

Bucklebury Parish Council strongly **OPPOSES** the proposed development of up to 2500 houses at North East Thatcham (SP 17). BPC has held four public meetings to brief parishioners on the proposal. Their subsequent representations to WBC, copied to BPC, have been taken into account in making these comments.

The main themes of our objection may be summarised as follows:

Flawed housing demand analysis

The analysis of housing demand predicated this draft proposal relies on out-of-date information. It fails to take account of the most major medical, social and economic catastrophe to impact our lives in the last 100 years. The Covid – 19 pandemic has transformed the way people work, travel and their housing needs yet this factor is ignored in the proposals. Furthermore, taking WBC's own housing demand figures, these show a need for less than 1700 homes not the 2500 proposed.

Strategic Gap

A tenet of past planning in West Berks has been the maintenance of strategic gaps to separate communities. Until this proposal was tabled, the land north of Floral Way has provided the gap between Thatcham and Bucklebury. The proposal all but eliminates the separation and would visually and socially break natural community boundaries. Breach of the strategic gap has been cited by WBC to refuse planning applications in the recent past. It is incomprehensible that its loss is now proposed.

Traffic

A development of the scale proposed would generate considerable traffic but the analysis in the proposal underestimates the volume and impact on the Parish. It is assumed that the bulk of the new traffic would use the A4, accessed via Floral Way. However, the A4 is already overloaded at peak times and new residents would look to find alternative routes. These inevitably would be through the Parish for those looking to access the A34 and the M4. The roads through these villages are ill suited to additional traffic; they are rural, single carriageway roads mostly lacking footpaths and featuring blind bends. Speeding is a well-known problem in the Parish and more cars would make a dangerous situation worse. The village roads are used by pedestrians, horses and cycles. Additional traffic makes accidents more likely and would endanger children walking to school.

AONB and The Common

The proposed development abuts Bucklebury Common and AONB. This development would have a lasting and negative impact on these special environs. The impacts fall into two categories; those that impact the AONB directly and those resulting from the inevitable increase in visitors. The Common is protected because of its flora, fauna and its situation. It contains remnants of ancient and fragile habitats that are home to rare and protected wildlife. Importantly the plants in and bounding the AONB would suffer and the Common would be put under pressure from additional visitors. The AONB is already witnessing habitat damage from walkers, cyclists and motorised vehicles. The visitor numbers, from the proposed development, would exacerbate damage to a struggling ecology.

Pollution

The development would generate extraneous light that would upset the life of birds and mammals; they cannot adapt and would be driven from their habitats. This light pollution would also affect the residents of Bucklebury by spoiling their night sky. The volume of homes proposed would generate pollution from carbon emissions and those associated with population density. The clean air of the Common would be a thing of the past.

The following are the major reasons for objection of BPC and are listed against the SPs of the Local Plan.

1. North Wessex Downs AONB (SP1 & SP2)

This proposal offers none of the required protections to the AONB, and in fact is active in massive development right to the AONB's boundary. By proposing it, WBC is failing in its stated Objective to protect this Nationally defined area.

There is a certain irony that one of the two HELAA sites in Upper Bucklebury was rejected because of its potential harm to the natural beauty and special qualities of the AONB. This rejection was entirely within the protections that should be afforded to the AONB, and WBC's development hierarchy; however, instead WBC suggests that 2,500 houses a stone's throw from that same boundary will have less detrimental effect to those special qualities and natural beauty.

There have been many pages written on THA20, but they are all Thatcham-centric; very little, if anything has been put forward about the direct and devastating effect of this development on Bucklebury.

WBC is required by its own Strategic Objectives to "...conserve and enhance the North Wessex Downs AONB." Strategic Objectives "represent the key delivery outcomes that the Local Plan Review (LPR) should achieve and it is against these objectives that the success of the LPR will be measured." Failing to protect the AONB means that the entire Local Plan would have in effect failed.

Paragraph 4.23 of the LPR states: "The primary purpose of AONB designation, 'to conserve and enhance the natural beauty of the area', is set out in the Countryside and Rights of Way Act 2000. its natural beauty is a function of the relationship between people and place over time. ...It is inevitable and appropriate that this unique landscape will continue to change and develop but it is important that this is done in a way that conserves and enhances its special qualities. Under Section 85 of the Countryside and Rights of Way Act 2000, the Council has a duty to have regard to the primary purpose of designation ... in a manner commensurate with its statutory status." WBC is reminded of this requirement; it is duty bound to protect the AONB. The provision of a country park, or a 25m buffer zone, or the measurement of sight lines from the valley floor is, quite simply, completely inadequate. Instead, the proposal considers AONB protection to involve massive traffic increases on rural roads, increased noise and pollution, removal of boundary habitats and hunting grounds for local species, and the complete eradication of dark skies.

SP2 states "Development will respond positively to the local context, conserving and enhancing local distinctiveness, sense of place and setting of the AONB. The strong sense of

remoteness, tranquility and dark night skies.... should be preserved. The conservation and enhancement of the natural beauty of the landscape will be the primary consideration in the assessment of all development proposals.” The AONB would clearly be adversely affected by the proposal; whilst a wood boundary might prevent day time visibility, urban lights would blight the dark skies within the AONB that WBC is charged to protect. Setting and remoteness would be completely lost given the dramatic increase in road traffic that the proposal would generate.

Whilst the development is not within the AONB, the sentiment is still valid; “Developmentin a manner commensurate with the statutory status of the AONB as a nationally valued landscape. Planning permission will be refused for major development ...the Council will consider whether the development, by reason of its scale, character or nature, has the potential to have a significant adverse impact on the landscape and scenic beauty of the AONB. This will include the consideration of the individual characteristics of a proposal and its context and the impact of cumulative development.” It is obvious that this development by its size and proximity would have a significant detrimental effect on the AONB, and WBC is therefore beholden to discount it.

THA20 is development within the open countryside, and Policy DC1 adds further weight to its folly. Policy DC1 states: “There will be a presumption against new development outside of adopted settlement boundaries. It goes on to say: “Planning permission **will not be granted** where a proposal harms or undermines the existing relationship of a settlement within the open countryside, where it does not enhance the character and distinctiveness of the rural area, including the special qualities and natural beauty of the landscape of the AONB or where development would have an adverse cumulative impact on the environment or highway safety.”

