


West Berkshire Local Plan Review 2022-2039
Proposed Submission Representation Form
Ref:
(For official use only)

Please complete online or return this form to:	Online: http://consult.westberks.gov.uk/kse
	By email: planningpolicy@westberks.gov.uk
	By post: Planning Policy, Development and Regulation, Council Offices, Market Street, Newbury, RG14 5LD
Return by:	4:30pm on Friday 3 March 2023

This form has two parts:

- Part A - Your details: need only be completed once
- Part B - Your representation(s): please fill in a separate sheet for each representation you wish to make

PART A: Your Details

Please note the following:

- *We cannot register your representation without your details.*
- *Representations cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.*
- *All information will be sent for examination by an independent inspector*
- *All personal data will be handled in line with the Council's Privacy Policy on the Development Plan. You can view the Council's privacy notices at <http://info.westberks.gov.uk/privacynotices>*

	Your details	Agent's details (if applicable)
Title:	Mr	Mr
First Name:*	Barry	Andrew
Last Name:*	Dickens	Black
Job title (where relevant):	Chairman	
Organisation (where relevant):	Bucklebury Parish Council	Andrew Black Consulting
Address* <i>Please include postcode:</i>		Hill Place House 55a High Street Wimbledon Village London SW19 5BA
Email address:*		
Telephone number:		

*Mandatory field

Part B – Your Representation***Please use a separate sheet for each representation***

The accompanying guidance note available at: <https://www.westberks.gov.uk/lpr-proposed-submission-consultation> will assist you in making representations.

*Your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change(s) as there will **not normally** be a subsequent opportunity to make further representations, **further submissions will ONLY be at the request of the Inspector, based on the matters and issues they identify for examination.***

Your name or organisation (and client if you are an agent):	Bucklebury Parish Council
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Please indicate which part of the Local Plan Review this representation relates to:

Section/paragraph:	All Sections
Policy:	All Sections
Appendix:	All Sections
Policies Map:	All Sections
Other:	All Sections

1. Legally Compliant

Please see the guidance notes for an explanation of what 'legally compliant' means.

Do you consider the Local Plan Review is legally compliant?

Yes

No

Please give reasons for your answer:

Please see attached document

2. Soundness

Please see the guidance notes for an explanation of what 'soundness' means.

Do you consider the Local Plan Review is sound?

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF)

Please tick all that apply:

NPPF criteria	Yes	No
Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development		x
Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		x
Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground		x
Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		x

Please give reasons for your answer:

Please see attached document

3. Complies with the Duty to Co-operate

Please see the guidance note for an explanation of what 'Duty to Cooperate' means.

Do you consider the Local Plan Review complies with the Duty to Co-operate?

Yes

No

x

Please give reasons for your answer:

Please see attached document

4. Proposed Changes

Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see attached document

5. Independent Examination

If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?

Yes

No

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To provide updated evidence to the examiner. For other relevant experts employed by parish council to give detailed technical views on matters.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

6. Notification of Progress of the Local Plan Review

Do you wish to be notified of any of the following?

Please tick all that apply:

Tick

The submission of the Local Plan Review for Independent Examination	<input checked="" type="checkbox"/>
The publication of the report of the Inspector appointed to carry out the examination	<input checked="" type="checkbox"/>
The adoption of the Local Plan Review	<input checked="" type="checkbox"/>

Please ensure that we have either an up to date email address or postal address at which we can contact you. You can amend your contact details by logging onto your account on the Local Plan Consultation Portal or by contacting the Planning Policy team.

Signature	Andrew Black	Date	01.03.23
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Your completed representations must be received by the Council by 4:30pm on Friday 3 March 2023.



West Berkshire Local Plan Review

Proposed Submission (Regulation 19)
Consultation

Representations on behalf of Bucklebury Parish
Council

March 2023

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**Appendix 1 – BPC Comments on Thattham North East Settlement
Boundary Review**

Appendix 2 – North East Thattham Sustainability Appraisal Extract

**Appendix 3 - Preliminary Study for the Establishment of a Thattham
Country Park**

Appendix 4 – Initial Biodiversity Assessment

Appendix 5 – YES Engineering – Transport Evidence Review



1. Introduction and Executive Summary

- 1.1 These representations are made on behalf of Bucklebury Parish Council (BPC) in response to the regulation 19 Consultation for the West Berkshire Council (WBC) Local Plan Review (LPR). The representations set out that there are multiple significant flaws in the regulation 19 version of Local Plan Review which are incapable of being remedied prior to the submission of the document for examination. The Local Plan Review, and accompanying evidence base, is fundamentally unsound for numerous reasons as set out within these detailed representations.
- 1.2 These representations have been prepared with significant input from experts on a variety of technical matters. Technical reports have been prepared by Yes Engineering in relation to highways and the Nature Bureau in relation to biodiversity and ecology and are appended to these representations.
- 1.3 The representations have been informed by ongoing consultation with the residents of Bucklebury and the surrounding area who have detailed knowledge of the history and constraints of North East Thatcham. This has uncovered a substantial lack of logic in the decision-making process to allocate the area to the North East of Thatcham for significant housing growth.
- 1.4 At the time of these submissions, a consultation is taking place (until 2 March 2023) for proposed changes to the National Planning Policy Framework (NPPF). The potential impact of those changes in respect of the WBC Local Plan Review are discussed in subsequent sections of these representations. However, the main thrust of these representations is made against the existing tests of soundness as set out in paragraph 35 of the current NPPF. This states that plans are 'sound' if they are:

Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

- 1.5 For the reasons set out within these representations, it is considered that the plan is unsound and fails against each of the tests as set out in paragraph 35 of the framework in numerous



areas of the LPR. The failings against the tests of soundness are set out in each of the subsequent sections of these representations.

- 1.6 The LPR is **not positively prepared** and would not achieve the goal of sustainable development for WBC and the wider Thatcham area.
- 1.7 The LPR is **not justified**. Many of the grounds for assessment of impacts and benefits lack credibility and are not based on available evidence. Reasonable alternatives have not been adequately explored and there is no basis to demonstrate that the allocation of North East Thatcham represents an appropriate strategy for WBC.
- 1.8 The LPR is **not effective**. There is no evidence that the development of 1,500 homes at North East Thatcham is deliverable within the plan period.
- 1.9 The LPR is **not consistent with national policy**. In many instances the allocation for development of North East Thatcham under policy SP17 would directly conflict with national policy, particularly in relation to landscape character and impact upon the AONB.
- 1.10 The process of assessing the impact of development under policy SP17 through the sustainability appraisal is fatally flawed and is not a matter which can be easily remedied through modifications to the plan.
- 1.11 The process for selection of North East Thatcham as a development site is severely flawed and lacks evidence.
- 1.12 These representations set out detailed commentary against the following matters:
 - *Timing of the Consultation*
 - *Consultation and Duty to Co-operate*
 - *Site Selection Process*
 - *Sustainability Appraisal*
 - *North East Thatcham Strategic Allocation*
 - *Landscape and Character Impact*
 - *Highway Impact*
 - *Heritage Impact*
 - *Infrastructure and Services*
 - *Climate Change and Flood Risk*
 - *Water Supply and Foul Drainage*
 - *Conclusions*



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- 1.13 Bucklebury Parish Council wishes to participate in the examination process and will be presenting further evidence through the submission of matters statements and oral evidence from experts.



2. Timing of Consultation

- 2.1 On 6 December 2022, Michael Gove, Secretary for Levelling Up, Housing and Communities, released a written ministerial statement which set out the following in relation to Local Plans:

We will end the obligation on local authorities to maintain a rolling five-year supply of land for housing where their plans are up-to-date. Therefore, for authorities with a local plan, or where authorities are benefitting from transitional arrangements, the presumption in favour of sustainable development and the ‘tilted balance’ will typically not apply in relation to issues affecting land supply.

I also want to consult on dropping the requirement for a 20% buffer to be added for both plan making and decision making – which otherwise effectively means that local authorities need to identify six years of supply rather than five. In addition, I want to recognise that some areas have historically overdelivered on housing - but they are not rewarded for this. My plan will therefore allow local planning authorities to take this into account when preparing a new local plan, lowering the number of houses they need to plan for.

- 2.2 Subsequently on the 22 December 2022, the Department for Levelling Up, Housing and Communities (DLUHC) commenced a consultation on the draft amendments to the NPPF which runs until March 2023.

- 2.3 In accordance with the Written Ministerial Statement, paragraph 61 of the NPPF in relation to *delivering a sufficient supply of homes* is proposed to be amended (in bold) to require the following:

*To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. **The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area (see paragraph 67 below). There may be – unless exceptional circumstances relating to the particular characteristics of an authority which justify an alternative approach to assessing housing need; in which case the alternative used which should** also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for²⁹.*

- 2.4 Policy SP12 of the Local Plan sets out provision will be made for up to 9.146 additional homes. This is based on the Local Housing Need Figure of 513 dwellings per annum which is based on the 2014-based ONS Household Projections. A shortfall of 230 dwellings from Reading Borough Council has been added in to the housing requirement.

- 2.5 Alongside the changes to the NPPF the Consultation Document published by DULHC states that the government will review the implications on the standard method of new household projections data based on the 2021 Census which will be published in 2024.



2.6 It is therefore clear that the direction of travel is for a plan led system where the amount of housing which must be planned for within any local plan is likely to be significantly reduced from the 513 dpa figure in the WBC LPR which is based on outdated ONS projections, and a flawed methodology used to derive a housing target. Other local authorities have chosen to pause further progress on local plans whilst the extent of the changes to the method of housing need calculation is fully understood.

2.7 The consultation also proposes significant changes to the presumption in favour of sustainable development as applied to plan making under paragraph 11 of the framework. The changes to paragraph 11b are also significant and state that:

b) *strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas⁶, unless:*

i) *the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area⁷; or*

ii) *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; such adverse impacts may include situations where meeting need in full would mean building at densities significantly out of character with the existing area⁸; or*

iii) *there is clear evidence of past over-delivery, in terms of the number of homes permitted compared to the housing requirement in the existing plan; in which case this over-delivery may be deducted from the provision required in the new plan.*

2.8 The Housing Delivery Test results published in January 2022 show that WBC provided 117% of the required housing over the preceding three years. However closer examination of the figures shows a more significant oversupply in the last year.

	2018-19	2019-20	2020-21	Total
Homes Required	551	476	342	1368 (100%)
Homes Delivered	543	439	621	1603 (117%)

2.9 Given this picture it is clear that this would be taken into account if the plan were to be brought forward under the new measures in the consultation version of the NPPF. This could mean that large scale release of sites such as North East Thatcham would be wholly unnecessary.

2.10 Numerous other local authorities have taken the opportunity to pause their plan making progress until the results of the consultation are released and the changes to Planning Policy are finalised. It is illogical that WBC has not taken the same opportunity.



- 2.11 It is also surprising that members did not require the plan to be taken back to full council for approval prior to submission to the Planning Inspectorate for examination.
- 2.12 Most authorities have held a final vote in order to approve the submission of the local plan for examination. An example of this being Spelthorne Council on 31 January this year where the decision to submit for examination was made by members in full knowledge of the responses received during the final regulation 19 consultation. It is considered highly irregular that WBC has not chosen to provide members with the same opportunity. Given the significant failings in the plan identified by BPC and numerous others, it is considered that members should still be given the opportunity to consider the position of submitting a plan for examination that is effectively destined to be found unsound.
- 2.13 Section 20 of the Planning and Compulsory Purchase Act 2004 sets out the process for independent examination and states that a local planning authority must not submit a development plan document to the Secretary of State for independent examination unless (with emphasis added)
- a) They have complied with any relevant requirements contained in regulations under this part, and*
- b) They think the document is ready for independent examination.***
- 2.14 Notwithstanding the failings under regulations including those for Sustainable Environmental Assessment it is clear from even a cursory reading of the development plan documents that the LPR is **not** ready for examination. The regulation 19 consultation was twice delayed, presumably due to inadequacies in the evidence base. It is not considered that the plan is ready for examination, and it is the position of BPC that it should not be submitted until councillors are satisfied that it passes the statutory requirements of section 20 of the Act.
- 2.15 This in itself is a matter for legal challenge which BPC maybe taking further advice from Counsel on should the plan continue to examination in its current form and on the current timescales.



3. Consultation and Duty to Co-operate

- 3.1 Local planning authorities must comply with the Duty to Co-operate when revising their development plan documents and reviewing whether they remain up to date.
- 3.2 Section 33A(3) of the Planning and Compulsory Purchase Act 2004 sets out the activities which bodies subject to the duty to co-operate must co-operate on. Paragraph (3)(d) of section 33A of that Act provides that such bodies will be subject to the duty when undertaking activities that can reasonably be considered to prepare the way for the preparation of development plan documents, marine plans and other local development documents. Plan reviews prepare the way for the preparation of such documents as they involve an assessment of whether policies in a plan need updating.
- 3.3 Plans are required to set out strategic policies that address strategic priorities. These may include cross-boundary matters, including issues such as whether an authority is able to meet all its housing need. Given the direct implications of plan reviews in enabling such matters to be addressed through the updating of policies, it is important that the bodies subject to the Duty to Co-operate have an opportunity to engage in both how plan reviews are undertaken and the review of the plan. Engagement with neighbouring authorities and prescribed bodies needs to occur before a final decision on whether to update policies in a plan is made, as such engagement may influence that decision.
- 3.4 The level of co-operation is expected to be proportionate to the task and should not unduly delay the plan review. For example, an authority may set out how they propose to review the policies in their plan and when and how neighbouring authorities and prescribed bodies will be engaged. A record of how authorities will be engaged in the review of plans and of where agreement has or hasn't been reached on the need to update a policy or policies can be set out in the Statement of Common Ground.
- 3.5 WBC announced the reg 19 consultation on 20th January but then notified interested parties that some content on the WBC web site would be unavailable on 21st and 22nd January because of planned work on maintenance of the site. It was unclear what content could not be accessed and so review of the LPR evidence could not begin. WBC knew of the maintenance work and could have started the consultation once the evidence was available on 23rd January. The effect of their mismanagement is to shorten the Reg 19 consultation by 2 days to less than the 6 weeks required.
- 3.6 Further evidence of the lack of consultation is apparent in the approach taken by WBC to the Settlement Boundary Review. A consultation was launched by WBC in February – March 2020 and details of this are set out in the Settlement Boundary Review Paper. The timing of the consultation is curious given that this was undertaken at the time of the first lockdown for Covid-19 when Parish Councils and residents were focused on the response to Pandemic.
- 3.7 BPC was not consulted by WBC on the boundary review in the first instance as part of the Settlement Boundary Review. When told of the review by Thatcham Town Council, BPC responded (appendix 1). WBC erroneously state in the review paper that BPC failed to



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respond. The important points made were the need for a strategic gap between Thatcham and Bucklebury and that a 'country park' should be outside the settlement boundary to aid its protection. Each of these factors were ignored in the LPR.

- 3.8 BPC has wider concerns around the way in which WBC has undertaken the consultation process for the LPR and the Duty to Cooperate in general. Failings with Duty to Cooperate are matters which are not capable of being remedied in advance of the plan being submitted for examination. BPC will set out further details of these failings to the inspector should the plan be submitted to the Planning Inspectorate by WBC.



4. Site Selection Process

4.1 BPC submit that the Site Selection Process undertaken by WBC was fatally flawed from the outset and has resulted in a plan which is wholly unjustified and as a result is unsound.

4.2 The Site Selection Methodology Paper (January 2023) forms part of the evidence base for the LPR. The Paper simply repeats much of the policy context which the plan is based upon and correctly references the methodology as set out in the Planning Practice Guidance (PPG) as follows:

- *Stage 1 – identification of sites and broad locations*
- *Stage 2 – site and broad location assessment;*
 - *Estimating development potential*
 - *Assessing suitability*
 - *Assessing availability*
 - *Assessing achievability*
- *Stage 3 – windfall assessment*
- *Stage 4 – assessment review*
- *Stage 5 – final evidence*

4.3 Despite the acknowledgement of the methodology as set out within the PPG there is actually little in the way of evidence presented in the Site Selection Methodology Paper of a rigorous process being undertaken. Moreover, it makes no reference whatsoever of the change in site selection process following the decision to drop the decision to make a large allocation at Grazeley.

4.4 The Sustainability Appraisal sets out the following in relation to the Thatcham Growth Study:

The Thatcham Growth Study¹³ was commissioned to consider how best to deliver strategic development in Thatcham. The study identified that strategic development would be required in Thatcham to support the service provision and regeneration that Thatcham requires. While all sites in Thatcham have been considered the only sites (in combination with each other) that are considered suitable for strategic level of development are the group of sites located in North East Thatcham. No other alternatives have been considered as there are no other sites, or group of sites within Thatcham that would be able to deliver the scale of development required to support the additional infrastructure required (further details in the Site Selection Methodology¹⁴).

4.5 The Settlement Boundary Review (SBR) Paper (December 2022) also forms part of the evidence base for the LPR. Paragraph 12 of the paper sets out the following:

In Spring 2020, the council gave all town/parish councils and neighbourhood planning (NDP) groups across the District an opportunity to undertake an initial review of boundaries themselves. Officers held three workshops in Calcot, Newbury and Hungerford in February 2020 outlining the work involved and then followed this up with further written advice and maps showing existing boundaries to encourage community involvement.



4.6 The SBR Paper goes onto state at paragraph 15:

As far as possible the council used the results from this exercise as a clear community steer for the way forward and considered this information alongside the evidence contained in existing landscape character assessments and other relevant documents referred above. At the same time, a number of requests that had been submitted, as part of the Local Plan Review, by residents and other developers for small extensions to boundaries in some settlements were also considered. An 'on the ground' review of all the settlements across West Berkshire was completed by officers in 2021 and proposed boundaries were drawn up.

4.7 The position set out within the SBR Paper and responses summarised in appendix 1 are misleading and represent a failure in due process as part of the site selection process and setting of settlement boundaries.

4.8 Thatcham Town Council and BPC were not adequately consulted as part of this process and their comments were not accurately recorded. The response that was submitted by BPC is included in appendix 1 of these representations.

4.9 Of further concern in the site selection process is the transparency of the Housing and Economic Land Availability Assessment (HELAA). The most recent version of the was only published at the time of the start of the consultation process and was not made available to councillors when the decision to launch the regulation 19 consultation. It is also notable that the previous versions of the HELAA from February 2020 and December 2020 have not been made available as part of the evidence base for the plan.

AWE Aldermaston and Burghfield (SP 4)

4.10 The LPR contains very limited information regarding AWE Aldermaston and AWE Burghfield which is illogical given the significant impact this has had on the overall strategy for WBC including the site selection process.

4.11 The changes to the Detailed Emergency Planning Zone for AWE Burghfield covers the area formerly identified for Grazeley Village and the allocation was subsequently dropped following objection from the Defence Nuclear Organisation.

4.12 Paragraph 6.33 of the supporting text on Policy SP4 (Site Allocations in the Eastern Area) states that *if in future the DEPZ is reviewed and emergency planning arrangements are amended then future reviews of the Local Plan will consider whether strategic allocations in this area would be suitable*. Given the history of the DEPZ it is equally possible that the area could again be increased which would have a severe impact on the allocation for North East Thatcham and other allocations.

4.13 BPC has identified that the approach taken to the DEPZ has been inconsistent and subject to significant changes in the period leading up to the regulation 19 consultation. BPC also has concern over the consultation process with AWE, particularly over the strategic allocation of a scale of development the size of North East Thatcham which is within the Outer Consultation



Zone. There is a lack of compelling evidence that WBC has adequately consulted and considered the impact of AWE Aldermaston and AWE Burghfield in the preparation of the LPR.

- 4.14 BPC will set out further information on this matter should the LPR reach the examination process.

Development in the Countryside and the ‘Strategic Gap’

- 4.15 A Site Selection Background Paper (Reg18 SSBP) was produced for the regulation 18 consultation and curiously has not been published as part of the regulation 19 consultation.

- 4.16 Paragraph 8.11 of the reg 18 SSBP states:

The master planning work considered all of the HELAA sites promoted in Thatcham, rather than considering all suitable sites within West Berkshire.

- 4.17 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.

- 4.18 The Reg18 SSBP set out the following in relation to Site THA9 in Table 8.2:

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.

- 4.19 THA9 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.

- 4.20 By contrast at the time of regulation 18, THA20 was 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.

- 4.21 If fair selection criteria were applied, then the comments for THA20 would have been consistent with those for the much smaller development of THA9. However, the comments for THA20 stated:

In contrast there are very few negative impacts that developing the site would have.

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

- 4.23 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. The 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.*

4.24 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.

4.25 Unfortunately, the development at North East Thatcham 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.

Siege Cross

4.26 Siege Cross is a constituent part of the site allocation at North East Thatcham, 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 and dismissed by the Secretary of State in a recovered appeal decision (APP/W0340/W/15/3141449). It is puzzling that a site for 500 houses should be heavily resisted by WBC and now subsequently promoted for a significantly larger scheme.

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

4.28 WBC Planning Officers put forward the following in the 15/00296/OUTMAJ West Berkshire Council’s Statement of Case opposing the scheme in relation to Landscape and Visual Impact:

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).

...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.

- 4.29 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. However, in the SP17 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.

- 4.30 The Officer Report also set out commentary in relation to the impact on the North Wessex Down AONB as follows:

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."

4.31 It is abundantly clear that WBC's own expert was categorical 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.

4.32 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.



- 4.33 WBC have provided no new information or analysis to overturn their earlier conclusion. If that process was sound, then the logical conclusion is that the current conclusion cannot be.

Thatcham Growth Study

- 4.34 The three stages of the Thatcham Growth Study (TGS) are included within the evidence base for the LPR and it is referred to within the supporting text of the LPR.
- 4.35 BPC understand that the promoters of the NE Thatcham site paid WBC the sum of £100,000 which was spent with David Lock Associates on a HEELA study which recommended the allocation of the site. The report contains material inaccuracies such as disqualifying alternative sites by failing to properly consider the benefits; a bridge over the railway at Thatcham to replace a dangerous and crowded level crossing being an example. WBC were alerted to this by BPC and others but declined to correct the report even though on any rational scoring scheme the conclusion could have been different.
- 4.36 WBC then proceeded in subsequent stages of the TGS to make NE Thatcham a condition of the work. This is a 'confirmation bias' and ensures that evidence is collected that supports the HEELA rather than continuing to consider all options. The primary example is the vision study for Thatcham. In this the consultant Icen were instructed in the statement of requirements to provide a vision assuming THA20 was adopted. There are two flaws here. Firstly, the vision work should have preceded the site selection and secondly, the vision fails to be more than confirmation of a decision already made.
- 4.37 Overall, the serious flaws in the site selection process have led to erroneous selection of North East Thatcham for allocation within the LPR. As a result, the plan is not justified and wholly unsound on this basis alone. This is not a matter which can be remedied through further work on the evidence base in advance of examination.
- 4.38 BPC will continue to amass evidence on the scope, methodology and funding of the TGS to present this to the Inspector at the examination stage of the LPR.



5. Sustainability Appraisal

- 5.1 BPC has serious concerns over the approach taken to the Sustainability Appraisal which accompanies the LPR. The assessments made of the impacts and benefits of the allocation of North East Thatcham against the sustainability objectives are seriously flawed and lack any credibility or rationality. As a result, the true impacts of the allocation of North East Thatcham under policy SP17 have been under-represented within the evidence base.
- 5.2 Paragraph 32 of the framework requires that Local Plans and Spatial Development Strategies should be informed **throughout** their preparation by a Sustainability Appraisal (SA) that meets the relevant legal requirements.
- 5.3 The legal frameworks for SAs are set out within section 19 of the Planning and Compulsory Purchase Act 2004 which states that the authority must prepare a plan *with the objective of contributing to the achievement of sustainable development*. Moreover, the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 states that SAs must ensure the potential environmental effects are given **full consideration** alongside social and economic issues.
- 5.4 For the reasons set out within this section, and other sections in these representations, it is not considered that the council has given full consideration to all effects nor are the conclusions of the SA in respect of those impacts robust and logical.
- 5.5 Paragraph 32 of the framework goes on to state that the SA should *demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains)*. *Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered)*.

Sustainability Appraisal for SP17 – North East Thatcham Strategic Site

- 5.6 The SA sets out the assessment of the council of the development of North East Thatcham against the key SA Objectives.
- 5.7 In **all instances**, BPC consider that the approach taken to the assessment and scoring of the site against the SA Objectives is severely flawed. BPC has prepared its own analysis against the SA Objectives, and this is included with the reps at appendix 2.
- 5.8 Many, if not most of the conclusions are not based on any accurate or available evidence and an accurate or reasonable assessment leads to the site performing poorly against all SA objectives. Commentary on the assessment in relation to individual policies and impacts is set out within subsequent sections of these representations. Given that site selection should be an iterative process that is informed by the SA this shows that the process taken to allocate SP17 is severely inadequate and must be wholly disregarded.



- 5.9 This is a matter of legal compliance which goes to the heart of the preparation of the plan. It is not an error which can be remedied through minor amendments or further update to the SA.

Reasonable Alternatives

- 5.10 The Planning Practice Guidance sets out the way in which the SA can assess reasonable alternatives and identify likely significant effects as follows:

The sustainability appraisal needs to consider and compare all reasonable alternatives as the plan evolves, including the preferred approach, and assess these against the baseline environmental, economic and social characteristics of the area and the likely situation if the plan were not to be adopted. In doing so it is important to:

- *outline the reasons the alternatives were selected, and identify, describe and evaluate their likely significant effects on environmental, economic and social factors using the evidence base (employing the same level of detail for each alternative option). Criteria for determining the likely significance of effects on the environment are set out in schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004;*
- *as part of this, identify any likely significant adverse effects and measures envisaged to prevent, reduce and, as fully as possible, offset them;*
- *provide conclusions on the reasons the rejected options are not being taken forward and the reasons for selecting the preferred approach in light of the alternatives.*

Any assumptions used in assessing the significance of the effects of the plan will need to be documented. Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in the plan. They need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made.

The development and appraisal of proposals in plans needs to be an iterative process, with the proposals being revised to take account of the appraisal findings.

Paragraph: 018 Reference ID: 11-018-20140306

Revision date: 06 03 2014

- 5.11 Table 30 of the Sustainability Appraisal sets out the following in relation to Quantum of Development at North East Thatcham.



Table 30 SA/SEA of Options for Quantum of Development at North East Thatcham

North East Thatcham (quantum of development)	Summary of SA/SEA (See Appendix 4 for the full SA/SEA)	Discussion and outcome
Upto 2,500 homes	Overall development of this site would be likely to result in a positive impact on all elements of sustainability. The scale of the development provides for community infrastructure to be delivered on site, resulting in a significantly positive impact on social sustainability. While there is an unknown impact on environmental sustainability in relation to impacts on air, water, noise and soil mitigation measures would be able to deliver an overall neutral impact. Development is likely to result in a positive impact in relation to economic sustainability as employment and business opportunities will be provided for on site along with community facilities. The scale of the site allows for greater scope for onsite mitigation to any potential sustainability impacts.	This option is not to be taken forward. This option was originally to be taken forward and was included in the Reg 18 consultation. Despite providing a considerable number of new homes and community infrastructure to support these homes and the wider Thatcham community the potential impact the local community is considered too high, and politically a reduced number on the site is considered to be more acceptable. Therefore, this option will no longer be taken forward.
1,500 homes	Overall development of this site is likely to give a neutral impact on all elements of sustainability. The scale of the development would provide for some community infrastructure, resulting in a positive impact on social sustainability, however, the development may not be of a size to deliver a wider range of facilities to support Thatcham such as new education facilities. While there is an unknown impact on environmental sustainability in relation to impacts on air, water, noise and soil mitigation measures would be able to deliver an overall neutral impact. Development is likely to result in a positive impact in relation to economic sustainability as employment and business opportunities will be provided for on site along with community facilities. The scale of the site will mean that more additional sites will need to be allocated across the district.	This option is to be taken forward. This option was considered in light of the responses received to the Reg 18 consultation, which largely considered that 2,500 dwellings in Thatcham was too many. In response, the council has considered a reduced number of dwellings, which still enables a strategic level of development which can provide onsite community facilities. It is noted, that compared to a higher number of dwellings, this option may not deliver all of the education provision originally envisaged on the site, or the additional improvements to community infrastructure within Thatcham. However, a reduced number on the site is considered to be more appropriate.

- 5.12 The conclusion against the quantum of 2,500 homes on site that it would likely to result in a **positive impact on all elements of sustainability** is wholly irrational and illogical. This is further compounded by the suggestion that a quantum of 1,500 homes would give a **neutral impact on all elements of sustainability** which again is simply not the case.
- 5.13 No option for no development at NE Thatcham or a further lower amount. 1,500 dwellings is still a considerable number of dwellings. No option for 250-500 dwellings along the southern end of the site in small areas of development adjacent to the Bath Road has been considered.
- 5.14 BPC has undertaken a justified and accurate assessment of the impacts of the allocation of North East Thatcham through policy SP17 which demonstrates that the approach taken by WPC lacks justification and is not positively prepared in any way whatsoever. BPC will present this to the inspector at examination process to demonstrate that lack of rationality in approach taken by WPC in preparation of the LPR.



6. North East Thatcham Strategic Allocation

- 6.1 The full policy wording of policy SP17 is set out below with some comments made against each section.

North East Thatcham Strategic Site Allocation

Land as shown on the Policies Map is allocated for a sustainable low carbon, urban extension comprising of distinct neighbourhoods defined by their landscape and connected and contributing to Thatcham, and woven through with natural habitats and links. The site will be masterplanned and delivered as a whole to achieve a comprehensive development.

- 6.2 It is illogical that Masterplanning is yet to take place for the site and that there is no vision for how the homes will be accommodated on the site, especially as the site is sloping and its access is compromised by the pipeline.

The provision of all infrastructure, services, open space and facilities will be timely and co-ordinated. The Thatcham Strategic Growth Study provides guiding principles for the delivery of the site therefore proposals will demonstrate that these guiding principles have been positively responded to.

- 6.3 There is no detail on the infrastructure or other facilities. It is also clear from the viability work undertaken that the infrastructure has not been costed adequately and there is no available evidence that the site is deliverable.

Homes

The site is to be allocated for approximately 1,500 dwellings which will be completed within the period of the plan. These dwellings will comprise of a housing mix which complies with the housing mix contained in Table 3 of Policy SP18. In addition at least:

***40% of dwellings will be affordable housing; and
3% of dwellings will be delivered via serviced custom/self-build plots.***

Community

The site will provide:

***Local centres providing local retail facilities and small-scale employment for community use (approximately 1,100 sq. metres Class E and F2);
450 sq. metres GP Surgery to be offered to the Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board or other such appropriate body;***

- 6.4 Further consideration on the viability and deliverability of the GP Surgery is set out within subsequent sections of these representations.

***Early years provision;
A 2.5 FE primary school on site and sports infrastructure requirements of the school, land***



***to be provided and build costs to be met by the applicant;
Secondary provision - Land to meet the impact of the development. The nature and cost of the mitigation will be informed by a feasibility study, undertaken at the applicants expense and prepared in collaboration with the Council and local stakeholders;***

- 6.5 It is noted that the school provision has not been costed within the viability appraisal and therefore the deliverability of this element of the allocation is unjustified.

1,200 sq m community indoor facility to be used for sport and community uses with a variety of room sizes (currently use classes E and F);

- 6.6 This is a substantial size for a community indoor facility and no details or costings are provided for this within the evidence base.

Outdoor formal and informal sports pitches and areas to meet the identified need of the development; Open space to meet the needs of the development in accordance with Policy DM41;

- 6.7 Given that most of the site is on a gradient it is unclear how formal or informal sports provision will be brought forward on the site.

Green Infrastructure

The site will provide a comprehensive green infrastructure network which will take advantage of the landscape features of value within and around the site. This network will comprise:

***A new community park linking Thatcham to the North Wessex Downs AONB;
Greenways which connect through the site to the park, facilitate connection to the AONB, and include leisure routes accessible to all users;***

- 6.8 It is unclear why links to the AONB are being encouraged as part of the proposed allocation. Given the sensitivity of the common and the wider AONB then impact through an increase in access should not be encouraged. This is expanded on within further sections of these representations.

A comprehensive network of other accessible routes and connections within the development which provide walking and cycling links along desire lines;

- 6.9 Given the gradient and level change across the site, it is not considered that a comprehensive network of cycle paths or walking routes could be delivered.

Existing and new Public Rights of Way; and

Retained and new trees, hedgerows and other appropriate native planting which contribute to biodiversity net gain.

Transport



Measures will be included to improve accessibility by, and encourage use of, non-motorised transport modes. A Transport Strategy will provide detail on how this will be achieved, including:

Active travel improvements on routes between the site, Thatcham town centre and the railway station;

A vehicular through route;

Sustainable transport through routes;

Mitigation of the development's impacts on the highways network with improvements to existing junctions where they are needed and delivery of new access points for all forms of movement and transport to the site at locations to be agreed with the planning authority; and

How adverse impacts on air quality will be minimised.

- 6.10 Detailed comments on highway impact are set out in subsequent sections of these representations. BPC has significant concern that the evidence base for trip rates and trip distribution is highly flawed and mitigation measures will not be successful. The highway network in the vicinity of North East Thatcham is already over capacity and development of this scale will lead to severe traffic impact which would breach the threshold set out in paragraph 111 of the NPPF.

