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Sunday 26 February 2023

Dear WBC Planning Officer,

RE: WBC LPR Regulation 19 Objection

My name and address:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

I am writing re your WBC Local Plan review 2022-2039.

I object to your plans for 1500-2500 new houses, to be built on green fields, adjacent to the North Wessex Downs AONB in North East Thattham.

I am prepared to appear at the public inquiry if invited.

I object to your plan. The plan will all but join Thattham to Bucklebury, thereby connecting a village within the AONB with the large Thattham. It will damage the character of Bucklebury, result in increased damage to Bucklebury Common, increase usage of Bucklebury Ford with the resulting rubbish and damage to the River Pang. The development will not support your own vision and strategy to protect the AONB, with a development on its very boundary. It will degrade the AONB, so that it becomes an Area of not quite such Outstanding Natural Beauty.

I wish in particular to object on the themes of the Environment and Traffic.

All page numbers of reference numbers that I have used in this objection, relate to your document "West Berkshire Local Plan Review 2022-2039 Proposed Submission".

THE NUMBER OF HOUSES REQUIRED IN THE OVERALL PLAN

You have established your housing requirement that has been:

- "informed by the local housing need (LHN) conducted using the standard method in national planning guidance" (1.9)
- "The local housing need (LHN) conducted using the standard method in national planning guidance. The LHN for West Berkshire is 513 dwellings per annum, using a 2022 base date." (4.5)

But as you also point out

- "West Berkshire contains a number of physical and environmental constraints which influence the location of development" (4.6)

However WBC has not used the physical and environmental constraints to challenge the standard method used in national planning guidance, and instead to recommend to central Government that

WBC should use have a smaller housing requirement that does take account of the physical and environmental constraints.

Instead you have chosen to press ahead with the standard method used in national planning, with the impact on the environment and traffic that will result.

I object to the fact that the Council has not proposed to use a non-standard method for planning the number of houses that are needed in the Local Plan, that might take into account the physical and environmental constraints within West Berkshire.

IMPACT TO THE ENVIRONMENT, IN PARTICULAR TO THE NORTH WESSEX DOWNS AONB

1. AONB protection

WBC wishes “Together with partners, to continue to conserve and enhance the North Wessex Downs AONB” (3.5, bullet 8).

You point out that “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”. (4.24) and that “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” (4.24)

You state that “As a nationally valued and designated landscape, the North Wessex Downs AONB will be conserved and enhanced in accordance with its national status and this is set out in Policy SP2.” (5.38)

Any development of 1500-2500 houses, within a few hundred metres of the AONB, will clearly not enhance the AONB. The Council is neglecting its duty (under Section 85 of the Countryside and Rights of Way Act 2000) to support the AONB’s designation to conserve and enhance the natural beauty of the area.

By planning for a new development of 2500 homes, up to the very boundary of the AONB, you introduce the high risk of doing the opposite of your vision and strategic objectives. The population of the extended Thatcham will overspill into the Bucklebury area of the AONB. It will increase the damaging 4x4 traffic on Bucklebury Common, put more cars into the narrow single track lanes that wind down from the Cold Ash - Upper Bucklebury ridge into the Pang Valley, send more people down to the recreation ground and playground in Bucklebury Village, add to the numbers of people who ‘play’ around Bucklebury Ford and who litter the River Pang.

Within your section on development INSIDE the AONB (Policy SP2), you write:

“If the proposal is considered to be major development, then the second part of the policy will apply and the following factors, as set out in the policy, will be taken into account:

- Detrimental effects on the environment, including wildlife and cultural heritage...” (4.28)

Your Policy SP2 applies to development within the AONB. It should equally apply to development almost adjacent to the AONB, where the development’s residents will overspill into the AONB. Whilst the houses can’t move, the people will.

Your plan for 1500-2500 homes almost adjacent to the AONB will not conserve or enhance the AONB. It will clearly damage and degrade it. The Council will probably produce some environmental

assessment that suggests otherwise – but such an assessment will clearly be biased or flawed. Building no houses in the area that you propose for North East Thatcham will clearly be better for the AONB than building 1500-2500 houses almost adjacent to the AONB.

2. Protection of Rivers in the AONB

In “Our Vision”, the Council stated that “Development will no longer contribute to the pollution of our air and water supply, including our rivers and aquifers” (3.3).

In your “Habitat Regulations Assessment for the Proposed Submission (Regulation 19) Local Plan Review (November 2022)” you assess the “wastewater treatment works” (4.26) and state that “There are no Habitats Sites within the Upper Kennet and River Enborne catchments, nor the Pang catchment, so there is likely to be no impact from the proposed development.” (4.26).

You state that “Special consideration needs to be given the Rivers Pang and Lambourn which are groundwater-fed chalk streams, and are fragile hydrological systems, supporting diverse, rare habitats.” (5.65)

And then claim that “The Council will work in partnership with the local community, statutory advisors, developers, landowners and other organisations to identify and prioritise areas which will provide the best opportunities to protect, maintain and enhance the District’s network of high quality ‘multi-functional’ green and blue spaces and other natural features.” (5.66)

But you have provide no plan or evidence on how you will stop the residents of the 1500-2500 new houses, on the doorstep of the River Pang, from damaging the river.

Again, your plan will be detrimental to the AONB.

Only a few weeks ago, I had to report an Environmental Incident to the Environment Agency, when a car leaked its sump oil into the Pang at Bucklebury Ford. If there are 5000 more people, living within 2 miles of the River Pang and Bucklebury Ford, there will inevitably be an increase in such incidents.

3. Protecting Dark Skies in the AONB

You state that “The strong sense of remoteness, tranquillity and dark night skies, particularly on the open downland, should be preserved.” (Policy SP2).

You state that the North East Thatcham Strategic Site will have “A Lighting Strategy which will include consideration of dark skies, particularly in relation to the nearby North Wessex Downs AONB, and measures to mitigate the impact on biodiversity” (Policy SP17).

Through sections 10.45 – 10.48 you lay out requirements for lighting controls that should be applied by any developers. Alas any development will produce more light pollution at night, no matter what controls you endeavour to put in place.

Thus this development will not preserve the dark night skies, within the neighbouring AONB. It will degrade those dark night skies.

Again, your plan will be detrimental to the AONB.

I object to the fact that the Council is proposing to allow the building of 1500-2500 houses, on a greenfield sites almost adjacent to the North Wessex Downs AONB.

IMPACT ON TRAFFIC

If you build 1500-2500 houses between Thatcham and Upper Bucklebury, it will increase traffic on the road that runs through Upper Bucklebury, Chapel Row, Bradfield Southend and to the dangerous junction of Common Lane and the A340 (on the corner of Englefield Estate's wall).

You cannot control where people drive. There will be 2000 or so more cars on the road and some will head north out of your proposed development.

This will push more traffic into the North West Downs AONB, onto rural roads that are inadequate and have no pavements. You should not attempt to mitigate the obvious increase in traffic with larger roads as that would be detrimental to the AONB.

You have produced no modelling to suggest that this increase in traffic will not occur. If you had such modelling, it would obviously be flawed as more houses, will cause more traffic.

I hope that instead of your proposed plan, that you will:

- Develop a plan that requires fewer houses, taking instead into account the physical and environmental constraints of West Berkshire;
- Not build on green fields, but instead have a plan that has multiple brown field developments;
- Not build almost adjacent to the AONB.

Yours sincerely,

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