9.1 states “Policy SP1...makes clear that only appropriate limited development in the countryside will be allowed” and is expanded in 9.2 “...land outside of settlement boundaries will be treated as open countryside where there is a presumption against new development. ...the conservation and enhancement of the North Wessex Downs AONB and its setting is clearly a key consideration. ... appreciation that all countryside will have some such qualities means that it needs to be protected or safeguarded.

Policy DC4 states: “...In ensuring a site is suitable for development proposals should satisfy all of the following criteria: There would be no harm to the amenity of occupants of neighbouring land and buildings.... through an unacceptable increase in pollution, including from light,... Where necessary suitable mitigation measures will be put in place;” Obviously the neighbour of the development is the AONB, and there are no mitigations for the unacceptable increase in light pollution that the proposal would bring. As light is specified as a form of pollution, Policy DC6 is categorical: “Development which would overload available facilities and create or exacerbate problems of flooding or pollution **will not be permitted.**”

The Thatcham Strategic Growth Study (TSGS) offers little assessment of the damage THA20 would cause to the AONB, apart from acknowledging that the AONB partnership has objected to it, and that there is “little intervisibility between the two if an appropriate buffer is included in any proposals.” (2.47) This hardly cover the effect the development would have on the AONB. The document goes on to say “The link with the North Wessex Downsis less strong” and then promotes links as a benefit for the town, with absolutely no

consideration of the impact on the AONB.

WBC is well aware of the negative impact on the AONB. The Site Selection Background Paper December 2020 Table 8.2. Site CA12 (pg21) (and later CA sites) states: “It is the Council’s preferred approach to allocate site THA20 as a strategic site. Due to the scale of development that could take place on THA20, it is considered that there should be no further allocations in Thatcham in the period to 2037 particularly as development of both north east and north Thatcham would result in the loss of the separate identifies of Cold Ash and Bucklebury, and would harm the setting of the AONB settlement pattern.”

This clearly states that by developing THA20 WBC is accepting that the separate identity of Bucklebury would be lost and there would be definite harm to the AONB setting.

In short, all evidence points to the inappropriate nature of this proposal. It would have a direct and irretrievable negative impact on the AONB. WBC are charged to protect the AONB, and should reconsider the positioning of THA20 as a viable site.

2. AWE Aldermaston and Burghfield (SP 4)

It is unacceptable for only four sentences in clause 6.22 of a 250 page document to be devoted to WBC’s decision to withdraw from the proposal to build a garden town at Grazeley Green. We think it incumbent on WBC to publish the information and justify the decision to make this change.

The result has caused WBC to find this alternative proposal for 2500 homes in Thatcham which has evidentially been rushed and poorly thought through.

It would seem that Reading Borough Council and Wokingham District Council have not taken the same view. It is interesting to note that the press announcement was made on 11th December 2020 about the possible withdrawal over concerns from a nuclear energy emergency and a change to the DEPZ, the same day as this consultation commenced.

WBC was working on alternatives long before any public awareness of problems with the Grazeley site and changes to the DEPZ.

3. Climate Change (SP 5)

WBC have included addressing Climate change as a major objective. This is further developed in Policy SP5. However, it is noted that whilst “the principles of climate change mitigation and adaptation will be embedded into new development...” (SP5), development only ‘should’ contribute to WBC’s carbon targets. Development “will be expected” to contribute positively to carbon reduction, the plan contained in Thatcham Strategic Growth Study Stage 3 was extremely limited in the coverage of carbon neutrality and the effects of Climate Change.

Given the scale of the development, the proposal should be expected to fully comply with the requirements of SP5. The Thatcham Stage 3 document is very sketchy on this area, and only seemed to note the inability of WBC to “... to force this in detailed building regulations.”

Policy SP17 states that the proposed site will be expected to deliver “on-site renewable energy to assist in the delivery of a carbon neutral development.” Policy DC3, 3.A requires a minimum provision of 20% energy from renewable sources. Policy DC3, 3.B states that WBC will support renewable energy applications if they are suitable for the area, are accompanied by a landscape assessment, and cause no harm to residential amenity. Given that any form of required renewable energy generation will have a highly detrimental effect on local amenity, the proposal fundamentally fails to address this requirement. There is no mention of this in the Thatcham Stage 3 document.

Policy SP5 requires developments to provide for “...sustainable forms of vehicular and personal transport...” Given the inadequacy of the transport plan included in the proposal, it is felt that this requirement is far from being met. Thatcham’s roads are already often gridlocked at peak times, the railway station and services inadequate, and people are unlikely to walk into the town centre further applying pressure to local roads. Local schools will increase traffic pressures, and rat running onto inefficient roads will be prevalent. All of this increases carbon generation, rather than reduce it.

The proposal allocates two bullet points to “Net Zero Carbon Development” and again is woefully inadequate in this area.

Fundamentally, the plan fails to address the detail of how it would meet WBC’s Climate Change requirements.

4. Flood Risk (SP 6)

The proposal fails to meet with WBC specifications regarding Flood Risk.

Policy SP6 states that:

- “Development within areas of flood risk from any source of flooding, including Critical Drainage Areas and areas with a history of fluvial, groundwater or surface water flooding will only be accepted if it is demonstrated that it is appropriate at that location, **and** there are no suitable and available sites at a lower flood risk.”

- “Mitigation measures should be considered as a last resort to address flood risk issues....”

- “Development will only be permitted if it can be demonstrated that:
...it is demonstrated that the benefits of the development to the community outweigh the risk of flooding...It would not have a detrimental impact on the flow of fluvial flood water, surface water or obstruct the run-off of water due to high levels of groundwater.”

- “When development has to be located in flood risk areas:
It will be safe and not increase flood risk elsewhere;”

5.9 “...This policy aims to achieve a planning solution to flood risk management wherever possible, steering vulnerable development away from areas affected by flooding.”

5.13 “The NPPF directs development away from areas that are liable to flood...”