Sustainability

Development of the site will be supported by a Sustainability Charter which will establish how policy requirements will be achieved. This will be informed by:

An Energy Strategy which sets out measures to achieve a model low carbon development (following the energy hierarchy) in accordance with Policies SP5 and DM4, including:

net zero carbon (regulated and unregulated energy) emissions for dwellings;

- 6.11 It is highly unlikely that the dwellings will be brought forward as net zero carbon and no allowance has been made for this within the viability appraisal for the site.

BREEAM 'excellent' non-residential buildings;

on-site renewable energy to assist in the delivery of a net zero carbon neutral development; and carbon off-setting.

An Integrated Water Supply and Drainage Strategy which will set out:

measures to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site; and



surface water management approaches that could deliver net gain for Thatcham town, including use of on-site sustainable drainage systems (SuDS).

- 6.12 It is unclear how any development on this site would deliver a 'net gain' for Thatcham Town in terms of drainage and there is no allowance for this within the viability report for the site.

***An Ecology Strategy which will set out:
a Biodiversity Net Gain Strategy to show how net gain will be achieved including through habitat restoration and linkages;
how priority habitats and ecological features will be protected and enhanced;
the creation of new ecological features; and
a site-wide management plan.***

- 6.13 Further comments are made on the ecology of the site within these representations.

***A Green Infrastructure Strategy which will show how a network of multifunctional green infrastructure will be delivered across the site.
A Public Rights of Way Strategy to demonstrate how existing Public Rights of Way will be protected and enhanced and how new ones will be established, including bridleway links and safe crossing points.
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.***

- 6.14 It is clear from the wording of this section of the allocation policy that WBC accept that the site is within the setting of the AONB and that there will be an element of harm (in respect of lighting) which requires mitigation. This position conflicts the position in the Sustainability Appraisal which assesses the impact as being neutral in this respect.

- 6.15 It is considered that the harm to the AONB extends to a far greater impact than just lighting and is a severe failing in the conclusions of the Sustainability Appraisal.

A Landscape and Visual Impact Assessment (LVIA) in accordance with the Landscape Institute Guidelines for Landscape and Visual Impact Assessment 3rd ed. 2013. This will inform the final capacity, development, design and layout of the site and requirements for green infrastructure and the provision of public open space. The LVIA will be informed by the Landscape Sensitivity Assessment (2021) of the site.

- 6.16 Given the highly sensitive location of the site it is illogical that an LVIA has not already been carried out for the proposed allocation.

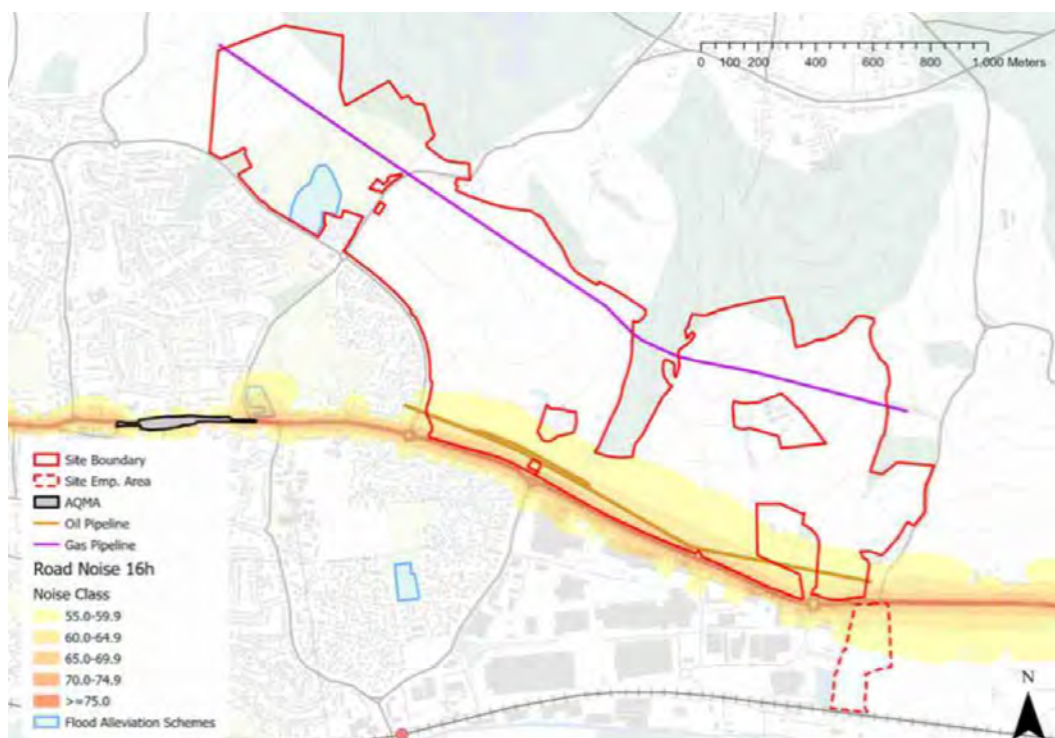
A Mineral Resource Assessment (MRA).

A Historic Environment Strategy to demonstrate how the listed buildings in the area will be conserved and how the impact of the development on their settings has been considered.

- 6.17 Consideration of heritage impact should have been undertaken as part of the site selection process and subsequent assessment of site capacity. It is not considered appropriate that this is left to later stages of the planning application process.

A Construction and Operations Management Plan (COMP) shall accompany any planning application on the site. The COMP shall safeguard the oil pipeline from operational works, including the provision of an appropriate buffer.

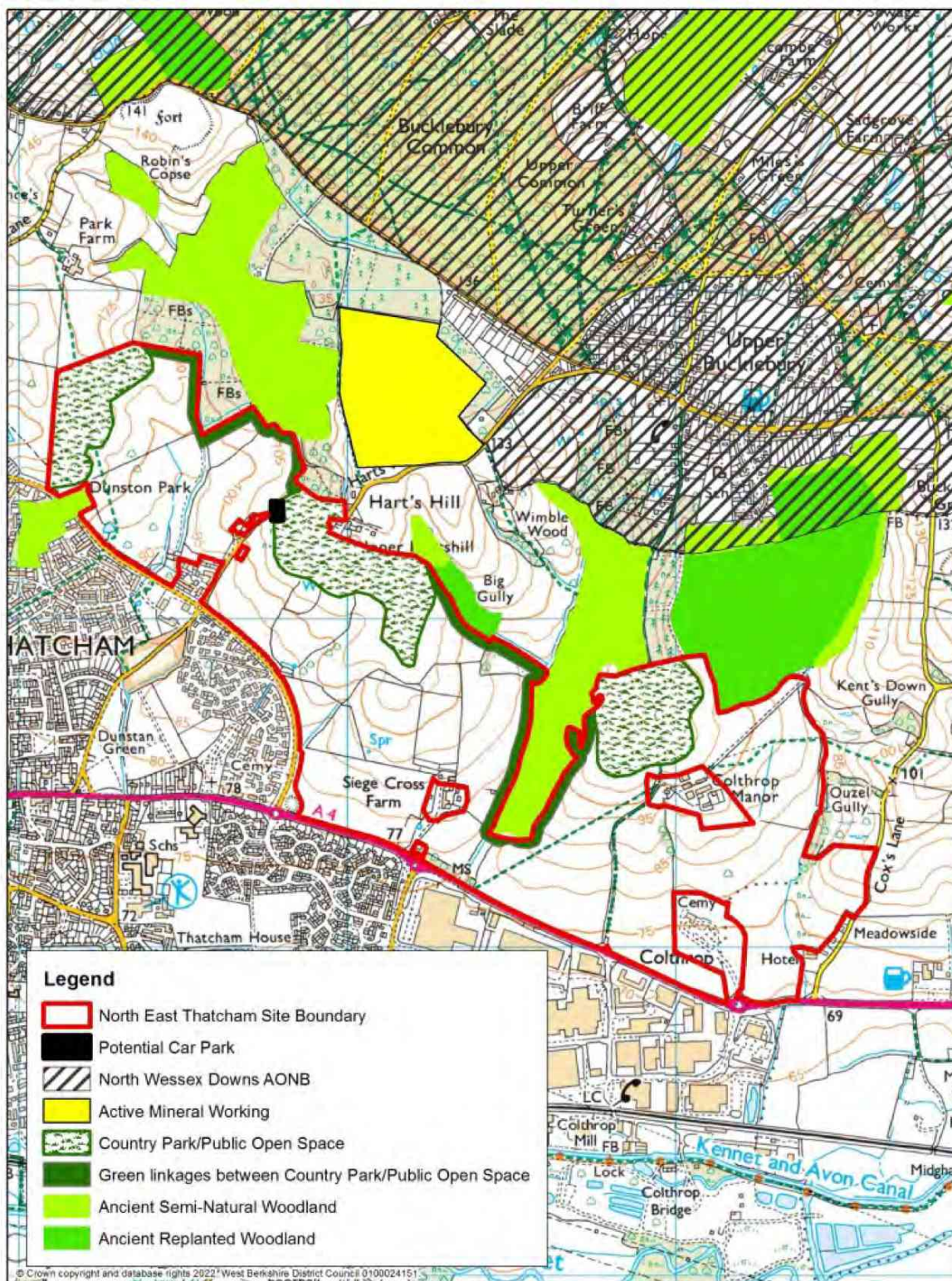
- 6.18 The Oil Pipeline is shown in figure 39 of the Thatcham Growth Study and runs along the entirety of the southern boundary and there is reference to a 6m easement either side. Assuming that this also includes a restriction on building roads then this could lead to significant impediments to the implementation of any development on the site.



- 6.19 Paragraph 2.44 of the Growth Study states:

*The low gradient land at the southern edge of the site is also compromised by the presence of an oil pipeline (detailed later in this chapter), **over which no development is possible for access reasons.***

- 6.20 Given the significant ambiguity over the position of the impact of the oil pipeline it is considered unclear on whether the site would pass the tests of **deliverable** and **developable** as set out in the glossary of the NPPF. Given that WBC are acutely aware of these constraints it is illogical that further work has not been undertaken. Further information will be presented by BPC at the examination on this matter.





7. Landscape and Character Impact

7.1 BPC has identified three key areas of environmental objection to the proposed Thatcham North-East strategic development site (SP17). These points of objection were summarised in the Bucklebury public meeting on December 2nd as follows:

- Damage to the Common
- Greenfield development in an AONB setting.
- Poor excuse of a 'country park'

7.2 There is no evidence to support claims that SP17 will have a positive impact on the environment. By contrast, there is every reason to believe it will have a significantly negative impact.

7.3 The National Planning Policy Framework is clear that plans should recognise the intrinsic character and beauty of the countryside, and that strategic policies should provide for the conservation and enhancement of landscapes. This can include nationally and locally-designated landscapes but also the wider countryside.

7.4 Paragraph 2.1 of the Context Section of the LPRPS sets out that 74% of West Berkshire is within the AONB and it therefore forms a very important part of the overall make-up of the district.

7.5 Policy SP2 of the LPRPS sets out the approach to development in connections with the North Wessex Downs AONB. The Supporting Text makes specific reference to the Management Plan for the North Wessex Downs.

7.6 During the regulation 18 consultation, a significant number of objections were raised based on the development's potential impact to the AONB. WBC responded to these objections by stating:

'In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.

The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.

With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to



provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.'

7.7 The Policy lacks focus for development within the setting of the AONB. Given the wide area of land (74%) that is covered by the AONB in the district there will consequently be a large amount of land that will be within its setting.

7.8 The North Wessex Downs AONB statement on development in the setting of the AONB states that *'examples of adverse impacts on the setting of the North Wessex Downs AONB include:*

- *development which would have a significant visual impact on views in or out of the AONB*
- *breaking the skyline, particularly when this is associated with developments that have a vertical emphasis and / movement (chimneys, plumes or blades for example)*
- *loss of tranquillity through the introduction or increase of lighting, noise, or traffic movement or other environmental impact like dust, vibration, spatial associations and historic relationships*
- *introduction of abrupt change of landscape character*
- *loss of biodiversity, particularly of habitats or species of importance to the AONB*
- *loss of features of historic and natural landscape interest, particularly if these are contiguous with the AONB;*
- *change of use of land such that to cause harm to landscape character*
- *development individually or cumulatively giving rise to significantly increased traffic flows to and from the AONB, resulting in loss of tranquillity and erosion of the character of rural roads and lanes*
- *Increase in air and water pollution.*

7.9 It is considered that the development of North East Thatcham would give rise to all of these adverse impacts to some degree or another.

7.10 The Planning Practice Guidance sets out the following in relation to landscape with special characteristic:

Where landscapes have a particular local value, it is important for policies to identify their special characteristics and be supported by proportionate evidence. Policies may set out criteria against which proposals for development affecting these areas will be assessed. Plans can also include policies to avoid adverse impacts on landscapes and to set out necessary mitigation measures, such as appropriate design principles and visual screening, where necessary. The cumulative impacts of development on the landscape need to be considered carefully.



Paragraph: 036 Reference ID: 8-036-20190721

Revision date: 21 07 2019

- 7.11 The Planning Practice Guidance goes on to set out how the character of such landscapes can be assessed.

For a designated landscape, the relevant management plan will contain further information on the area's particular character and beauty.

Where appropriate, landscape character assessments can be prepared to complement Natural England's National Character Area profiles. Natural England provides guidance on undertaking these assessments.

To help assess the type and scale of development that might be able to be accommodated without compromising landscape character, a Landscape Sensitivity and Capacity Assessment can be completed.

To demonstrate the likely effects of a proposed development on the landscape, a Landscape and Visual Impact Assessment can be used.

Paragraph: 037 Reference ID: 8-037-20190721

Revision date: 21 07 2019

- 7.12 The PPG goes on to states:

*All planning policies and decisions need to be based on **up-to date information** about the natural environment and other characteristics of the area including drawing, for example, from River Basin Management Plans, Areas of Outstanding Natural Beauty Management Plans, Green Infrastructure Plans (including environmental net gain and Nature Recovery Networks), Tree and Woodland Strategies, and landscape character assessments. Working with Local Nature Partnerships and other public bodies where appropriate, this should include an assessment of existing and potential components of ecological networks, biodiversity resources and landscapes.*

- 7.13 The Supporting Text of policy SP8 (Landscape Character) sets out the following in paragraph 5.41:

Other relevant landscape character assessments include the North Wessex Downs AONB Landscape Character Assessment (2002), which was produced in order to manage and guide change across a designated area extending beyond West Berkshire. In addition, Historic Landscape Characterisation (2007) and Historic Environment Character Zoning (2007) ⁽³⁰⁾, which provide a sound understanding of the historic environment context of West Berkshire, can also be used by the Council to inform and support planning decisions.

- 7.14 It is not considered that the Landscape Character Assessment that is now more than 20 years old can be considered as *up-to-date* in accordance with the guidance.



7.15 The Planning Practice Guidance goes on to state:

A Sustainability Appraisal which meets the relevant legal requirements on strategic environmental assessment should be an integral part of the preparation of spatial development strategies and local plans, and should consider all the likely significant effects on the environment, economic and social factors, and inform the strategy being progressed. Where relevant, strategic policy-making authorities will need to take into account the noise generated by existing businesses when allocating sites, in accordance with the “agent of change” policy set out in the National Planning Policy Framework.

Plans may require a variety of other environmental assessments, such as under the Habitats Regulations where there is a likely significant effect on a Habitats Site (which may not necessarily be within the same local authority area and may include in combination effects).

Paragraph: 043 Reference ID: 61-043-20190315

Revision date: 15 03 2019

7.16 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.” This does not adequately assess 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.

7.17 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 identities of Cold Ash and Bucklebury, and would harm the setting of the AONB settlement pattern.

7.18 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.

7.19 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.

Proposed Country Park

7.20 The LPR makes provision for a country park which is indicated as three areas on the plan accompanying the allocation.



- 7.21 The Reg 18 version of the LPR contained only 2 areas for the country park, the third was added for landscape reasons – to help support the need for rural separation on Harts Hill
- 7.22 The AONB board objects to the concept of a country park in close proximity to the AONB as it will encourage visitors to the area which has the potential to cause further harm to the wider areas.
- 7.23 The ‘country park’ has not been designed to support biodiversity net gain – not only are the areas indicated shown in isolated points (and not part of the broader habitat network) but also there is no evidence to suggest the levels of biodiversity net gain they might deliver, alongside the devastating scale of development it is there to buffer.
- 7.24 A carpark has been provided to attract users to the country park, but this is counter intuitive to the need to protect The Common and the wider AONB.
- 7.25 The Sustainability Appraisal sets out the allocation for development at North East Thatcham under policy SP17 would have a positive impact against the objective to *conserve and enhance the character of the landscape*. The WBC justification for this assessment states that *the policy is likely to have a positive impact on landscape character as consideration of the landscape is written into the policy*. This conclusion is absurd and lacks any justification.

Conclusion in respect of Landscape and Character Impact

- 7.26 It is not considered that plan is positively prepared, justified or effective in regard to landscape and the AONB and is unsound on this basis alone regardless of the conclusions against other elements of the LPR.



8. Ecology and Biodiversity Impact

8.1 It is considered that there are some significant issues with soundness on the approach taken to ecology and biodiversity impact as a result of the allocation of the land at North East Thatcham.

8.2 BPC commissioned reports from the Nature Bureau in relation to biodiversity and the country park and these are appended to these representations.

8.3 Paragraph 174 of the NPPF sets out the following in relation to biodiversity and ecology.

Planning policies and decisions should contribute to and enhance the natural and local environment by (inter alia):

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

8.4 The site is in the setting of the AONB and as such the development of the land would not protect nor enhance this valued landscape.

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

8.5 The development of this site would have a significant impact on the character and beauty of Thatcham and Bucklebury.

c) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

8.6 There is no evidence that the impact of the development on biodiversity or the provision of net gains for biodiversity have been adequately considered. Instead, this is being left to the application stage. This is considered too late and runs contrary to the approach set out in the NPPF.

d) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans;

8.7 Again, there is no evidence that the impact on these matters has been taken into account by WBC in the selection of the allocation site.



8.8 Paragraph 174 of the Framework goes on to state:

Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework⁵⁸; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

8.9 As set out, there is a distinct lack of evidence base documents in relation to such sites. Where such an evidence base does exist, it is considered to be significantly out of date.

8.10 Paragraph 179 of the Framework goes on to state:

To protect and enhance biodiversity and geodiversity, plans should:

- a) *Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity⁶¹; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation⁶²; and*
- b) *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.*

8.11 The Planning Practice Guidance sets out the following:

Section 40 of the Natural Environment and Rural Communities Act 2006 places a duty on all public authorities in England and Wales to have regard, in the exercise of their functions, to the purpose of conserving biodiversity. A key purpose of this duty is to embed consideration of biodiversity as an integral part of policy and decision making throughout the public sector, which should be seeking to make a significant contribution to the achievement of the commitments made by government in its 25 Year Environment Plan.

Guidance on the law concerning designated sites and protected species is published separately because its application is wider than planning. In applying this, the aim should be to fulfil statutory obligations in a way that minimises delays and burdens.

Paragraph: 009 Reference ID: 8-009-20190721

Revision date: 21 07 2019

8.12 The council has not embedded biodiversity as part of the plan and have instead chosen to leave this to the application stages.

8.13 The PPG goes on to set out how planning authorities can plan for biodiversity and geodiversity as follows:



Development plans and planning decisions have the potential to affect biodiversity or geodiversity outside as well as inside relevant designated areas.

Planning authorities and neighbourhood planning bodies can work collaboratively with other partners, including Local Nature Partnerships, to develop and deliver a strategic approach to protecting and improving the natural environment based on local priorities and evidence. Equally, they need to consider the opportunities that individual development proposals may provide to conserve and enhance biodiversity and geodiversity, and contribute to habitat connectivity in the wider area (including as part of the Nature Recovery Network).

In this context, it is useful to consider:

- *the latest government policies that are relevant, including the commitments in the 25 Year Environment Plan;*
- *the contents of existing up-to-date plans and strategies for biodiversity and nature recovery;*
- *the potential effects of a development on the habitats or species on the Natural Environment and Rural Communities Act 2006 section 41 list;*
- *whether an ecological survey is appropriate;*
- *opportunities to restore or enhance local ecological networks, including those that contribute to the wider Nature Recovery Network;*
- *how to secure net gains for biodiversity as part of green infrastructure provision; and*
- *opportunities to work strategically in order to streamline development decisions: for example, by establishing a ‘zone of influence’ around protected sites.*

Paragraph: 010 Reference ID: 8-010-20190721

Revision date: 21 07 2019

8.14 There is no evidence that WBC has taken into account any of these factors in the preparation of the plan.

8.15 The PPG sets out the evidence which needs to be taken into account in identifying and mapping local ecological networks:

Relevant evidence in identifying and mapping local ecological networks can include:

- *the broad geological, geomorphological and bio-geographical character of the area, creating its main landscapes types;*
- *key natural systems and processes within the area, including fluvial and coastal;*
- *the location and extent of internationally, nationally and locally designated sites;*



- *the distribution of protected and priority habitats and species;*
- *areas of irreplaceable natural habitat;*
- *habitats where specific land management practices are required for their conservation;*
- *main landscape features which, due to their linear or continuous nature, support migration, dispersal and gene flow, including any potential for new habitat corridors to link any isolated sites that hold nature conservation value, and therefore improve species distribution;*
- *areas identified by national or local partnerships with potential for habitat enhancement or restoration, including those necessary to help biodiversity adapt to climate change or which could assist with the habitat shifts and species migrations arising from climate change;*
- *audits of green infrastructure, such as open space within urban areas;*
- *information on the biodiversity and geodiversity value of previously developed land and the opportunities for incorporating this in developments; and*
- *areas of geological value which would benefit from enhancement and management.*

Local Nature Partnerships and similar partnerships working to conserve wildlife can be a useful source of information for existing ecological networks.

Paragraph: 011 Reference ID: 8-011-20190721

Revision date: 21 07 2019

8.16 There is no evidence that WBC has taken into account any of these factors in the preparation of the plan.

8.17 The LPR states (p46):

8.18 *Where a proposal is likely to result in harm to sites of local importance (including habitats or species of principal importance for biodiversity, and sites that meet the criteria for designation as a Local Wildlife Site or designation as a Local Geological Site), developers will be required to accord with the following sequential approach:*

Firstly, seek an alternative site in the District with a lesser impact than that proposed

Secondly, if the first is not possible, demonstrate mitigation measures can be taken on site

Thirdly, and as a last resort, seek appropriate compensation measures, on site wherever possible and off site where this is not feasible including long term management and maintenance.



Damage to Bucklebury Common

- 8.19 Bucklebury Common is one of the largest Commons in Southern England, containing the largest heathland in the North Wessex Downs AONB. It includes the historic Avenue of Oaks at Chapel Row, notable ancient woodlands, and other important habitats. It is a designated Local Wildlife Site, part of the Bucklebury Plateau Biodiversity Opportunity area, and as such is considered to include 'important and rare habitats and species', including one of the country's most important adder communities, and numerous protected animals and plants.
- 8.20 Management of the Common is entering a new phase and has presented its vision for the enrichment and on-going maintenance of this extremely rare and precious environment. The management team for the Common includes Natural England, BBOWT, NWD AONB and the Forestry Commission, along with members of the local community and ecological consultants.
- 8.21 At a presentation of the vision to the broader community, it was acknowledged that the Common is an open area, accessible by all. As such, it requires very careful management to protect it.
- 8.22 It is a key part of the Bucklebury vision for the Common to not increase the number of visitors, but to place the emphasis firmly on providing nature with a chance to restore itself and thrive, both in terms of the diversity and abundance of its fragile ecosystem.
- 8.23 Based on the housing mix described in the LPR, the proposed development represents an additional 4000+ people being actively encouraged into the AONB, which includes the irreplaceable habitats found in Bucklebury Common, with its ancient woodlands and heaths, pastures, greens and historic ponds.
- 8.24 The Common is already struggling to balance accessibility and leisure usage with the needs of the environment, with increased usage from cyclists and dog walkers particularly impacting ground-nesting birds, notably woodcock, and other wildlife.

Damage to Ecology

- 8.25 The land immediately adjacent to the proposed development area for SP17 contains 41 Local Wildlife Sites and is part of the Bucklebury Plateau Biodiversity Opportunity Area.
- 8.26 The data being used to establish the presence of species is out of date. In 2020, Bucklebury Parish sought environmental records for the 41 LWSs impacted by SP17:
- 80% of surveys were conducted more than 15 years ago
 - 50% were more than 20 years old
 - 44% were over 30 years old
- 8.27 BPC has appointed ecologists to conduct an independent study of the impacted area. The findings from a single day walk on public access routes indicated that the site had a much higher biodiversity value than previously appreciated, including the presence of seven species of threatened breeding birds and one threatened migratory species, several bat species and



abundant badger setts. The hedges, old trees and gullies served as important corridors linking up different habitats within and beyond the site boundaries. These initial findings imply that a full study will show the required mitigation measures and BNG will be far more complex for the development than was anticipated by the planners.

8.28 This one study has provided more information about the site than has been presented in the whole the LPR and its available evidence base. The area has a much higher biodiversity value than assessed by WBC.

8.29 Protected species are present across the site and will be impacted. No detail on mitigation measures has been presented by WBC. Critical habitat network features are under threat from the development and will severely impact distribution of key species.

8.30 The Sustainability Appraisal states that the allocation of development at North East Thatcham will have a significantly positive impact as a result of policy SP17. The WBC justification states that *the policy is likely to have a significantly positive impact on biodiversity as it sets out specific requirement for the development.*

Conclusions in respect of Ecology and Biodiversity Impact

8.31 Based on the representations made in relation to this matter it is not considered that the plan is justified, effective or consistent with national policy and is unsound on this basis alone.



9. Highway Impact

- 9.1 YES Engineering Group Limited was appointed by Bucklebury Parish Council to review the transport related evidence submitted with the West Berkshire Council emerging Local Plan specially with regards to the proposed allocation of NE Thattham. The full report is included as appendix 5 of these representations. References are set out within the report to THA20 rather than SP17 as this is how the site is described within the transport evidence base.
- 9.2 The WBC Phase 1 Transport Assessment report identified some junctions and links that would be affected by the proposed Local Plan growth. These were particularly focussed near to the proposed strategic North East Thattham site, indicating delays and congestion occurring around key junctions along the A4 corridor, with through traffic diverting onto unsuitable routes.
- 9.3 Concept junction improvements are set out in Appendix A of the WBC Phase 2 report which essentially provides greater capacity at junctions along the A4 corridor purely to facilitate the increase in traffic associated with development of North East Thattham. However, providing extra capacity would be contrary to WBC Policy CS 13 which seeks to mitigate the impact on the local transport network and the strategic road network.
- 9.4 Journey time analysis during the AM and PM peak hours was undertaken over a 2-week period from 13th to 24th February 2023 to assess the most desirable routes for those travelling east (towards Reading) or west towards M4 Chieveley. As shown within Appendix B of the appended report, it is demonstrated that the quickest route in each direction is via Harts Hill Road or via Cold Ash Lane rather than the strategic network (A4). The impact on these routes has not been assessed and this is a fundamental flaw within the modelling assessment.
- 9.5 Whilst the WBC Phase 2 report confirms other mitigation measures will be required to reduce car dependency for North East Thattham, however they cannot reduce the congestion (which already exists) to such levels that the most desirable route will no longer be heading north either via Harts Hill Road or Cold Ash Lane. This situation already occurs, and the WBC Phase 1 report has confirmed that these roads are unsuitable. Therefore, the selection of North East Thattham for significant development is fundamentally wrong as traffic will need to divert off the strategic network and non-highway based mitigation measures are almost impossible to achieve due its location/topography.
- 9.6 The A4 itself will create severance of the site from Thattham rail station for pedestrian/cycle activity as it will be extremely difficult to cross this strategic road, whilst any formal crossing points will cause further delay on the road network.
- 9.7 Congestion has been raised by WBC as a Key Issue and is consistently cited in the Council's annual residents' surveys as an issue that needs improving in the local area. The district has a high level of car ownership and usage that is in excess of the South East and national averages. Rapid population growth, housing, and employment in the last few decades, as well as the proximity to other larger urban areas, have seen an increase in demand for travel and a reliance on journeys made by the private car. The development at NE Thattham is located



within a rural setting with very limited access to public transport. As such it is expected that the development would only add to the already congested roads and is at odds with the Local Transport Goals to minimise congestion on the transport networks.

- 9.8 The WBSTM report confirms “Traffic flows increase (compared to the Reference Case) on major roads such as the A34, A339, A4, Bury’s Bank Road/Crookham Hill and the Broad Lane, as a result of increased traffic demand generated by the preferred Local Plan sites. There is a consistent re-assignment of traffic in all Local Plan scenarios (compared to the Reference Case) due to naturally increased demand and congestion in the town centre in particular, though local roads in general seem to demonstrate low levels of highway demand increases across all Local Plan scenarios. General increases in Local Plan traffic demand though the corridor, as well as THA20 site traffic directly accessing the A4 in this area, is likely to cause some displacement onto wider routes away from the A4, through local villages such as Upper Bucklebury”. As set out in Section 2, the routes of Bucklebury are unsuitable (no footways, no lighting, high speed, tight bends) for an increase in traffic flows and would create highway safety issues for existing residents.
- 9.9 The trip rate criteria is considered unreliable, whilst the a trip rate reduction of 25% due to mitigation measures is wholly unrealistic.
- 9.10 NPPF paragraph 111 states that ‘development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.’.
- 9.11 As demonstrated within the appended report, the impacts are severe and as acknowledged in the WBSTM report (point h above), development at North East Thatcham is likely to cause displacement onto wider routes away from the A4, through local villages such as Upper Bucklebury. The WBC Phase 1 Transport Assessment describes these routes as **undesirable** and critically the impact has not been assessed within any of the evidence presented in support of the emerging local plan. Additionally, there are fundamental flaws within the trip assessment and distribution.
- 9.12 In summary in relation to transport it can be concluded that:
- **The trips rates set out by WBC are unreliable and not robust.**
 - **The trip distribution is unrealistic (all evidence suggest traffic will be diverted from the A4).**
 - **The proposed mitigation measures suggested by WBC are improbable at best.**
 - **The location of site means car traffic will dominate the area.**
 - **The Highway network in the vicinity of THA20 is already over capacity.**
 - **No assessment has been made of the routes most likely to be affected by an increase in traffic.**



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- **Increase in traffic through Bucklebury will pose highway safety issues.**



10. Heritage Impact

- 10.1 The allocation at North East Thatcham surrounds the Grade II listed Colthrop Manor.
- 10.2 The Planning Practice Guidance sets out the following in relation to local plans and historic environment:

Planning policies need to be based on up-to-date evidence about the historic environment in their area. Strategic policy-making authorities can use this evidence to assess the significance of heritage assets and the contribution they make to their environment and to predict the likelihood of currently unidentified heritage assets being discovered in the future. Authorities may draw on a wide range of evidence sources, including the relevant historic environment record, the National Heritage List for England, conservation area management plans and appraisals, and local consultations that have identified assets of local historic importance.

Where a landscape character assessment is being prepared, strategic policy making authorities may wish to integrate this with assessments of historic landscape character and, for areas where there are major expansion options assessments of landscape sensitivity.

Good practice advice on the Historic Environment in local plans can be found on Historic England's website.

Paragraph: 045 Reference ID: 61-045-20190315

Revision date: 15 03 2019

- 10.3 There is no evidence that the WBC has taken into account the setting or significance of Colthrop Manor as a designated heritage asset in the allocation of North East Thatcham nor has WBC considered the impact of the development or the way in which the capacity of the site would be affected by it.
- 10.4 The wording of policy SP17 requires the submission of *a Historic Environment Strategy to demonstrate how the listed buildings in the area will be conserved and how the impact of the development on their settings has been considered.*
- 10.5 This should have been undertaken as part of the site selection process.
- 10.6 The Sustainability Appraisal states that the allocation of North East Thatcham under policy SP17 would have a positive effect on the SA objective to *protect or conserve and enhance the built and historic environment to include sustaining the significant interest of heritage asset.* It is not considered that this assessment is justified in any way whatsoever and the policy lacks credibility as a result.
- 10.7 The LPR is not considered to be justified or consistent with national policy in respect of heritage impact and is unsound on this basis alone.



11. Infrastructure and Services

11.1 BPC submits that there are significant failings with the LPR on whether the provision of infrastructure associated with the development at North East Thatcham under policy SP17 is viable or deliverable. It is not considered that the LPR has been positively prepared in this regard nor would the wording of the policy be effective in delivering the infrastructure required for the scope of development suggested for North East Thatcham or set out within the wording of policy SP17.

11.2 The Planning Practice Guidance sets out the following on the evidence that is needed to plan for health and well-being:

Strategic policy-making authorities can work with public health leads and health organisations to understand and take account of the current and projected health status and needs of the local population, including the quality and quantity of, and accessibility to, healthcare and the effect any planned growth may have on this. Authorities will also need to assess the quality and quantity of, and accessibility to, green infrastructure, education, sports, recreation and places of worship including expected future changes, and any information about relevant barriers to improving health and well-being outcomes. Strategic policy-making authorities may consult any relevant Health Impact Assessments and consider their use as a tool for assessing the impact and risks of development proposals.

Paragraph: 046 Reference ID: 61-046-20190315

Revision date: 15 03 2019

Healthcare Facilities

11.3 The North-East Thatcham development plan (SP17) proposes a 450 sq m primary healthcare facility with the suggestion that a GP Surgery be offered to the Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board or other such appropriate body. However, the document is bereft of detail or insight into strategic healthcare planning.

