

LOCAL PLAN REVIEW REGULATION 19 CONSULTATION

Dear Sirs

I refer to the Local Plan Review to 2039 referred to in your e-mail to constituents received on 20 January 2023. In particular I would comment on Policy SP17 for the North East Thatcham Strategic Site proposing at least an additional 1500 homes.

In recent weeks it has been widely reported that the number of houses to be built to 2039 had been reduced from 2500, however the WBC document referred to above has the overall development area remaining unchanged from the December 2020 draft. This therefore leads me to assume that the Council has an intention at a later date to further increase the housing numbers on this site.

However in view of the Secretary of State for Levelling UP, Housing and Communities statement on 6th December 2022 that housing numbers required by Councils should now be considered as an advisory starting point and not mandatory one wonders why WBC is pressing on with this plan when other Local Authorities have put theirs on hold until updated guidance is provided.

Additionally WBC rejected plans for 500 homes at Seige Cross (now incorporated into the current scheme) in 2015 as it would harm the character of Thatcham and erode the landscape between Thatcham and Upper Bucklebury and also detract from the landscape contributing to the AONB. It would also create clear and demonstrable damage to education provision in Thatcham. It is inconceivable that WBC should now be considering a development at least three times the size in the same locality.

Notwithstanding the above I wish to register my objection to the current plan for the following reasons .

1. Increased burden of traffic
2. Negative impact on the local environment
3. Negative impact on local healthcare
4. Negative impact on Education
5. Overload of statutory services

1. Traffic

Traffic on the surrounding road network is already heavy during peak periods and Harts Hill is regularly used as a rat run to avoid the congestion which regularly occurs on the A4. Long traffic queues regularly build up at the Harts Hill Road/Floral Way and Floral Way/A4 roundabouts and this proposed development will further increase traffic congestion on the A4 through Thatcham towards Newbury and Reading. Traffic heading towards Basingstoke will also increase over the Thatcham railway crossing where vehicles now can regularly wait up to 20mins in order to cross due to the frequency of trains.

The WBC transport assessment paragraph 3.31 states that the development will cause additional queuing at the railway crossing but will clear as the gates open. However at rush hour the queues do not completely clear during trains so this modelling is clearly

unsound. Additionally an alternative development on a brownfield site at Colthrop which includes a bridge over the railway has been discounted without proper analysis despite Clause 4.20 stating that the Spatial Strategy seeks to make use of brownfield land.

It is also understood that a road junction to this development is proposed onto Harts Hill Road, paragraph 3.11 of the 2021 Transport Assessment Report, but there is no concept design included as to how this will be achieved. This junction will inevitably encourage additional vehicles to use the rural routes via Harts Hill Road as opposed to the main trunk roads which will significantly increase the vehicular movements to unacceptable levels through the villages of Upper Bucklebury, Southend Bradfield and Cold Ash. Particular concerns must be raised regarding the road through Burdens Heath to Cold Ash, a road along which is little more than a country lane with no footpaths. This road is wholly unsuitable for an increase in traffic flows and will cause additional safety fears for parents whose pupils attend St Finians Primary School.

SP17 suggests that these new junctions will not cause traffic problems but no modelling has been provided to prove this.

Harts Hill Road can be particularly hazardous during winter months with icy conditions despite salting by the Council and is not suitable for the inevitable significant increase in vehicle movements as a result of this proposed development.

Additionally the proposal for a potential car park located on the most dangerous part of Harts Hill Road due to a series of blind bends will only serve to cause a serious hazard with the potential for serious injury and no proposals have been provided to mitigate this.

2. Environment

The site is known to contain several protected species, bats, newts, badgers and ponds with breeding dragonflies and SP17 claims that the development would have a positive impact on the environment and will achieve the legal requirement for biodiversity net gains. However the Local Plan Review provides no evidence on how this will be achieved and also no evidence that a base line on which the 10% net gains as required under the 2021 Environment Act can be measured. The site is a green field site and therefore there is every reason to believe that this development will have a significant negative impact on the environment. SP17 makes the assumption that this negative impact can be mitigated during the planning process.

The indicative site plan for the site indicates two significant features.