Flood risk is a significant threat to Thatcham, and so, by interpretation of WBC's own SP6, development at Thatcham NE is not appropriate. There are available sites at lower flood risk, and so the "and" requirement is not met. Mitigations **may** be possible, but they are a last resort, and the site will increase flood risk in the town. By WBC's own requirements, THA20 is an inappropriate site. Also, DC6 states that: "Development which would overload available facilities and create or exacerbate problems of flooding or pollution **will not be permitted.**" There can be no doubt that the introduction of 2,500 houses and associated infrastructure will exacerbate problems. Both DC6 and SP6 point to the inappropriate nature of this site.

TSGS even reinforces these arguments:

- 2.48 "Flood risk and surface water drainage is a key consideration...particularly so within the town of Thatcham where extensive surface water flooding was experienced in 2007."
- 2.51 "There is a risk of surface water flooding within the site along the natural drainage routes based on Environment Agency modelling"
- 2.52 "The extent of surface water risk to the site is highest at the north-western end of the site, known as Dunston Park"
- Box 4.2 "An essential issue to address for development at North East Thatcham is the management of surface water runoff."
- 4.8 "Management of surface water drainage is a key concern for development on the slopes above Thatcham"

Furthermore:

- For a development of this size it is clear that the flood risk to the site and subsequent impact on flood risk to the downstream areas of Thatcham (designated as nationally significant 'Flood Risk Area for surface water flood risk within the 2018 Environment Agency Preliminary Flood Risk Assessment') have not been considered. The LP references the Strategic Flood Risk Assessment (SFRA) for how flood risk will be assessed for this proposal, however there is very little mention of this proposal and no known local plan site screening has been published for this proposal in the 2020 review.
- The SFRA also states that 'Areas at risk from surface water or locations at risk of groundwater emergence should be protected from development to ensure flow routes are not blocked.' As outlined in the SFRA this proposal site is underlain by clay and therefore is highly susceptible to groundwater emergence. The areas downstream of the site are identified as at high risk of surface water flooding. If this development were to go ahead it would contradict what it outlined in the supporting SFRA.
- As per the National Planning Policy, priority should be given to sustainable drainage. In the LP there is no evidence in the plans proposed of where SuDS will be placed within the development area. As it states within the West Berks SFRA, 'flood risk should be considered at an early stage in deciding the layout and design of a site to provide an opportunity to reduce flood risk within a development'. It is clear that this has not happened.
- The LP states on page 64 that the proposal will incorporate Surface water management approaches that could deliver net gain for Thatcham town. There is no justification for this statement or any evidence provided to substantiate this claim.
- From the initial look of the LP document it seems clear that flood risk for THA20 and the subsequent impact of flood risk to Thatcham has not been considered as it does not reference

the TSGS study. For full transparency the information included within the TSGS is included or at least referenced within the LP to provide evidence to claims made in the LP with regard to flood risk.

- The site of THA20 is currently a greenfield site and the development will be subject to meeting the greenfield runoff rate. WBC state new developments must limit runoff to below greenfield conditions. It is especially important at this site that the runoff rates are not under predicted. It should be noted that there are a number of factors not taken into account in the national greenfield runoff rate figure which can result in under prediction of runoff rates from a site. These include the vegetated land characteristics e.g. grassland, woodland, farmed land and the gradient of the site. Both of these are key to this proposal due to the elevation of the land proposed for development and the removal of trees which currently intercept flows of both surface and ground water. An increase in flood risk to an area that is already identified as a nationally significant flood risk area for surface water flood risk is unacceptable.

Whilst flooding of Thatcham does not have a direct physical impact on Bucklebury Parish, to not refer to obvious shortfalls in the proposal in this regard would be remiss of BPC.

5. Design Principles (SP 7)

Quality Development is a WBC strategic objective, which is expanded in Policy SP7. The proposal fails to describe how it will meet its WBC's objectives, mainly because it does fail to achieve WBC's stated objectives.

For example, developments are expected to "...conserve...and enhance the character, appearance...of an area," "enhance the landscape character," and "contribute to local distinctiveness and sense of place."

Developments should be "...sympathetic to its setting...night and day visibility...." This proposal will further destroy any chance of dark skies and will be highly visible and intrusive from the rural areas surrounding it.

(5.27) "New development should begin with an understanding of an area's existing character and context "...Development should complement and enhance existing areas ...to reinforce local identity and to create a sense of place ...contributes to the character of an area..." The proposal will take rural farmland and turn it into an overwhelming urban area. This is not sympathetic development, but riding roughshod over the very characteristics that elevate West Berkshire.

Thatcham Stage 3 (4.5) "...Thatcham has few examples of hillside development, and ...is fundamentally a linear settlement, built along the Kennet Valley..." The proposal builds up into the hills and fundamentally goes away from development that enhances the local area.

It should be noted that WBC has a predisposition for not building into the countryside. This development will require the breaching of the Thatcham settlement boundary. As quoted in the Thatcham Stage 3 document, key principles of the WB LCA are:

- Conserve and strengthen existing boundary elements
- Retain the distinction between and individual identity of settlements
- Conserve elements that mark a transition between settlement and countryside (eg Floral Way)

It would appear that any amendment of the Settlement boundary to allow the development at Thatcham NE will have broken at least two of those principles.

The proposal aims to produce 3 linked villages. This design philosophy goes against the often-stated West Berkshire (including in the LCA) landscape characteristic of distinct villages, with a quantifiable gap between them. Addressing this issue in a way that is sympathetic to the local area will generate other problems (eg transport), that all point to the inadequacy of the basic plan.

6. Landscape Assessment (SP 8)

Inadequate landscape assessment and use of higher grade agricultural land.