11.4 Proposals for a major development that is likely to have a significant health impact in relation to its size and location, should be accompanied by a fit for purpose Health Impact Assessment (HIA) in accordance with the current guidance from Public Health England. The HIA should include reference to how the proposals for development have been discussed with health service providers regarding impacts on primary health care services. The development proposals should demonstrate how the conclusions of the HIA have been considered in the design of the scheme because an unacceptable impact on the health and wellbeing of existing or new communities will not be permitted. It is of concern that neither WBC nor the developers, as public and private stakeholders respectively, appear to have arranged or published a prospective HIA specific to the proposed North-East Thatcham development.

11.5 Tackling health and wellbeing requires a multi-agency approach. The Berkshire West Health and Wellbeing Strategy 2017-2020 2021-2030, has been developed by the Reading, West Berkshire and Wokingham Health and Wellbeing Boards together with the Berkshire West



Integrated Care Partnership. Developers are encouraged to engage with the healthcare providers at the earliest opportunity in order to determine the health care requirements associated with new development. It is of concern that there appears to have been no direct engagement between the North-East Thatcham Development Consortium and local general practices.

- 11.6 Few new GP practices are commissioned by NHS England, even where they consider there to be patient demand for improved services. NHS Digital figures of patients registered in the NHS Berkshire West Clinical Commissioning Group (CCG) confirm there is an even worse shortage of GPs in other areas of the country. There is therefore no realistic prospect of a new GP practice being established in Thatcham or West Berkshire in the foreseeable future.
- 11.7 GP practices look to create efficiencies and economies of scale to make general practice more financially sustainable and to increase access and extend the range of services and primary healthcare professionals available on a single site. It would make no financial, organisational or geographic sense for an existing local GP practice to set up a branch surgery on the proposed new development because of the additional administrative, computing and staffing costs and encumbrance working across two sites.
- 11.8 There has been no approach by WBC or the developers to any local GP practice to discuss an appropriate site, floor-space or location to which one or more practices could relocate. An enlarged primary healthcare site is required and might be better located close to the middle of Thatcham to improve access and minimise traffic as the proposed NE Thatcham development is peripheral to the centre of the population. This would be likely to be supported by Thatcham Town Council but has not been suggested in the sustainability appraisal of site options. Local practices did not have input with the inadequate 450 sq m floor size proposal which they only discovered with the SP17 Policy of December 2022, Appendix D.
- 11.9 The proposed North-East Thatcham development site is covered by the existing practice boundaries of Thatcham Medical Practice (west of Harts Hill Road), Burdwood Surgery (east of Harts Hill Road) and Chapel Row surgery (the whole area). All three practices are already overstretched. The two Thatcham doctors' surgeries run independently of each other, and their combined lists include approximately 27,800 patients that equates to just under 2,000 patients per GP. Newly registered patients moving into housing developments tend to make a greater demand on GP services because there are more young children, a higher maternity workload, less local extended family support and there is initially a higher housing turnover. One permanent and repeated temporary pharmacy closures in Thatcham have further exacerbated pressure on primary care locally.
- 11.10 Thatcham dental practices are unable to provide dental care for the whole population with a significant minority of patients needing to travel further afield for NHS and private dental care. Thatcham Vision, endorsed by WBC in 2016, confirmed only 60% of residents were registered at a Thatcham dentist (with 17.5% registered with a doctor outside Thatcham). There is no evidence provided that either WBC or the developers have approached any local dental



practices regarding the potential impact of increased workload resulting from additional housing.

- 11.11 Reviewing the scanty healthcare recommendations within the Thatcham Strategic Growth Study (David Lock and Associates) - Stage 2: Thatcham Present, paragraph 4.10 states: 'A dialogue with the relevant healthcare and education agencies should be established early in the master planning process to address concerns that social infrastructure may not be provided.' The Stage 3: Thatcham Future report published in September 2020 includes no further detail except the outcome of a community representatives' workshop, that the existing GP facilities are at capacity and suggesting a new health centre.
- 11.12 WBC and the developers appear to have neither arranged a relevant HIA nor provided evidence of having appropriately liaised with local health care agencies or providers. They are proposing a healthcare site that is unsuitable for NHS primary care and so have not made provision to mitigate the burden that 1,500 or more new houses will make on a local NHS struggling to cope.
- 11.13 The objective of WBC and the North-East Thatcham Development Consortium to improve access to the health service component of community infrastructure has not been met as they have not provided evidence for the provision of a viable primary care medical facility.

Education Facilities

- 11.14 The provision for education from Nursery, Early Years, through Infant to Secondary education is not clearly defined within the Local Plan Review (LPR). There is no coherent end-to-end plan and this therefore breaches the obligations of WBC to provide education facilities for children. Without this provision, the Plan for a large new housing development is wholly unsound.
- 11.15 The lack of effective or justified education provision across the various proposed developments also means that it is impossible to estimate the subsequent impact on traffic. The location of a secondary school in the North East Thatcham development under policy SP17 would result in a significant increase in traffic across the whole Thatcham area and this has not been adequately considered in the traffic plans and modelling in the LPR.
- 11.16 There are no details in the LPR of the provision for Nursery or Early Years education. Policy SP17 NE Thatcham Strategic Site Allocation, merely states that *the site will provide Early Years provision*.
- 11.17 The provision for primary school education is unclear and contradictory. There is no data or evidence on the planned numbers of schools or 'form entry' requirements. The LPR proposes that the sum of £12 million will be sourced from the developers of SP17 to fund the provision of primary education. However, with no recent data available (the only data referenced is from 2011), it is impossible to assess if this funding would be sufficient for the delivery of the required education provision.



- 11.18 The current situation for secondary school students from Bucklebury is that they have a choice of either The Downs School or Kennet School as they are in the catchment area for both.
- 11.19 Where schools are oversubscribed, children who live nearer to the school are given precedence. This means that children from the proposed NE Thatcham development would be able to opt for Kennet and those from Bucklebury would then be limited to The Downs.
- 11.20 The LPR is inconsistent, incomplete, and contradictory on the provision of secondary schooling in and around Thatcham. The latest LPR is in contradiction to the supporting documentation. It proposes that the sum of £15 million will be sourced from the developers of SP17 to fund the provision of secondary education. There are no details of the location of the land to be provided and hence no possibility of assessing its suitability, deliverability, or achievability.
- 11.21 The Thatcham Growth Study, produced by David Locke Associates and Stantec on behalf of WBC, proposes funding for a 6-8FE (Form Entry) secondary school, half-funded by developer contribution.
- 11.22 Government guidelines are that Secondary Schools with less than a 6FE are not sustainable or deliverable. However, the Thatcham Growth Study previously stated that the NE Thatcham development (at the time allocated for 2,500 homes) was not sufficient to fill a 6–8 FE school: Specifically: -
- 5.18 *Provision of a new secondary school in North East Thatcham is an essential part of enabling growth in the town. However, the scale of growth proposed is not sufficient on its own to fill a 6-8FE secondary school.*
- 5.19 *Secondary schools need to be of sufficient scale to make them sustainable and able to provide suitable facilities for their students, so it is not considered feasible for a new school to be smaller than 6FE.*
- 11.23 With an apparent 40% reduction in the housing allocation in the 2023 LPR (2022 to 2039) to 1500 houses, a secondary school simply cannot be sustainable or deliverable in this location.
- 11.24 Furthermore, the Thatcham Growth Study also noted that the education provision was based on WBDC data on pupil yield from a study in 2011. Clearly the use of 11-year-old data is inadequate.
- 11.25 The Growth Study states:
- 4.83 *This study has not engaged in a detailed demographic prediction and modelling exercise to determine future primary and early years educational demand across the town and has not attempted to predict the long-term capacities of existing schools. Inevitably educational provision will be examined in more detail as any development comes forward.*
- 11.26 The LPR now states that land (but not the Secondary School itself) will be provided for the development.



11.27 In summary, it is therefore clear that the plan for secondary school provision is 'unsound' for the following reasons:

- There is no satisfactory evidence of the number of pupils the school is to cater for.
- The location of a school within the proposed development is not clear.
- The number of Form Entries is not defined, but it is noted that anything less than a 6FE school is unsustainable.
- The timing and responsibility for the funding is not clear and has not been adequately costed in the viability appraisals.
- There is no evidence that the proposed funding is sufficient to meet the Council's obligations to provide education.

11.28 West Berkshire Council, as an education authority, has a duty to make arrangements for suitable school provision. How this obligation will be met across all school years is not defined or evidenced in the LPR.

Sports Fields Provision

11.29 The LPR requires the provision of sports fields and facilities as part of the development of NE Thatcham under policy SP17. This raises two issues not answered in the LPR.

11.30 Firstly, that playing pitches require flat ground. The only flat area of ground in the proposed site is that which is closest to the A4. Secondly, that there is no funding earmarked for these facilities nor has the provision of these facilities been adequately costed within the viability evidence.

11.31 The objective of WBC and the North-East Thatcham Development Consortium to provide sports fields has not been met as they have not provided evidence for funding or for a suitable location.

11.32 Overall, it is plainly apparent that there are significant failings with the LPR on whether the provision of infrastructure associated with the development at North East Thatcham under policy SP17 is viable or deliverable. It is not considered that the LPR has been positively prepared in this regard nor would the wording of the policy be effective in delivering the infrastructure required for the scope of development suggested for North East Thatcham or set out within the wording of policy SP17.



12. Climate Change and Flood Risk

- 12.1 BPC has significant concerns that WBC has failed to properly address the impacts on climate change and flood risk arising from the LPR and specifically the development of housing at North East Thatcham through policy SP17.
- 12.2 WBC has 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.
- 12.3 Given the scale of the development proposed at North East Thatcham under policy SP17, 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.”
- 12.4 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.
- 12.5 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.
- 12.6 The proposal allocates two bullet points to “Net Zero Carbon Development” and again is woefully inadequate in this area. There is no evidence that a net zero carbon development would be viable or has been costed as part of the viability appraisal produced for the site.

Flood Risk

- 12.7 Flood risk is a significant threat to Thatcham, and so, by interpretation of WBC’s own policy SP6, the development at North East Thatcham under policy SP17 is not appropriate.
- 12.8 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.

12.9 The Thatcham Strategic Growth Study 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”.

12.10 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.

12.11 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.

12.12 As per the NPPF, priority should be given to sustainable drainage. In the LPR 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.

12.13 The allocation for policy SP17 states 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.



12.14 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.

Conclusions in respect of Climate Change and Flood Risk

12.15 The Sustainability Appraisal is ambiguous in relation to flood risk. It states that the development at North East Thatcham under policy SP17 would have a positive impact but there is also a '?' place in the assessment box. The justification for the assessment given by WBC states that *the policy requires consideration of SuDS that could deliver net gains for Thatcham, but there is no other reference made to flood risk. The policy does include requirements for GI, ecology and sustainability measures to be included which may all have a positive impact on flood risk.*

12.16 It is not considered that this is a credible assessment, and the question mark demonstrates that WBC are unsure of the impacts in this regard.

12.17 It is not considered that the LPR is justified, effective or consistent with national policy and is unsound on this basis alone.



13. Water Supply and Foul Drainage

- 13.1 Currently the water for Thatcham and the environs is extracted at Bishops Green and Speen.
- 13.2 Sarah Bentley, CEO of Thames Water has recently stated that the current requirement for water per person is 150 litres per day. The increasing demand for fresh, potable water is having a profound impact on the water table in both the Kennet and Pang River valleys. In other local authorities such as Chichester, Horsham and Crawley this has given rise to significant concern of water neutrality in highly sensitive areas.
- 13.3 The River Pang that runs through the villages of Bucklebury and the adjacent village of Bradfield completely ran dry again this year, not only through the prolonged dry season but also as a result of the reduced level of the aquifer.
- 13.4 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 in 1976. In 2022 the river did not run for a considerable time and, even after the very wet period in the autumn, the river was still bone dry in November and not really flowing until 9 December 2022. A devastating impact on the environment and the biodiversity caused over by over extraction at Compton and neighboring extraction points and is in complete contradiction to the Water Framework Directive that is cited in Regulation 19. There are no mitigation measures, the only action is to make this the sole responsibility of Thames Water.
- 13.5 The Infrastructure Plan also points out this is a major problem in sections 5.65 & 5.66.
- 13.6 Thames Water (TW) is responsible for supplying the entire West Berkshire area with water. The WCS 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 development of 110 l/p/d allowed under Building Regulations is justified, however West Berkshire Council may want to consider going further than the 110l/p/d target, particularly in larger strategic developments.
- 13.7 The WCS 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 week or drought conditions, and proposes actions over the WRMP planning period to improve resilience".
- 13.8 It is unsound to state that there is no predicted supply demand deficit when we are experiencing predicted extreme weather conditions and we have had a hose pipe ban in force for weeks, it was only lifted on 22 November 2022. The existing infrastructure in Bucklebury and adjacent parishes is old and in poor condition and suffers from numerous bursts and fractures.



River Pang – 26 October 2022



River Pang once it started flowing again – 9 December 2022

- 13.9 By adding a larger pump and increasing the pressure the problem is only exaggerated.
- 13.10 There is a lack of evidence or supporting information on how the developers of North East Thatcham will achieve water usage 110 litres/person/day.



Sewage

- 13.11 Thatcham, Newbury and the surround district is service by Thames Waters sewage treatment plant in Lower Way. There are two pipes (Dia. 18" and Dia 15") running from Faraday Road to Lower Way that are cast Iron, in poor repair and over 100 years in age. These take the combined flow of sewage and surface water from the older area of the town as many of the properties have combined down pipes. There is a similar pipe that runs from Turnpike serving that area with a pumping station at Beedon Hill. Another pipe from the pumping station in Station Road, Thatcham and the last system is a gravity feed system feeding all the current estates in the north 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.
- 13.12 Currently there are 600 new houses being constructed near Vodafone, 167 the new flats at Boundary Road (Ex-Sterling Cables site), 157 houses near the Tesco Supermarket (Retail Park). 100 houses with planning approval in Lower Way. In total 1,024 excluding any infill and ribbon development (say and additional $1024 \times 300 = 307,200$ litres/day). The current TH.20 proposal add an additional 1,500 houses, plus $(1,500 \times 300 = 450,000)$ litres per day).
- 13.13 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 foul water 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, raw sewage is delivered directly into the river Kennet - untreated.
- 13.14 There is no mention of how the infrastructure is going to be improved with regards to this simple sewage requirement. The average daily requirement is 150 litres per person per day, that is a staggering additional 450,000 litres/day from just SP17 that has to be treated at Lowerway. This does not take into account and surface water that might have been connected to the sewer system, new buildings and immensities or any other necessary infrastructure and, more importantly, the above additional input from the recent developments. In our equation we have also not added the additional 1,100 dwelling built recently at The Race Course (330,000 litres/day).
- 13.15 This waste water facility that is already over capacity and has been for the past twenty years will also be expected to deal with the sewage from sites designated HSA1 to HSA7, HAS17 & HAAS22.
- 13.16 West Berkshire Council (WBC) has just passed this burden on to the Thames Water utility company (please see Infrastructure Development Plan: 5.36), but where is the public consultation and due diligence when referring and developing the infrastructure plan.
- 13.17 Without the necessary infrastructure the proposed housing development in this area is ill considered and will cause environmental damage (as the Biological Oxygen Demand (BOD) and Chemical Oxygen Demand (COD) on the outflow will certainly have to increase). From Goggle earth it is very apparent that there is very little room for further expansion on the site,



maybe an additional storage tank? But that does not mitigate the risk of pollution into the Kennet, far from it.

13.18 If the outdated plant cannot cope with the increase in flow, then there is no option other to increase BOD (and COD) discharge level at outlet to the Kennet and this will exceed the permitted percentile limit set by the Environment Agency. The only other option for the EA to meet the increasing demand therefore is to reduce the maximum compliance Limit!

13.19 This is completely contra to the Water Framework Directive cited in Regulation 19 as these are for restoration and enhancement. To increase pollution into the Kennet basin without adequate provision is just - wrong. Please note that much of the drinking water supply for Reading comes from this source and is abstracted at Fobney downstream of this Lower Way and the proposed development.

13.20 It is inconceivable that in the twenty first century this, untreated discharge, can be allowed. To compound the pollution to the Kennet, the similar facilities at Kintbury and Hungerford discharge directly into the river during peak flow periods – criminal and an environmental disaster.

13.21 West Berkshire Council has allegedly identified the requirement, it is mentioned in 5.63 of 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

13.22 If this problem has been clearly identified by WBC, surely no planning development should be considered until this matter has been fully mitigated. The existing sewers and infrastructure feeding Lower Way are a real matter for concern, as there is no simple method of repairing or replacing this Victorian system, short of excavating the A4 main road while this extensive works could be carried out.

13.23 There is absolutely no doubt that the existing infrastructures is failing with extreme infiltration identified in Faraday Road being just the tip of a very large iceberg. Recently an old section failed on the junction to Hambridge Road, which hopefully, is well documented by the Environment Agency but will have resulted in surface and subterrain pollution.

13.24 The LPR just touches briefly on the subject with the casual “suitable land and access is safeguarded for the maintenance and treatment of water resources and wastewater, flood defences and drainage infrastructure”. Where is the detail? potential developers, resident tax payers and local councils need this information.



13.25 The development Plan Control Policies 10.45 States:

*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.*

13.26 If this is adopted and implemented by West Berks Council (WBC), any planning developments should be refused 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.

13.27 The Local Plan Review does not mention any improvements to the existing sewage network or planning provision for new treatment sites – This alone make the current proposal unsound.



14. Conclusions

- 14.1 These representations make it abundantly clear that there are significant failings with the soundness of the plan.
- 14.2 The LPR is **not positively prepared** and would not achieve the goal of sustainable development for WBC.
- 14.3 The LPR is **not justified**. Many of the grounds for assessment of impacts and benefits lack credibility and are not based on available evidence. Reasonable alternatives have not been adequately explored and there is no basis to demonstrate that the allocation of North East Thatcham represents an appropriate strategy for WBC.
- 14.4 The LPR is **not effective**. There is no evidence that the development of 1,500 homes at North East Thatcham is deliverable within the plan period.
- 14.5 The LPR is **not consistent with national policy**. In many instances the allocation for development of North East Thatcham under policy SP17 would directly conflict with national policy, particularly in relation to landscape character and impact upon the AONB.
- 14.6 The process of assessing the impact of development under policy SP17 through the sustainability appraisal is fatally flawed and is not a matter which can be easily remedied through modifications to the plan.
- 14.7 The process for selection of North East Thatcham as a development site is severely flawed and lacks evidence.
- 14.8 Bucklebury Parish Council wishes to participate in the examination process and will be presenting further evidence through the submission of matters statements and oral evidence from experts.



West Berkshire Local Plan Review

Proposed Submission (Regulation 19)
Consultation

Appendix 1 – BPC Comments on Thatcham North East Settlement Boundary Review

March 2023

Bucklebury Parish Council's comments on the Thatcham North East Settlement Boundary Review

Introduction

Bucklebury Parish Council (BPC) **strongly OBJECTS** to the proposed settlement boundary for Thatcham North East.

WBC's consultation request on this proposed settlement boundary (SB) change was sent to some parties, but not BPC, on or about 9th March 2021. Bucklebury parish boundary is but metres from the proposed SB so it is hard to understand why WBC would consider that BPC lacked a legitimate interest in this matter. The initial boundary review took place in Feb-Mar 20 of which BPC was not informed. Given the wider circumstances at that time, it is understandable that Parish Councils did not search out the changes that were proposed for their neighbours. The consultation is lacking in its communication.

BPC has had the benefit of reading the comments on this boundary review by Thatcham Town Council and adopts and endorses those in this response.

Consultation Process

It is BPC's view that the consultation process is flawed in that it fails any test of 'community involvement'. WBC failed to inform BPC of the proposed changes to the SB that lies just over the parish boundary. This casts doubt on the integrity and legitimacy of the whole LPR consultation, which WBC states will be a "...a detailed 'on the ground' community led assessment ...". As SB changes are an important part of the proposed Draft Local Plan consultation, not involving bordering Parish Councils, and arguably individuals, means that the local populations are not being adequately consulted on the entirety of the Local Plan review.

BPC expects WBC to launch a new and meaningful consultation to take account of the views of all communities affected by the proposed settlement boundary change.

Strategic Gap

A tenet of past planning in West Berks has been the maintenance of strategic gaps to separate communities. Until this boundary change proposal was tabled, the land north of Floral Way has provided the gap between Thatcham and Bucklebury. The proposal all but eliminates that separation and will visually and socially break natural community boundaries. Breach of the strategic gap has been cited by WBC to both refuse planning applications and to remove site allocations from the HELAA process eg THA9, CA16. The description of CA16 in the HELAA documents acknowledges that the Thatcham - Upper Bucklebury Strategic Gap would be sacrificed and the separate identity of Upper Bucklebury lost, despite WBC's stated intent to "protect the character of a settlement..."

It should be noted that the treatment of the 'country park' within THA20 causes particular concern. The SBR documentation states that: "1. Boundaries will exclude: Recreational or amenity open space which extends into the countryside or primarily relates to the countryside in form and nature. This includes designated Local Green Space." There appears to be no provision for this necessary protection - a change in the plan could see building to the proposed settlement boundary and the 'country park' lost. There must be some provision to limit the SB to the edge of the proposed building line to protect the 'country park' from any development.

Bucklebury Parish Council's comments on the Thatcham North East Settlement Boundary Review

Landscape Setting

The Landscape Character Assessment LCA Section WH4 states "Open farmland on the lower slopes contributes to a sense of separation between the elevated character area and the towns of Thatcham and Newbury in the valley below." This sense of partition and openness is amplified in the Landscape Sensitivity Study (LSS): Thatcham "LLCA14F: *Colthrop Manor Plateau Edge*...forms an important ... rural transition zone between the urban area and the AONB," "Lower slopes of important ridgeline," "Good views across the area and long views across the Kennet Valley," and "The area is highly visible from the Kennet Valley and the Greenham escarpment"

The SBR documentation states that "1. Boundaries will exclude: Highly visible areas such as exposed ridges, land forms or open slopes..." and "Specific issues to be considered...The wider setting and important views both into and out of the settlement will... be taken into account..."

WBC should reconsider the proposed SB in light of its own guidance. Account should also be taken of the proximity of the ancient woodland and the historic settlement at Siege Cross Farm. WBC should also review the landscape-based defence it put forward to oppose the previous development proposal at Siege Cross, and recognise the failings of this SB change proposal.

AONB and The Common

The proposed SB would inevitably have a lasting negative impact on these special environs that WBC is specifically charged, through legislation and its own Strategic Objectives, with protecting.

Not only would the AONB settlement pattern be distorted by the movement of the SB (as acknowledged in the comments in CA12 of the Site Selection Paper), but Bucklebury Common, part of the AONB, would be irretrievably damaged. The impacts would fall into two categories: those that would impact the Common directly, and those resulting from the inevitable increase in visitors. The Common requires protection because of its flora, fauna and AONB situation; it contains remnants of ancient and fragile habitats that are home to rare and protected wildlife. These would be put under increased pressure if the SB were moved to the proposed location and building could literally overlook and overshadow the delicate ecosystems. Increased footfall would inevitably exacerbate the direct damage caused by the effects of the SB change.

Exclusion of a more adequate "country park" from the Thatcham North East proposed settlement boundary would be a starting point in protecting the Common, but the AONB would only be truly protected if WBC was to reconsider this entire proposal in light of its strategic objectives.

Conclusion

Thatcham North East is a deeply unpopular plan that is marked by flawed execution of the consultation process. In what is a fundamental part of the progression of the LPR, WBC has failed to adequately consult all the communities, and all community members, in the areas surrounding the proposed settlement boundary changes. The area delineated by the settlement boundary itself is too close to the AONB and fails to adequately protect it, and inadequate weight appears to have been given to the effects on the landscape.

BPC strongly OBJECTS to the proposed site settlement boundary changes at Thatcham North East.

Barry Dickens
Chairman BPC



West Berkshire Local Plan Review

Proposed Submission (Regulation 19)
Consultation

Appendix 2 – North East Thatcham Sustainability Appraisal Extract

March 2023

SP17 – North East Thatcham – Sustainability Appraisal Extract

SA Objective 1: To enable provision of housing to meet identified need in sustainable locations

AB To add commentary on compliance with SA Methodology

SA Sub Objective	Effects of Policy on SA Objective	Justification for assessment	Mitigation / Enhancement	Comment	Bucklebury Parish Assessment of Effect	Bucklebury Parish Comment
1(a) To maximise the provision of affordable housing to meet identified need	++	The policy includes specific reference to the provision of affordable housing to be provided on the site.	n/a	The policy is likely to have a significant positive impact on social sustainability as it will help to meet housing to meet needs	+	Whilst AH delivery important it must be in right location. No evidence of mix to meet all sectors
1(b):To enable provision of housing to meet all sectors of the community, including those with specialist requirements	++	The policy includes requirements for a range of dwellings types as set out in SP18. There is also a requirement for 3% of dwellings to be delivered via serviced custom/self-build.	n/a	[sic], including affordable housing and provision to meet needs across all sectors of the community	+	No evidence of accommodating self build or specialist housing on the site.

SA Objective 2: To improve health, safety and wellbeing and reduce inequalities

AB To add commentary on compliance with SA Methodology

SA Sub Objective	Effects of Policy on SA Objective	Justification for assessment	Mitigation / Enhancement	Comment	Bucklebury Parish Assessment of Effect	Bucklebury Parish Comment
2(a) To support health active lifestyles	++	The policy includes requirements for sports facilities, sustainable modes of travel to be designed into the site to allow for safe, active travel.	n/a	The policy is likely to have a significantly positive impact as it seeks to support and improve health, safety and wellbeing.	?	No evidence on viability or delivery of sports facilities. Location will not give rise to sustainable travel
2(b) To reduce levels and fear of crime and anti-social behaviour	+	The policy is likely to have a positive impact as the design of the site should be such to design out crime.	n/a		?	No evidence to support this conclusion
2(c):To enable the protection and enhancement of high quality multi-functional GI across the District	++	The policy is likely to have a significantly positive impact as it includes details of the GI provision required.	n/a		??	The Green Infrastructure SPD that the Council promised in the Core Strategy Policy CS18 (2012)¹ was never delivered². Thus, there is no GI evidence base to inform the draft LPR so no proper assessment can have been made in relation to sustainability.

¹ https://www.westberks.gov.uk/media/36372/Core-Strategy-CS18-Green-Infrastructure/pdf/Core_Strategy_-_CS18_-_Green_Infrastructure.pdf?m=638047964231600000

² <https://www.westberks.gov.uk/article/41087/Supplementary-Planning-Documents-SPD-and-Guidance-SPG>

SA Objective 3: To improve accessibility to community infrastructure

AB To add commentary on compliance with SA Methodology

SA Sub Objective	Effects of Policy on SA Objective	Justification for assessment	Mitigation / Enhancement	Comment	Bucklebury Parish Assessment of Effect	Bucklebury Parish Comment
3(a): To improve access to education, health and other services	++	The policy is likely to have a positive impact on accessibility community services and facilities, including education provision, health care provision and other services/facilities	n/a	The policy is likely to have a positive impact on all elements of sustainability as it seeks to improve accessibility to community infrastructure.	??	No evidence on delivery of school to support this assessment of effective. No evidence on health
3(b): To support the development of access to IT facilities including Broadband particularly in rural locations	?	The policy itself unlikely to impact on access to IT facilities as there is no mention of IT facilities in the policy.	Other policies in the plan require consideration of digital infrastructure, so overall the development should result in a positive impact on digital accessibility.		??	TBC

SA Objective 4: To promote and maximise opportunities for all forms of safe and sustainable travel

AB To add commentary on compliance with SA Methodology

SA Sub Objective	Effects of Policy on SA Objective	Justification for assessment	Mitigation / Enhancement	Comment	Bucklebury Parish Assessment of Effect	Bucklebury Parish Comment
4(a): To reduce accidents and improve safety	+	The policy is likely to have a positive impact on road safety as safe travel will be critical to the design of the site	n/a	n/a	TBC	Note that no mitigation or comment
4(b): To increase opportunities for walking, cycling and use of public transport	++	The policy is likely to have a significantly positive impact on walking, cycling and public transport as the development should be designed with these in mind	n/a	n/a	TBC	Note that no mitigation or comment

SA Objective 5: Ensure that the character and distinctiveness of the natural, built and historic environment is conserved and enhanced

AB To add commentary on compliance with SA Methodology

SA Sub Objective	Effects of Policy on SA Objective	Justification for assessment	Mitigation / Enhancement	Comment	Bucklebury Parish Assessment of Effect	Bucklebury Parish Comment
5(a): To conserve and enhance the biodiversity and geodiversity of West Berkshire	++	The policy is likely to have a significantly positive impact on biodiversity as it sets out specific ecological requirements for the development	n/a	The policy is likely to have a significantly positive impact on environmental sustainability as it seeks to conserve and enhance the natural, built and historic environment.	-	The LPR policy SP11 is adequate for the needs of Biodiversity Opportunity Areas³. However, in relation to SP17 no evidence is available to guarantee achievement of long term biodiversity net gain on the site, or mitigate impacts on immediately adjacent habitats and species to which the site is intimately linked, especially ancient woodlands. Given the level of development involved it would be expected that at least a Preliminary Ecological Appraisal as recommended by the Chartered Institute of Ecology and Environmental Management would have been undertaken. Any off-site compensation would undermine the sustainability of SP17. Given

³ SP11 para 5.89 Biodiversity Opportunity Areas (BOA) have been identified by the Berkshire Local Nature Partnership. There are 17 which have currently been identified, either whole or in part, across the District. BOAs do not represent a statutory designation or a constraint upon development, rather, they are the areas where biodiversity improvements are likely to have the most beneficial results at a strategic scale. The Council will pursue net gains for biodiversity in and around BOAs and projects which seek to enhance biodiversity within West Berkshire, particularly based on Biodiversity Opportunity Areas, will be supported.

5(b): To conserve and enhance the character of the landscape	+	The policy is likely to have a positive impact on landscape character as consideration of the landscape is written into the policy.	n/a				the high population that will be concentrated in the site, the level of disturbance will have a negative effect on habitats by trampling, and species by disturbance.
5(c): To protect or, conserve and enhance the built and historic environment to include sustaining the significant interest of heritage assets	+	The policy is likely to have a positive impact on the historic environment as it includes the requirement for a Historic Environment Strategy to be submitted	n/a				Julian to complete
							No evidence of any consideration to listed buildings within site or mitigation required

SA Objective 6: To protect and improve air, water and soil quality, and minimise noise levels throughout West Berkshire

AB To add commentary on compliance with SA Methodology

SA Sub Objective	Effects of Policy on SA Objective	Justification for assessment	Mitigation / Enhancement	Comment	Bucklebury Parish Assessment of Effect	Bucklebury Parish Comment
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6(a): To reduce air pollution	0	The policy is unlikely to impact on air quality	Other policies in the plan will ensure that there is no negative impact on air quality.	The policy is unlikely to impact on any element of sustainability in relation to air, water, soil or noise.	-	Additional highway movements will have significant impact
6(b): To manage noise levels	0	The policy is unlikely to impact on noise levels			-	Additional highway movements will have significant impact
6(c): To maintain and improve soil quality	0	The policy is unlikely to impact on soil quality			-	It seems unlikely that a large scale development would maintain or improve soil quality. Top soil will be removed during construction for buildings and roads, and vehicle movements will compact soils elsewhere.
6(d): To maintain and improve water quality	0	The policy is unlikely to impact on water quality.			-	Surface water draining from urban areas and roads will contain pollutants some of which will percolate into ground water and some will flow down in to the drainage system.

SA Objective 7: To promote and improve the efficiency of land use

AB To add commentary on compliance with SA Methodology

SA Sub Objective	Effects of Policy on SA Objective	Justification for assessment	Mitigation / Enhancement	Comment	Bucklebury Parish Assessment of Effect	Bucklebury Parish Comment
7(a): To maximise the use of previously developed land and buildings where appropriate	-	The policy is greenfield	n/a	The policy is likely to have an overall neutral impact, with a positive impact on social sustainability as it seeks to provide suitable densities of dwelling across the site.	-	No PDL on site. Reasonable alternatives not properly considered
7(b): To apply sustainable densities of land use appropriate to location and setting	+	The policy is likely to have a positive impact on density of land use, as the number of dwelling on site take into account appropriate densities	n/a		?	No evidence that density is appropriate for setting of the AONB and other characteristics of site

SA Objective 8: To reduce consumption and waste resources and manage their use efficiently

AB To add commentary on compliance with SA Methodology

SA Sub Objective	Effects of Policy on SA Objective	Justification for assessment	Mitigation / Enhancement	Comment	Bucklebury Parish Assessment of Effect	Bucklebury Parish Comment
8(a): To reduce energy use and promote the development and use of sustainable /renewable energy technologies, generation and storage	++	The policy is likely to have a significantly positive impact on energy use as it requires the site to consider energy use and provide on-site renewable energies.	n/a	The policy is likely to have a significantly positive impact on environmental sustainability as it seek sot manage natural resources.	?	Embodied energy of greenfield development not assessed
8(b): To reduce waste generation and disposal in line with the waste hierarchy and reuse of materials	0	The policy is unlikely to have an impacts on waste generation. However, the policy does require 'BREEAM' excellent for non-residential buildings which can include consideration of waste management.	n/a		-	Additional waste requirements from 1,500 homes – no mention of mitigation
8(c): To reduce water consumption and promote reuse	+	The policy is likely to have a positive impacts on water consumption as it requires an integrated water supply and drainage strategy to be submitted.	n/a		-	No evidence of additional infrastructure required for water
8(d): To reduce the consumption of minerals and promote reuse of secondary materials	+	The policy is likely to have a positive impact on the consumption of minerals as it requires a MRA to be submitted.	n/a		?	No evidence

SA Objective 9: To reduce emissions contributing to climate change and ensure adaption measures are in place to respond to climate change

AB To add commentary on compliance with SA Methodology

SA Sub Objective	Effects of Policy on SA Objective	Justification for assessment	Mitigation / Enhancement	Comment	Bucklebury Parish Assessment of Effect	Bucklebury Parish Comment
9(a): To reduce West Berkshire's contribution to greenhouse gas emissions	+	The policy is likely to have a positive impact as it seeks for a sustainable, low carbon development.		The policy is likely to have a positive impact on all element of sustainability in relation to responding to climate change.	?	No evidence presented on how units would come forward at lower carbon than agreed building regs
9(b): To sustainably manage flood risk to people, property and the environment	?/+	The policy requires consideration of SuDS that could deliver net gains for Thatcham, but there is no other reference made to flood risk. The policy does include requirements for GI, ecology and sustainability measures to be included which may all have a positive impact on flood risk,	The policy, in combination with other policies in the plan (eg. the flooding policy) should result in a positive impact.		?	No evidence presented on how flood risk or surface water would be managed.