1. Community Park open space
2. Potential car park off Harts Hill.

The Country Parks are located at the top of the slope nearest to the settlement boundary of Upper Bucklebury which lies within an ANOB and the SP17 states that it is intended to provide a network of green infrastructure which will include a new strategic community park linking Thatcham to the AONB with greenways to facilitate connection to the AONB including leisure routes accessible to all users. This takes no

account of the management of Bucklebury Common which focuses on not increasing pressure on the fragile ecosystems that they are trying to restore.

The proposal to incorporate a car park on Harts Hill Road close to the settlement boundary of Upper Bucklebury will encourage use of the proposed community park and together with the proposed leisure routes would inevitably encourage a significant increase in footfall onto Bucklebury Common causing irreversible damage. This car park could also attract fly tipping which is already an issue in other car parking areas on and around the Common.

West Berks Council planning has always previously maintained strategic gaps between communities and Floral Way has been the that gap between Thatcham and Upper Bucklebury. Any breach of that gap has been a reason to previously refuse planning permission but this development not only virtually eliminates that strategic gap but will effectively destroy the unique character of Upper Bucklebury that the Council has previously sought to preserve.

3. Healthcare

The area surrounding of this proposed development is served by three G.P. practices. Thatcham Medical Centre (TMC) , Burdwood Surgery and Chapel Road Surgery all of which are over subscribed with existing patients finding it more and more difficult to obtain suitable appointments. Currently the two Thatcham surgeries, TMC and Burdwood have an average of over 2000 patients per G.P.

It is anticipated that this development will have a population of 4000 - 5000 people and SP17 states that a 450sqm GP surgery will offered to the Care Board. This size of surgery would be wholly inadequate as a stand alone practice assuming GP's could be found as it is a fact that GP's are leaving the health care service quicker than new ones can be recruited.

In addition to the SP17 development WBC have already approved the building of a further 91homes within the catchment area of the Thatcham surgeries further increasing the number of potential patients by an estimated 300-400.

There are also serious problems in obtaining dental care as there are no NHS dentists in the Thatcham area accepting new patients and many patients have to travel further afield even to find a private dentist. There is no provision made in SP17 for additional dental surgeries

This is wholly unsustainable and shows that the proposals for providing additional healthcare to support these new developments as wholly unsound.

4. Education

Early Years

There is no information in either SP17 or the West Berks strategic growth study concerning early years education. Although there are no estimates, with 40% affordable housing it is likely that there will be significant demand for nursery and

infant schooling. The Get Information Schools Service indicates that the nearest primary school, Francis Bailey, is already working above its design capacity of 570 pupils. Clearly additional school places need to be constructed before any housing are occupied.

Secondary Education

Thatcham secondary schools are also operating at approaching or exceeding their design capacity and the proposed development will lie in the secondary school catchment area of Kennet School in Stoney Lane for which the latest available data shows that it is within 19 pupils of its 1881 capacity. SP17 states that land will be provided to meet the impact of the development with the nature and cost of the mitigation be informed by way of feasibility study, however the Local Plan Review provides no information as to where such a school will be located but may be delivered in phases with 50% of the funding provided by the developers. Para. 5.22 of the Strategic growth plan states any new school would initially be 4FE with land for future expansion but 5.19 states that a new secondary school is not considered feasible if small than 6FE. This is therefore contradictory.

Pupils in Upper Bucklebury live in the catchment area of Kennet School (2miles) and The Downs school in Compton (9miles). Where schools are oversubscribed then those living nearer the school will be given preference. Pupils living on the new development will therefore take priority for places at Kennet over those from Upper Bucklebury leaving them restricted to The Downs which is 7 miles farther away. It is also worthy of note that The Downs has already more pupils attending than its design capacity. (see latest data from 'Get-Information-schools.service.gov.uk).

SP17 gives no indication when new schools will be built but it would not be economic to provide additional school places until it is known how many will be required. The West Berks strategic growth study 5.18 - 5.22 provides no indication as to how additional school places will be found until any new school can become economically viable and therefore the study must be considered incomplete and unsound.

Services

Drainage Systems

Foul Drainage

A development of this magnitude will put significant pressure on the existing foul drainage system. 1500 homes will house upwards of 4000 persons and with the average foul discharge per person per day being about 150litres, this would represent a minimum of 600,000 litres per day.

