History data also notes that 1,107 properties within the Thatcham area had internal flooding, source of which was surface water.

Education

The provision for education from Nursery, Early Years, through Infant to Secondary education is not clearly defined within the LPR. This is therefore in breach of the Council's obligations to provide education facilities for children. This lacking of information causes further worries regarding the number of vehicles and traffic on the highways, with a fair assumption being that many households will have to commute to schools due to those proposed or already in existence having insufficient capacity to cope with the huge spike in population.

There are no details within the LPR of any provisions for Nursery or Early Years education. Nursery places are seldom available, with those that are accepting new attendees favouring full time children over that of part time due to high demand. A new development of 1,500 plus houses will push an already stretched educational system to breaking point. As the LPR does not outline how these measures will be mitigated, it can only be assumed that they won't, leaving parents with the dilemma of work or care. No nursery and school spaces for children will ultimately result in more parents, especially single parents, turning to benefits to mitigate the situation.

The provision for Primary school and Secondary school education is also unclear and contradictory. Developer contributions have been noted within the LPR, £12M for Primary and £15M for Secondary, though no recent data has been referenced to justify these figures. Due to the Kennet School being landlocked within a residential estate, it has no ability to further expand. 4.83 notes, *"The study has not engaged in a detailed demographic prediction and modelling exercise to determine future primary and early years educational demand across the town, and has not attempted to predict the long-term capacities of existing schools"*. The LPR therefore sets no locations for any school, no timing for funding to be provided, no evidence that the funding is sufficient for the requirements, no parameters as to what the schools must abide; fundamentally West Berkshire Council have not defined or evidenced their obligation as an educational authority how arrangements for suitable schooling provisions will be met.

"Fulfilling Community Objectives"

The Thatcham Strategic Growth Study Phase 3 report by David Lock Associates stated within its Summary of Findings, that a concept masterplan for developing north-east Thatcham has been developed building on principles established at a community representatives' workshop. Unsure of who these representatives are and what their links are to the area, it is hard to believe such a large-scale development is fulfilling community objectives. The Thatcham Town Council Liberal Democrat representative, Cllr David Lister, is strongly against the development from happening, residents who would be directly affected by the development alongside many within the Thatcham community are also strongly against the development, with a petition started to voice their objections. The development's consultation period was launched just before Christmas 2019 but was not widely advertised, therefore many residents were unaware of the consultation or the development itself taking place. With such a short time frame to respond to Regulation 18, it allowed little time to review the documentation drafted and respond with any objections prior to the consultation deadline. Thatcham community were not given adequate time to respond to the proposal and object accordingly, therefore it is imagined that any response received did not give a true representation of the thoughts of the residents.

Size, Density and Tenure

Stated within the Local Plan Review 2020 -2037 under Policy SP18, *“residential development will contribute to the delivery of an appropriate mix of dwelling tenures, types and sizes to meet the existing and future housing needs”*. Also stated within the LPR under Housing type and mix, Item 6.66, Table 3, the size in highest demand for market value properties is 2-bedroom at 40-45%, with affordable housing also being 2-bedroom properties at 35-40%. The plan also mentions that there should be a broad mix of future dwelling sizes for both market and affordable housing, however this appears to be seldom the case with recent developments within the local area. Reed Gardens in Woolhampton for example appears to have delivered 14 affordable houses, though only 2 of those properties being 2-bedroom, the highest in demand, with the remainder being 3 and 4-bedroom properties. Additionally, recent developments within Settlement Boundary could have increased density without negative impact on the development or surrounding context. As such, had recent developments delivered properties of a size to meet those highest in demand, and/or provided a density of scheme appropriate for its location within Settlement Boundary, the requirement for new housing may be fewer than the 1,500-2,500 proposed.

The 2011 ONS Census states that there were 10,241 dwellings in Thatcham. The number of new units proposed at the north-east Thatcham development would mean an increase to Thatcham of nearly 25%, an excessive number that neither the infrastructure or surrounding landscape would cope with. Tull Way for example consists of only 75 properties however exceptionally low density when compared to the site’s area.

I, along with many other residents of Thatcham object to the extent of the North East Thatcham Development, specifically to those affecting the Harts Hill Road and Harts Hill Farm area. Resulting from a huge increase in traffic numbers I worry for the safety of children. A lacking provision of education further increases the number of cars on the roads, increasing traffic, pollution, noise, and accidents. A development will greatly impact the AONB, ancient woodland and open countryside regardless of mitigations.

I therefore hope that West Berkshire Council reconsider the proposed Housing Site Allocations and look to locate the houses required in a more appropriate, brownfield or within Settlement Boundary area, not within open countryside.

Regards,
Mr Hope

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