SA Objective 10: To support a strong, diverse and sustainable economic base which meets identified needs

AB To add commentary on compliance with SA Methodology

SA Sub Objective	Effects of Policy on SA Objective	Justification for assessment	Mitigation / Enhancement	Comment	Bucklebury Parish Assessment of Effect	Bucklebury Parish Comment
10(a): To encourage a range of employment opportunities that meet the needs of the District	+	The policy is likely to have a positive impacts on employment opportunities as it includes a requirement for community facilities, which could include employment opportunities, to be provided on site.	n/a	The policy is likely to have a positive impact on economic sustainability as it requires provision of employment opportunities.	?	No evidence of delivery of retail or small scale employments
10(b): To support key sectors and utilise employment land effectively and efficiently	0	The site is unlikely to impact on the effective and efficient use of employment land	n/a		0	Agreed
10(c): To support the viability and vitality of town and village centres	++	The policy is likely to have a significantly positive impact on the viability and vitality of Thatcham as the development will support itself and other improvements within Thatcham.	n/a		?	Unclear how allocation of this site would have any positive impact on vitality of Thatcham



West Berkshire Local Plan Review

Proposed Submission (Regulation 19)
Consultation

Appendix 3 – Preliminary Study for the Establishment of a Thatcham County Park

March 2023



naturebureau

**Preliminary Study for the
Establishment of a
Thatcham Country Park**

4 October 2022



Votec Centre 2c,
Hambridge Lane,
Newbury RG14 5TN
United Kingdom

Registered in England and Wales No. 2369556
VAT GB 537 590618

+44 (0)1635 550380

post@naturebureau.co.uk
www.naturebureau.co.uk

Established in 1990

Independent ecological consultancy, project management, nature conservation,
communication materials, design and wildlife book publisher.



Thatcham Country Park Study

Ref:	Eco22-02	Site Name:	Colthrop, Thatcham
Service:	Preliminary Study for the Establishment of a Thatcham Country Park	Location:	51.407006°N -1.232577°W
Area:	Approx 83 hectares	Contact Name:	Helen Pratt
Site terrain:	Arable fields, rough grassland, mature hedgerows, tall trees, woodland	Contact Details:	Office: Clerk to Bucklebury Parish Council Jasmine Cottage, Byles Green, Upper Bucklebury, Reading RG7 6SD Tel: 01635 863581 Mail: clerk@buckleburyparish.org
Authors:	<i>Written by</i> Kristina Wood, MRes, ACIEEM <i>Checked by</i> Paul Goriup, MSc, CEcol, CEnv, FCIEEM	Report date:	4 October 2022

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1 INTRODUCTION

Following a proposal for a potential development of 2,500 homes to be built on the north-eastern side of Thatcham, West Berkshire, as published in the Thatcham Strategic Growth Study¹, residents of Upper Bucklebury raised concerns that the potential biodiversity value and nature conservation interest of the site was not sufficiently considered so far in the planning process. Accordingly, Upper Bucklebury Parish Council engaged NatureBureau to investigate and assess the biodiversity value of an area of land included in the development proposal, and to assess impacts the development could have on surrounding landscape and biodiversity. The assessment found that the site is intimately ecologically linked to the surrounding ancient woodlands, designated sites and to the wider natural environment through a series of terrestrial, aquatic, and aerial wildlife corridors.

As the report identified potential adverse impacts on local habitats and wildlife, Upper Bucklebury Parish Council commissioned NatureBureau to develop the concept of a country park, which is mentioned several times in the above-mentioned planned development site as a public green space. Country parks benefit the health and wellbeing of residents and visitors alike, promoting the great outdoors and the importance of nature and the wildlife in the area. Moreover, a country park along the northern boundary of the proposed development site would provide a local protected habitat for many plant and animal species, create new jobs, promote exercise, and offer an educational facility.

For the purposes of this study, the name Thatcham Country Park has been accorded to the proposed area, but this does not imply the name could not be changed as planning proceeds.

¹ <https://info.westberks.gov.uk/CHttpHandler.ashx?id=49800&p=0>

2 NORTH-EAST THATCHAM AND BIODIVERSITY

To the upper part of the site proposed for development (herein called the NE Thatcham Development Site) lies the village of Upper Bucklebury, on the top of a ridge that forms the southern edge of the North Wessex Downs Area of Outstanding Natural Beauty. Furthermore, the site is surrounded by ancient woodland included in the Woodland Priority Habitat Network and is near two Sites of Special Scientific Interest (including a Special Area of Conservation for birds). The NE Thatcham Development Site is around 0.75 km southwest of Bucklebury Common, and immediately to the south of the site is the northern boundary of the West Berkshire Living Landscape Project – hosting at least 97 threatened or endangered species across 2,700 ha. Local Biodiversity Opportunity Areas are also present within the NE Thatcham Development Site. Overall, Thatcham hosts a diverse range of rich conservation habitats, and the proposal to set up a country park (herein called Thatcham Country Park) would contribute significantly to many important sites.

The Core Strategy Development Plan (Policy CS 17)² states that a core policy of WBC is to “conserve and enhance the environmental capacity of the District” and that, during development, “opportunities will be taken to create links between natural habitats and, in particular, strategic opportunities for biodiversity improvement will be actively pursued within the Biodiversity Opportunity Areas identified on the Proposals Map in accordance with the Berkshire Biodiversity Action Plan.”

Not only would the inclusion of a country park within any new housing development in northeast Thatcham assist West Berkshire Council in meeting this policy, but it would also assist in positively and proactively managing the countryside as assets for biodiversity, as outlined in Section 4 of the Core Strategy Document³.

² [Core Strategy in sections for new website \(westberks.gov.uk\)](#)

³ [Core Strategy in sections for new website \(westberks.gov.uk\)](#)

3 VISION FOR A THATCHAM COUNTRY PARK

The Thatcham Strategic Growth Study⁴ refers to the inclusion of country parks within the proposed housing development so as to enhance natural habitats and create links to the countryside – with at least 50% of the site to be left as open space. The document proposes the development to include three core neighbourhoods, with the creation of two country parks within the Siege Cross and Colthrop Village areas in the centre and east of the site (Figure 1).

Figure 1: Approximate boundaries (in green) for two country parks within the NE Thatcham Development Site. Source: Thatcham Strategic Growth Study. Stage 3 Report⁴



This study suggests that the areas identified for country parks are not feasible. They are too small and separated to serve their purposes, insufficient for conserving the entirety of the Bucklebury Plateau Biodiversity Opportunity Area, would encourage uncontrolled access to the intervening woodland, and are not contiguous with the existing landscape. Accordingly, this study proposes broadening the scope of the proposed country park to incorporate all the Biodiversity Opportunity Area and have boundaries that are more linked to the existing landscape.

⁴ West Berkshire Council (2020). Thatcham Strategic Growth Study. Stage 3 Report: Thatcham Future. [Online]. [Stage 3 Report 131120.indd \(westberks.gov.uk\)](#) Stage 3 Report 131120.indd (westberks.gov.uk)

The Thatcham Country Park proposed by this study (Figure 2) addresses these deficiencies. It totals approximately 96 ha in size within a single managed area, with approximately 65 ha of this falling within the NE Thatcham Development Site – approximately 37% of the whole area. It includes five entry points to the park, consisting of two vehicle entrances with a car parks, and three pedestrian-only entrances. The pedestrian entry to the northeast of the site is based on an existing Public Right of Way, offering continued ease of access for residents of Bucklebury, and would not be promoted as a main entry point for visitors.

Figure 2: The proposed Thatcham Country Park shown in relation to the NE Thatcham Development Site and the North Wessex Downs Area of Outstanding Natural Beauty.



Although the inclusion of the pasture area to the north-west must carefully consider safety in relation to the presence of Harts Hill Road, to exclude this area would be missed opportunity for further landscape enhancement and protection. Inclusion of this area would require a new pedestrian crossing to be established. The erection of a footbridge over Harts Hill Road would allow pedestrians and cyclists to cross safely, whilst also eradicating any issues of increased traffic congestion between Thatcham and Bucklebury.

This proposal will require cooperation from surrounding landowners, in particular for establishing public footpaths through the woodland from the east of the park into the centre, for the inclusion of some land to the north of the site (potentially extending the northern boundary to adjoin the AONB), and for the inclusion of Colthrop Manor within the country park.

3.1 Aims and Objectives

The purpose of a country park is to provide a place that has a natural, rural atmosphere for visitors without the need to venture out into the wider countryside. Country parks allow visitors to enjoy a public open space with an informal atmosphere. The overall vision for the Thatcham Country Park is to offer an asset which meets the needs of an ever-growing human population within Thatcham and surrounding areas, whilst maintaining and improving local habitats for wildlife, and establishing a permanent buffer between the increased urbanisation of the Thatcham landscape and protected sites situated less than one kilometre north of the NE Thatcham Development Site. In this regard, it mirrors the roles of Greenham and Snelsmore Commons for the residents of Newbury.

Visitor services objectives include the aim of attracting visitors all year round, for both recreation and to educate them on environmental and conservation issues whilst promoting healthy wellbeing and exercise. The human health benefits of having access to nature are shown to be both cognitive and physical; lowering stress hormones and blood pressure, improving sleep, and helping people connect to nature and their community.

Conservation objectives mean that the park will be managed to provide a number of features designed to protect the landscape of the site, enhance the site for biodiversity and increase public enjoyment of the site for recreation.

4 CONSERVATION MANAGEMENT

The Thatcham Country Park should be managed to provide a number of features designed to protect the landscape of the site, enhance the site for biodiversity and increase public enjoyment of the site for recreation.

Much of the land included within the country park proposal includes seminatural woodland, improved grassland, semi-improved grassland, and arable land, in a habitat mosaic resulting from differences in historic management practices. The land rests on varying degrees of slope, starting at 76 m above sea level at the lowest point and reaching a viewpoint at 133 m on Harts Hill in the northwest. Small stands of planted trees and scrub are found in the open areas of grassland, mostly along footpaths, and there is woodland around the northern perimeter of the site. Almost all the proposed Thatcham Country Park falls within the Bucklebury Plateau Biodiversity Opportunity Area, with small extensions to facilitate access.

Figure 3: The proposed Thatcham Country Park shown in relation to the Bucklebury Plateau Biodiversity Opportunity Area (shown in yellow).



Habitats should be created to boost the local environment, including woodland, scrubland, wildflower meadows and dew ponds. The habitats that will be created should be based on notable animal species records both on and within a 2 km radius of the NE Thatcham Development Site. Full lists of these species can be found in Annexes 2-5.

Biodiversity should also be considered within the structural design of park facilities. For example, any built structures should be made from sustainable materials and utilise a green roof. Existing trees will be incorporated into the park to prevent disruption to local habitats. The park should be mostly natural with minimal lighting as to not disrupt local nocturnal wildlife.

4.1 Biodiversity Enhancement

4.1.1 Fauna

The NE Thatcham Development Site falls into the priority area for Countryside Stewardship measures addressing lapwing, redshank and willow tit habitat restoration, and also falls within the distribution map boundaries identified by the RSPB Bird Conservation Targeting Project. In particular, it sits within the areas identified as important for grey partridge, lapwing, redshank, stone curlew, turtle dove and yellow wagtail. Furthermore, the site falls approximately 1 km south of Important Bird Areas, as identified by Birdlife International. Willow tits, lapwings, skylarks, grey partridge, turtle doves, redshank and yellow wagtails have previously been recorded both on and around the NE Thatcham Development Site, and additional nationally red-listed bird species identified on the site during May 2022 include tawny owl, starling, greenfinch, and yellowhammer. These factors provide a great opportunity for the proposed country park to be enhanced for the conservation of birds, with a particular focus on the above-mentioned species. This should include retaining much of the open, mixed farmland found on the site, which is ideal breeding habitat for many ground-nesting birds, and could also include the installation of bird nesting boxes and dew ponds.

The open grassland and hedge/tree lines provide good foraging and commuting opportunities for several species of bat, some of which were recorded on the site during 2022. The installation of bat boxes around the country park would provide excellent sites for bats to roost in, and the proposed dew ponds would provide additional feeding habitat.

Dormice have been recorded on the west of the NE Thatcham Development Site in recent years, making the Thatcham Country Park an ideal space for enhancing woodland habitat to accommodate their populations. Reptiles and amphibians have also been recorded within close proximity to the site and are known to inhabit nearby Bucklebury Common. Providing these species with designated hibernacula (such as log piles and leaves) could encourage their populations to thrive within the park at a very limited cost.

4.1.2 Flora

Management should aim to maintain or enhance the habitat by encouraging long-term plant diversity of the site. This can be achieved by producing areas of long and short turf, and patches of scrub of varying height and density.

The park should aim to create herb-rich chalk grassland, providing a colourful landscape which will be rich in diversity through spring and summer and support a variety of wildlife. The grassland should be managed with a view to creating the best conditions for wildflowers - potentially through a grazing programme and weed control which must consider requirements under the Weeds Act (1959) and the Wildlife and Countryside Act (1981). Grazing, mowing and hand-pulling should be sufficient to prevent weeds from dominating the sward.

The NE Thatcham Development Site is surrounded by ancient and semi-natural woodlands, all of which are designated as Berkshire Local Wildlife Sites. The woodland contained within the northeast and center of the Thatcham Country Park proposal are also Local Wildlife Sites, known to be home to several protected species. This woodland should be maintained with minimal intervention, as a policy of minimum intervention will allow woodland to remain more naturalised. Where management is necessary, trees within the park should sensitively managed for longevity but also incorporate hazardous tree assessments, with the overall aim to keep these woodlands within favorable status. Aims should include ensuring there is no loss of woodland area, the diversity of woodland habitats are maintained, and dead wood is maintained (where it poses no public safety risk). Any tree works should only be carried out to minimise the dangers to the public, and efforts should be made to incorporate dead wood habitats for invertebrates.

4.1.3 Aquatic Habitat

The chalky soils of the site are well-drained and would not naturally support wetlands. However, because livestock will be needed to graze the grasslands and control unwanted scrub invasion, one or more dew ponds could be constructed to form focal features of the park. They would also provide an important resource for breeding birds, bats, reptiles and amphibians (great crested newts have been recorded locally to the NE Thatcham Development Site). Dew ponds are small and shallow and would not represent a public safety risk.

5 VISITOR MANAGEMENT

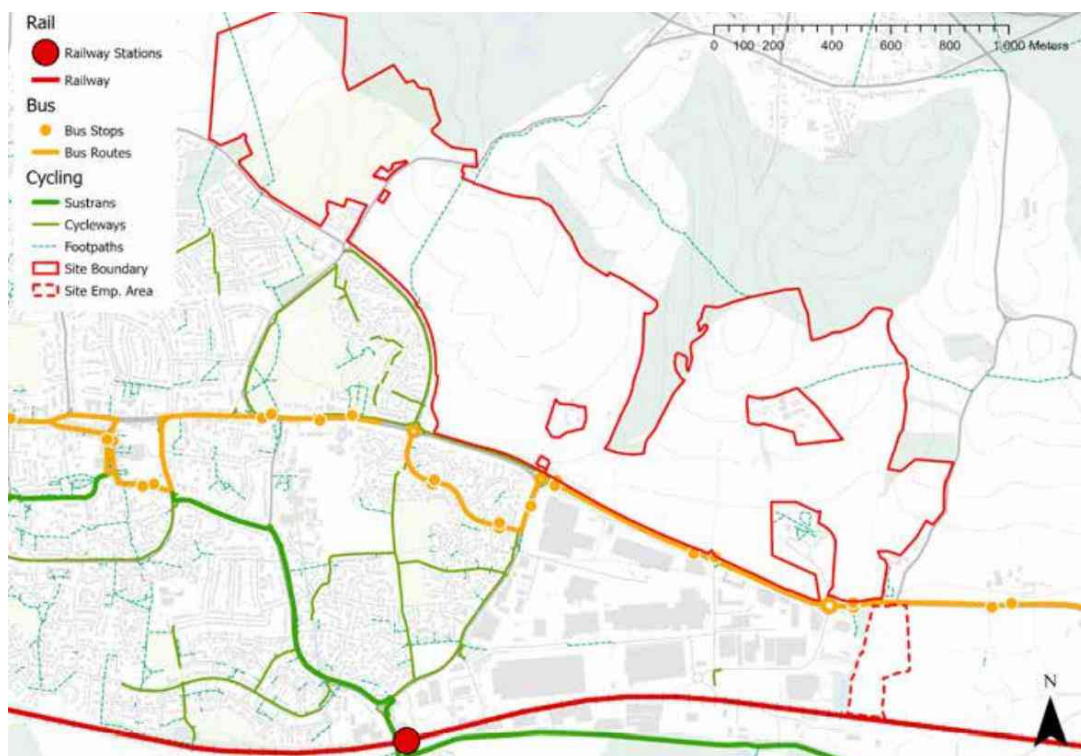
As a Country Park, public access will influence the management of the site, and public health and safety will play a key role in how the site is managed.

5.1 Accessibility

This proposal offers two vehicle entrances and car parks, with the main entrance situated near Colthrop Manor on the east of the site, where a vehicle entry point already exists. Vehicle entry from the southern side of the site will alleviate the small village of Upper Bucklebury from significantly increased congestion. With landowner cooperation, the existing Colthrop Manor could be converted into the main entrance, with the existing building acting as a visitor centre. Without landowner cooperation, the area around Colthrop Manor could still be converted into the main park entrance. The establishment of this country park would offer increased business for the existing Colthrop B&B and presents the opportunity for expansion into a café.

To encourage both exercise and the use of public transport, it is important that the Thatcham Country Park is easily accessible without the use of a personal vehicle. Figure 4 below shows that there are bus stops already located on the south side of the site, along the A4 road, near to where the proposed main park entry points are located. Furthermore, the existing cycleways and footpaths of Thatcham could be extended northwards into the NE Thatcham Development Site and up to the country park.

Figure 4: Sustainable modes of transport near the NE Thatcham Development Site. Source: West Berkshire Council's Strategic Growth Study⁵



⁵ <https://info.westberks.gov.uk/CHttpHandler.ashx?id=49800&p=0>

The country park should be signposted on main roads within at least five miles of the site, and the entrance points clearly signposted along the A4 road. For public health and safety reasons, access points to the park should be carefully considered and the provision of new road crossings may be necessary.

5.2 Rights of Way

The boundaries of the country park should be clearly marked on visitor maps, and the use of signage, fencing and natural barriers (such as hedgerows) can be used to further indicate the boundaries to visitors. These barriers should be particularly implemented on the northern side of the site, to avoid a heavy increase in footfall towards Bucklebury Common and the North Wessex Downs Area of Outstanding Natural Beauty. These factors combined will help to protect surrounding landowners from trespass, increase public safety by preventing easy access to the roads in Bucklebury, and help protect local designated sites from the negative impacts of significantly increased visitors.

Public Rights of Way (including bridle paths and restricted byways) should criss-cross the site and provide both shorter and longer distance routes for walkers, cyclists and horse riders alike. Easy-access trails should be provided to ensure that the park is inclusive of those with differing abilities, and when designing these trails, the sloping nature of the landscape should be considered. Rights of Way must be accessible to pushchair and wheelchair users.

As the woodland contained within the proposed park boundaries are designated Local Wildlife Sites, known to be home to many protected species, Public Rights of Way must be carefully considered in order to facilitate access to these woodlands whilst protecting the habitats of these species and giving consideration to public health and safety.

All Rights of Way and restricted areas must be clearly signposted at regular intervals throughout the park, with signs indicating the length and difficulty level of each trail. Each trail could be provided with an interesting and memorable name to help park visitors easily identify their location and plan their routes. All signs, both directional and informational, should be made accessible in formats appropriate for people with different needs. For example, information signs should provide text in braille for those with visual impairments

5.3 Activities

Activities provided at the Thatcham Country Park will depend greatly on factors such as available space and funding. Some activities that require an initial cost, but can be free to run include:

- Crayon rubbing trails; brass plaques with a 3D printed design which visitors can use to create a picture by rubbing a crayon over some paper
- Cycling trails
- Walking/running trails; clearly separated from cycling routes for public health and safety purposes.

Some activities that require an initial cost, and some ongoing management costs include:

- Children's playground
- Bandstand and picnic area

The park should take an active role in encouraging exercise activities in the local community. The provision of a walking/running trail introduces the possibility of organised park runs, which could be included in a programme of events held by the park. Further events could include guided walks, and evening bat talks hosted by the local Bat Group. These activities will both encourage exercise through walking and help promote environmental awareness.

5.4 Facilities

As mentioned in Section 5.1, the existing Colthrop Manor could become the main entrance to the country park, with the existing building acting as a visitor centre where people can find detailed information about the park. This building would host facilities such as public toilets and offers the opportunity for a small business enterprise to open a café. There is the potential to also host a small classroom facility if the park is to take an active role in education (see Section 7.1). Without the Colthrop Manor landowner cooperation, a new, separate building should be erected for this purpose. A main noticeboard displaying a park map should be mounted at the entrance, with smaller maps also provided at several locations around the park so that visitors can easily identify their location and the layout of the park trails and facilities. Additional signage should be included to provide visitors with an awareness of site rules, alongside the provision of a telephone number for the park's main office.

Benches should be situated along the trails created within the park, with some picnic benches scattered throughout the amenity grass areas. A dedicated picnic area could be installed near the pond or within a location which offers good landscape views.

It is expected that the country park would be utilised quite heavily for the purposes of dog walking. To facilitate this activity, designated dog areas could be provided where dogs can be allowed to run freely, whilst in other areas of the park they must be kept on leads (i.e., around playgrounds and ponds). Designated dog areas would reduce the areas in which fowling would occur and would protect wildlife and grazing animals from disturbance.

General waste bins, dog waste bins and recycling points should be provided at regular intervals around the park trails, with extra consideration given specifically to the car park/visitors area, picnic areas, pond and playground. A daily site patrol and litter pick should be undertaken by site wardens.

6 PARK MANAGEMENT

West Berkshire Council own three country parks in the West Berkshire area: Greenham Common, Snelsmore Common and Thatcham Reed Beds (Thatcham Discovery Centre). These are managed by the Berks, Bucks, & Oxon Wildlife Trust (BBOWT)⁶. This proposal recommends that BBOWT are commissioned to act as management for the Thatcham Country Park on behalf of West Berkshire Council.

West Berkshire Council would need to provide and maintain permissive and statutory rights-of-way, public rest points, picnic tables and litter bins as well as provide interpretative material to increase the educational resource of the site.

6.1 Site Staffing

The Thatcham Country Park should employ wardens who will perform daily patrols of the park and carry out safety and maintenance inspections alongside dealing with vandalism and graffiti. Wardens would report back to park management with any issues and to arrange external contractors when required. Collectively, park wardens and managers will be responsible for delivering the park conservation management objectives and for maintaining the visitor facilities.

Furthermore, the park should employ litter pickers who are also responsible for emptying the bins. Part-time education staff could be employed to host educational visits for schools and clubs, and the opening of an inhouse park café would provide additional staffing. These roles provide new job opportunities for the local community and would assist the park in meeting the essential criteria set out by Natural England for country park designation (Annex 1).

6.2 Volunteering Opportunities

Alongside the creation of new jobs, Thatcham Country Park would provide volunteering opportunities within the local community. These opportunities could include regular, fixed volunteer roles for nature enthusiasts, or for students undertaking environmental studies/Duke of Edinburgh Awards, and they could include volunteer days hosted by the park, with a specific project aim to be completed. Volunteer roles help people to develop physical and social skills, promote community networking, offer people a sense of social inclusion and can provide job prospects. Additionally, projects undertaken by volunteer groups can remove/reduce the requirement for funding the project.

⁶ [Home | Berks, Bucks & Oxon Wildlife Trust \(bbowt.org.uk\)](http://www.bbowt.org.uk)

7 COMMUNITY ENGAGEMENT

Thatcham Country Park should be informed by the local community. Press releases in local newspapers, publicised drop-in sessions and feedback surveys will allow the public to have some influence over the development of the park, discovering which facilities are most desired. Once the park has been established, further meetings and park exit surveys can be utilised to receive feedback and find out what improvements the public want, and what facilities they used while they visited.

A Community Liaison Group should be set up, where invited guests from the parish council, local police, and representatives of cycling, ramblers, neighbouring landowners and other local interested parties are able to attend meetings and talk about the park, its management and aims for the future.

It is important to conduct outreach that engages with less represented members of a community. Effective community engagement means understanding local demographics and removing barriers, which could include language, geography, age, and socio-economic factors. Working with existing local community groups and using a diverse range of engagement techniques can help to ensure that everyone is given an equal right to have their views heard and respected.

7.1 Education

A country park offers the opportunity to raise environmental awareness and provide education on a range of environmental topics such as botany, biodiversity, entomology, and habitat and species conservation. Passive education can be provided via the use of information signs placed around the park, whilst active education can take the form of guided trips for schools, clubs and even birthday parties.

Thatcham hosts nine nurseries, six primary schools and one secondary school. In the nearby town of Newbury, there are 16 nurseries, 10 primary schools and four secondary schools. The Northeast Thatcham housing proposal considered in this report suggests the provision of two new primary schools and one new secondary school. If the park is to provide active education programmes, the provision of a small classroom should be considered at the visitors' centre.

Educational signage could include, for example, information boards on pollinators within the herb-rich grasslands, information on wildfowl around the pond areas, and information on invertebrates and mammals around the woodland.

8 HEALTH AND SAFETY

West Berkshire Council has a statutory duty to enforce the provisions of the Health and Safety at Work etc Act 1974, the primary umbrella legislation for many associated Regulations. The Council carries out this duty by employing suitable, qualified and trained staff, who are authorised to enforce the requirements of the Act. Park management must ensure they follow corporate policies and legislation regarding the safety of both staff in the workplace and visitors to the site and seek appropriate advice on legislation and policy where required. All park staff must be trained in health and safety management, with at least one member of staff assigned for the purposes of liaising and feedback. Wardens should have access to a warden's handbook for the site which summarises all important information that they need to know, alongside a Health & Safety Manual summarising the most relevant risk assessments for the staff. Emergency plans must also be developed for the site. A fire and emergency plan should identify rendezvous points; locations of fire hydrants and safety equipment, vehicle access points, available water supplies and other hazards on site. The plan should include both the visitor's centre and the wider site.

In general, there must be regular health and safety inspections carried out on any facilities provided for public use (i.e. playgrounds and benches), with the park wardens taking responsibility for implementing repairs and ensuring formal professional health and safety inspections are carried out each year subject to West Berkshire Council policies.

Signs should be provided around the park to make visitors aware of any immediate risks. A phone number for the park office should be provided for use by visitors.

9 FUNDING

The park must be free for visitors, with West Berkshire Council providing an annual revenue budget for the park, and additional income raised via other sources. Fundraising ideas include:

- A pay and display machine located in the car parks
- Voluntary donations points set up both on site and potentially off site (i.e., in local shops and online)
- An inhouse café
- Educational school trips
- Rental of the picnic areas/bandstand for children's birthday parties
- Annual family fun days, charging stall holders a fee
- Conservation grants
- Hosting of sports events
- Camping opportunities
- Bat walks/talks in partnership with the Bat Conservation Trust

10 MARKETING

Locally, the park can be promoted via tourism signage, through local news outlets, via posters on noticeboards, through the Council website and through schools. It is important to conduct marketing outreach into all areas of the community (see Section 7).

To reach members of the public further afield, the park should have its own webpage and Facebook page which should be regularly updated and monitored, with any queries answered by a knowledgeable member of the park team.

11 ACCREDITATION

In recent years, country parks have been created under informal arrangements, with Natural England working with partners to encourage a revival of parks and providing parks with accreditation if they meet certain criteria⁷. For Natural England to give accreditation to a country park, the area proposed area for designation must meet eleven essential criteria, and at least ten of the desirable criteria. The full criteria list can be found in Appendix 1, with an indication on which of the criteria this proposal for a Thatcham Country Park would meet.

Alongside accreditation by Natural England, Thatcham Country Park could aim to achieve a Green Flag Award⁸.

⁷ [Get accreditation for a country park you manage in England - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

⁸ [Green Flag Award](#)

12 REFERENCES

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13 ANNEXES

Annex 1: Essential and Desirable Criteria for Country Park designation by Natural England

The park must be:	Applicable to NE Thattham proposal?
At least 10 hectares in size	X
Defined by a clear boundary, marked on a map, whether open or fenced in	X
Accessible – less than 10 miles from a residential area	X
Free to enter	X
Inclusive and accessible – meeting equality and disability needs and provided for varied groups	X
Predominantly natural or semi-natural landscape, for example woodland, grassland, wetland, heathland or parkland, with no more than 5% of the area built on (excluding car parks)	X
Signposted and easy to navigate – showing visitors where they can go and providing directions to footpaths, bridleways, and cycle routes	X
Visibly staffed (e.g. litter collection and maintenance)	X
Available for public or educational events	X
Near public toilets (on site or within a two minute walk)	X
Informed by the local community - the public should have some influence over the management and development of your site	X
The park should ideally have...	
A visitor centre	X
Play facilities	X
Catering	X
Bike and horse trails	X
Art and sculpture	
Permanent staff presence during the day	Possibly
Detailed information available for visitors	X
Brown and white tourist directional signs and shown on OS map	X
Activities outside, such as water and adventure sports	
Achieved (or working towards) Green Flag Award Status	Possibly
Green transport policy, such as buses and cycle routes	X
Facilities for less able visitors, such as easy trails, seats and information available in accessible formats	X
Planned for the management of biodiversity, geodiversity and preservation of historical environment	
Opportunities for practical community involvement, such as volunteering	X
Promoted the health benefits of walking	X
An outreach programme promoting the site to less represented sectors of the community	X
A programme of events and guided walks, promoting healthy living and environmental awareness	X

Annex 2: Protected species recorded within a 2 km radius of NE Thattham Development Site.

Source: National Biodiversity Network 2022.

Species	Number of records	Date(s) of observation(s)
INVERTEBRATES		
White-clawed crayfish	1	2003
Stag beetle	1	2019
AMPHIBIANS and REPTILES		
Common lizard	4	1995, 1996, 2012
Slow worm	1	2012
Grass snake	4	1996, 2001, 2004, 2011
Great crested Newt	6	May 2016 and June 2016
Palmate newt	2	1992 and 1996
Common frog	53	1990 - 2011
MAMMALS		
Eurasian badger	4	1995, 2014, 2015
Eurasian otter	1	2012
Hazel dormouse	3	2015, 2018, 2021
West European Hedgehog	69	1992 - 2021
Brown long-eared bat	1	2013
Pipistrelle bat	5	2013

Annex 3: Protected bird species recorded on and around the NE Thattham Development Site.

Source: Thames Valley Environmental Record Centre.

Species			
Barn owl	Common crossbill	Hobby	Red kite
Bittern	Common scoter	Kingfisher	Redwing
Black-headed gull	Fieldfare	Little gull	Scaup
Black-necked grebe	Firecrest	Little ringer clover	Spoonbill
Black-tailed godwit	Garganey	Marsh harrier	Spotted crake
Black redstart	Goldeneye	Merlin	Stone curlew
Black tern	Great northern diver	Montagu's harrier	Whimbrel
Bluethroat	Green sandpiper	Osprey	Whooper swan
Brambling	Greenshank	Peregrine	Wood sandpiper
Cetti's warbler	Hen harrier	Pintail	Woodlark

Annex 4: Records of licenses issued by Natural England for works affecting protected species within 3 km of the NE Thatcham Development Site.

Source: Natural England.

Species	Date
Hazel or Common dormouse	2018
Great crested newt	2016
Great crested newt	2016
Bats: BLE, C.Pip	2010
Bats: BLE, C.Pip, S.Pip	2013
Bats: BLE, C.Pip	2020
Bats: BLE, C.Pip, S.Pip	2009
Bats: BLE, S.Pip	2013
Bats: BLE, S.Pip	2012
Bats: BLE, C.Pip, S.Pip	2018
Bats: BLE, C.Pip, S.Pip	2015
Lesser horseshoe bat	2014
Bats: BLE, C.Pip, S.Pip	2018
Bats: BLE, C.Pip	2009

Annex 5: Bird observations on the NE Thatcham Development Site on May 13th 2022

Source: NatureBureau.