- Any landscape assessment would not conclude a series of estates of new houses totalling 2500 between Upper Bucklebury and Thatcham was appropriate in terms of location, scale and design to the existing landscape. It would not enhance either the diversity or local distinctiveness of the landscape.
- The proposed development is contrary to Bucklebury Vision, the Parish Design Statement, which states at 3G2 that the natural beauty of the landscape, visual quality and amenity of the area should be conserved and enhanced.
- Building on some of the best and most versatile agricultural land goes against WBC's policy of focusing development on brownfield sites and low-grade agricultural land.
- In contrast to the rest of Thatcham, there is very little flat land within the site, and some areas of the site close to the northern edges have steep gradients which would be difficult to develop effectively without significant earth movement. Low gradient land is concentrated at the southern edge along the A4, although almost no parts of the site are below 2% gradient. Flat land in the north-western part of the site is predominantly covered by a recently-constructed surface water attenuation pond. The low gradient land at the southern edge of the site is also compromised by the presence of an oil pipeline over which no development is possible for access reasons. (TSGS)
- A detailed skyline and impact analysis has not been undertaken, although a landscape and skyline analysis by the partnership's consultants has been shared and informed this study. All proposals should be further substantiated with detailed impact assessments. (TSGS)

7. Green Infrastructure (SP 10)

The proposal fails to meet a WBC core objective of protecting and enhancing existing landscape features and biodiversity habitats.

The development would obviously require the removal of vast tracts of undeveloped green land containing mature trees and a vast hedgerow network. This would remove large areas of animal habitat, with little actual detail on how this would be matched and surpassed. Thatcham Stage 3, 2.60, does state that there would be a "net gain in biodiversity," which is difficult to see happening in practice.

2.62 goes on to say that “All efforts to retain such distinctive landscape features (mature trees and hedgerows) and biodiversity habitats should be made.” 2.63 acknowledges the presence of protected species, priority species and priority habitat near the site, though nothing is added as to how these would be protected, and even admits that more detailed surveys are required as the information and effects are basically incomplete, and inadequate.

Policy SP10 states: “Development will protect and enhance existing GI assets and linkages and add to the local network for the benefit of both the natural environment.” Removal of vast tracts of hedgerow, mature trees, the butting of the development 25m away from ancient forests will not meet this requirement in any form.

SP10 goes on to say “Depending on their location, nature and scale, all development proposals will: protect or enhance existing GI and the functions this performs, and create additional GI...” and “help to mitigate the causes of and address the impacts of climate change through measures such as sustainable drainage, minimalizing (sic) urban heating, flood risk management, and maximise GI to sequester carbon and provide cooling and insulation functions” There are no proposals to protect existing GI, and no indications of how climate change will be addressed through carbon sequestering, urban heating reduction etc.

While the developers’ proposal provides for a “country park” and green space, this comes at a cost to our irreplaceable natural habitat, and threat to our protected and endangered species. The site would not protect and enhance what is already there, and as such fails in the requirements of WBC Strategic Objectives and enabling policies. Instead, the proposal (Thatcham Stage 3 4.53) puts forward that “The site offers the potential for significant biodiversity enhancement over its current land uses” but does not specify how these would be achieved.

8. Biodiversity (SP 11)

BPC strongly objects to the proposed housing development which would have a catastrophic effect on biodiversity in Bucklebury and surrounding area. Many longstanding residents live here specifically for the biodiversity.

The following areas which abut or overlook the proposed THA20 development will suffer:

- North Wessex Downs Area of Outstanding Beauty. Designated exceptional landscape whose distinctive character and natural beauty are precious enough to be **safeguarded in the national interest.**
- Common land – Bucklebury Common. The Common land is unique, historical and has remained largely undisturbed through centuries, a remnant of medieval times when people relied on commons for their survival. With increased numbers of visitors during the Covid 19 crisis, and illegal use of 4 x4s, we are already struggling to prevent damage, and the proposed development would put more pressure on this precarious ecosystem.

- Blacklands Copse – parts of which are Ancient Woodland. The ancient Parish Boundary with its ditch and bank.
- Long Grove Copse. Ancient semi-natural woodland (OS map ref: SU56J10)
- Big Gully. Ancient woodland (SU56J06)
- Hartshill Copse (SU56J04) Historic environment. Record type: Monument. Late Bronze Age ironworking site. Cremation burial site and Roman ditch defined trackway.
- The Plantation (SU56J01) – Ancient woodland.

Government Habitats’ Regulations Imperative Reasons of Overriding Public Interest (IROPI) where a plan or project affects a priority habitat or species. Maintaining a coherent network of protected sites with overarching conservation objectives is still required in order to: fulfil the commitment made by government to maintain environmental protections; and continue to meet our international legal obligations such as The Bern* Convention, the Oslo & Paris Conventions, Bonn & Ramsar Conventions.

*Wildlife & Countryside Act part II Nature Conservation, Countryside (& National Parks) SSSIs Natural England to notify planning authority, owner(s), occupier(s) of any of that land, & Secretary of State. Also, to be specified (a) the flora, fauna or geological or physio-graphical features by reason of which land is of special interest and (b) any operations appearing to Natural England to be likely to damage that flora & fauna or those features. The proposal is too close to the above listed areas.

Special Protection and Suitable Areas of Natural Greenspace are needed to increase our biodiversity, residential development needs a greater buffer between these and AONB and Common Land in an effort to protect our local wildlife.

Natural England. Wildlife and habitat conservation.

Badgers: Surveys and mitigation for development projects. Survey reports and mitigation plans are required for development projects that could affect protected species. Survey for badgers: signs of setts – development site or nearby. (Bucklebury Common has badger setts). Historical or distribution records show that badgers are active in the area or suitable habitat for sett building. You cannot translocate badgers for a development site. Badgers habitat is a mixture of woodland and open country. Territory may be as small as 30ha and up to 150ha.

Bats: The law: not damage or destroy a breeding or resting place, obstruct access to their resting or sheltering places. Intentionally or recklessly disturb a bat while it is in a structure or place of shelter or protection. Activities that can harm: removing ‘commuting habitats’, hedgerows, water courses, woodland. Changing or removing bats’ foraging areas. (Pipistrelle bats are regularly to be seen at Burdens Heath).

Hazel dormice: These protected and under threat species can be affected by: disturbance, e.g. noise and light, woodland and hedgerow management, habitat removal, clearing woodland and hedgerows, habitat fragmentation and isolation. (Dormice are known to inhabit Bucklebury Common).

Birds: Nightjars, woodlarks, skylarks, tree pipits and stonechats as well as common species live on the Common. Ground nesting birds are significantly affected detrimentally by the

presence of dogs even on leads. Barn owls, tawny owls and buzzards live and nest in the woodland and hunt in the surrounding open spaces.