The West Berks Water Cycle Study final report dated September 2021 states that Chieveley, Hungerford and Newbury wastewater treatment works were predicted to or were exceeding their flow permit and that further developments in these catchments could lead to increased operation and environmental damage.

It is the Newbury treatment works in Lower Way, Thatcham that will be serving this proposed development but there are already further developments in the Newbury area confirmed which will cause even additional load totalling another 1000+ homes.

Thames Water have already had issues with the current sewage system on the A4 with discharges into the river Kennet. This therefore confirms that the existing foul drainage systems do not have the capacity to accept future loading without major upgrades. This is confirmed by the JBA Consulting report para 5.3.1 showing the network on red alert and reporting that any upgrade would take 12-24 months to complete

It is clear from the Local Plan Review paragraph 10.71 that no discussions have been held with Thames Water to establish how this considerable extra demand for water treatment will be achieved even though additional housing beyond the NE Thatcham Site has already been approved.

Storm Drainage

The proposed 170 hectare site is currently farmland sloping towards Floral Way and the A4 and as such this land during periods of rainfall absorbs much of this water helping to prevent the overloading of existing storm drainage systems. The Thatcham Flood Alleviation Schemes recently completed lie to the South and West of this site and therefore unlikely to fall within the catchment area of the majority of the North East Strategic Site. However, the storm waters generated by this scheme, from building roofs, roads and hardstanding gulleys etc will need to be discharged into the existing storm sewer system.

With the effects of global warming, the rainfall in the Thatcham area has been recorded as significantly increased and more concentrated in recent years and this can only increase further in the coming years and yet when the existing drainage systems were designed along Floral Way some 25 years ago the current change in climate would not have been contemplated. The quantity of additional rainwater from this proposed development can only serve to surcharge the existing system to such an extent so as to significantly reduce the benefits of the recently completed Flood Alleviation Scheme and therefore existing pipework may well need to be upgraded.

In older parts of Newbury storm and foul waters are combined which feed into the Lower Way sewage works but with higher rainfall this will only serve to put even greater pressure on the treatment works and the increasing likelihood of polluting discharges into the local rivers.

It is inevitable that the drainage infrastructure will need to be upgraded prior to any development being occupied, this will cause significant and unacceptable disruption to the people of Thatcham and surrounding areas for many months. Once again the consequences of the NE Thatcham Development have not been properly thought through and mitigated and therefore the proposals have been shown to be unsound.

Water

The West Berkshire Water Cycle Study Phase 2 final report dated September 2021 states that West Berkshire is an area of serious water stress and that an increase in water demand due to growth can cause the hydraulic capacity of the existing supply infrastructure to be exceeded. Although this is likely to manifest itself as low water pressure at peak times it is also stated that the Water Resource Management Plans are broadly in line with development plans by WBC.

It is not accurate to say that there is no predicted supply deficit as with our summers becoming hotter and drier due to climate change increasing demand for river extraction due to lowering of the water table requiring the increasing possibilities of hosepipe bans. It is a fact that the River Pang ran dry for several weeks during 2022 as a result of over extraction of water as a means of preserving supply.

Upper Bucklebury relies on potable water supplies being pumped from the pumping station at the bottom of Harts Hill Road which will lie adjacent to the proposed NE Thatcham Development and it is of great concern that as additional housing become occupied there is potential for reducing supplies to the village.

Electricity

The Scottish and Southern Electricity Networks Engineering Justification Paper states that the Thatcham Bulk Supply Point (BSP) is supplied from the Bramley BSP and predicts that by 2027 there will be an anticipated increase in peak demand in Thatcham of 40.9MW.

It also states that in the event of an outage and the need to restore power within 3hours network capacity for demand transfer is inadequate to meet the minimum demand at Thatcham and therefore network reinforcement is required.

SP17 makes no mention of anticipated electrical demand or whether consultations have been held with the statutory authority to ensure that electrical supplies will not be compromised.

Upper Bucklebury's water supply is heavily dependant on security of power feeding the Harts Hill Road pumping station and concerns must be raised that a significant increase in demands of the Thatcham network will cause outage issues for the residents of the Village

In Conclusion

In view of my comments above I therefore wish to register my strongest objection to the proposals by West Berks Council to develop the site for a minimum of 1500 homes at NE Thatcham

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