Species	Highest breeding evidence	Count	Status*
Swift (<i>Apus apus</i>)		5	
Woodpigeon (<i>Columba palumbus</i>)	01 Nesting habitat (H)	4	
Red Kite (<i>Milvus milvus</i>)		4	
Buzzard (<i>Buteo buteo</i>)	01 Nesting habitat (H)	1	
Magpie (<i>Pica pica</i>)	01 Nesting habitat (H)	4	
Carrion Crow (<i>Corvus corone</i>)	01 Nesting habitat (H)	2	
Blue Tit (<i>Cyanistes caeruleus</i>)	01 Nesting habitat (H)	4	
Great Tit (<i>Parus major</i>)	02 Singing male (S)	2	
Skylark (<i>Alauda arvensis</i>)	02 Singing male (S)	3	
Swallow (<i>Hirundo rustica</i>)		6	
Chiffchaff (<i>Phylloscopus collybita</i>)	02 Singing male (S)	4	
Blackcap (<i>Sylvia atricapilla</i>)	02 Singing male (S)	2	
Whitethroat (<i>Curruca communis</i>)	02 Singing male (S)	2	
Wren (<i>Troglodytes troglodytes</i>)	02 Singing male (S)	3	
Starling (<i>Sturnus vulgaris</i>)	01 Nesting habitat (H)	2	
Song Thrush (<i>Turdus philomelos</i>)	02 Singing male (S)	2	
Blackbird (<i>Turdus merula</i>)	02 Singing male (S)	3	
Robin (<i>Erithacus rubecula</i>)	02 Singing male (S)	2	
Wheatear (<i>Oenanthe oenanthe</i>)		1	Migrant
Pied Wagtail (<i>Motacilla alba yarrellii</i>)		1	
Greenfinch (<i>Chloris chloris</i>)	02 Singing male (S)	1	
Goldfinch (<i>Carduelis carduelis</i>)	03 Pair in suitable habitat (P)	4	
Yellowhammer (<i>Emberiza citrinella</i>)	02 Singing male (S)	1	



West Berkshire Local Plan Review

Proposed Submission (Regulation 19)
Consultation

Appendix 4 – Initial Biodiversity Assessment

March 2023



naturebureau

**NE Thatcham Housing
Development Proposal:
Initial Biodiversity
Assessment**

16 June, 2022



Votec Centre 2c,
Hambridge Lane,
Newbury RG14 5TN
United Kingdom

Registered in England and Wales No. 2369556
VAT GB 537 590618

+44 (0)1635 550380

post@naturebureau.co.uk
www.naturebureau.co.uk

Established in 1990

Independent ecological consultancy, project management, nature conservation,
communication materials, design and wildlife book publisher.



NE Thatcham Housing Development Proposal: Initial Biodiversity Assessment

Ref:	Eco22-02	Site Name:	NE Thatcham Site
Service:	Review and assessment of available biodiversity information	Location:	51.403535°N -1.229202°W
Area:	Approx. 179 ha	Contact Name:	Helen Pratt
Site terrain:	Arable fields, rough grassland, mature hedgerows, tall trees and a ditch	Contact Details:	Office: Clerk to Bucklebury Parish Council Jasmine Cottage, Byles Green, Upper Bucklebury, Reading RG7 6SD Tel: 01635 863581 Mail: clerk@buckleburyparish.org
Authors:	<i>Written by</i> Kristina Wood, MRes, ACIEEM <i>Checked by</i> Paul Goriup, MSc, CEcol, CEnv, FCIEEM	Report date:	16 June 2022

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1 INTRODUCTION

NatureBureau was engaged by Upper Bucklebury Parish Council to investigate and as far as possible assess the biodiversity value of an area of land included in a development proposal for 2,500 houses on the north-eastern side of Thatcham, West Berkshire, herein called the NE Thatcham Site. Local residents are concerned that the potential biodiversity value and nature conservation interest of the site was not sufficiently considered so far in the planning process.

Although the survey work reported here follows the guidelines for conducting a Preliminary Ecological Appraisal published by the Chartered Institute of Ecology and Environmental Management¹, it does not represent the full appraisal that should be undertaken by the developer in the course of making a formal planning application. Furthermore, since the whole site is privately owned, the survey work was restricted to access and views from public rights of way, and only done in the spring season.

The NE Thatcham Site (Figure 1) covers about 174 ha, spread over 3 km, and an additional 5 ha plot of land to the south of the A4, adjacent to Colthrop Industrial Estate. The western end of the NE Thatcham Site is adjacent to the existing Thatcham settlement boundary along Floral Way and Bath Road (A4). The eastern end of the site is adjacent to Colthrop Industrial Estate. The village of Upper Bucklebury sits to the north of the site, on the top of a hill that forms the southern edge of the North Wessex Downs Area of Outstanding Natural Beauty.

The proposed development was included in the Thatcham Strategic Growth Study (West Berkshire Council, 2020a), following a Housing and Economic Land Availability Assessment (HELAA) which highlighted several sites to be considered for development in Thatcham. The February 2020 HELAA proposal for NE Thatcham formed the basis for the Community Stakeholder Workshop consultation, but in September 2020 the proposed boundary was altered. Most notably, the northern edge of the site was extended into an area of about 30 ha that had previously been deemed unsuitable for development (shown in orange in Figure 1). Although it is unclear whether this additional area is indeed being considered for development, for the purposes of this report it has been included.

The site mostly comprises arable land, improved and semi-improved grassland, linear networks of mature hedgerows, some old growth trees, several streams, and a drainage ditch. The proposed development site is surrounded by ancient woodland included in the Woodland Priority Habitat Network, the North Wessex Downs Area of Outstanding Natural Beauty, and two Sites of Special Scientific Interest (including a Special Area of Conservation for birds). Local Biodiversity Opportunity Areas are also present within the proposed site boundary.

¹ <https://cieem.net/wp-content/uploads/2019/02/Guidelines-for-Preliminary-Ecological-Appraisal-Jan2018-1.pdf>

Figure 1: Approximate boundaries of the NE Thatcham Site

Shaded areas are excluded from the development site
(Aerial image from Google Earth, acquired 15 May 2022)



2 METHODS

The following techniques were employed to gather information about the site:

- Visual inspection of aerial and remotely sensed images available on Google Earth and OS Maps, with the most recent image from 08 June 2022.
- Interrogation of the MAGIC website² of geographic information about rural, urban, coastal and marine environments across Great Britain. It is presented in an interactive map which can be explored using various mapping tools. Natural England manages the service under the direction of a Steering Group who represent the MAGIC partnership organisations.
- Interrogation of the National Biodiversity Network (NBN) Atlas³ which combines multiple sources of information about UK species and habitats, with the ability to interrogate, combine, and analyse these data in a single location; it currently holds about 235 million species occurrence records.

² <https://magic.defra.gov.uk/>

³ <https://nbnatlas.org/>

- A walk-over of the site carried out on 13 May 2022 from public footpaths located around and through the site, and views from adjacent land with permissions from the landowner.
- Interviews and correspondence with local residents living close to the site.
- Examination of available and relevant local planning and strategy documents.

3 RESULTS

3.1 Desk Studies

The interrogation of online publicly available datasets covered citations of statutory designated sites of importance for nature conservation; species occurrence records; licences issued for works involving European endangered species; and maps/aerial images for features of interest.

3.1.1 National Biodiversity Network

The National Biodiversity Network was accessed to locate notable animal species records both on and within a 2 km radius of the NE Thatcham Site. Table 1 presents these findings in relation to species afforded legal protection under the Wildlife & Countryside Act 1981 (as amended), the Conservation of Habitats and Species Regulations 2010 and the Protection of Badgers Act 1992. Hedgehogs were also included in this report as they are considered a species of 'principal importance' under the Natural Environment and Rural Communities Act (2006), which is meant to confer a 'duty of responsibility' on public bodies.

Table 1: Protected species recorded within a 2 km radius of NE Thatcham Site

Species	Number of records	Date(s) of observation(s)
INVERTEBRATES		
White-clawed crayfish	1	2003
Stag beetle	1	2019
AMPHIBIANS and REPTILES		
Common lizard	4	1995, 1996, 2012
Slow worm	1	2012
Grass snake	4	1996, 2001, 2004, 2011
Great crested Newt	6	May 2016 and June 2016
Palmate newt	2	1992 and 1996
Common frog	53	1990 - 2011
MAMMALS		
Eurasian badger	4	1995, 2014, 2015
Eurasian otter	1	2012
Hazel dormouse	3	2015, 2018, 2021
West European Hedgehog	69	1992 - 2021
Brown long-eared bat	1	2013
Pipistrelle bat	5	2013

These records do not include the species identified by NatureBureau during May 2022. See Table 2 for bird records and the Annex for bird species identified during the site survey.

3.1.2 Thames Valley Biodiversity Report

The TVERC (2021) biodiversity report lists a number of protected and notable species on and around the NE Thatcham Site. This includes animal species such as the adder, common frog, common lizard, Eurasian badger, European otter, European water vole, grass snake, great crested newt, hazel dormouse, marsh fritillary butterfly, palmate newt, slow worm, smooth newt, stag beetle, west European hedgehog, and 11 bat species. Protected plant species found on the NE Thatcham Site includes the bluebell. Forty protected bird species were also recorded, as shown in Table 2 below.

Table 2: TVERC records: Protected bird species

Species			
Barn owl	Common crossbill	Hobby	Red kite
Bittern	Common scoter	Kingfisher	Redwing
Black-headed gull	Fieldfare	Little gull	Scaup
Black-necked grebe	Firecrest	Little ringer clover	Spoonbill
Black-tailed godwit	Garganey	Marsh harrier	Spotted crake
Black redstart	Goldeneye	Merlin	Stone curlew
Black tern	Great northern diver	Montagu's harrier	Whimbrel
Bluethroat	Green sandpiper	Osprey	Whooper swan
Brambling	Greenshank	Peregrine	Wood sandpiper
Cetti's warbler	Hen harrier	Pintail	Woodlark

3.1.3 Natural England Protected Species Licences

Within 3 km of the site (centre point) there are 14 records of licenses issued by Natural England for works affecting protected species entered on the MAGIC website⁴. These records are summarised in Table 3 and shown in Figure 7.

The NE Thatcham Site is centrally located to the sites which received licences issued in relation to works affecting bats. All species of bats receive special protection under UK law and it is a criminal offence under the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017 (The Habitat Regulations), to destroy or damage their roosts, or to disturb, kill or injure them without first having obtained the relevant licence from Natural England.

⁴ <https://magic.defra.gov.uk/>

Table 3: Records of licenses issued for development works affecting protected species

Species	Distance from closest site edge	Date
Hazel or Common dormouse	0 m	2018
Great crested newt	0m	2016
Great crested newt	60 m	2016
Bats: BLE, C.Pip	40 m	2010
Bats: BLE, C.Pip, S.Pip	220 m	2013
Bats: BLE, C.Pip	900 m	2020
Bats: BLE, C.Pip, S.Pip	1.1 km	2009
Bats: BLE, S.Pip	1.1 km	2013
Bats: BLE, S.Pip	1.1 km	2012
Bats: BLE, C.Pip, S.Pip	1.6 km	2018
Bats: BLE, C.Pip, S.Pip	1.7 km	2015
Lesser horseshoe bat	1.9 km	2014
Bats: BLE, C.Pip, S.Pip	2.1 km	2018
Bats: BLE, C.Pip	2.3 km	2009

Key: BLE – brown long-eared bat; C.Pip = common pipistrelle; S.Pip – soprano pipistrelle

Figure 2: Map displaying the granted EPS licences outlined in Table 3
(Source: MAGIC, Google maps, 2022)



3.1.4 NE Thatcham and Bird Conservation

The Defra MAGIC website shows that the NE Thatcham Site falls into the priority area for Countryside Stewardship measures addressing lapwing, redshank and willow tit habitat restoration. According to the National Biodiversity Network database, willow tits have been recorded as present in the woodland to the north-west of the proposed development site. Lapwings and skylarks have also been recorded both on and around the NE Thatcham Site. The open, mixed farmland found on the site is ideal breeding habitat for these birds.

The NE Thatcham Site also falls within the distribution map boundaries identified by the RSPB Bird Conservation Targeting Project. These maps are aimed at a suite of rare and declining farmland and/or woodland birds, both for arable and grassland habitats. In particular, the proposed development site falls within the areas identified as important for grey partridge, lapwing, redshank, stone curlew, turtle dove and yellow wagtail. According to the National Biodiversity Network, grey partridge, lapwing and the turtle dove have previously been identified within the proposed site boundary. Other than the curlew, the other species considered by the CTP have been recorded within a 2 km radius of the site.

Furthermore, the site falls approximately 1 km south of Important Bird Areas, as identified by Birdlife International.

Figure 3: Map displaying the proximity of NE Thatcham Site to Important Bird Areas

(Source: BirdLife International, Google maps, 2022)



3.1.5 Site designations

There are no protected sites within the NE Thatcham Site. However, to the north of the boundary lies the North Wessex Downs Area of Outstanding Natural Beauty. Figure 9 below shows the proximity of the AONB to the proposed site.

Figure 4: Proximity of the North Wessex Downs AONB to the NE Thatcham Site

(Source: MAGIC, Google maps, 2022)



The NE Thatcham Site is surrounded by ancient and semi-natural woodlands, all of which are designated as Berkshire Local Wildlife Sites. The 3 ha of woodland contained within the potential site expansion to the north is also a Local Wildlife Site, known as Big Gully. Biodiversity Opportunity Areas have also been identified around and within the NE Thatcham Site (Figure 5).

The proximity of these protected sites means that the whole of the NE Thatcham Site lies within SSSI Impact Risk Zones as shown in Figure 6. These risk zones are used to assess planning applications for likely impacts on statutory protected sites in England which would mean the local planning authority must consult Natural England if certain risk categories of development are proposed. Two categories of risk could apply in this case:

- Rural Residential: any residential development of 100 or more houses outside existing settlements/urban areas; and
- Infrastructure: pipelines, pylons and overhead cables; any transport proposal.

The woodlands surrounding the NE Thatcham Site are also high spatial priority areas for Countryside Stewardship measures, namely the Woodland Priority Habitat Network. The woodland on the far east of the site, Ouzel Gully, is also part of this network, as is Big Gully.

To the south of the NE Thatcham Site, across the railway track, lies the River Kennet: a designated Site of Special Scientific Interest. The NE Thatcham Site is also approximately 2 km north-east of a Special Area of Conservation (Kennet and Lambourne Floodplain), and the Thatcham Reed Beds SSSI.

3.1.6 Other features of interest

To the east of the NE Thatcham Site there are some priority lowland meadow habitats, and approximately 2 km north-east is Bucklebury Common, which is known to host protected species such as adders and slow worms.

3.2 Site Viewing

For this report, the proposed development site has been divided into four main areas: west, centre, east and north.

Figure 7: Approximate boundaries of the NE Thatcham Site, divided into four segments

(Aerial image from Google Earth, acquired 17 May 2022)



3.2.1 The West

The west side of the NE Thatcham Site appears to be comprised of mainly rough, agriculturally improved (i.e., fertilised and/or reseeded) grassland. To the north of the site is an ancient woodland. A footpath runs north-west to south across this area. To the south is a water attenuation basin enclosed by semi-improved grassland. Aerial images indicate a large pond within the basin, and a stream that runs south from it.

During the site viewing a muntjac, roe deer and red fox were seen in the area. Bird species observed on the western area included song thrush, blackbird, goldcrest, wren, great tit, robin and great spotted woodpecker.

3.2.2 The Centre

The central segment of NE Thatcham Site is comprised mainly of arable land, featuring mixed-species tree lines and mature hedgerows. Views from the public footpath are limited for this area. To the north-west of the central segment, north of Harts Hill Road, there appears to be a small, young native tree plantation.

3.2.3 The East

The east of NE Thatcham Site is mostly comprised of arable farmland. There is an airstrip to the north-west of this segment that occupies around 1,000 m² of semi-improved grassland. Long Grove lane and several footpaths cross this area, meeting in the centre around Colthrop Manor. Just west of Colthrop Manor are two large metal outbuildings. Immediately south of the Manor there appears to be a mature hedgerow (featuring species such as oak, elm, willow and hawthorn), whilst south-west of Colthrop Manor is a drive that leads down to the Bath Road (A4). A drainage ditch runs alongside this path. During the site viewing, freshwater shrimp were seen in this ditch, despite the water being polluted with an oily substance. Other species identified during the site walkover included roe deer and insects such as the white-tailed bee, tortoiseshell butterfly, peacock butterfly, brimstone butterfly and large white butterfly. A full list of the birds identified on the east of the site is given in the Annex. Of these species, yellowhammer, greenfinch, skylark and starling are red-listed as UK Birds of Conservation Concern⁵. The wheatear, song thrush, wren, whitethroat and wood pigeon are amber-listed. Many of these species appeared to be breeding on the site.

On the eastern side of West Berkshire Crematorium is more arable land and some mature hedgerows. Sitting on the northern boundary is a copse of approximately 2.6 ha, known as Ouzel Gully. With permission from the landowner, access was gained to this area of woodland. On the west side of the wood, along the boundary of the planned development site, is a large pond fed by a stream from the north. Two pairs of mallard ducks (also listed as UK Birds of Conservation Concern) were observed here.

3.2.4 The North

The northern segment refers to the orange area shown in Figure 1. Along the footpath on the west of this area is some old, broken newt/reptile fencing. Desk studies show that newt surveys were carried out on this area in 2016, and it is apparent that the fencing was not removed, as required, following some works.

⁵ <https://www.bto.org/our-science/publications/psob>

Figure 8: Pond on the eastern boundary of the proposed development site

(Source: NatureBureau)



Figure 9: Old newt/reptile fencing along the western boundary of the north segment

(Source: NatureBureau)



The area beyond this fencing appears to be an old quarry, dominated by ruderal species such as foxglove, ox-eye daisy and bird's-foot trefoil.

On the east side of the northern segment, there is a footpath leading from Harts Hill Road, south through Little Gully. To the east of Little Gully there is improved grassland, and the to the west arable land. Within Little Gully there is a shallow, flowing stream. Species observed during the site viewing of the north segment included early bumblebee, roe deer, peacock butterflies, woodpigeons, carrion crows and chiffchaffs.

3.2.5 European Protected Species

During the site walkover on 13 May, active badger setts and fresh badger droppings were incidentally located in three different areas. For animal welfare reasons, the exact locations of these active setts are not disclosed here.

In addition, the NE Thatcham Site provided ideal habitats for bats to roost and feed. The desk study also showed that bats have been reported in this area (see Section 3.1 Desk Studies). As bat populations are under threat from the loss of roosting sites and foraging habitats, on 13 and 14 May we attended the eastern segment of the NE Thatcham Site to determine whether bats were present. A passive acoustic bat detector, the Anabat Express, was utilised to record bat presence. On 17 and 18 May, the same method was used on the east side of the NE Thatcham Site. During the bat data recording on all dates in May, tawny owls could be heard calling from the surrounding woodland.

Figure 10: Locations of the Anabat Express data recordings

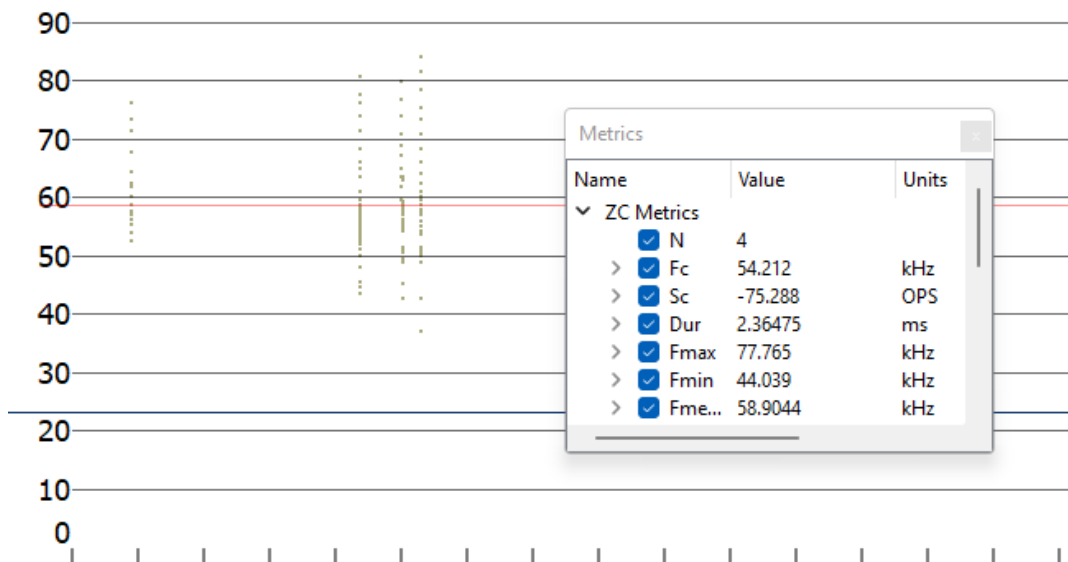
(Aerial image from Google Earth, acquired 20 May 2022)



On the eastern side of the site, bats were witnessed both emerging from the woodland to the north of the NE Thatcham Site and also appeared to fly across from the south of the site to enter the woodland or fly along the treeline. Analysis of the Anabat Express data (Figure 11) showed that the most common frequencies of bat calls recorded between 13 and 14 May were between 22 and 60 kHz.

Figure 11: Example of frequency data of a bat call recorded on the NE Thatcham Site on 13 May 2022

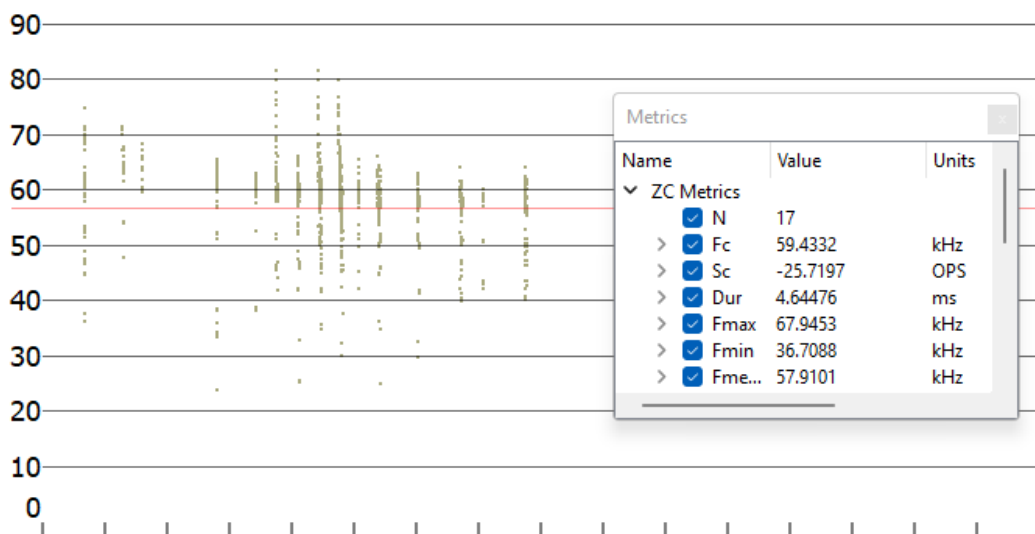
(Anabat Insight data analysis, viewed 20 May 2022)



On the western side of the site, bats were observed flying overhead. The view from this footpath was more limited than the view from eastern side, so not much is known about their activity beyond these initial observations. Analysis of the Anabat Express data (Figure 12) showed that the most common frequencies of bat calls recorded between 17 and 18 May were between 25 and 80 kHz.

Figure 12: Example of frequency data of a bat call recorded on the NE Thatcham Site on 18 May 2022

(Anabat Insight data analysis, viewed 20th May 2022)



The frequency ranges recorded during all visits fit within the frequency ranges of the species previously identified as being present on or around the site (see Section 3.1. Desk Studies).

3.3 Site Connectivity

Well-established mammal tracks were observed across the site in various locations. There is also evidence of tracks entering/exiting the NE Thatcham Site boundary, in particular, on the eastern side of the site, to/from the fields both north and east of Cox's Lane. All around the proposed development site there are tracks entering/exiting the surrounding woodland, and some of the tracks identified lead into areas where badger setts were identified.

The NE Thatcham Site is surrounded by ancient woodland and hosts several old growth trees and mature hedgerows. Most species of bats roost in woodland and use treelines and woodland edges as coverage, and to help with navigation as they travel up to 5 km from their roosts every night. Species such as the soprano pipistrelle are specialist feeders and much prefer foraging around water sources, particularly around riparian woodland – like that found just outside of the eastern boundary of the proposed development site, 0.7 km from the location where bats were detected (see Section 3.1.3).

The NE Thatcham Site is surrounded by several designated sites and priority habitats. For further information on these aspects of site connectivity, see Sections 3.3 and 3.5.

3.4 Local Resident Observations

Informal interviews of residents living near to the NE Thatcham Site aimed to draw together local knowledge regarding the ecological value of the proposed development site. Several residents stated that they regularly see badgers and hedgehogs, particularly on or near Cox's Lane. One interviewee lives on land to the north of the eastern area. This resident stated that they have knowledge of great crested newts on the site boundary. This is displayed in Figure 13. Further species noted by residents as being sighted in the local area include deer, hares, rabbits, frogs, toads, hedgehogs, foxes, bats, as well as a range of birds.

Figure 13: Area where great crested newts have been reported by local residents, shown in purple

(Source: Google Maps, 2022)



3.5 Additional Information

3.5.1 Site surveys

The Thatcham Strategic Growth Study (West Berkshire Council, 2020a) notes that most of the site is agricultural land, with small areas of woodland and mature hedgerows separating fields. In terms of biological features, it further notes a large surface water attenuation basin and a small area of ancient woodland, both adjacent to Floral Way, and a valley and substantial linear ancient woodland running from north to south. Other features noted in the study were houses, an electricity substation, and other buildings. Other than the mention of TVERC records, no further comments were made about species present on the site. The study does acknowledge the proximity of ancient woodland and protected/designated sites. It further acknowledges that the overlap of the NE Thatcham Site with Biodiversity Opportunity Areas presents a need to introduce biodiversity net gain measures. Section 2.64 of the study states “Up to date ecological surveys will be required to determine detailed mitigation measures.”

The TVERC (2021) biodiversity report lists a number of protected and notable species on and around the proposed development site (see Section 3.1.2).

3.5.2 Local Planning Policy and Biodiversity

Local Plans must be consistent with the principles and policies contained within the National Planning Policy Framework (2021), whereby plans and strategies should be continuously informed by sustainability appraisals which demonstrate how the plan has addressed (amongst others) environmental objectives. Where there may be significant adverse impacts, alternative options should be considered, or suitable mitigation should be proposed. The Local Plan Review 2020 – 2037 (West Berkshire Council, 2020b) is currently in draft stage and undergoing review following the Government’s revised version of the National Planning Policy Framework on July 20th 2021. This Local Plan Review (LPR) will go to the Council in the summer of 2022, alongside a formal period of consultation that will allow residents and businesses to have their say. The current draft LPR states that the planning system should be “plan-led” to “provide a positive vision for the future of an area; a framework for meeting housing needs and other economic, social and environmental priorities; and a way for local people to shape their surroundings”.

The West Berkshire Council Environment Strategy 2020 to 2030 (2020c) describes West Berkshire’s “beautiful and diverse” natural environment as “one of our biggest assets.” Acknowledging the benefits to wildlife and human health, the Strategy states that measures must be taken to protect threatened species and “protect and conserve what we have currently”. It promotes the adoption of a Nature Recovery Network, where primary sites (such as Local Wildlife Sites and SSSIs) are protected, increased in size, and bridged by creating and/or looking after habitats that sit between them. Furthermore, the Local Plan Review (2020b) lists one of WBC’s strategic objectives as “To continue to conserve and enhance the North Wessex Downs AONB” and, in reference to the AONB, states “The strong sense of remoteness, tranquillity and dark night skies, particularly on the open downland, 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.” Whilst the NE Thatcham Site is not within the AONB, the proximity to the designated site cannot be disregarded when considering the impact of pollution from noise and light.

4 CONCLUSIONS

The findings set out in this initial biodiversity assessment report, even after only a brief viewing of the site and desk research, clearly indicate that the NE Thatcham Site contains a range of habitats that support a diverse range of wildlife, including several legally protected species. The site is also intimately ecologically linked to the surrounding ancient woodlands, designated sites and to the wider natural environment through a series of terrestrial, aquatic, and aerial wildlife corridors. This includes protected species such as badgers, dormice, newts, birds and bats, among others, that are known to use the site.

Any plan for urban development of the NE Thatcham Site would need to include a detailed and multi-season ecological survey, conducted according to the relevant Guidelines published by the Chartered Institute of Ecology and Environmental Management. We anticipate that very careful avoidance and mitigation measures, as well as biodiversity net gain provisions, will be needed to prevent direct destruction of these habitats and their connectivity, as well as reduce or eliminate additional negative pressures arising from construction and human occupation. In particular, development could impact the flight paths between bat roosts and feeding habitats, destroy badger setts, result in the removal of existing mature hedgerows and damage to grasslands with their associated rare breeding birds and have overflow impacts on other key features in neighbouring protected sites.

Due to the evident local ecological importance of the NE Thatcham Site, we believe that the site has the potential to be managed for improving nature value under the forthcoming Environmental Land Management Schemes, proposed to start in 2024. Not only could this benefit the local habitats and wildlife, it would also contribute to the West Berkshire net zero carbon emissions ambition as well as provide amenity improvements for the local population in terms of health and wellbeing.

