

Planning Department
West Berkshire Council
Market Street
NEWBURY
RG14 5LD
For the Attention Case Officer

Reference: WBC Local Plan Review - Regulation 19 objection - STRONGLY OPPOSE

Dear Sir/Madam

I have taken a considerable amount of time to read through the Proposed Local Plan and the remarks below superficially relate to the proposed SP.17 housing development to which I object as I find it unsound.

Although we all understand the necessity for new housing it needs to be a considered approach and take into account all existing sites and infrastructure within the local area. This is why I strongly disagree with the proposed allocation of 1,500 - 2500 dwellings (actually this figure maybe higher) on the North East Thatcham development.

1. There is absolutely no evidence to support WBC claims that SP17 will have a positive impact on the environment. There is no evidence to support this claim. There is no habitat survey or environmental study on the biodiversity. How can a council report there will be a nett gain when there is no study or evidence-based survey on the existing or background study? This fact alone makes the environment impact brief unsound, and not fit for purpose. As part of the objections to SP.17 Bucklebury Parish Council complied a biodiversity study of the proposed site and identified that it would cause a significant loss of habitat and identified may endangered species, seven of which are on the red list. We also recorded and have evidence of bat activity, badgers, Western Roe Deer, fox in the adjacent woodland and hedgerows to the site. The streams adjacent to the site support fresh water shrimp and other important creatures including Newts. Why was this not picked up during the not, inconsiderable time frame, that WBC had to prepare their report?
2. The existing hedgerows in particular are vitally important as green infrastructure and wildlife corridors that attached to the AONB. WBS actually identifies this in Paragraph 179 of the framework but there is not strategy detailed as to how these are to be safeguarded and ring-fenced.
3. The council supposedly supports the creating of strategic gaps and keeping village identity and the proposal . *The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character.*

If this is fact then why is the current proposal contra to this policy. It is important to keep the strategic gap between Thatcham and Bucklebury. This is also relevant to the other developments for example at Benham Hill otherwise the entire of this area become one monolithic urban development and completely loses the character of individual settlements.

4. The original Thatcham Growth Plan issued by WBC had provision for two Country Parks. This has been subsequently down-graded in SP.17 to undefined "community parks". The LPR actually states to facilitate connection to the AONB. As I am privileged sit on the Parish Council, The Common Stewardship Scheme and the Chair of the Bucklebury Commoners Association, I confirm that we have not even been consulted on this proposal and its potential impact.

We can confirm that the increase footfall during and after Covid 19 and a very negative effect on the biodiversity of Bucklebury Common reducing and putting pressure on a number of endangered species, including Woodcock. We are working very hard to preserve, maintain and enlarge the only heathland in the AONB. This area is very special, sensitive habitat and a refuge for Adders (Common Viper), Stonechats, Nightingales, Woodcock and Nightjars are of which are under threat. The Common is private land but the landlord grants access to the general public but this needs to be controlled. There are no mitigating parameters within the SP.17 to prevent a very negative biodiversity imbalance. There is a real, genuine concern that illegal 4 x 4 and trails bike traffic will also increase.

5. The visual impact on the AONB will be enormous, especially when viewed from Greenham or the higher ground south of Newbury/Thatcham. Reading through the report there is some confusion and ambiguity on which levels are considered acceptable. Much of the proposed development actually exceeds the 100 m contour especially around Harts Hill and towards Long Grove Copse. We have been informed under Regulation 18 that the development will all be below 100 m. This is false. It will be imposing for the existing residents and be extremely visual. Anyone who has actually looked at this vista will have noted the Henwick Driving range and this is noted as being at 90 m. The majority of proposed housing will be at this level and above – highly, highly visible. We raised this question during Regulation 18 and the response was it was the responsibility of the developer's masterplan. To avoid this issue is just unacceptable and again raises the question of soundness.
6. Thinking of the precedent that it sets, it is interesting to note that the Planning Inspectorate dismissed an appeal to build 26 homes adjacent to the North West Downs Area of Outstanding Natural Beauty as it would have had a significant impact on the AONB and *"suburbanise an important green gap which makes a significant contribution to the rural setting.. and cause irreversible harm to the intrinsic rural character..."* This decision was made on 26 dwellings imagine the impact of 1,500 -2,500 and the subsequent infrastructure required.
7. Traffic – I raised a number of questions under Regulation 18 on the matter of the increased traffic and its effect on Bucklebury and the environs. The answer cited is naïve. *"Highway works and active travel routes would assist in directing residents to using the A4/Floral Way rather than Harts Hill Road, and using an enhanced cycling and walking network to travel, including to Thatcham train station"*.