Plants: Bluebells, orchids and other plants which grow in long-undisturbed situations show us that there are many patches of ancient woodland, contributing to Bucklebury's biodiversity. All the above species are in the AONB and Bucklebury Common. It is incumbent upon West Berkshire Council and developers to ensure all measures, studies and licences are implemented.

No178 English Nature Report on the effects on wildlife of artificial lighting:

Nocturnal animals and birds such as barn owls are likely to be disturbed by the presence of bright illumination. As these are already under threat, this may be significant pressure on remaining populations.

We have a 'dark skies' policy in Bucklebury. The proposed development would change this aspect of our lives and have a detrimental effect on biodiversity.

9. Approach to Housing Delivery (SP 12)

The world has changed in the last 12 months. We need to re-look at the assumptions on which plans were previously based to see if they are applicable now and if they will be relevant in the future.

Housing Needs

The local housing needs assessment requiring 520-575 dwellings pa to be built needs to be revisited in the light of changed circumstances. This target was set before the onset of the pandemic, the focus on rebalancing the economy and the UK's exit from the EU. We are already seeing changing working practices and higher rates of unemployment. There will be lower disposable incomes for many after tax rises to pay for the huge cost of the pandemic. The housing need methodology does not take account of the loss of the Grazeley site. Taken together all these new factors are highly likely to reduce the housing need in West Berkshire and call into question the numbers of houses required in Thatcham (THA20) to satisfy that need. Furthermore, the Government published the new standard method for assessing local housing need in December 2020. This included a spreadsheet containing the indicative figures for each local authority in the country. The figure for West Berkshire is 513 dwellings per annum.

Housing Supply

The requirement was to provide a land supply for approx. 9775 houses until 2037 now **8,721** under the December 2020 calculation. According to the consultation document 8,114 have been identified excluding the proposal for NE Thatcham (THA20).

WBC's calculations have used approximately 114 houses per annum as windfall. If our understanding is correct, over the plan period between 2006 and 2020 there have been 2900 approved sites, some 190 per annum. WBC have estimated 140 for this plan period but reduced it by the overage of approvals outstanding from the previous plan period. This would

seem to be overly cautious and pessimistic and this reduces the windfall value in the WBC forecast by approximately 400 houses.

The estimate also adjusts down the availability of housing in the Sandleford Park scheme by 1/3 and it states WBC are only expecting 1000 of 1500 home provision to be built within the plan period. Why is this adjustment necessary? If this process is about land supply for properties, there is no reason to adjust.

Only looking at these two items potentially satisfies the shortfall in total. In addition, there is a long list of sites within the HELAA of which 122 hectares is on pre-developed land and not included for development. Why is WBC looking to use new Greenfield sites when there are clearly other options available?

There is absolutely no need for 2,500 houses to be considered when the shortfall is a maximum of 607. There are many ways of mitigating the numbers that may be required from this development.

10. Large sites allocated for Housing and mixed user development (SP 13)

BPC strongly objects to the inclusion of SP17 as an allocated site for development in SP13. The reasons are provided throughout this document but none more so than detailed in Clause 14 Siege Cross below. Here, WBC makes statements in their opposition to an application on only part of this site. The statements made by WBC then are still true now and therefore this site should not be included. The focus should not be on greenfield sites particularly where the impact on the AONB and the strategic gap between Thatcham and Upper Bucklebury is compromised and eroded to such an extent.

11. Issues that impact Thatcham which will also have a detrimental effect on Bucklebury Parish (SP17)

- **Traffic.** Congestion of traffic on the A4 and roads around it. Driving from Bucklebury down Harts Hill Road and onto Floral Way, particularly at peak times for work and to/from school will see major tailbacks as residents try to access the main roads to Thatcham, Newbury and Basingstoke. The development plan has been unsatisfactory and there is little consideration given to transport and highways, including the effect on air quality.
- **Thatcham rail crossing** is already a problem with very long waiting times to cross the railway line and queues. This will get much worse with increased traffic.
- **Parking at Thatcham station** is inadequate. There are already queues for parking and with a lack of public transport, people drive rather than walk, particularly in bad weather.
- **Schooling.** Bucklebury is in the catchment area for Kennet school, which is already oversubscribed. Parishioners are concerned about the education provision being further stretched.
- **Environmental impact.** We would see an increase in the number of walkers and visitors to Bucklebury Common. That would be difficult to manage and it would have a detrimental

impact on wildlife and our environment. We would lose existing green space, views and rights of way. Footpaths up and down to the A4 would become overused and spoilt. Listed and historic buildings (Colthrop Manor and barns) and their environs would be spoilt. With so many houses nearby, we would lose the rural and village feel of our community if this proposed urban development in NE Thatcham goes ahead. Many have moved to this area for that rural and village lifestyle and it is enshrined in the Bucklebury Vision statement. The viability of our rural community would be lost.

- **Flooding.** Flooding problems would be exacerbated
- **Shopping and town centre.** There is no commitment detailed in the plan to regenerate Thatcham town centre. There would be pressure on an already busy Thatcham town centre where many Bucklebury parishioners shop at the supermarkets, pharmacies and other outlets. Previous promises of regeneration have come to nothing.
- **Medical Facilities.** The only two surgeries which would be able to serve the proposed development are the Bucklebury Surgery at Chapel Row and the Burdwood Surgery in Thatcham. These are both full to capacity. A new facility would need to be provided immediately but how would this be manned when GPs are in such short supply?
- **Lengthy proposed construction period.** It would be noisy and polluting for a prolonged period of years impacting the peace and quiet of Bucklebury parishioners.

12. Road Traffic (SP 17, SP 22, DC8 & DC33)

There is extreme concern amongst parishioners who have attended our briefing meetings about the magnitude and impact of the increased traffic through Upper Bucklebury and Chapel Row as a consequence of the development.