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ANNEX

Scientific names of animal species mentioned in the text

Common Name	Scientific Name
Adder	<i>Vipera berus</i>
Barn owl	<i>Tyto alba</i>
Bittern	<i>Botaurus stellaris</i>
Black redstart	<i>Phoenicurus ochruros</i>
Black tern	<i>Chlidonias niger</i>
Blackbird	<i>Turdus merula</i>
Black-headed gull	<i>Chroicocephalus ridibundus</i>
Black-necked grebe	<i>Podiceps nigricollis</i>
Black-tailed godwit	<i>Limosa limosa</i>
Bluethroat	<i>Luscinia svecica</i>
Brambling	<i>Fringilla montifringila</i>
Brimstone butterfly	<i>Gonepteryx rhamni</i>
Brown long-eared bat	<i>Plecotus auritus</i>
Cetti's warbler	<i>Cettia cetti</i>
Chiffchaff	<i>Phylloscopus collybita</i>
Common crossbill	<i>Loxia curvirostra</i>
Common frog	<i>Rana temporaria</i>
Common lizard	<i>Zootoca vivipara</i>
Common scoter	<i>Melanitta nigra</i>
Carrion crow	<i>Corvus corone</i>
Early bumblebee	<i>Bombus pratorum</i>
Eurasian badger	<i>Meles meles</i>
Eurasian otter	<i>Lutra lutra</i>
European water vole	<i>Arvicola amphibius</i>
Fieldfare	<i>Turdus pilaris</i>
Firecrest	<i>Regulus ignicapilla</i>
Freshwater shrimp	<i>Gammarus pulex</i>
Garganey	<i>Anas querquedula</i>
Gold crest	<i>Regulus regulus</i>
Goldeneye	<i>Bucephala clangula</i>
Grass snake	<i>Natrix natrix</i>
Great crested newt	<i>Triturus cristatus</i>
Great northern diver	<i>Gavia immer</i>
Great spotted woodpecker	<i>Dendrocopos major</i>
Great tit	<i>Parus major</i>
Green sandpiper	<i>Tringa ochropus</i>
Greenfinch	<i>Chloris chloris</i>
Greenshank	<i>Tringa nebularia</i>
Grey partridge	<i>Perdix perdix</i>

Hare	<i>Lepus lepus</i>
Hazel dormouse	<i>Muscardinus avellanarius</i>
Hen harrier	<i>Circus cyaneus</i>
Hobby	<i>Falco subbuteo</i>
Kingfisher	<i>Alcedo atthis</i>
Lapwing	<i>Vanellus vanellus</i>
Large white butterfly	<i>Pieris brassicae</i>
Lesser horseshoe bat	<i>Rhinolophus hipposideros</i>
Little gull	<i>Hydrocoloeus minutus</i>
Little ringed clover	<i>Charadrius dubius</i>
Mallard duck	<i>Anas platyrhynchos</i>
Marsh fritillary butterfly	<i>Euphydryas aurinia</i>
Marsh harrier	<i>Cirus aeruginosus</i>
Merlin	<i>Falco columbarius</i>
Montagu's harrier	<i>Circus pygargus</i>
Muntjac	<i>Muntiacus reevesi</i>
Osprey	<i>Pandion haliaetus</i>
Palmate newt	<i>Lissotriton helveticus</i>
Peacock butterfly	<i>Aglais io</i>
Peregrine	<i>Falco peregrinus</i>
Pintail	<i>Anas acuta</i>
Pipistrelle bat	<i>Pipistrellus pipistrellus</i>
Rabbit	<i>Oryctolagus cuniculus</i>
Red fox	<i>Vulpes vulpes</i>
Red kite	<i>Milvus milvus</i>
Redshank	<i>Tringa totanus</i>
Redwing	<i>Turdus iliacus</i>
Robin	<i>Erithacus rubecula</i>
Roe deer	<i>Capreolus capreolus</i>
Scaup	<i>Aythya marila</i>
Skylark	<i>Alauda arvensis</i>
Slow worm	<i>Anguis fragilis</i>
Smooth newt	<i>Lissotriton vulgaris</i>
Song thrush	<i>Turdus philomelos</i>
Spoonbill	<i>Platalea leucorodia</i>
Spotted crane	<i>Porzana porzana</i>
Stag beetle	<i>Lucanus cervus</i>
Starling	<i>Sturnus vulgaris</i>
Stone curlew	<i>Burhinus oedicnemus</i>
Tawny owl	<i>Strix aluco</i>
Toad	<i>Bufo bufo</i>
Small tortoiseshell butterfly	<i>Aglais urticae</i> <i>Nymphalis</i>
Turtle dove	<i>Streptopelia turtur</i>
West European hedgehog	<i>Erinaceus europaeus</i>
Wheatear	<i>Oenanthe oenanthe</i>

Whimbrel	<i>Numenius phaeopus</i>
White-clawed crayfish	<i>Austropotamobius pallipes</i>
White-tailed bee	<i>Bombus lucorum</i>
Whitethroat	<i>Sylvia communis</i>
Whooper swan	<i>Cygnus cygnus</i>
Willow tit	<i>Poecile montanus</i>
Woodpigeon	<i>Columba palumbus</i>
Wood sandpiper	<i>Tringa glareola</i>
Woodlark	<i>Lullula arborea</i>
Wren	<i>Troglodytes troglodytes</i>
Yellow wagtail	<i>Motacilla flava</i>
Yellowhammer	<i>Emberiza citrinella</i>

Scientific names of plant species mentioned in the text

Common Name	Scientific Name
Foxglove	<i>Digitalis purpurea</i>
Oxeye daisy	<i>Leucanthemum vulgare</i>
Bird's-foot trefoil	<i>Lotus corniculatus</i>
Bluebell	<i>Hyacinthoides non-scripta</i>
Oak	<i>Quercus robur</i>
Elm	<i>Ulmus procera</i>
Willow	<i>Salix sp.</i>
Hawthorne	<i>Crataegus monogyna</i>

Bird observations, NE Thatcham Site: East**13/05/2022 10:05 - 13:35**

Species	Highest breeding evidence	Count	Status*
Swift (<i>Apus apus</i>)		5	
Woodpigeon (<i>Columba palumbus</i>)	01 Nesting habitat (H)	4	
Red Kite (<i>Milvus milvus</i>)		4	
Buzzard (<i>Buteo buteo</i>)	01 Nesting habitat (H)	1	
Magpie (<i>Pica pica</i>)	01 Nesting habitat (H)	4	
Carrion Crow (<i>Corvus corone</i>)	01 Nesting habitat (H)	2	
Blue Tit (<i>Cyanistes caeruleus</i>)	01 Nesting habitat (H)	4	
Great Tit (<i>Parus major</i>)	02 Singing male (S)	2	
Skylark (<i>Alauda arvensis</i>)	02 Singing male (S)	3	
Swallow (<i>Hirundo rustica</i>)		6	
Chiffchaff (<i>Phylloscopus collybita</i>)	02 Singing male (S)	4	
Blackcap (<i>Sylvia atricapilla</i>)	02 Singing male (S)	2	
Whitethroat (<i>Curruca communis</i>)	02 Singing male (S)	2	
Wren (<i>Troglodytes troglodytes</i>)	02 Singing male (S)	3	
Starling (<i>Sturnus vulgaris</i>)	01 Nesting habitat (H)	2	
Song Thrush (<i>Turdus philomelos</i>)	02 Singing male (S)	2	
Blackbird (<i>Turdus merula</i>)	02 Singing male (S)	3	
Robin (<i>Erithacus rubecula</i>)	02 Singing male (S)	2	
Wheatear (<i>Oenanthe oenanthe</i>)		1	Migrant
Pied Wagtail (<i>Motacilla alba yarrellii</i>)		1	
Greenfinch (<i>Chloris chloris</i>)	02 Singing male (S)	1	
Goldfinch (<i>Carduelis carduelis</i>)	03 Pair in suitable habitat (P)	4	
Yellowhammer (<i>Emberiza citrinella</i>)	02 Singing male (S)	1	

* Birds of Conservation Concern 5, 2021: <https://www.bto.org/our-science/publications/birds-conservation-concern/status-our-bird-populations-fifth-birds>



West Berkshire Local Plan Review

Proposed Submission (Regulation 19)
Consultation

Appendix 5 – YES Engineering – Transport
Evidence Review

March 2023



Transport Evidence Review

Regulation 19 consultation on the emerging draft West Berkshire Local Plan Review to 2039 – Transport Evidence Review

Prepared for **Bucklebury Parish Council**

By **YES Engineering Group Limited**

March 2023



Revision History

Revision N°	Prepared By	Description	Date

Document Acceptance

Action	Name	Signed	Date
Prepared by	Paul Willis		March 2023
Reviewed by	Jocelyn Willis		March 2023
Approved by	Kathryn Backhouse		March 2023
on behalf of	YES Engineering Group Ltd		

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1 Introduction

YES Engineering Group Limited was appointed by Bucklebury Parish Council to review the transport related evidence submitted with the West Berkshire Council emerging Local Plan specially with regards to a proposed allocated site south of the parish, as set out in Policy SP17 (North East Thatcham Strategic Site Allocation). Within the transport evidence the site is referred to as THA20.

West Berkshire Council (WBC) is currently undertaking a Local Plan Review (LPR), with the new Local Plan covering the period up to 2039. The new Local Plan will provide the overarching principles that will guide future development in the district. It will replace the existing West Berkshire Local Plan Core Strategy 2016-2026 and Housing Sites Allocations Development Plan Document 2026.

The current Local Plan is in place until 2026 and a review is currently taking place to extend it through to 2039. The review is expected to take until the end of 2023.

The Regulation 19 consultation draft of the Local Plan included the identification of a preferred housing site at North East Thatcham (NET). This was identified as a strategic residential site for approximately 1,500 dwellings. Additionally, the proposed site will include:

- Local centres providing local retail facilities and small-scale employment for community use (approximately 1,100 sq. metres Class E and F2);
- 450 sq. metres GP Surgery to be offered to the Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board or other such appropriate body;
- Early years provision;
- A 2.5 FE primary school on site and sports infrastructure requirements of the school, land to be provided and build costs to be met by the applicant;
- Secondary provision - Land to meet the impact of the development. The nature and cost of the mitigation will be informed by a feasibility study, undertaken at the applicants expense and prepared in collaboration with the Council and local stakeholders;
- 1,200 sq m community indoor facility to be used for sport and community uses with a variety of room sizes (currently use classes E and F);
- Outdoor formal and informal sports pitches and areas to meet the identified need of the development;
- Open space to meet the needs of the development in accordance with Policy DM41;

As discussed further within this document the transport evidence considers an allocation of some 2,500 dwellings on the proposed site.

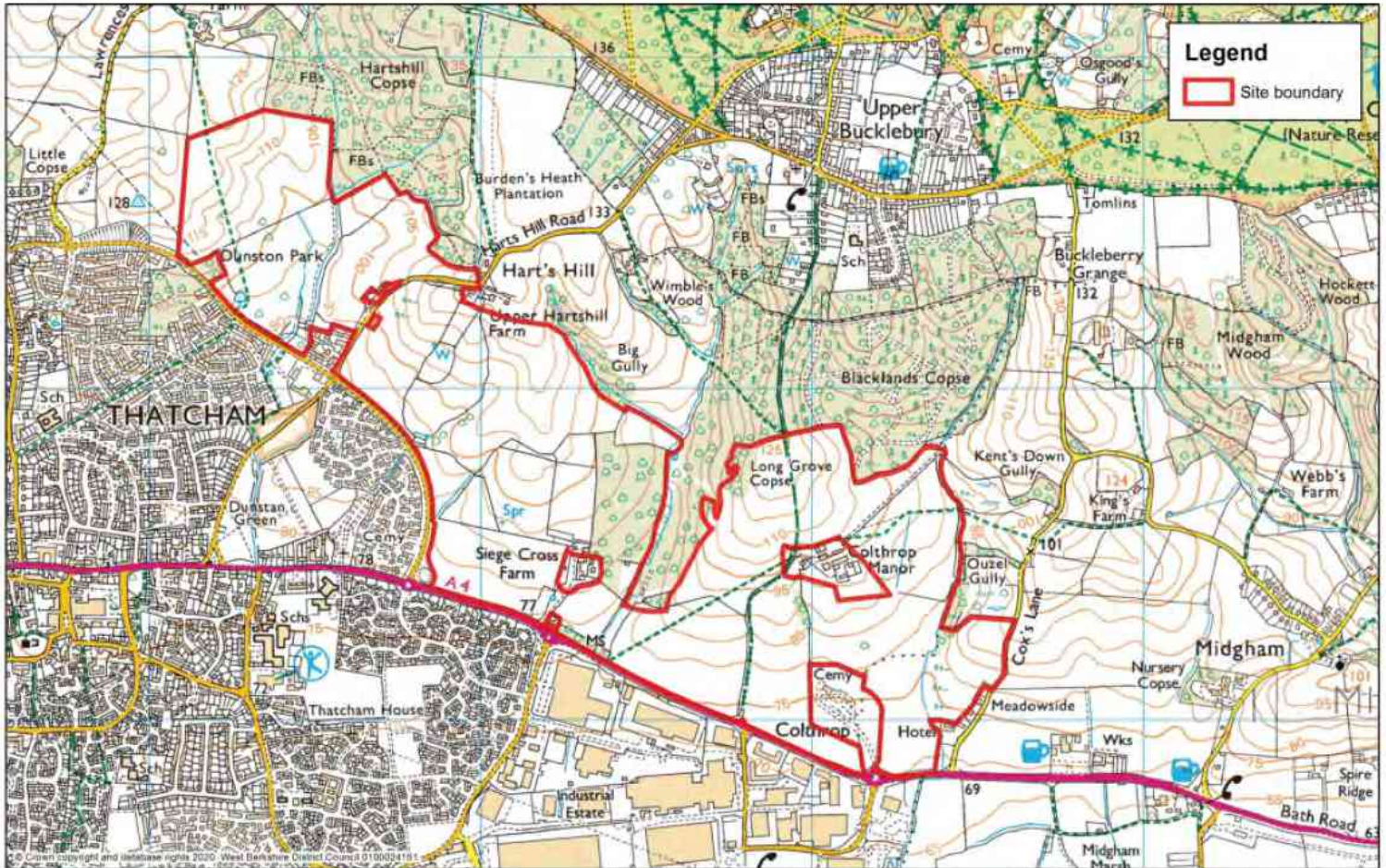
The main focus of this report is concerned with the impact of, and potential mitigation package required for the possible strategic development site at North East Thatcham (reference SP17/THA20), as this is the main preferred site being pursued by the Council as part of the Local Plan Review.

1.1 Description of the proposed Site (SP17/THA20)

Four large sites to the North- East of the Thatcham Northern Distributor Road and the A4 London Road at Colthrop were originally submitted separately through the Housing and Economic Land Availability Assessment (HELAA) process, these sites were subsequently submitted together by the four parties as a single site. This forms a proposed strategic housing site at North East Thatcham referred to as site SP17/THA20.

The site, as identified in **Figure 1.1** below, is allocated for a residential-led development comprising approximately 2,500 dwellings.

Figure 1.1 – Location of the Site (SP17/THA20)



The site is located within the administrative area of the West Berkshire District Council (WBC) which is a unitary authority and forms both the Local Planning Authority and Highway Authority.

The parish of Bucklebury lies immediately north of the proposed site.

1.2 Scope of the Transport Evidence Review

Following this introduction, the report is structured as follows.

Section 2.0, Existing Conditions: Describes the local highway network, existing public transport network and local amenities and considers the anticipated car level ownership and method of travel for future residents.

Section 3.0, Policy: Describes the existing and emerging policy applicable to the proposed site.

Section 4.0, Review of Evidence Base for SP17/THA20: Reviews all the evidence that has been produced so far to support the allocation of SP17/THA20 and the robustness of the evidence.

Section 5.0, Summary and Conclusions: Provides a summary of the report and draws together its conclusions.

2 Existing Conditions

2.1 Existing Road Network

When considering the suitability of the proposed site, it is important to consider the suitability of the location in transport terms. Bucklebury itself is a small rural parish in West Berkshire, situated between the A4 and the M4 and between Newbury and Reading. The present population is around 2350. It is widely spread across the many individual hamlets.

As shown in **Figure 1.1**, site SP17/THA20 lies immediately south of Upper Bucklebury, north of Thatcham and is linked via Harts Hill Road/Floral Way. Harts Hill Road is rural in nature, subject to a speed limit of 40mph, without footways or street lighting, with numerous tight bends and relatively steep in gradient (as defined by the plentiful contour lines).

At the northern end of Harts Hill Road it links with Broad Lane. Broad Lane ultimately connects with Theale (M4) towards the east and Chieveley (M4) to the west. Broad Lane becomes particularly rural towards the west and speed limit increases to 60mph, with no footways or lighting.

To the south of the proposed site, runs the A4 (strategic highway network) which links Newbury in the west to Reading in the east. The road is subject to a speed limit of 40mph and there are limited formal crossing points. The A4 itself creates severance of the site SP17/THA20 from Thatcham rail station to the south for pedestrians and cyclists as it is difficult to cross this busy strategic road.

The local road network within Bucklebury consists entirely of unclassified roads (rural roads), mostly without pavements or kerbstones, all single carriageway or single track, with few passing places, are generally narrow winding country lanes with hedgerows or soft verge edges. Consequently, any increase in traffic on these roads need to be assessed as it may present safety implications.

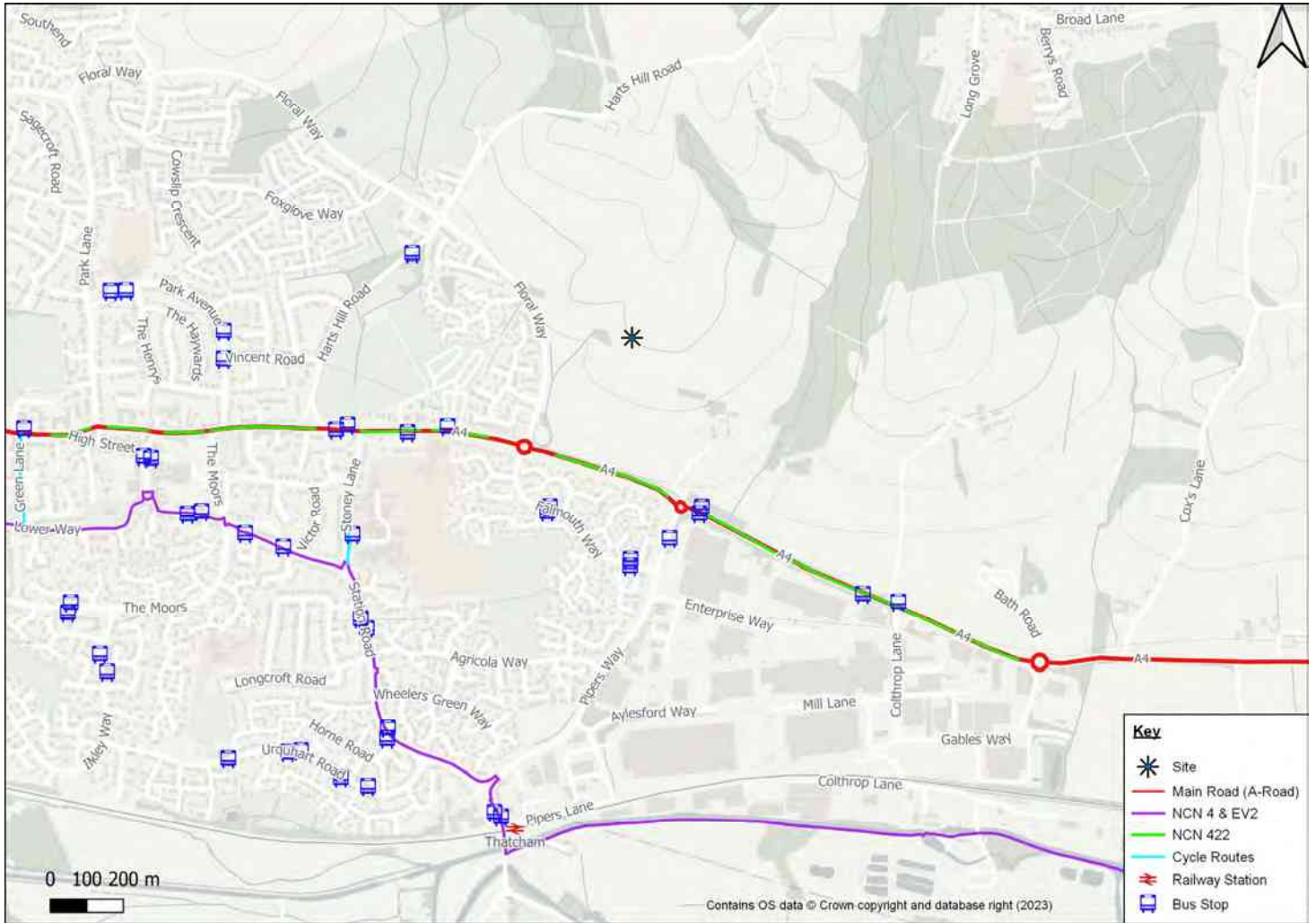
Two roads run east/west, one from Thatcham, through the two main Parish centres, Upper Bucklebury and Chapel Row and on to Theale and Reading, and a second from Hermitage to Chapel Row through Marlston and Bucklebury Village. Most of the remaining lanes join these two roads on a north/south axis serving the small and scattered enclaves of houses throughout the area.

The two principal roads serve two functions: primarily for local movements to and from the Parish and adjoining Parishes (most residents work outside) and secondly they have come to be used as a through road for traffic between Hermitage / Newbury / Thatcham and Pangbourne / Theale / M4 and Reading.

2.2 Existing Public Transport

Figure 2.1 demonstrates there is very limited public transport within the vicinity of SP17/THA20. This will increase the need to travel by private car.

Figure 2.1 – Existing Public Transport



2.3 Existing Amenities

Figure 2.2 demonstrates there is very limited amenities within the vicinity of SP17/THA20. This will increase the need to travel by private car to visit local facilities.

Figure 2.2 – Existing Amenities



2.4 Anticipated Car Ownership Levels and Method of Travel

The 2021 Census data for car availability was obtained for the 2021 Super Output Area – Middle Layer (E02003383: West Berkshire 017), where the SP17/THA20 site resides. This information is set out in Table 2.1 below. The full census data is presented in Appendix A.

Table 2.1 – 2021 Census Data – Car Availability West Berkshire Super Output Middle Layer

Cars or Vans	Houses	Number of cars per Household
No car or van	278	1.6
1 car or van in household	974	
2+ cars or vans in household	1,080	
3+ cars or vans in household	432	
Total	2,764	

Table 2.1 above shows that the average car ownership per households within the West Berkshire Area is 1.6 cars which reflects the rural location of the Site with limited access to local facilities and public transport options. When the local car ownership level of 1.6 is applied to the proposed 2,500 new homes, this would lead to the generation of 4,007 additional vehicles.

The West Berkshire Super Output Middle Layer Census data was also examined to establish the profile of residents' method of travel to work. This information is attached at Appendix A and set out in Table 2.2 below. The 2011 Census Data has been examined as it is noted that the 2021 Census was undertaken during the Covid-19 lockdown period where a large percentage of the population worked from home so does not provide a robust assessment.

Table 2.2 – 2011 Census Data - Method of Travel to Work (West Berkshire Super Output Middle Layer)

Main Mode	2011 Data Number of People of Employment Age	2011 Data Percentage Trips
Work mainly at or from home	228	5%
Underground, metro, light rail, tram	1	0%
Train	202	4%
Bus, minibus or coach	95	2%
Taxi	9	0%
Motorcycle, scooter or moped	42	1%
Driving a car or van	2,768	55%
Passenger in a car or van	196	4%
Bicycle	142	3%
On foot	275	5%
Other method of travel to work	14	0%
Not in employment	1,089	22%
Total	5,061	100%

It can be seen in Table 2.2 above, that over half of the working population (55%) in the West Berkshire area use the car as a means to drive to work. It can therefore be assumed that the proposed new homes would create a significant amount of additional traffic within peak rush hours on the local rural roads which is discussed in Section 4 of this report.

3 Planning Policy

3.1 Introduction

When looking at the suitability of the proposed site 'SP17/THA20', it is useful to consider transport policy pertinent to the proposals.

The site 'SP17/THA20' falls within the jurisdiction of West Berkshire Council which is a unitary authority, and as such is both the Local Planning Authority and the Local Highway Authority for the District. The Council is responsible for producing both the Local Plan and the Local Transport Plan (LTP) which specifically addresses transport issues; and there are strong links between these two forward planning documents.

A summary of the applicable policy and a discussion of how the proposed SP17/THA20 site complies is provided below:

3.2 West Berkshire Core Strategy – 2006 – 2026

Policy CS 13 Transport

Development that generates a transport impact will be required to*:

- Reduce the need to travel. Improve and promote opportunities for healthy and safe travel.
- Improve travel choice and facilitate sustainable travel particularly within, between and to main urban areas and rural service centres.
- Demonstrate good access to key services and facilities.
- Minimise the impact of all forms of travel on the environment and help tackle climate change.
- Mitigate the impact on the local transport network and the strategic road network.
- Take into account the West Berkshire Freight Route Network (FRN). Prepare Transport Assessments/Statements and Travel Plans to support planning proposals in accordance with national guidance.

*Development proposals may not need to fulfil each bullet point. The supporting text below clarifies the types and scale of development which will be required to meet the specific parts of this policy.

5.82 West Berkshire Council is a unitary authority, and as such is both the Local Planning Authority and the Local Highway Authority for the District. The Council is responsible for producing both the Local Plan and the Local Transport Plan (LTP) which specifically addresses transport issues; and there are strong links between these two forward planning documents. An Infrastructure Delivery Plan identifies the key infrastructure projects required to support the delivery of the Core Strategy, and infrastructure that is critical to the delivery of the Core Strategy is set out in Appendix D. The LTP is supported by an Implementation Plan which sets out how schemes and initiatives will deliver the LTP, and this will be updated annually.

5.86 Improving travel choice is a key way of working towards a modal shift away from single occupancy car use in favour of more sustainable travel (walking, cycling, bus and rail travel, car sharing). Improving sustainable travel choice within and between the main urban areas and rural service centres of West Berkshire and key destinations in neighbouring authorities will help to facilitate regular journeys for example to work and education. All development will be required to show how it improves travel choice and reduces the use of single occupancy cars.

5.87 The nature of West Berkshire poses a significant challenge for accessibility to key services and facilities. Residential development should seek to demonstrate good accessibility by: locating where there is already good access to key services and facilities; contributing towards improving connections between communities and key services and facilities.

5.88 The quality of the environment is a key factor in the attractiveness of West Berkshire, and the part that changing travel behaviour can play in reducing carbon emissions is recognised in the Council's Climate Change Strategy. West Berkshire's air quality is strongly linked to transport, so where air quality becomes a cause for concern, the Council will seek to manage it through transport related measures. All development will be required to demonstrate how it minimises the impact of travel on the environment and helps to tackle climate change.

5.89 The Council is responsible for the local highway, cycle and walking, and public right of way networks. The Highways Agency is responsible for the strategic road network (SRN) which, in West Berkshire, comprises the M4 and the A34. All development proposals will be required to demonstrate that they do not adversely affect these networks or that they can mitigate the adverse impact. Where a Transport Assessment for a significant development illustrates that there will be an impact on the capacity of the SRN, the developer will need to undertake detailed traffic modelling in accordance with national guidance. Developers will need to work with the Council and the Highways Agency to establish a suitable mitigation package. Junctions that are likely to require such attention during the life of the plan up to 2026 are (but not exclusively):

- Junction 12 of the M4.
- Junction 13 of the M4.
- A34 / A343 junction.

5.90 The Council has established a preferred Freight Route Network (FRN) for West Berkshire which identifies a hierarchy of routes that should be used for freight movements to, through and within the District. Development which results in freight movements, including construction traffic should take into consideration the FRN.

5.91 Transport Assessments / Statements and Travel Plans are vital to support planning proposals so that the impact of the proposed development can be assessed and mitigated. All development which meets the thresholds set out in national guidance will be required to prepare the appropriate Transport Assessments / Statements and Travel Plans.

5.92 Standards for parking provision will be related to levels of accessibility. The basis for this will be established through the Local Transport Plan, and subsequently a Supplementary Planning Document (SPD) will be prepared.

3.3 West Berkshire Local Transport Plan Freight Strategy – November 2014

The identification and implementation of a freight routing network was identified as a high priority delivery element in the previous LTP Freight Strategy. As a result the Council undertook a review of freight movements in the District and from this developed a draft freight route network which was sent out for public consultation in 2007. Revisions were made following the consultation and the network and its associated maps were formally adopted by the Council in February 2009.

The 2009 West Berkshire Freight Route Network (FRN) as shown in Appendix A consists of a series of preferred freight routes that aim to show HGV drivers and businesses the most appropriate routes to use in the District. In addition there are two further detailed maps covering the Newbury/Thatcham and the Calcot/Tilehurst areas. It should be noted that the routes in the FRN are advisory in nature and have been produced to help freight operators and drivers to plan their routes and deliveries in the District.

The hierarchy of the freight routes shown on the FRN maps is as follows;

- Strategic Lorry Routes: For through HGV movements based on the M4 and A34 passing through the District.
- District Access Routes: The main access routes from the SRN to key freight destinations - largely based on the 'A' roads that provide access to the main areas of industrial and commercial activity.

- Local Access Routes: Accesses to local sites only and are not intended for through HGV movements. Some of these routes may contain restrictions that further limit HGV movement. These comprise 'A' roads not on routes linking main industrial areas, 'B' roads, and some minor routes.

The FRN maps also show those routes and local communities that are unsuitable for HGV traffic. These include the locations of signed width, height, and weight restrictions that prevent the use of HGVs, and those routes which are signed "Unsuitable for HGVs" (typically rural single track routes).

3.4 Local Transport Plan for West Berkshire 2011 - 2026

Local Transport Goals 2011-2026

- To improve travel choice and encourage sustainable travel;
- To support the economy and quality of life by minimising congestion and improving reliability on West Berkshire's transport networks;
- To maintain, make best use of and improve West Berkshire's transport networks for all modes of travel;
- To improve access to services and facilities;
- To improve and promote opportunities for healthy and safe travel;
- To minimise energy consumption and the impact of all forms of travel on the environment

Key Issue – Congestion

Peak time congestion is frequently experienced at key junctions within the District, as well as on the M4. The Council, with its partners, will need to explore ways of making best use of transport networks through better management and increased choice to the benefit of the economy, environment, and local communities.

Although widespread congestion is not experienced throughout the local road network in West Berkshire, localised congestion regularly occurs during peak times around key junctions in the main urban areas. The concentration of journeys for work and school contribute to these congestion hotspots which often cause delays and inconvenience to local residents and businesses, as well as causing poor air quality and road safety concerns. Congestion is considered to be an important local issue, being consistently cited in the Council's annual residents' surveys as an issue that needs improving in the local area.

As identified previously, West Berkshire is a relatively prosperous District, with a high level of car ownership and usage that is in excess of the South East and national averages. Rapid population growth, housing, and employment in the last few decades, as well as the proximity to other larger urban areas, have seen an increase in demand for travel and a reliance on journeys made by the private car. Furthermore, car dependency is more prevalent in the large number of rural communities in the District where travel choices are often extremely limited.

Key Issue – Accessibility

Access to services and facilities is a major issue for those without access to a car, particularly from rural communities. Young people and the over-65s are identified as groups in particular that have the poorest transport provision for their needs where car use is not an option or public transport is not convenient.

Key Issue – Carbon Reduction and Climate Change

Climate change is widely regarded as the most serious environmental challenge of the 21st century. The Council will need to develop a transport system that will seek to reduce local transport-based carbon emissions, and to develop networks that will have greater resilience to the impacts of climate change.

Key Issue – Highway Network

Good performance of the highway network is crucial for the District and its economy, which will become more of a challenge with increased demand for travel. The Council will need to make best use of the network through better traffic management and maintenance of the highway asset.

The M4 and A34 strategic routes are the responsibility of the Highways Agency (HA). All other parts of the highway network, from the busy A4 and A339 corridors through to country lanes, are the responsibility of the Council. This includes the management and maintenance of the network, for which the operations are outlined in the Network Management Plan.

3.5 West Berkshire Local Plan Review 2022 – 2039 – Proposed Submission – January 2023

The emerging West Berkshire local Plan (WBLP) sets out the strategy for housing and employment growth within West Berkshire for the period to 2039. A key component of the strategy is the proposed allocation of a major development at North East Thatcham on site SP17/THA20 comprising 2,480 dwellings and 189 jobs; the largest single allocation within the WBLP.

Policy DM42

Transport Infrastructure Proposals for new development will be expected to demonstrate the type and level of travel activity likely to be generated. In order to assist in tackling the climate emergency, this travel activity will be expected to be minimised by the design of developments that support low levels of travel with a focus on local journeys that can be made sustainably. Developments will be required to be supported through a range of infrastructure associated with different transport modes. New development will only be supported where the relevant transport infrastructure is delivered in a timely manner. Where required, new developed will be expected to make a contribution to the provision or improvement of a range of transport infrastructure. This transport infrastructure will specifically, but not exclusively, include the following:

- a. Connections and improvements to local pedestrian, cycle and equestrian networks, including access to public transport routes;
- b. Walking, cycling and equestrian infrastructure identified in relevant Local Cycling and Walking Infrastructure Plans;
- c. Secure cycle and motorcycle parking;
- d. Improvements to passenger facilities across a range of transport interchanges;
- e. Provision of real time passenger information at bus stops along key bus routes;
- f. New or improved passenger transport services;
- g. Improvements to the safety and operational capacity of the local road network;
- h. Works to allow the re-use of former railway line alignments as walking, cycling, and equestrian routes; and

i. Provision of electric vehicle charging points and associated infrastructure.

12.94 The NPPF states that transport issues should be considered at the earliest stage of development proposals, so that the potential impact on transport networks can be addressed, that opportunities from existing and proposed infrastructure are realised, and that opportunities to improve walking, cycling and public transport are identified and pursued. At all stages, proposals should consider the need of reducing the need to travel, especially during the working day. Where possible, services and facilities should be located within an acceptable walking distance and cycling distance of new places of employment or residences.

12.95 The development and delivery of transport infrastructure will need to contribute to the aims of Policy SP23 and relevant Council strategies and plans, such as the West Berkshire Environment Strategy, July 2020 and the Local Transport Plan. There is a need for development to assist in the provision of deliverable measures that will contribute towards modal shift to sustainable modes of travel for residents and employees of both new development, and if possible, for existing communities.

12.96 The Council actively seeks to further develop walking, cycling, and equestrian networks in the District to encourage more travel by sustainable modes. As part of this, Local Cycling and Walking Infrastructure Plans (LCWIPs) identify specific walking and cycling improvements on key corridors. These are largely centred on the urban areas with one covering Newbury and Thatcham urban area and the other including the Eastern Urban Area. For the latter plan the Council has partnered with Reading and Wokingham Borough Councils in the development of a LCWIP for the wider Reading urban area. The LCWIPs will be used to inform the Council's own future investment strategies and CIL funding bids as well as to guide the delivery of the most appropriate walking, cycling, and equestrian infrastructure to support new development.

12.97 The Council as both local planning and local highway authority will need to ensure that development proposals will not result in an unacceptable impact for any user of both the local and strategic road networks.

12.98 Whilst it is anticipated that the majority of development will be focused in existing urban areas and within settlement boundaries, it is important that improvements are also sought to encourage sustainable leisure and recreational opportunities in the rural areas of the District. Specifically this could include opportunities to replace that part of the former Didcot, Newbury & Southampton railway line to provide between Hermitage and Hampstead Norreys, a route for both leisure and potentially commuter use, incorporating existing minor roads and bridle ways as a walking, cycling, and equestrian route. Opportunities at other locations, including use of the Kennet and Avon Canal towpath, will be sought where applicable).

12.99 The provision of electric vehicle charging points and associated infrastructure supports the need for readiness for the banning the sale of new petrol, diesel or hybrid cars in the UK, which will occur during the lifetime of the plan, by 2030. While the provision of such infrastructure will be mandated in developments, developers will be encouraged to go further to help achieve a comprehensive public charging network in public car parks, supermarkets and retail parks, railway stations, and where is safe to do so, at petrol filling stations. The provision of such infrastructure is essential to contribute towards the achievement of a zero carbon West Berkshire by 2030.

3.6 Summary

Congestion has already been raised by WBC as a Key Issue and is consistently cited in the Council's annual residents' surveys as an issue that needs improving in the local area. The district has a high level of car ownership and usage that is in excess of the South East and national averages. Rapid population growth, housing, and employment in the last few decades, as well as the proximity to other larger urban areas, have seen an increase in demand for travel and a reliance on journeys made by the private car. The development at SP17/THA20 is located within a rural setting

with very limited access to public transport. As such it is expected that the development would only add to the already congested roads and is at odds to the Local Transport Goals to minimise congestion on the transport networks.