I cannot believe WBC officers actually think that drivers will turn left into congestion if they wish to go East/West for the A4 and M4 and over the crossing to join the A34 north/south. This is just unrealistic and any proposal should be supported by detailed modelling. Traffic going north will transit up Harts Hill, along the ridge and through Cold Ash putting enormous pressure on struggling system. The area of Burdens Heath (Bucklebury) will be specifically impacted and although this is an existing 30 mph zone, traffic leaves the village anywhere between 40-60 mph (we have the data).

Those drivers going west for the A4 and M4 will just drive straight through the parishes of Bucklebury, Bradfield and Englefield and will cause more congestion at the dangerous Theale crossroads which is an accident blackspot. The general public are in love with their cars and cannot be easily persuaded onto public transport. I formerly invite any WBC officer to come and discuss this matter in person using the existing/proposed public transport and the enhanced cycling/walking network.

8. The local plan also identifies an aviation pipeline on the south of the site and a gas pipeline at the north. Both of these will restrict access and the size of the potential development and create problems with easement. There is no detail on how developers are going to overcome these issues especially access into the SP.17 site from the south.
9. The Harts Hill Road is a notoriously dangerous stretch of windy road (We recently had three accidents in one morning this January). Having a new access route into the site from this road is profoundly unsound.
10. Foul Water

Current Synopsis

Thatcham, Newbury and the surrounding district is served by Thames Water's Sewage Treatment Works (STW) in Lower Way, Thatcham. The facility is fed by two sewers (Dia. 18" and Dia 15") running from Faraday Road to Lower Way that are in poor repair and over 100 years in age. These take the combined flow of sewage and surface water from the older areas of Newbury as many of the properties have combined systems. There is a similar pumping main that runs from Turnpike, serving that area with a pumping station at Benham Hill. Another sewer runs from the pumping station in Station Road, Thatcham is gravity fed from all the current estates in the north development of Thatcham and the town centre. This facility also has to accommodate all the smaller village septic tank systems, tankered into Lower Way, and commercial septic/cesspool collections.

Currently there are 600 new houses being constructed near Vodafone, 167 new flats at Boundary Road (Ex-Sterling Cables site), 157 houses near the Tesco Supermarket (Retail Park), and 100 houses with planning approval in Lower Way. In total 1,024 properties excluding any infill and ribbon development (say, an additional $1024 \times 300 = 307,200$ litres/day). The current NE Thatcham20 proposal (SP17) adds an additional 1,500 houses (minimum), (i.e. $1,500 \times 300 = 450,000$ /litres per day).

The current system at Lower Way has a maximum intake capacity of about 600 litres/second. If the input figure is in excess of this figure, which frequently occurs, the

combined flow is fed into two overflow tanks. The regulated input is fed into Fermentation Settling Tanks (FST), an activated sludge system with percolating filter. If these are over capacity, or if the overflow tanks are full, the untreated effluent is delivered directly into the River Kennet.

Regulation 19

There is no mention of how the infrastructure is going to be improved with regards to this foul water requirement. The average daily requirement is 150 litres per person per day; assuming an average of two persons/household, adds an additional 450,000 litres/day from the proposed SP17 development that has to be treated at Lower Way. This does not take into account any surface water that might have been connected to the sewer system, new buildings and amenities, or any other necessary infrastructure and, more importantly, the above additional input from recent developments. The equation excludes the additional 1,100 dwellings built recently at The Race Course (330,000 litres/day).

The TSW at Lower Way, has reached its design capacity, and apart from the sites listed above will also be required to treat the foul water from proposed sites designated: RSA1 to RSA7, RSA 9, RSA17 and RSA 22.

Without the necessary infrastructure the proposed housing development in NE Thatcham, SP17, is ill- considered and unsound. It will cause environmental damage (as the Biological Oxygen Demand (BOD) and Chemical Oxygen Demand (COD) on the outflow will certainly have to increase). From Google earth it is very apparent that there is very little room for further expansion on the site. There may be room for an additional storage tank but that would only act as additional attenuation and not mitigate the risk of pollution into the Kennet.

If this outdated plant cannot cope with the increase in flow, then the operators have no option other than to increase the BOD (and COD) discharge levels at the outlet into the River Kennet. This will exceed the permitted percentile limit set by the Environment Agency (EA).

This completely contradicts the Water Framework Directive cited in Regulation 19, for the improvement, restoration and enhancement of watercourses. Please note that much of the drinking water supply for Reading comes from this source and is abstracted at Fobney, downstream of the Lower Way STW and the proposed developments. The similar treatment facilities at Kintbury and Hungerford also discharge untreated water directly into the River Kennet during peak flow period.