The traffic assessment for this site is seen by BPC as being woefully inadequate. There is little faith in the estimates of an increase of 12% to the East and surrounding villages and 10% to the North. In particular:

- This appears to take no account of traffic from the development heading through Upper Bucklebury and Cold Ash for the A34 and M4 West. All these additional vehicles would be passing through Upper Bucklebury.
- The traffic estimate does not take any account of ‘rat running’ up Harts Hill and through the Parish to avoid the inevitable backups on Floral Way and the A4 at peak times.
- There have been no improvements to the affected parts of the A4 in over 40 years. The A4 road is narrow in width and contains many junctions in a short stretch through the town centre. The number of roundabouts and traffic lights in Thatcham already holds up the east/west A4 traffic flow, additional ones for this development would cause more issues. Floral Way and the A4 are already backed up, and the inclusion of 2500 houses and 3 schools in close proximity is just going to produce gridlock.
- The volume of traffic on the A4 travelling in both directions is already far more at peak times than it can actually support. The WBC traffic assessment shows that 62% of the trips from these properties will join the A4 and another 17% will either cross it or access part of it for local travel.

- The route ‘to the north’ is even more problematic taking traffic along single carriageway roads along Burdens Heath and through the built up areas of Cold Ash and Curridge before reaching the A34.
- Floral Way was meant to be the northern relief road around Thatcham, this proposal adds in effect yet another relief road further north adjacent to the AONB which is totally unacceptable. None of this impact has been considered in SP17.

Any junction or roundabout on Harts Hill Road will encourage road users towards Upper Bucklebury along what is already a dangerous road. Harts Hill Road from Thatcham to Upper Bucklebury is characterised by a steep hill and multiple blind bends, all of which are relatively narrow and unlit in keeping with the proximity to AONB. Access to the proposed site MUST only be accessed from Floral Way.

All this increased traffic through Bucklebury Parish will put children walking to school and parishioners walking on the parish roads where there are no pavements at further risk

Data from Community Speed Watch by WBC in August 2020 (Covid-19 Impacted data during summer holiday period) shows average traffic volume in one direction through Chapel Row to be in the range of 500 to 1,400 vehicles per day and average traffic volume in one direction through Broad Lane in August 2017 (summer holiday period) to be 1,300 to 2,100 vehicles per day. The TSGS Figure 3.2 suggests a profile of National traffic in England where a peak flow of 260 cars per hour produces an average flow over the day of 100 cars per hour. Table 4.1 in the same document suggests a peak flow of 5,432 vehicles per hour of which 47% are external to the development. Combination of the above numbers presented by WBC suggests an average of 2,090 cars per hour of which 980 are external. This equates to a total of 23,500 external car movements per day. 12% of this figure equates to 2,800 additional movements per day. Doubling the current known peak data for the parish to reflect out and return journeys gives 4,200 journeys – hence at best the current traffic model suggests an increase of 67% over existing known peak levels on the main route through the parish. Concerns over additional ‘rat runners’ may make this an underestimate.

The impact on noise, vibration and air quality from this additional traffic through the Parish has not been considered in the proposal.

BPC working with WBC regarding Community Speed Watch have found that in August 2020 and November 2019 traffic on Harts Hill, Burdens Heath and Chapel Row exceeded Association of Chief Police Officers (ACPO) limits of 25%+ of the 30mph speed limit. The impact of existing traffic is already at a critical level for the parish.

Bucklebury Vision, the Parish Design Statement accepted by WBC, says:

- 6G1. any development which creates unacceptable levels of traffic would be resisted.
- 6G2. the reduction of vehicular traffic in order to reduce traffic on unclassified roads is supported.

The stated 5% traffic increase to the South probably acknowledges the reluctance to use this route because of delays at the Thatcham level crossing, a 25/40 minute wait at the Railway Crossing is not uncommon. Even without such a significant increase in Thatcham's population this route suffers severe congestion and improvement of this needs to be considered as part of the overall plan. A bridge over the Railway line is a clear omission from

this plan as it would reduce the A4 traffic and allow access to areas of employment such as Greenham Park and Basingstoke.

WBC has stated there will be no road improvements planned to the surrounding villages. BPC are not seeking road improvements to increase traffic flow and are looking at how traffic through the parish can be reduced in future to address the current safety concerns as currently being shared with WBC.

SP22, DC8 and DC33 for rural areas state:

- *SP22 – “Development that generates a transport impact will be required to mitigate any impact on local transport networks and the strategic road network.”*
- *DC8 – “To ensure it does not generate levels of traffic, parking or other environmental problems which would result in substantial harm to the character, appearance or significance of the area.”*
- *DC33 – “The redevelopment would not generate traffic of a type or amount that would result in substantial harm to local rural roads, and/or would require improvements that would adversely affect the character and nature of such roads”*
- *HELAA THA16 – “Local Highway Capacity: Unless it was improved / realigned etc., I would consider that the impact on Harts Hill Road and the Thatcham NDR would be severe. The Council's Highways Team would also be concerned regarding any increase in traffic through Upper Bucklebury.”*

HELAA THA20 – “Local Highway Capacity: This would have a very significant impact on Thatcham, the A4 and the Northern Distributor Road. To accommodate such volumes of traffic, significant improvements would be required along the NDR including many of the junctions and including the junctions onto the A4. The NDR especially would need to be widened and realigned at Heath Lane. This may not be enough. There are concerns regarding the A4 into Newbury and the A4 within Thatcham. New routes across the north of Newbury may be required to link the north of Thatcham to the A339 and M4, and feasibility of these would need to be

13. Development in the Countryside and the ‘Strategic Gap’

The proposal contains numerous examples of rushed and confused thinking, where it appears that the evidence is made to fit the desired answer of a development at Thatcham. The LPR Site Selection Background Paper Para 8.1 states “The master planning work considered all of the HELAA sites promoted in Thatcham”, rather than considering all suitable sites within West Berkshire.

Such a cavalier approach to trying to make the plan fit is noticeable throughout the proposal, but is spelt out quite clearly in the attitude to the Strategic Gap.

SSBP Table 8.2. Site THA9. “There are concerns that development may reduce the open countryside between Thatcham and Newbury / Greenham, and introduce built form to south of Lower Way. The site is a buffer to development and forms part of the open character along this side of Lower Way. There is further concern that development would not be appropriate in the context of the existing settlement form, pattern and character of the landscape.”