The additional traffic created by SP17/THA20 would create a greater level of vehicles including servicing vehicles on the country roads which do not have dedicated footways or cycle lanes for safe pedestrian/cycle movement. This is therefore contrary to Policy DM42 of the Emerging Local Plan and the Local Transport Goals to promote opportunities for healthy and safe travel. The surrounding country roads are also designated as 'unsuitable for HGVs' within the West Berkshire Local Transport Plan Freight Strategy dated November 2014.

4 Review of Evidence Base for the allocation of SP17/THA20

4.1 Background Context

The emerging West Berkshire local Plan (WBLP) sets how many new homes are required and where they should be constructed for the period to 2039. It also looks at employment needs and finds opportunities for future growth. It will also identify the places where growth should be limited.

As shown in **Figure 1.1** the proposed site allocation SP17/THA20 is located on the boundary of Bucklebury Parish and comprises of some 1,500 dwellings as well as various community facilities (the largest single allocation within the WBLP). As discussed below the transport evidence considers an allocation of some 2,500 dwelling on the proposed site. As such the proposals are likely to have significant implications for the road network within the local community.

The WBLP is supported by an evidence base and relies on three principal documents related to transport as set out below to justify the location of SP17/THA20 in transport terms:

- WBSTM Local Plan Forecasting Report (March 2022).
- Phase 2 Transport Assessment (July 2021); and
- Phase 1 Transport Assessment (December 2020).

The summary within the WBSTM Local Plan Forecasting Report states “General increases in Local Plan traffic demand though the corridor, as well as THA20 site traffic directly accessing the A4 in this area, is likely to cause some displacement onto wider routes away from the A4, through local villages such as Upper Bucklebury”. However, the additional movements displaced through Upper Bucklebury and local highway network has not been quantified and given the scale/location of development this could be significant.

In view of this, Bucklebury Parish Council (BPC) has instructed YES Engineering to undertake a review of the evidence base to assess the basis of the modelling results and to identify any areas of concern that would necessitate an objection to the emerging Local Plan.

4.2 Phase 1 Transport Assessment (December 2020)

This report outlines the first phase of the Transport Assessment work that has been undertaken, including outputs from transport modelling using the Council’s strategic transport model and confirms that all sites were assessed in terms of accessibility and proximity to local pedestrian, cycle and public transport (bus and rail) networks and accessibility to everyday services and facilities. This included determining accessibility to local centres, education, employment, services and facilities.

However as set out in Section 2, site SP17/THA20 is located in an area where there is currently limited facilities and active Travel measures (Travel Plans etc..) are likely to be difficult to encourage given the steep topography in the area and distance to the rail station. Local census data set out in Section 2 confirms the overwhelming majority of residents travel by car despite the presence of Thatcham Rail Station.

The report confirms that the council used three separate traffic models to support the Local Plan Review.

- **West Berkshire Strategic Transport Model (WBSTM) 2017** – a district-wide transport model with separate models for AM peak hour, inter-peak and PM peak hour.
- **Newbury 2017 VISSIM model** – Local model focussing on the highway network in central Newbury for the AM and PM peaks.

- **Thatcham 2018 VISSIM** – Local model cordoned around the Thatcham urban area for the AM and PM peaks.

The modelling outcomes are presented as ‘Level of Service’ results based on categories of delay and graded from ‘A’ to ‘F’ with ‘A’ representing the lowest delays as set out below in **Table 4.1**.

Table 4.1 – VISUM Level of Service Results

VISUM Level of Service Category	Mean delay per vehicle	
	Un-signalised junction	Signalised junction
A	0 – 10 sec	0 – 10 sec
B	10 – 15 sec	10 – 20 sec
C	15 – 25 sec	20 – 35 sec
D	25 – 35 sec	35 – 55 sec
E	35 – 50 sec	55 – 80 sec
F	50 + sec	80 + sec

Whilst no local junctions within Bucklebury parish are considered, Table’s 5.2 – 5.4 within the report confirm that the A4 corridor (south of Bucklebury) suffers significant delays at various junctions along its route. It follows that delays on the A4 will be further exacerbated by any development of THA20 and likely to cause displacement onto wider routes away from the A4, through local villages such as Upper Bucklebury (the impact has not been considered).

4.3 Phase 2 Transport Assessment (July 2021)

The Phase 2 report follows on from the Phase 1 report which identified some junctions and links that would be affected by the proposed Local Plan growth. These were particularly focussed near to the proposed strategic North East Thatcham site, indicating delays and congestion occurring around key junctions along the A4 corridor, with through traffic diverting onto unsuitable routes.

The assessment confirms that “The main focus of this report is concerned with the impact of and potential mitigation package required for the possible strategic development site at North East Thatcham (HELAA reference THA20)”.

Paragraph of the Phase 2 report states “The use of standard TRICS rates however, is not suitable for the NET site, which is a large, strategic development site comprising four co-joining land parcels. The size of the site will result in several proposed access points onto the highway network on both Floral Way and the A4 to the north and east of Thatcham”. It is unclear why the TRICS database (the industry standard method of assessing trips to and from a site) would not be suitable, large sites within the site would include other local facilities/attractions affecting the need to drive.

Paragraph 3.4 goes on to confirm that a set of revised trip rates has been developed specifically for the SP17/THA20 site based on 2011 Census data for employment and mode of travel for existing Thatcham wards. However, no details are provided to show how these were calculated or what the resulting trips are, and it could be argued that census data is remote of the SP17/THA20 with easier access to Thatcham rail station for example, thus underestimating the trip rates. Sites from the TRICS database can be used to assess other similar site to provide a more reliable model.

Furthermore, the Census data only assesses the vehicle movements associated with work journeys, whereas the TRICS data encapsulates other trips such as to schools, shops, recreation, etc. The Census data will therefore underestimate the number of trips that would be added to the highway network.

Paragraph 3.10 declares that highway mitigation measures are required at key junctions along the A4 corridor and that further modelling will be required to assess their impacts alongside other non-highway mitigation measures.

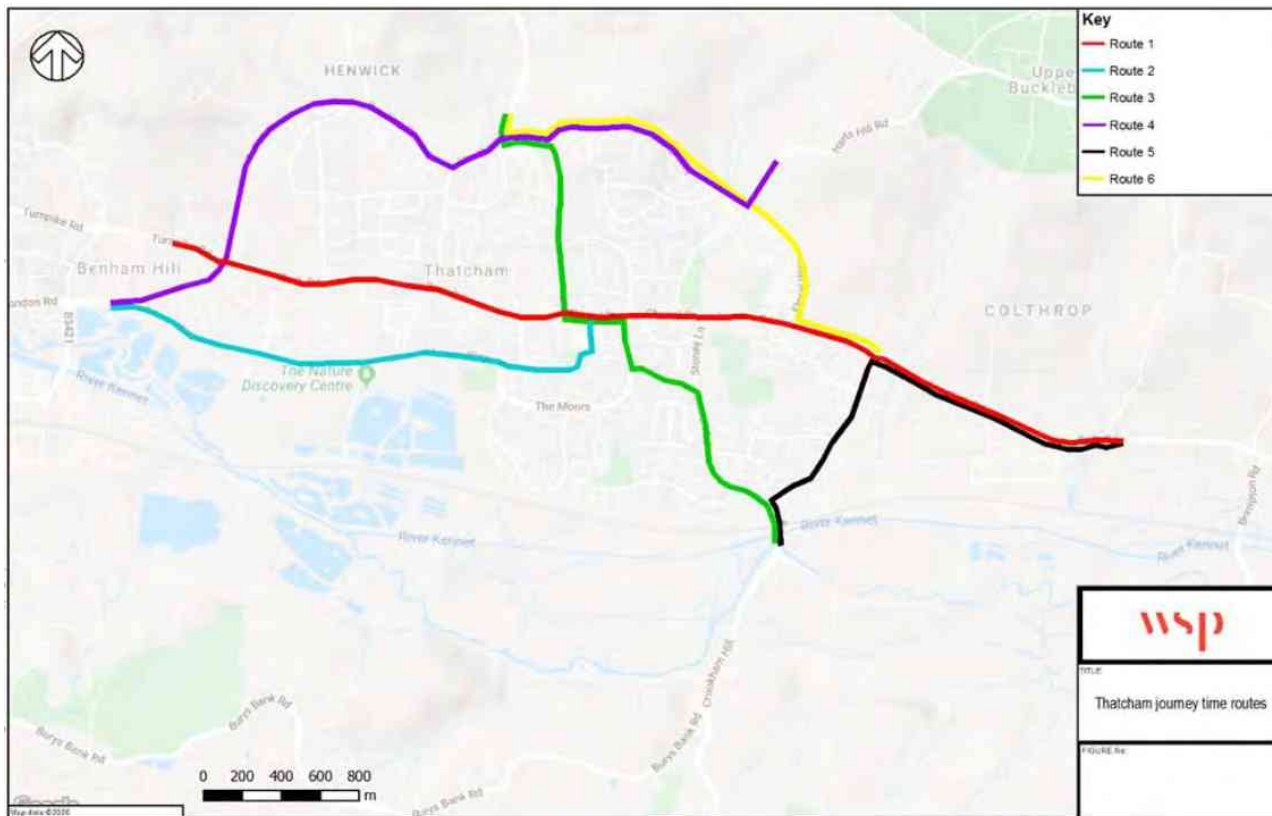
Paragraph 3.42 confirms that “the results from the WBSTM and Thatcham local VISSIM models suggest that there will be a significant increase in traffic on the local road network” and states that there is a need to develop a package of non-highway based mitigation measures (as set out previously this may be difficult to achieve due its location). There are no modelling results from the WBSTM for the highway network in Bucklebury parish despite the Phase 1 report confirming that congestion occurs around key junctions along the A4 corridor, with through traffic diverting onto unsuitable routes. It would seem a significant oversight not to consider the impact of additional traffic through Bucklebury when the safety of the road network could be compromised.

Paragraph 3.44 talks of the importance of developing excellent pedestrian and cycle links. However, as set out in Section 2, the site SP17/THA20 is located in a difficult location due to the topography (the entire site is on a steep hill) and it is unrealistic to assume a significant shift to sustainable modes of travel over and above car as confirmed by the census data.

Concept junction improvements are set out in Appendix A of the report which essentially provide greater capacity at junctions along the A4 purely to facilitate the increase in traffic from site SP17/THA20. However, providing extra capacity would be in contrary to West Berkshire Core Strategy Policy CS 13 to mitigate the impact on the local transport network and the strategic road network. Additionally, this would essentially try and push further traffic onto the A4 and as set out in the modelling results the A4 corridor is already significantly congested and would inevitably result in traffic diverting onto unsuitable routes (through Bucklebury).

Journey times are assessed within the Phase 2 report and the routes are set out in Appendix C of the report. For convenience the map has been reproduced below in **Figure 4.1** below.

Figure 4.1 - Journey Times Assessed



It is clear from the journey time map that an assessment of the most convenient routes for future residents of site SP17/THA20 has not been considered. As set out in the Phase 1 report existing congestion on the A4 will be exacerbated forcing drivers to see alternative routes. As shown in **Figures 4.2 & 4.3** below, interrogation of google maps confirms the most likely route for future residents heading either to Reading or north to M4 Chieveley junction would actually be via Harts Hill

Road or Cold Ash Lane as this provide the quickest route, this will be further exacerbated by any increase of traffic on the A4.

Figure 4.2 – Journey Time towards Reading

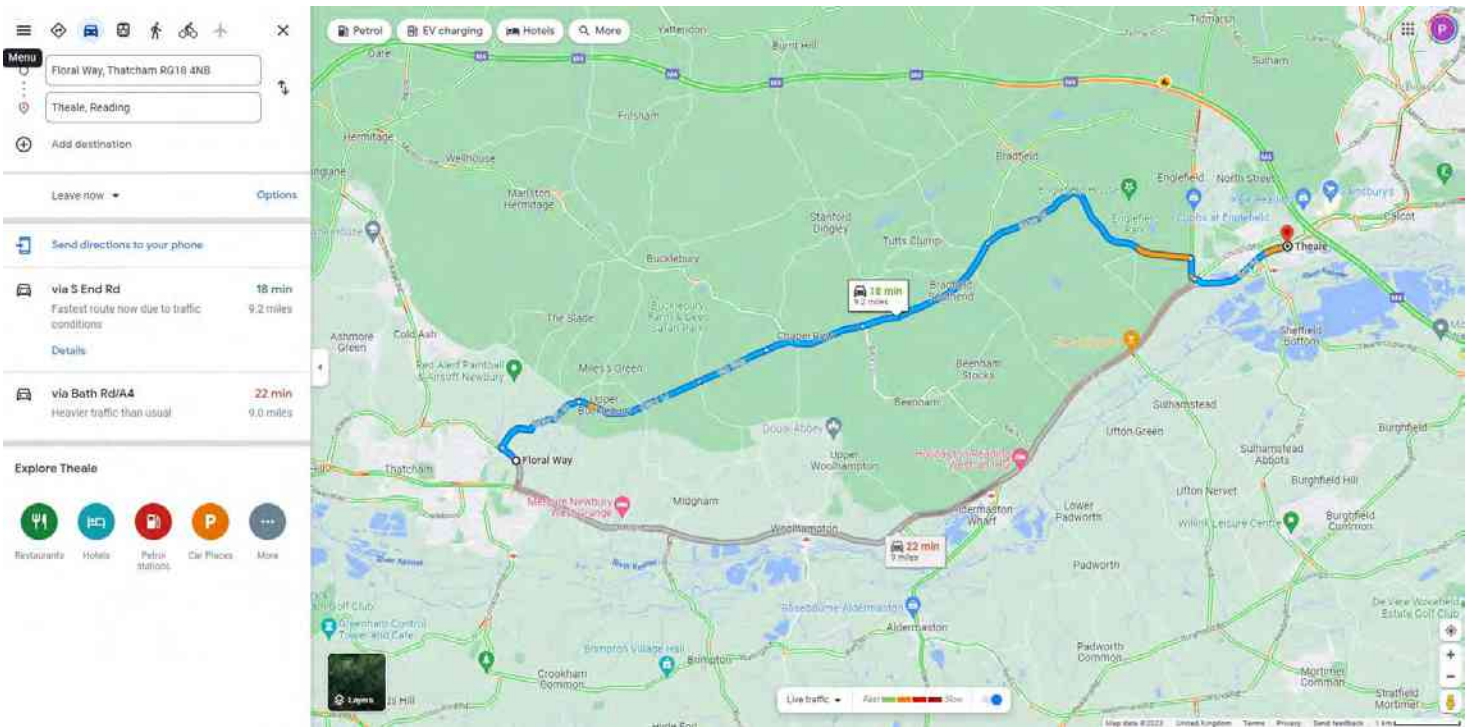
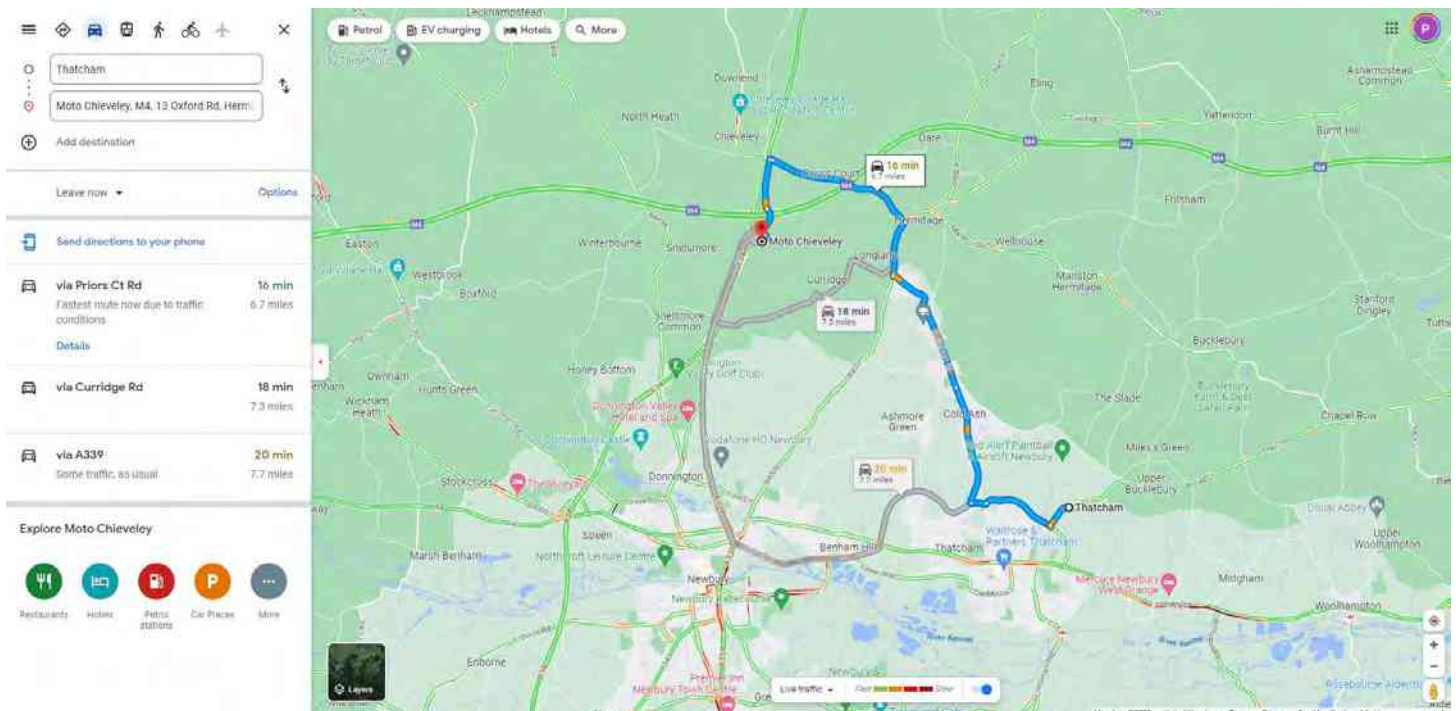


Figure 4.3 – Journey Time Towards M4 Chieveley



Further journey time analysis during the AM and PM peak hours was undertaken over a 2 week period from 10th February to 23rd February 2023 to assess the most desirable routes for those travelling east (towards Reading) or west towards M4 Chieveley. As shown within **Appendix B**, it is demonstrated that the quickest route in each direction is via Harts Hill Road or via Cold Ash Lane. The impact on these routes has not been assessed which is a fundamental flaw within the modelling assessment.

Whilst the Phase 2 report confirms mitigation measures will be required to reduce car dependency for SP17/THA20, they cannot reduce the congestion (which already exists) to such levels that the most desirable route will no longer be heading north either via Harts Hill Road or Cold Ash Lane. This situation already occurs, and the Phase 1 report has confirmed that these roads are unsuitable. Therefore, the location of THA20 is fundamentally wrong as traffic will need to divert off the strategic network and non-highway based mitigation measures are almost impossible to achieve due to its location/topography. The A4 itself creates severance of the site SP17/THA20 from Thatcham rail station as it will be extremely difficult for pedestrians/cyclists to cross this strategic road, whilst any formal crossing points will cause further delay on the road network (pushing drivers to use local routes).

4.4 WBSTM Local Plan Forecasting Report (March 2022)

WBSTM Local Plan Forecasting Report models a range of scenarios in the district under 2037 travel conditions, to help inform the selection of sites to be included in the 2037 West Berkshire Local Plan (WBLP).

Paragraph 1.2.3 states "One of the largest sites is the 'North East Thatcham' (THA20) site. Following the production of the S1R2 (with Local Plan) model, potential mitigation measures were assessed in two stages:

- Mitigation 1 – demand management, which applies a reduction in car traffic demand to/from the THA20 model zones to reflect potential impacts of bus improvements and active travel measures.
- Mitigation 2 – as Mitigation 1, with highway mitigation which includes proposed highway improvements on the network around the THA20 site to reduce congestion and wider impacts of the Local Plan traffic demand."

Paragraph 2.4.8 confirms trip generation for SP17/THA20 is derived from Technical Note and included in Appendix C of the Forecasting Report. 2011 Census data for employment and mode of travel for existing Thatcham wards. However, it could be argued that census data is remote of the SP17/THA20 and easier access to Thatcham rail station for example, thus underestimating the trip rates.

This methodology ignores all other journey reasons, including shopping, education, leisure etc.. and result total trip generation for the site SP17/THA20 is likely to be underestimated. It is unclear why the TRICS database (the industry standard method of assessing trips to and from a site) would not be suitable, large sites within the site would include other local facilities/attractions affecting the need to drive. Consequently, it is not considered that the trip rates present a robust assessment of the potential trips associated with SP17/THA20.

Further within the report at paragraph 5.2.7 it states "reduction factors have been applied to the THA20 car traffic demand to reflect a reasonable assumption of the potential impacts of active travel measures and improved bus services that are expected with the THA20 development:

- Car demand to/from THA20 reduced by 5% for active travel measures (trips within 10km)
- Car demand to/from THA20 reduced by 20% for bus proposals (to/from Thatcham town centre and rail station)"

To assume a 25% shift in car borne trips in this location is unrealistic given its remote location and difficult topography. Clearly any new bus routes would travel along longer routes to pick up the maximum number of passengers as the bus stops need to be within 400m of all the new residents, and also be subject to delays and congestion heading south from SP17/THA20 onto the A4 which has been documented within the submitted evidence as significantly congested. The use of bus is

therefore a mitigation that would be unattractive, even for local journeys and no evidence has been supplied to justify such reduction. No information has been provided by a bus operator to indicate the journey times between SP17/THA20 and Thatcham and railway station so the considerable reduction in car borne trips is not justified.

Cycling is unlikely to a realistic mitigation measure for the average resident due to the steep topography as demonstrated by Census data. The A4 itself creates severance of the site SP17/THA20 from Thatcham rail station as it will be extremely difficult for pedestrians/cyclist to cross this strategic road, whilst any formal crossing points will cause further delay on the road network (pushing traffic to use local routes). A trip rate selected from the TRICS database using a similar located site would encompass those traveling by sustainable means without the need for making assumptions, and in this case a totally unrealistic reduction of 25%.

Trip Distribution

Section 3 of the Technical Note included within Appendix C of the Forecasting Report sets out the likely trip distribution for trips resulting from the development. This distribution is then used to allocate trips from the land parcels onto the highway network. Journey to work data (ONS Data Set: WU03EW) has been used to establish the likely trip destinations of those living in the site. Based on the data the following route allocations have been used in the analysis.

Route	A4 Newbury	A4 Reading	S	N
Distribution	36.4%	30.4%	23.9%	9.3%

Paragraph 5.3 within the TN confirm “it is proposed that there would be an internal route provided within the site to enable ease of movements for all modes along a centralised corridor. This would mean that areas of the development would be able to travel internally within the site without using the local highway network external to the site. this would allow the future residents to choose a more optimal location to exit the site based on their need ultimate end destination, such as residents living to the west of the site, travelling internally to exit on the A4 near Gables Way for eastbound travel”. Given the existing delays and congestion already observed and set out in the Phase 1 report it is extremely unlikely that this is the most likely route future residents would take travelling eastbound when analysis set out above confirms the most desirable/fastest route is generally to the north via Hart Hill Road (which has not been assessed).

Section 6 within the TN present the proposed traffic flows from each of the proposed access point. However, there is no assessment of vehicles travelling north from the Harts Hill Access, which as demonstrated is the most desirable route for those residents travelling toward Reading or north towards the M4.

Junction modelling was undertaken at the following locations and the impact through Bucklebury was not considered despite it being the most desirable route for those travelling towards Reading or the M4:

- Floral Way / Harts Hill Road
- A4 / Floral Way
- A4 / Pipers Way
- A4 / Colthrop Lane
- A4 / Gables Way.

5 SUMMARY AND CONCLUSIONS

5.1 Summary

- a YES Engineering Group Limited was appointed by Bucklebury Parish Council to review the transport related evidence submitted with the West Berkshire Council emerging Local Plan specially with regards to a proposed allocated site (SP17/THA20) south of the parish.
- b Phase 1 Transport Assessment report identified some junctions and links that would be affected by the proposed Local Plan growth. These were particularly focussed near to the proposed strategic North East Thatcham site, indicating delays and congestion occurring around key junctions along the A4 corridor, with through traffic diverting onto unsuitable routes.
- c Concept junction improvements are set out in Appendix A of the Phase 2 report which essentially provides greater capacity at junctions along the A4 corridor purely to facilitate the increase in traffic associated with development of SP17/THA20. However, providing extra capacity would be in contrary to West Berkshire Core Strategy Policy CS 13 to mitigate the impact on the local transport network and the strategic road network.
- d Journey time analysis during the AM and PM peak hours was undertaken over a 2-week period from 13th to 24th February 2023 to assess the most desirable routes for those travelling east (towards Reading) or west towards M4 Chieveley . As shown within **Appendix B** it is demonstrated that the quickest route in each direction is via Harts Hill Road or via Cold Ash Lane rather than the strategic network (A4). The impact on these routes has not been assessed which is a fundamental flaw within the modelling assessment.
- e Whilst the Phase 2 report confirms other mitigation measures will be required to reduce car dependency for SP17/THA20, however they cannot reduce the congestion (which already exists) to such levels that the most desirable route will no longer be heading north either via Harts Hill Road or Cold Ash Lane. This situation already occurs, and the Phase 1 report has confirmed that these roads are unsuitable. Therefore, the location of SP17/THA20 is fundamentally wrong as traffic will need to divert off the strategic network and non-highway based mitigation measures are almost impossible to achieve due its location/topography.
- f The A4 itself will create severance of the site SP17/THA20 from Thatcham rail station for pedestrian/cycle activity as it will be extremely difficult to cross this strategic road, whilst any formal crossing points will cause further delay on the road network.
- g Congestion has been raised by WBC as a Key Issue and is consistently cited in the Council's annual residents' surveys as an issue that needs improving in the local area. The district has a high level of car ownership and usage that is in excess of the South East and national averages. Rapid population growth, housing, and employment in the last few decades, as well as the proximity to other larger urban areas, have seen an increase in demand for travel and a reliance on journeys made by the private car. The development at SP17/THA20 is located within a rural setting with very limited access to public transport. As such it is expected that the development would only add to the already congested roads and is at ends to the Local Transport Goals to minimise congestion on the transport networks.
- h The WBSTM report confirms "Traffic flows increase (compared to the Reference Case) on major roads such as the A34, A339, A4, Bury's Bank Road/Crookham Hill and the Broad Lane, as a result of increased traffic demand generated by the preferred Local Plan sites. There is a consistent re-assignment of traffic in all Local Plan scenarios (compared to the Reference Case) due to naturally increased demand and congestion in the town centre in particular, though local roads in general seem to demonstrate low levels of highway demand increases across all Local Plan scenarios. General increases in Local Plan traffic demand though the corridor, as well as THA20 site traffic directly accessing the A4 in this area, is likely to cause some displacement onto wider routes away from the A4, through local villages such as Upper Bucklebury". As set out in Section 2, the

routes of Bucklebury are unsuitable (no footways, no lighting, high speed, tight bends) for an increase in traffic flows and would create highway safety issues for existing residents.

- i The trip rate criteria can be considered unreliable, whilst the a trip rate reduction of 25% due to mitigation measures is wholly unrealistic.
- j NPPF paragraph 111 states that 'development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.'. As demonstrated within this report the impacts are serve and as acknowledged in the WBSTM report (point h above), site SP17/THA20 is likely to cause displacement onto wider routes away from the A4, through local villages such as Upper Bucklebury. The Phase 1 Transport Assessment described these routes as undesirable and critically the impact has not been assessed within any of the evidence presented in support of the emerging local plan. Additionally, there are fundament flaws within the trip assessment and distribution.

5.2 Conclusions

In summary it can be concluded that allocation of site SP17/THA20 based on the transport evidence is unsound for the following reasons:

- The trips rates are unreliable and not robust.
- The trip distribution is unrealistic (evidence suggests that traffic will be diverted from the A4).
- The mitigation measures are improbable at best (with little or no evidence).
- The location of site means car borne will dominate.
- Highway network in the vicinity of SP17/THA20 is already over capacity.
- No assessment has been made of the routes most likely to be affected by an increase in traffic.
- Increase in traffic through Bucklebury will pose highway safety issues.

Appendices

Appendix A – Census Data

QS701EW - Method of travel to work

ONS Crown Copyright Reserved [from Nomis on 27 February 2023]

population	All usual residents aged 16 to 74
units	Persons
date	2011
rural urban	Total

Method of Travel to Work

msoa2011:E02003383 : West Berkshire 017

All categories: Method of travel to work	5,061
Work mainly at or from home	228
Underground, metro, light rail, tram	1
Train	202
Bus, minibus or coach	95
Taxi	9
Motorcycle, scooter or moped	42
Driving a car or van	2,768
Passenger in a car or van	196
Bicycle	142
On foot	275
Other method of travel to work	14
Not in employment	1,089

In order to protect against disclosure of personal information, records have been swapped between different geographic areas. Some counts will be affected, particularly small counts at the lowest geographies.

TS045 - Car or van availability

ONS Crown Copyright Reserved [from Nomis on 27 February 2023]

population	All households
units	Households
date	2021

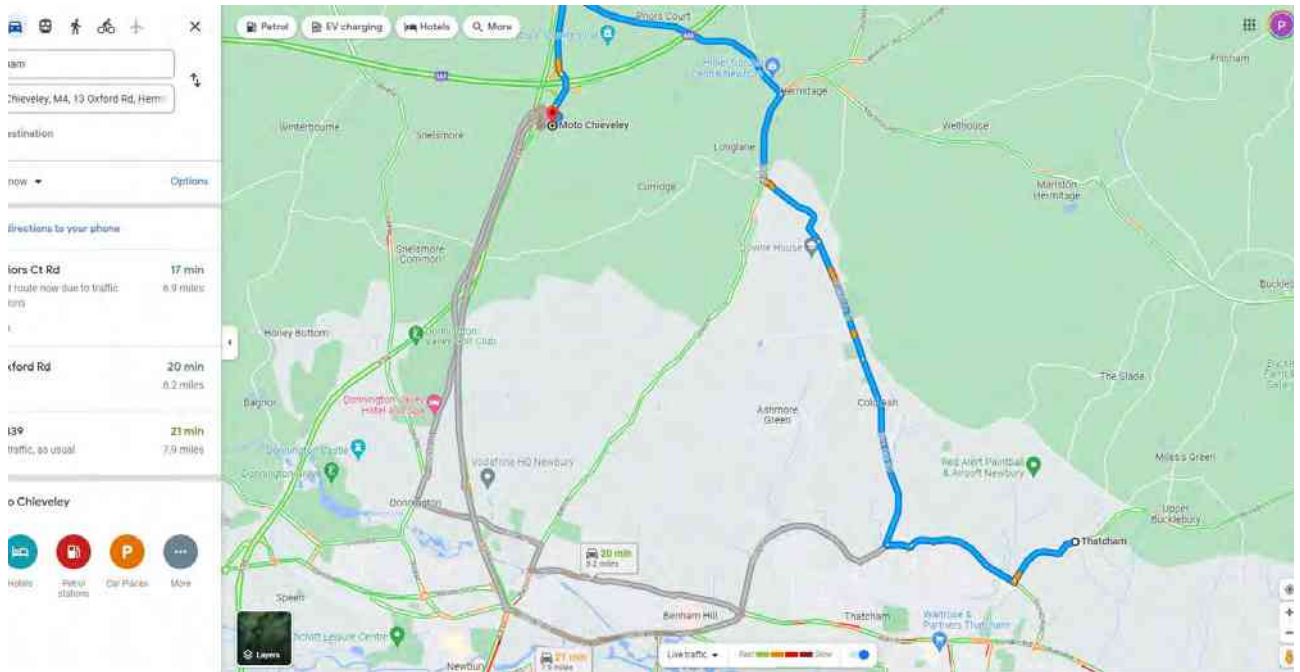
Number of cars or vans **msoa2021:E02003383 :** **West Berkshire 017**

Total: All households	2,764
No cars or vans in household	278
1 car or van in household	974
2 cars or vans in household	1,080
3 or more cars or vans in household	432

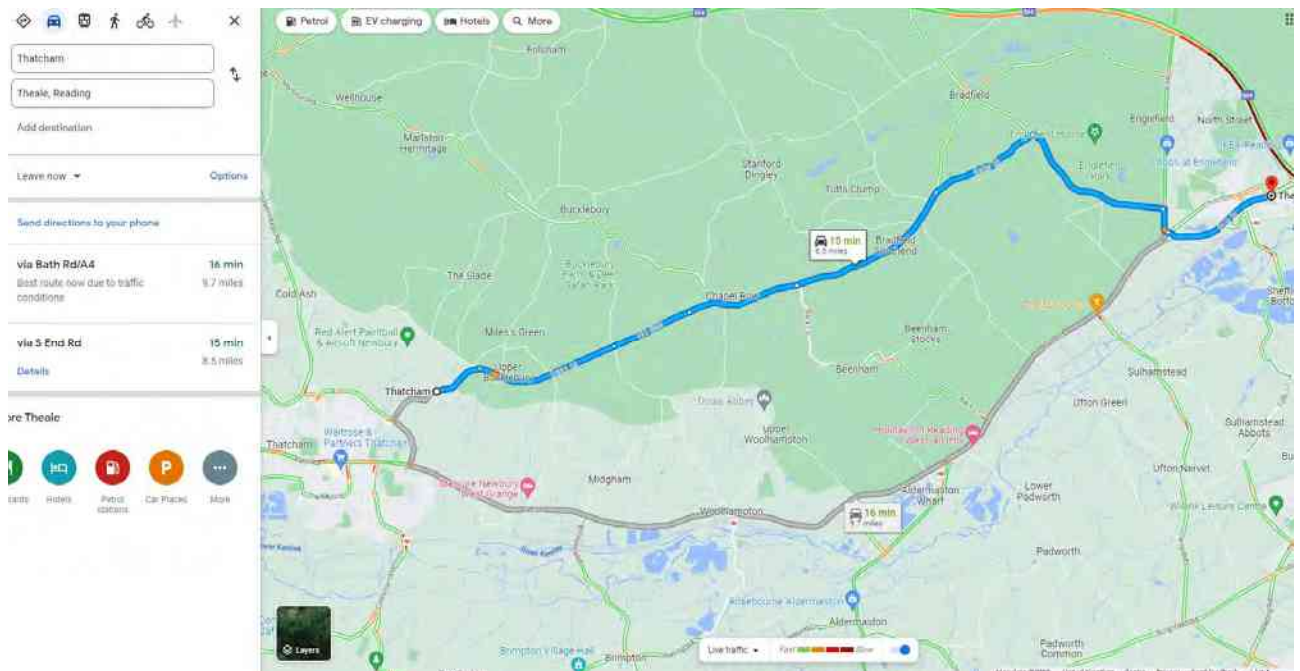
In order to protect against disclosure of personal information, records have been swapped between different geographic areas and counts perturbed by small amounts. Small counts at the lowest geographies will be most affected.

