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Planning Policy Team
Development and Planning
West Berkshire District Council
Market Street
Newbury
RG14 5LD

4th February 2021

Dear Planning Policy Team,

Regulation 18 consultation on the emerging draft West Berkshire Local Plan Review to 2037

Oxford & Country Planning act on behalf of Bucklebury Parish Council. We write in response to the consultation on the Local Plan Review (LPR) to 2037.

Bucklebury Parish Council have produced a separate, collective and more detailed response (also dated 4th February) which is attached. The contents of this submission are complementary to the Parish Council's letter and the two documents should be read together.

The Parish Council **strongly objects** to the proposed North East Thatcham Strategic Site Allocation for 2,500 dwellings (Policy SP 17). The reasons for their objections are summarised in the headings below, which are then expanded upon in the body of the letter:

- Harm to the setting of the North Wessex Downs AONB;
- Erosion of strategic gap between Thatcham and Bucklebury;
- Impact on the local highways network;
- Surface water flood risk;
- Impact on nature conservation;
- Harm to the setting of listed buildings; and
- Housing requirement in the light of the publication of the new standard method.

Harm to the setting of the North Wessex Downs AONB

The development will have a major adverse impact on the appearance of the distinctive landscape character of the land between the north of Thatcham and Bucklebury. This area makes an important contribution to the setting of the AONB boundary of which runs less than 600 metres to the north of the proposed allocation.

National Planning Practice Guidance (NPPG) at para 039 of the Natural Environment Guidance confirms that the Local Authorities duty of regard is relevant in considering development proposals that are situated outside AONB boundaries which might have an impact on their setting or protection.

Para 042 the NPPG specially address how development within the setting of protected landscape should be dealt with. It states that *Land within the setting of these areas often makes an important contribution to maintaining their natural beauty, and where poorly located or designed development can do significant harm. This is especially the case where long views from or to the designated landscape are identified as important, or where the landscape character of land within and adjoining the designated area is complementary. Development within the settings of these area will therefore need sensitive handling that takes these potential impacts into account.*

The evaluation of the North East Thatcham allocation must include a proper assessment of the potential sensitivity of the site and its impacts on setting of the AONB.

Erosion of strategic gap between Thatcham and Bucklebury

The proposed allocation will significantly erode the open landscape which forms an important strategic gap between Thatcham and Upper Bucklebury.

The existing landscape rises from the Kennet Valley quite steeply towards the North Wessex Downs and Bucklebury Common. It is a very attractive area of countryside with well-maintained and historic hedgerows, ancient trees, and well-established woodland blocks.

The National Planning Policy Framework (NPPF) states at para 170 that *Planning policies and decisions should contribute to and enhance the natural local environment by (amongst other things) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services.*

It is important that there is a full and independent assessment of the proposed allocation on the landscape character of the area including impacts on local identity as well as visual prominence given the site is on rising ground.

It is noted that in the suitability conclusions in the Housing Land Availability Assessment (HELAA) that there is, *Concern that development would not be appropriate in the context of the existing settlement form, pattern and character of the landscape.*

Furthermore, the HELAA states that, *Development to the north of Floral Way does not conform to the current settlement pattern of Thatcham.* Floral Way and Bath Road form strong and well-defined boundaries between the built-up edge of Thatcham and the open countryside beyond. If this boundary is breached there will be resulting harm to the character and separate identities of Thatcham and the rural settlement of Bucklebury.

Impact on the local highways network

The proposed development at North East Thatcham will have a very significant impact on the local highways network. This is acknowledged in the evidence base for the site in both the HELAA (Site Ref THA20) and the Site Selection Background Paper (Appendix 4b). These impacts are highlighted for the A4, Northern Distributor Road and Thatcham town.

However, the evidence base does not consider the impacts on the wider road network. The consequential increase in traffic on the two minor roads that run through the Parish is of great concern to the residents of Bucklebury. These roads provide a route from Thatcham through the two main parish centres, Upper Bucklebury and Chapel Row to Theale, Reading and M4 in one direction and through Bucklebury and Marlston villages to Hermitage and the A34/M4 junction in the other direction. These routes are already used as 'rat runs' for traffic seeking to avoid existing congestion problems on Floral Way and the A4 through Thatcham and Newbury.