This is for a proposed HELAA development of 36 houses, situated beyond the natural and actual settlement boundary of Lower Way, and which would breach the strategic gap between Thatcham and Newbury.

THA20 is a proposed development of 2500 houses, which would be situated beyond the natural and actual settlement boundary of Floral Way and the A4, and which would breach the strategic gap between Thatcham and Upper Bucklebury and the AONB. The proposed site is a buffer to development and forms part of the open character along this side of Floral Way and the A4. There is much local concern that development would not be appropriate in the context of the existing settlement form, pattern and character of the landscape.

If fair selection criteria were applied, this is what would be expected in the description of THA20. Instead, the comments for THA20 read “In contrast there are very few negative impacts that developing the site would have.”

This shows how predisposed and skewed the “analysis” that WBC is undertaking is.

Much is made of the West Berkshire characteristic of separate, defined settlements, and WBC has previously gone to great lengths to protect separate settlement identities. The Landscape Character Assessment (LCA) WH4 Detractors No 5 Decreasing separation/coalescence between settlements acknowledges: “The expansion of Thatcham and Newbury...has reduced the physical and perceptual separation between settlements...” LCA WH4 Landscape Strategy No 5 “Retain the distinction between and individual identity of settlements” and No 6 “Conserve elements that mark a transition between settlement and countryside” promote the requirement to maintain the “Strategic Gap”

Policy SP3 4.34 requires that “Outside these settlements, in the countryside, a more restrictive approach to development will be taken as set out in other policies in this Plan.” Development in the countryside is limited by Policy DC1 which states “There will be a presumption against new development outside of adopted settlement boundaries” and “Planning permission will not be granted where a proposal harms or undermines the existing relationship of a settlement within the open countryside, where it does not enhance the character and distinctiveness of the rural area, including the special qualities and natural beauty of the landscape of the AONB...”

The LPR states “Policy SP1 sets out that the principle of development is acceptable inside settlement boundaries and makes clear that only appropriate limited development in the countryside will be allowed.” Section 9.2 goes on to say “...this policy makes clear that land outside of settlement boundaries will be treated as open countryside where there is a presumption against new development... In West Berkshire, the conservation and enhancement of the North Wessex Downs AONB and its setting is clearly a key consideration...”

There are numerous quotes within policy that require development to protect the countryside between developments for its own right, but also to maintain the gap between settlements. Policy SP3 requires “The retention of the individual identity of adjacent settlements”

The strategic gap between Bucklebury and Thatcham is an extremely important one. Bucklebury is a rural parish within the AONB, whilst its neighbour Thatcham is an urban town. Floral Way is the important boundary between them, and it should not be breached,

otherwise their separate identities will be lost. Bucklebury Vision states that “local residents highly value the rural nature of the area in which they live and are keen to protect this for future generations to enjoy.”

All policies point to the requirement that these settlements should be distinctly separate, and maintain their own definite identities. This requirement for separate settlements is made even more important if the remote nature of the AONB is to be protected in accordance with national requirements.

Unfortunately, the THA20 would destroy this important feeling of separateness, with the virtual merging of a dense housing estate with the rural setting of Upper Bucklebury. Although there is a “country park” strip between them, this is far too narrow and ultimately ineffective in maintaining the gap between the settlements. As Upper Bucklebury is lost into Thatcham, so too is the edge of the AONB.

It is even more unfortunate that WBC already acknowledges that THA20 would destroy the separate identity of Upper Bucklebury, and with it, part of the AONB setting.

The LPR Site Selection Paper Table 8.2. Site CA12 (and later CA sites.) “It is the Council’s preferred approach to allocate site THA20 (Thatcham NE) as a strategic site. Due to the scale of development that could take place on THA20, it is considered that there should be no further allocations in Thatcham in the period to 2037 particularly as development of both north east and north Thatcham would result in the loss of the separate identifies of Cold Ash and Bucklebury, and would harm the setting of the AONB settlement pattern.”

This clearly states that, by developing THA20, WBC is acknowledging that the separate identity of Bucklebury will be lost. This is in direct contravention to the LCA, and various policies within the draft LPR. This would be devastating if the damage were just to the parish of Bucklebury, but the statement also acknowledges the damage to the setting of the AONB settlement pattern. WBC is charged with protecting the AONB and its setting, but appears to be pushing through a policy that it accepts will cause damage to the very thing it is meant to protect.

The proposed development at THA20 actively goes against LPR policies to protect the separate identities of adjacent settlements, and WBC acknowledges it is ignoring its own policies in the Site Selection Paper. WBC also acknowledges that THA20 would be to the detriment of the AONB. This is one further example of how inappropriate THA20 is.

14. Siege Cross

Siege Cross is a constituent part of the THA20 proposal, making up one of the three proposed “linked villages.” It was the subject of developers’ plans in 2015/16, but planning permission for around 500 houses was refused. It is puzzling that a site for 500 houses should be refused permission, given WBC now promotes it as part of a development five times bigger.

It may assist to reiterate some of the arguments WBC itself used to counter the Siege Cross proposal. The elements quoted are a selection of the multiple similar points successfully deployed in refusing the Siege Cross application.

WBC Planning Officers put forward the following in the 15/00296/OUTMAJ West Berkshire Council's Statement of Case:

1.2. 3) Landscape and Visual Impact

"... The development would result in significant and demonstrable harm in terms of landscape character; settlement form; scale; identity and distinctiveness; and the historic environment. In particular:

(c) The proposed development would result in harm to the character and identity of Thatcham and erode the open landscape between Thatcham and Upper Bucklebury.

(d) The development would have an adverse impact on the distinctive local landscape character and appearance of the landscape north of Thatcham, which contributes to the setting of the AONB the boundary of which runs some 575 metres to the north of the site.

(e) The development would urbanise the key areas of sensitivity within the Local Landscape Character Area 14F (Colthrop Manor Plateau Edge), including: the lower slopes of an important ridge line; Big Gully, a local landmark; good views across the area and long views across the Kennet Valley; the lack of development with scattered farmsteads and minor roads; and the rural setting of the historic settlement at Siege Cross Farm.