West Berkshire Council has identified the requirement, it is mentioned in 5.63 of the Infrastructure Development Plan:

5.63 The Study indicates that “new homes require the provision of clean water, safe disposal of wastewater and protection from flooding. The allocation of large numbers of new homes in certain 35 locations may result in the capacity of existing available infrastructure being exceeded, a situation that could potentially cause service failures to water and wastewater customers, adverse impacts to the environment, or high costs for the upgrade of water and wastewater assets being passed on to the bill payers.”

Conclusion

If the problems above have been clearly identified by WBC, surely no planned development should be considered until this matter has been fully investigated and a solution prepared. The existing sewers and infrastructure feeding Lower Way are real matters for concern, as there is no simple method of repairing or replacing this Victorian system, short of excavating the A4, one of the main arterial roads, while this extensive work could be carried out.

There is absolutely no doubt that the existing infrastructures is failing. The evidence of extreme infiltration identified at the Faraday Road sump, is clear evidence that the pipework has lost its integrity. Recently an old section failed on the junction to Hambridge Road which should be well documented by the Environment Agency but it will have resulted in surface and groundwater pollution.

The LPR touches only briefly on the subject of Sewage Treatment In Section DC.6 para e : *“suitable land and access is safeguarded for the maintenance and treatment of water resources and wastewater, flood defences and drainage infrastructure”*. There is no detail. Potential developers, resident tax payers and local councils need this information.

The Infrastructure Development Plan Control Policies states:

*10.45 Developers will need to demonstrate that existing, planned and/or committed infrastructure is sufficient to accommodate new development proposals. This includes demonstrating that there is adequate water supply, surface water drainage, foul drainage and sewage treatment capacity both on and off site to service the development. Necessary improvements to sewerage water treatment infrastructure will be programmed by the water companies **and need to be completed prior to occupation of the development**. This is to ensure that such infrastructure is in place to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property and pollution of land and watercourses. In some circumstances this may make it necessary for developers to arrange for appropriate studies to ascertain whether the proposed development will lead to the overloading of existing local infrastructure. Where there is a capacity problem in the local network developers will be expected to requisition or otherwise fund local infrastructure improvements.*

If this directive is adopted and implemented by West Berks Council (WBC), any planning developments should not commence until all the relevant information is submitted by developers and approved by WBC. This is a key clause and should be fully implemented and enforced, if the infrastructure system is not improved and augmented it is impossible for developers to comply with WBC Policy DC.6.

The Local Plan Review does not mention any improvements to the existing sewage network or planning provision for new STW sites: this alone makes the current proposal unsound.

11. Potable Water

Currently the water for Thatcham and the environs is extracted at Bishops Green and Speen. Sarah Bentley, CEO of Thames Water, has recently stated that the current requirement per person per day is 150 litres. The increasing demand for potable water is having a profound impact on the water table in both the Kennet and Pang River valleys. The River Pang that runs through the villages of Bucklebury and the adjacent village of Bradfield completely ran dry again this year as a result of the reduced level of the aquifer.

In the past there are accounts of the river not running (1838 - Environs of Newbury), but this was during the first half of the year and only then for a couple of months; and again briefly during the drought of 1976. In 2022 the river did not run for a considerable time four to five months and even after the very wet period in the autumn the river was still bone dry in November and not really flowing until 9th December 2022. This devastating impact on the environment and the biodiversity was caused by over-extraction at Compton and neighbouring extraction points and is in complete contradiction to the Water Framework

Directive that is cited in Regulation 19. There are no suggested mitigation measures as this is the sole responsibility of Thames Water.

The infrastructure plan, in sections 5.65 & 5.66, also points out this is a major problem:
5.65 Thames Water (TW) are responsible for supplying West Berkshire with water. The council identifies West Berkshire as an area of serious water stress, in common with the rest of the South East. It comments that the more stringent water efficiency target for new developments of 110 l/p/d allowed under Building Regulations is justified, however West Berkshire Council may want to consider going further than the 110 l/p/d target, particularly in larger strategic developments.

5.66 The WBC states that growth plans defined in Water Resource Management Plans (WRMPs) are broadly in line with the growth projections of West Berkshire Council. "The WRMP does not predict a supply-demand deficit, except in peak or drought conditions, and proposes actions over the WRMP planning period to improve resilience".

This is an unsound judgment for foreseeing no predicted supply demand deficit, we are experiencing predicted extreme weather conditions and had a hose pipe ban enforcement for many weeks in the summer of 2022 which was lifted only on 22nd November, 2022. The existing water mains and infrastructure in Bucklebury and adjacent parishes is old and in poor condition and suffers from numerous bursts and fractures.