The roads through these villages are rural in nature, mostly lacking footpaths, with numerous junctions and blind bends. The inevitable increase in traffic on the roads through the Parish arising from the North East Thatcham development could create an unacceptable impact on highway safety. The absence of a detailed traffic assessment on the wider rural network is a fundamental omission from the evidence base which risks the Local Plan being found 'unsound'.

Surface water flood risk

There is a real risk of surface water flooding in the area being exacerbated by the development. The site is crossed by a number of natural drainage routes and ephemeral watercourses.

It is noted in the HELAA that there are surface flow routes through the site, one of which is a major surface water flood flow. It is also noted that there is a medium risk of groundwater flooding in part of the site and there is limited potential for infiltration due to high ground water levels. These constraints may well reduce the potential developable area to accommodate extensive attenuation measures.

Impact on nature conservation

There is likely to be considerable harm to local biodiversity resulting from the development at North East Thatcham.

It is noted in the HELAA that the Thames Valley Environmental Research Centre states that there is a *high risk of adverse impacts* on nature conservation. These include priority habitats, ancient woodland, protected species, a Site of Special Scientific Interest and Local Wildlife Sites in close proximity to the site. Much of the upper slopes are designated a Biodiversity Opportunity Area, part of the Bucklebury Plateau BOA, and the site is within a local habitat network. The BOA contains important habitats which should be retained and enhanced.

Para 174 of the NPPF states that plans should *promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity*. The proposed allocation fails to demonstrate how these requirements will be achieved.

Harm to the setting of listed buildings

The scale of the proposed development could adversely impact upon the setting of the two listed buildings at Siege Cross Farm and the listed barn at Colthrop Manor.

The NPPF states (para 190) that, *Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset)..... They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.*

In terms of potential impacts of a proposed development, the NPPF states (para 193) that, *great weight should be given to the asset's conservation* and that (para 194) *Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.*

In order to make a proper judgement of the effects of the proposal on these listed buildings, a full Heritage Impact Assessment should be undertaken to inform decision making.

Housing requirement in the light of the publication of the new standard method

The Local Plan proposes to provide for between 8,840 to 9,775 net additional homes in the period to 2037, which equates to between 520 and 575 dwellings per annum (Policy SP 12).

The supporting text states that, *using the 2014-based housing projections, and an uplift based on the ratio of house prices to workplace-based earnings the local housing need figure is 513 dwellings per annum using a baseline of 2020 (520 dwellings per annum using a baseline of 2019).* The text goes on to say at para 6.6 that, *The Government has recently consulted on a revised standard method for calculating local housing need but at this stage it is not known how this will be amended following analysis of the comments received. It will therefore be necessary to keep Policy SP12 under review.*

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.

Whilst the figures from the standard method are minimum estimates of local housing need, local authorities may set housing requirements greater than the standard method or provide for less housing, subject to the provisions of the NPPF. Environmental, infrastructure capacity and other factors will ultimately determine the final housing figure contained within the Local Plan. Given the above, it is considered that the Local Plan as drafted is, at the upper end of the range, potentially providing for 1,000 more homes than required ($513 \times 17 = 8,721$). This has a fundamental implication for the strategy of the Plan as a whole, including the proposed strategic allocation at North East Thatcham. Therefore, the Parish Council urges West Berkshire Council to review its housing requirement in the light of the publication of the new standard method.

Conclusion

Bucklebury Parish Council **strongly objects** to the proposed North East Thatcham Strategic Site Allocation for 2,500 dwellings

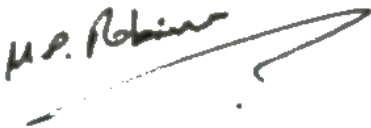
There are a number of identified negative impacts of the proposed development outlined above, which have not been given sufficient weight or full consideration in developing the Local Plan.

There are conflicting conclusions regarding the site in the Council's evidence base. In the Sustainability Appraisal the summary states, *There are a number of positive and significant positive sustainability effects that developing the site would have. In contrast there are very few negative impacts.* However, the HELAA highlights a number of negative impacts. Indeed, in the suitability conclusions of the HELAA the overall assessment is stated as suitability unknown. Similarly, in the achievability section of the HELAA, the overall conclusion is achievability unknown. This disparity needs to be explained.

It is clear that there are a range of factors and technical issues which require much further detailed investigation to determine whether the North East Thatcham proposal is a justified and appropriate allocation. Without a proper evidence base the Local Plan could be found 'unsound'.

The Parish Council wishes to be notified of any future updates and consultations on the Local Plan.

Yours sincerely,



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