(f) The development would detract from the enjoyment of the character and appearance of the AONB in views from the escarpment south of the River Kennet."

"...the development fails to have due regard to the sensitivity of the area to change. The development is inappropriate in terms of its location over the whole site, and its scale in the context of the existing settlement form, pattern and character of Thatcham. The development also fails to conserve the historic landscape setting and rural context of Siege Cross Farm."

"The development is contrary to guidance in the relevant landscape character assessments, and therefore fails to protect and enhance the local identity and distinctiveness. The development would erode the identity of Thatcham as being separate to that of the surrounding rural settlements."

"...the application is contrary to the National Planning Policy Framework, the Planning Practice Guidance, Policies ADPP3, ADPP5, CS14 and CS19 of the West Berkshire Core Strategy (2006-2026), the relevant landscape character assessments, the North Wessex Downs AONB Management Plan (2014- 2019), and the North Wessex Downs AONB Position Statement on Setting (2012)."

5.4 "...the Council will highlight that the appeal site is largely undeveloped land outside of the existing defined settlement boundary and within open countryside. The Council will give evidence on the weight that should be applied to individual policies, and will demonstrate the proposed development fails to comply with the National Planning Policy Framework, Policies ADPP1, ADPP3 and CS1 of the West Berkshire Core Strategy (2006-2026), Policy HSG.1 of the West Berkshire District Local Plan 1991-2006 (Saved Policies 2007) and emerging Policy C1 of the Housing Site Allocations DPD with respect to the location of new development.

It is notable that WBC were particularly concerned about the effect of the Siege Cross development on the wider landscape, its failure to comply with National and local policies

and on the AONB which “runs some 575 metres to the north...” However, in the THA20 proposed development, WBC proposes a site that abuts the AONB, and then erroneously implies that there will be no harm to it or to the wider countryside.

WBC’s Case Officer also noted in his report on Siege Cross that:

5.9 LANDSCAPE CHARACTER AND VISUAL IMPACT

“One of the core planning principles of the NPPF is that planning should take account of the different roles and character of different areas... recognising the intrinsic character and beauty of the countryside... The NPPF advises that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes.”

To ensure that the detrimental impact of the Siege Cross development was given the weight it deserved in those proceedings, WBC employed a landscape expert, Bettina Kirkham DipTP BLD CMLI of Kirkham Landscape Planning to complete a landscape assessment. The result was further damning evidence of the effect of development at Siege Cross Farm:

Landscape Assessment Summary

“S.5 ...I set out the North Wessex Downs AONB’s objections to the proposed development, which I support.”

“S.7 ...the attributes of the site and its immediate setting are recognised as key features which should be conserved and enhanced in order to maintain the local character and distinctiveness of the landscape and the rural setting to Thatcham and the North Wessex Downs AONB.”

“S.10 ...The site makes an important contribution to the setting of the AONB and to the setting of both ecological and heritage designations (Long Grove Copse, Big Gully and Siege Cross Farm).”

“S.11 ... it is a ‘valued ’landscape within the meaning of NPPF 109 which should be protected and enhanced... which provides acknowledged landscape benefits. The proposed development would result in significant and demonstrable harm to a valued landscape and to the intrinsic beauty and character of this landscape ...the proposed development is not environmentally sustainable contrary to NPPF para 7.”

“S.12 ...The proposed development on the appeal site would therefore be an extensive arm into this open elevated and prominent landscape. It is clearly not a logical extension to Thatcham as it will intrude into an overwhelmingly rural landscape, which forms an intrinsic part of the wider landscape between the AONB and Thatcham, well beyond a clearly defined and established landscape boundary to the settlement.”

“S.14 ...The value of the landscape is enhanced by the presence of historic assets in this case two Grade II listed buildings, the historic settlement of Siege Cross Farm ...”

“S.17 ... adverse effect of the development on the physical and visual setting and character of the site environment... cannot overcome the impact of the location,

extent and mass and scale of the development, nor the impact on many views...consequence, the development would result in a wide range of long term major and moderate-major adverse landscape and visual effects and several additional moderate adverse effects. **On this basis I conclude that the proposed development on the appeal site would result in significant and demonstrable harm to a valued landscape and to the intrinsic beauty and character of that landscape by:**

- Harming the character, value and visual appearance of the site as part of the open countryside;
- Harming the landscape and visual setting of the historic Siege Cross Farm and its Grade II listed buildings;
- **Harming the setting of the North Wessex Downs Area of Outstanding Natural Beauty...**

“S.19 In conclusion, the Inspector and Secretary of State are respectfully requested to dismiss the appeal on unacceptable landscape and visual impact grounds.”

It is abundantly clear that WBC’s own expert was categoric in the assessment of the damage that Siege Cross would cause to the local environment. This expert opinion was repeated throughout WBC’s vigorous opposition to the site. It is noted that both WBC and its expert were concerned about the harm that would be inflicted on the AONB that was half a kilometre away.

BPC emphasise that the Siege Cross site now forms part of the THA20 proposal. However, this current proposal is 5 times the size and much closer to the AONB. The potential damage caused would be significantly greater

WBC are reminded of its previous positioning regarding Siege Cross, and its vigorous defense of the countryside and the AONB. It is beholden on them to remember that previously stated position, and acknowledge the irretrievable damage that THA20 would cause to the local area and the AONB. THA20 must be recognised for what it is - an irresponsible and irrevocable blight on our landscape - and be discarded as a development option.

15. Summary

Bucklebury Parish Council has considered the strength of public opinion in the Parish against THA20. BPC **OPPOSES** this disproportionate development in North East Thatcham. By its own admission, WBC admits that the proposal would result in the loss of the separate identity of Bucklebury and be of harm to the AONB. Furthermore, astonishingly, WBC states that the plan has few negative aspects, but BPC’s analysis demonstrates a panoply of detrimental consequences. The strength and persuasiveness of these arguments dictate that WBC needs to undertake an urgent reappraisal of the entire plan.

In conclusion, the proposal is disproportionately big, poorly sited and would have too great an impact on the surrounding population and environment.

WE STRONGLY URGE THE PROPOSAL BE REJECTED.