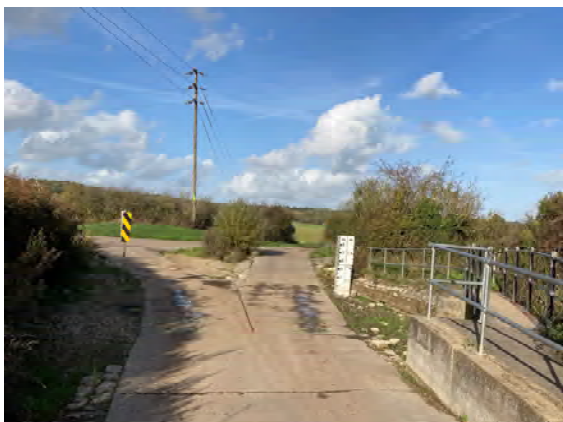


Fig.1 River Pang 26th October 2022



Fig.2 River Pang started flowing again 9th December 2022.

12. Flooding

UKCIP predicts a reduction in the overall annual rainfall but more frequent and intensive storms. The heavy storms in 2007 illustrates the amount of flooding that can occur off the hills surrounding Thatcham. The severity of storms will increase in nature and frequency. Global warming will increase the amount of rainfall through as an increase in temperature, increases the moisture capacity of air. Anyone with access to a psychrometric chart can make the calculation, for example, at 25°C with a RH (relative humidity) 60% the amount of moisture is 12 g/m³. This does not sound a lot but this need to be multiplied but a given area and a height of approximately 10 km. An increase of two degrees to 27°C/60% RH increases the amount of moisture to 13.5 g/m³ (12.5% increase in the air moisture capacity).

If SUDS and attenuation measures reduce the immediate impact the collective storm water this total flow will all converge on Thatcham and the River Kennet. SP.17 proposes 1500-2500 dwellings plus garage, outbuildings, hard standings, car parking, pavements, roads or any infrastructure works, schools, playgrounds and warehousing development etc. Even if this attenuation is mitigated locally, the problem is just shifted further downstream which is environmentally irresponsible and in breach of current environmental protection policies.

Conclusion

The area of SP.17 is bisected by the ephemeral water courses which is such a dominant geological and natural feature of the proposed site. 2.51 actually states *“There is a risk of surface water flooding within the site along the natural drainage routes based on Environment Agency modelling”*. The document however fails to identify the underlying rock strata of Reading Beds clays which predominates and promotes rapid runoff as anybody who has carried out the standard percolation test on this material will substantiate.

Already West Berks Council have spent a substantial amount of money in flood defences to protect the town but these are completely irrelevant if the road network penetrates these defences. The water will simply find the path of least resistance.

Policy CS 16 states:

Development will only be permitted if it can be demonstrated that:

- *Through the sequential test and exception test (where required), it is demonstrated that the benefits of the development to the community outweigh the risk of flooding.*
- *It would not have an impact on the capacity of an area to store floodwater.*
- *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.*
- *Appropriate measures required to manage any flood risk can be implemented.*
- *Provision is made for the long-term maintenance and management of any flood protection and or mitigation measures.*
- *Safe access and exit from the site can be provided for routine and emergency access under both frequent and extreme flood conditions.*

It is unclear who will retain the overall design responsibility for the flood alleviation systems and their essential maintenance programme. If the council have identified and set the above parameters their proposal of building 1500-2500 dwellings, warehouses, roads and associated infrastructure the proposal contains no detail on how these vitally important measures are to be costed, implemented, maintained and adopted.

13. On 22nd May 2019, the Government introduced REPP19 to strengthen the national emergency preparedness and response arrangements for radiological emergencies. The new legislation replaced the Radiation (Emergency Preparedness and Public Information) Regulations 2001. All 36 UK nuclear sites working with ‘ionising radiation’ (as defined by the legislation) have one year to comply in full by 21st May 2020. The AWE Detailed Emergency Planning Zone (12th March 2020) set out and defined the Outline Planning Zone (OPZ) for Aldermaston area as 15 km. WBC issued the emerging draft LPR in December 2020, under policy SP.4 section and the Outline Consultation Zone (OCZ) for Aldermaston is set at 8 km. The AWE Emergency Plan states:

What is important and pertinent to our findings is that for both sites there has been no change in activity, safety or risk, but a change in criteria required to evaluate the risks against. The differences between the two sites with respect to the scale of change relates to what materials are on each site, the amounts involved and what processes are undertaken at each of the sites.

Following and instruction from the ONR this was reduced to 5km. If the above is correct then why a reduction in the zone? furthermore, the OPZ has also been reduced from 15 km to 12 km.

I conclude that I will be prepared to give evidence at a public enquiry and clarify any details arising from the above.

Yours Sincerely