Appendix B – Journey Times

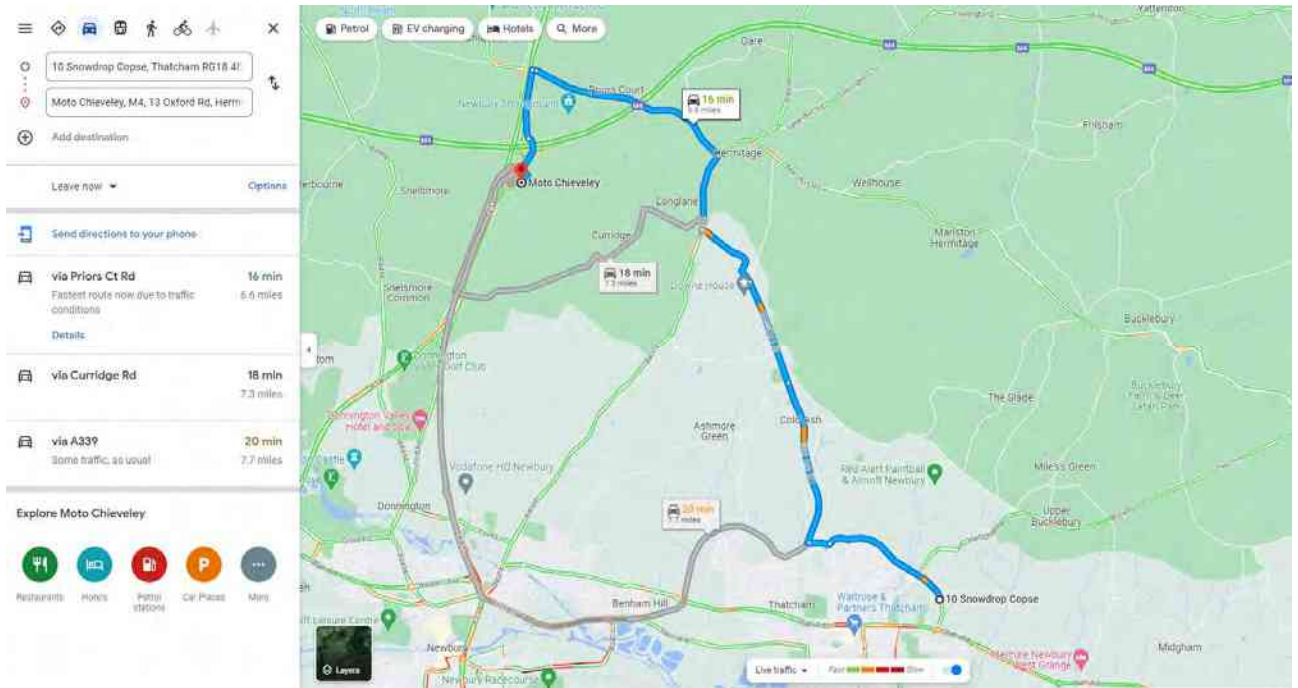
Journey Times Towards M4 Chieveley, PM Peak Hour – 10/02/2023



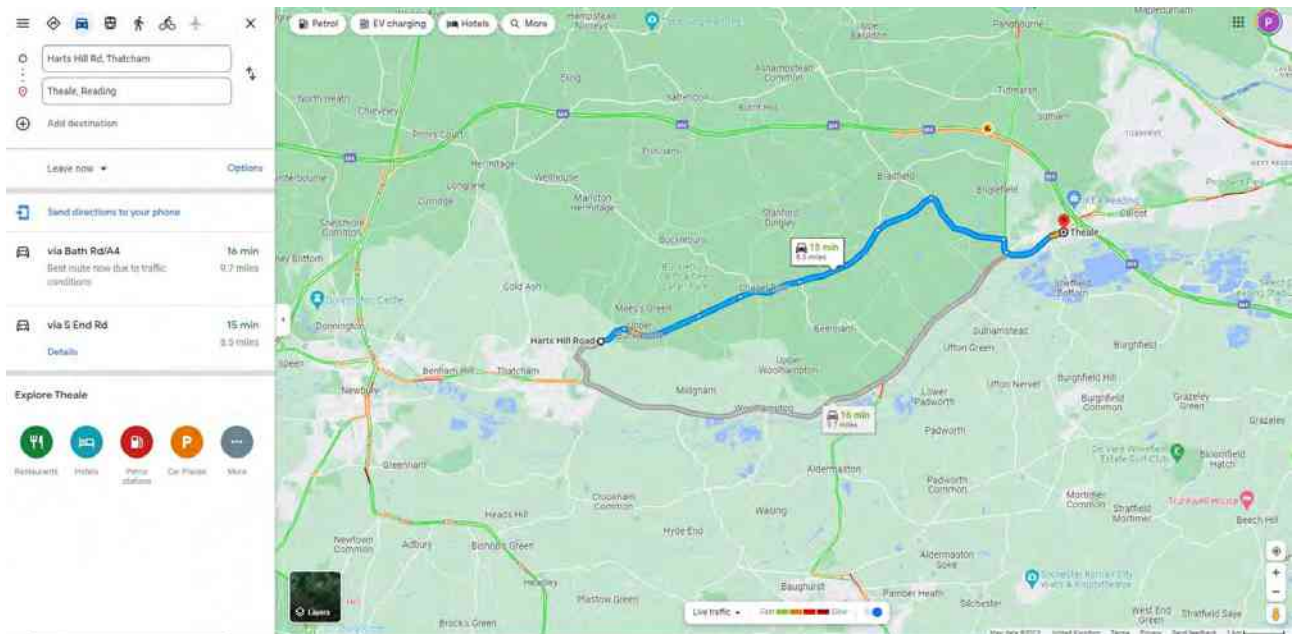
Journey Times towards Reading, PM Peak Hour – 10/02/2023



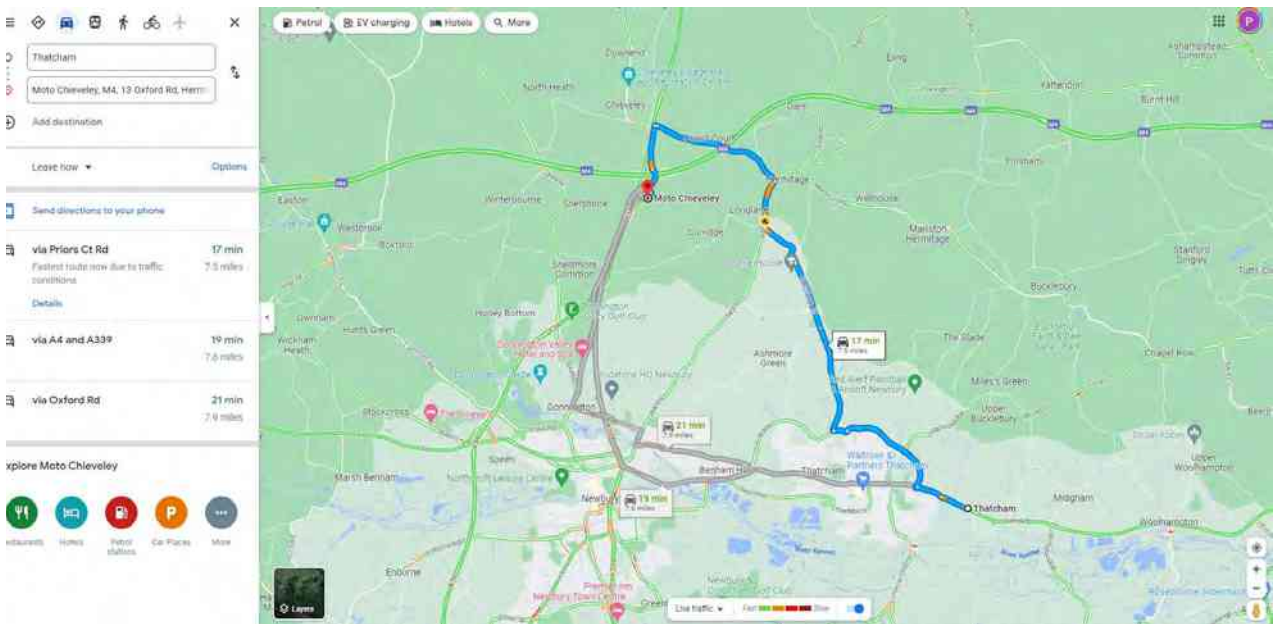
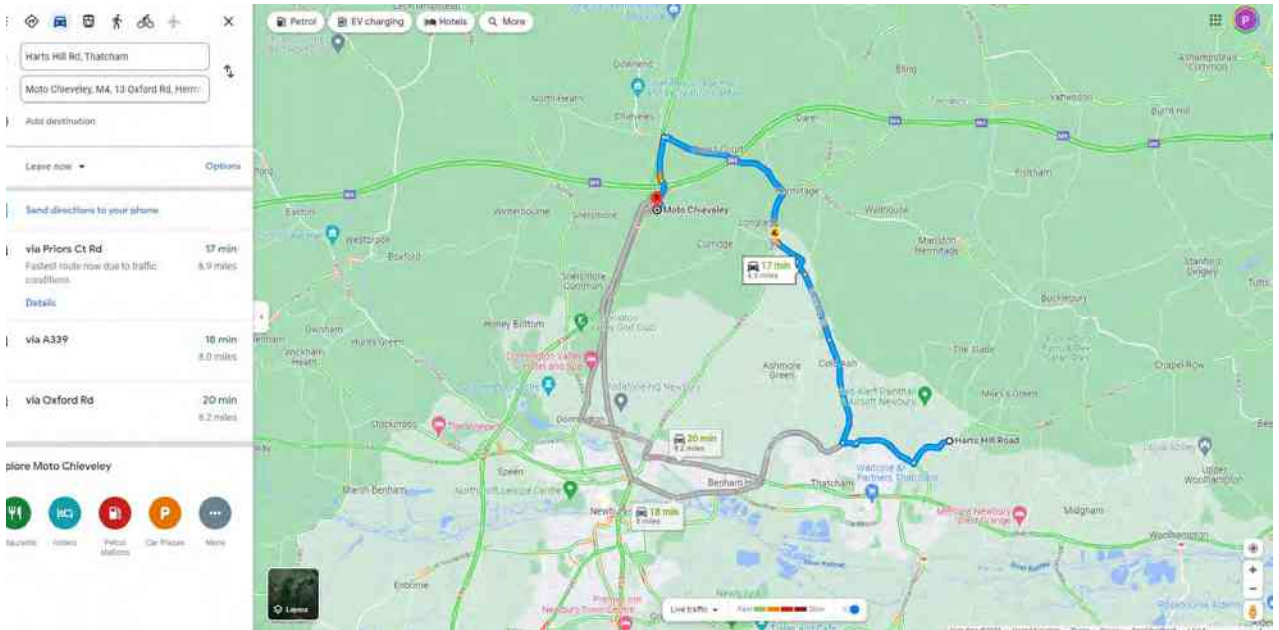
Journey Times Towards M4 Chieveley, PM Peak Hour – 13/02/2023



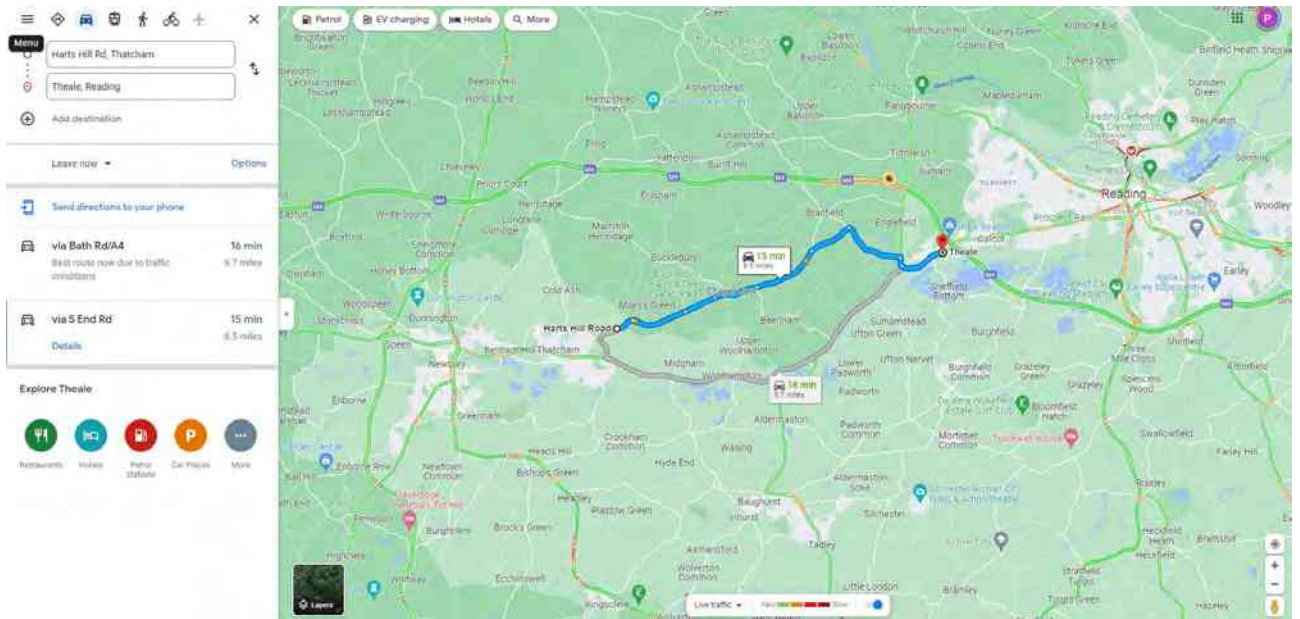
Journey Times towards Reading, PM Peak Hour – 13/02/2023



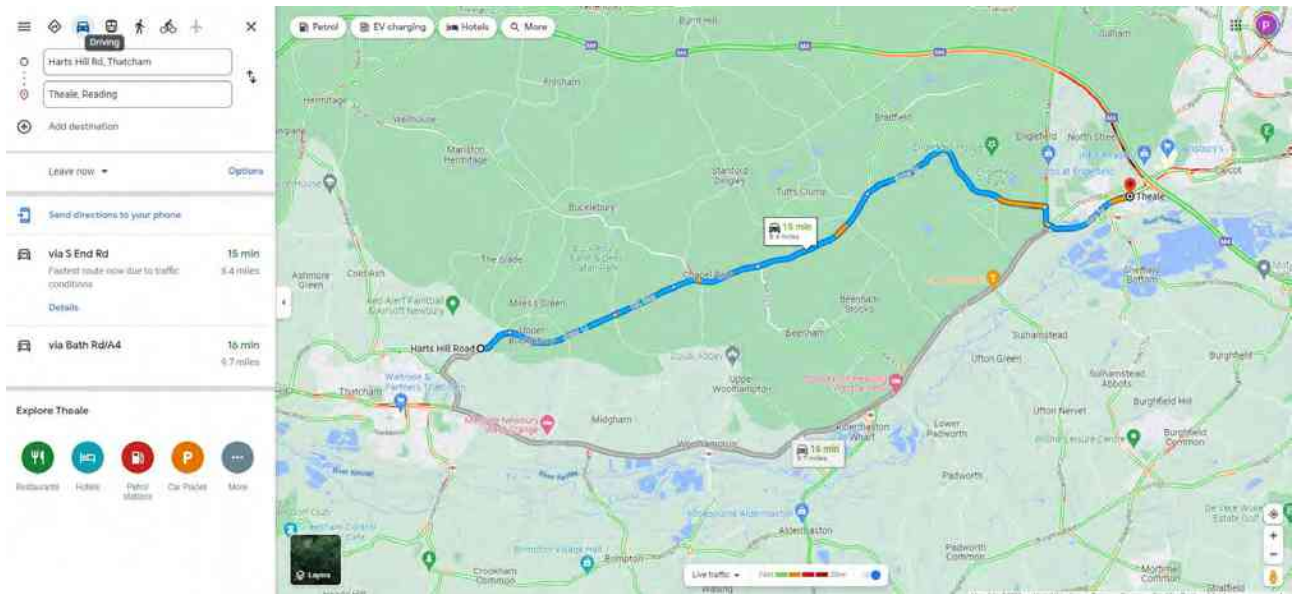
Journey Times Towards M4 Chieveley, AM Peak Hour – 14/02/2023



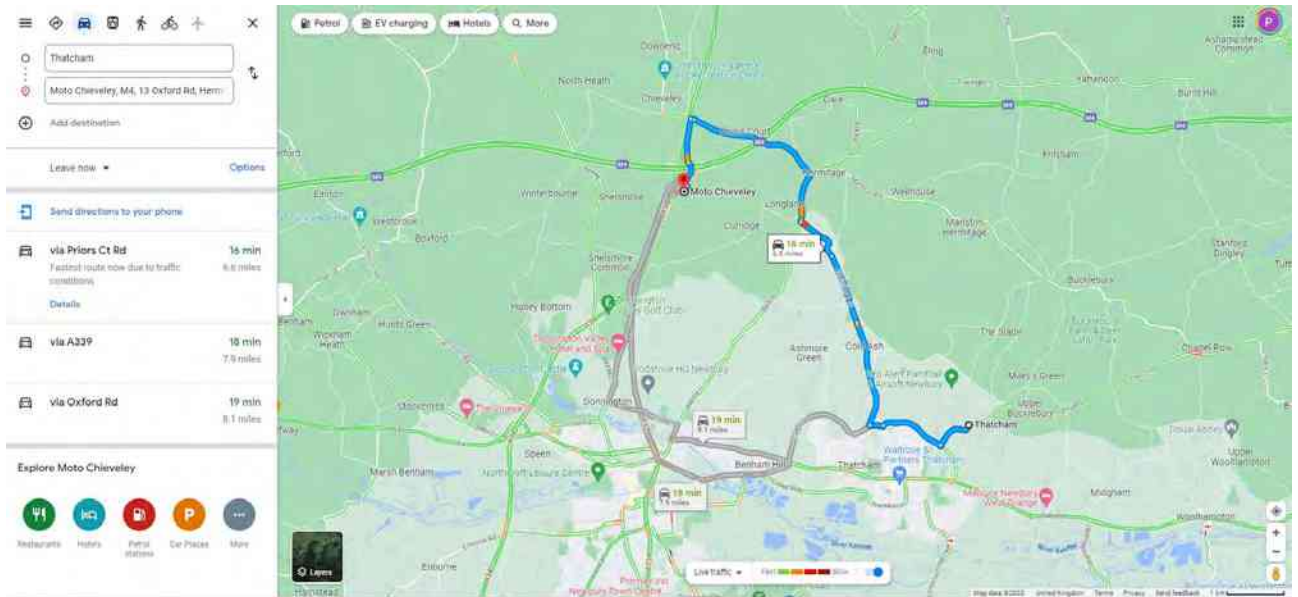
Journey Times towards Reading, AM Peak Hour – 14/02/2023



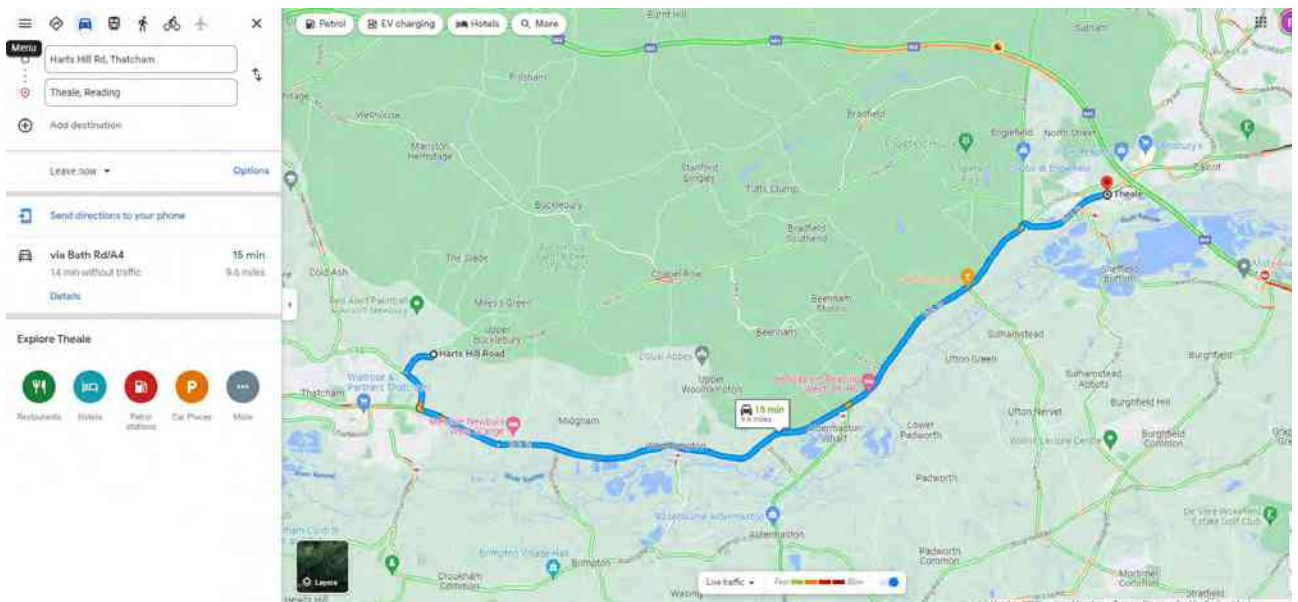
Journey Times towards Reading, PM Peak Hour – 14/02/2023



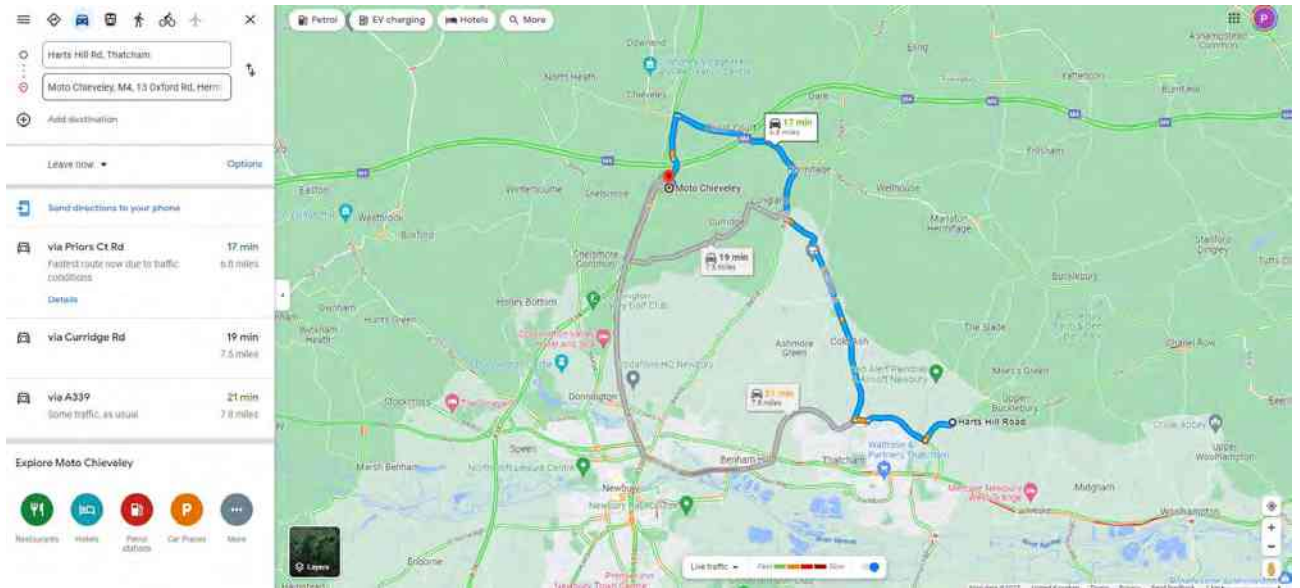
Journey Times towards M4 Chieveley, AM Peak Hour – 15/02/2023



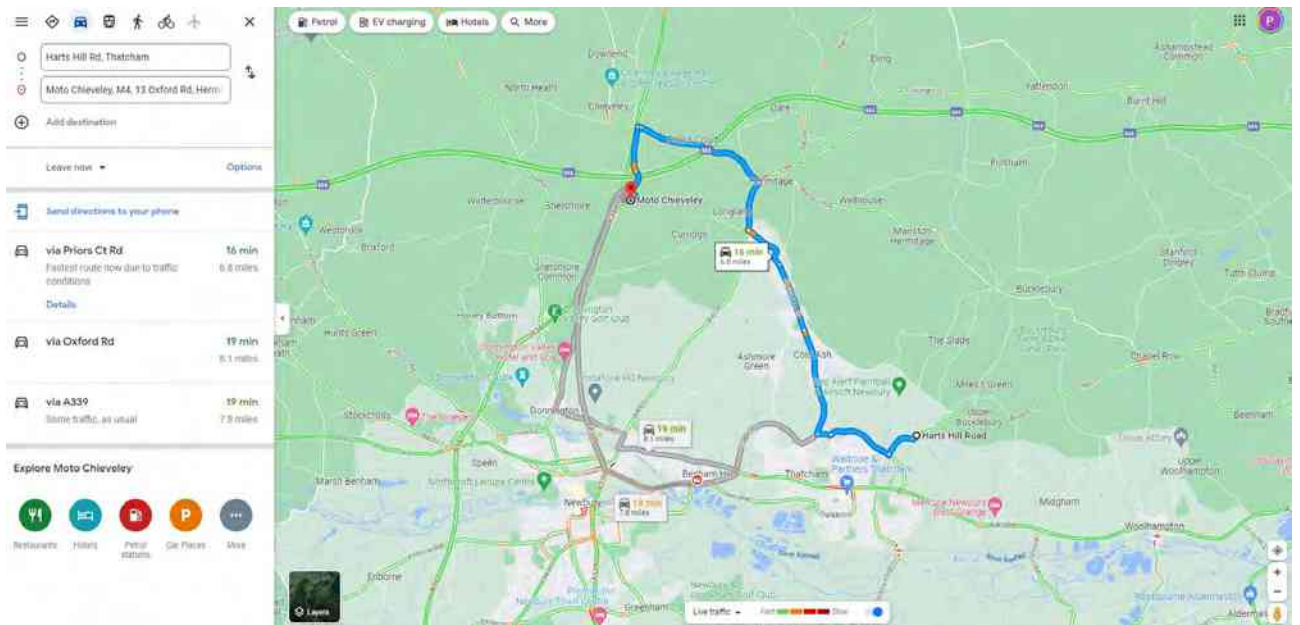
Journey Times towards Reading, AM Peak Hour – 15/02/2023



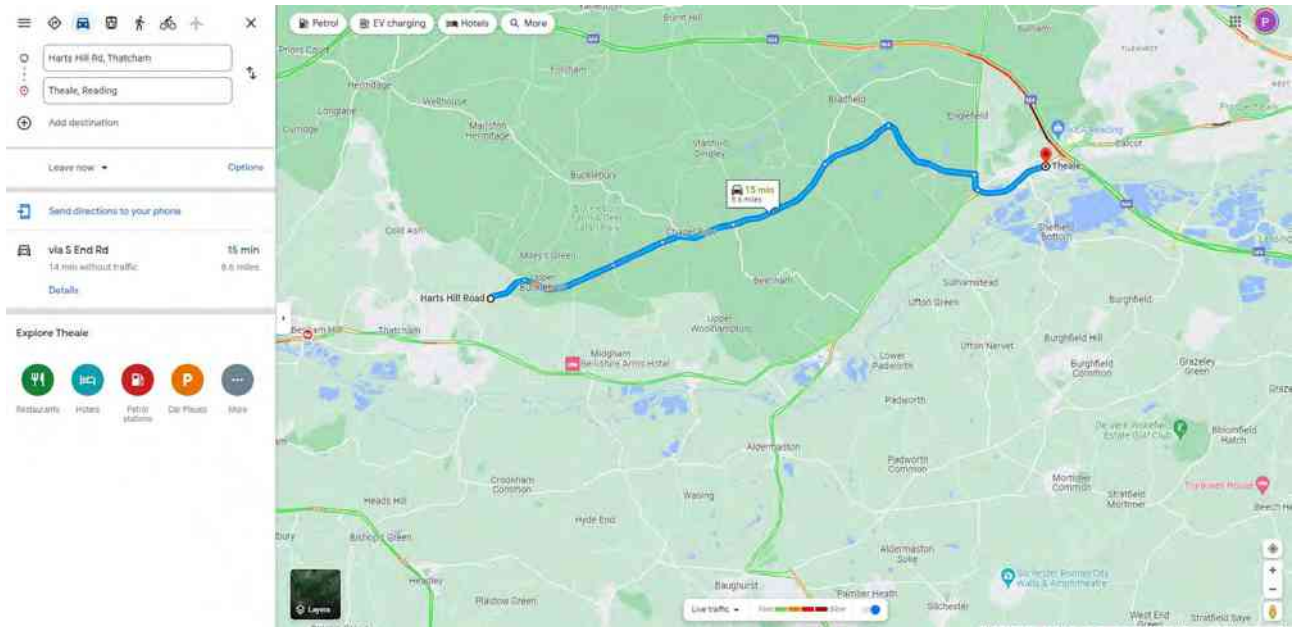
Journey Times towards Reading, PM Peak Hour – 16/02/2023



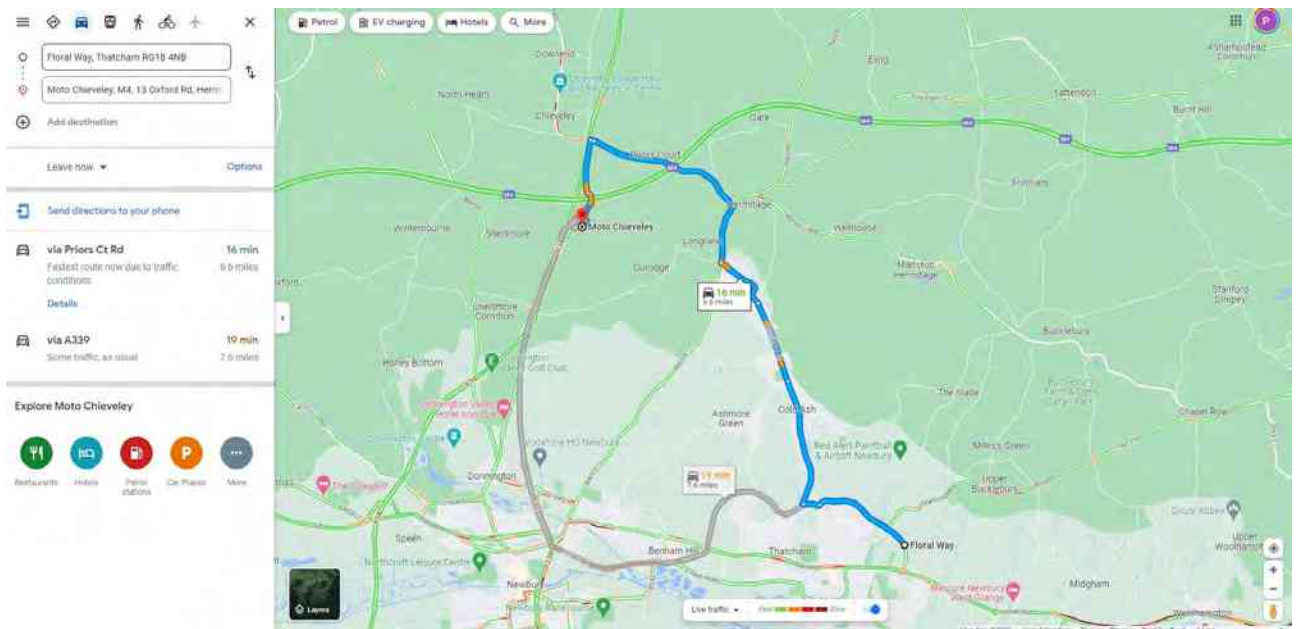
Journey Times Towards M4 Chieveley, PM Peak Hour – 17/02/2023

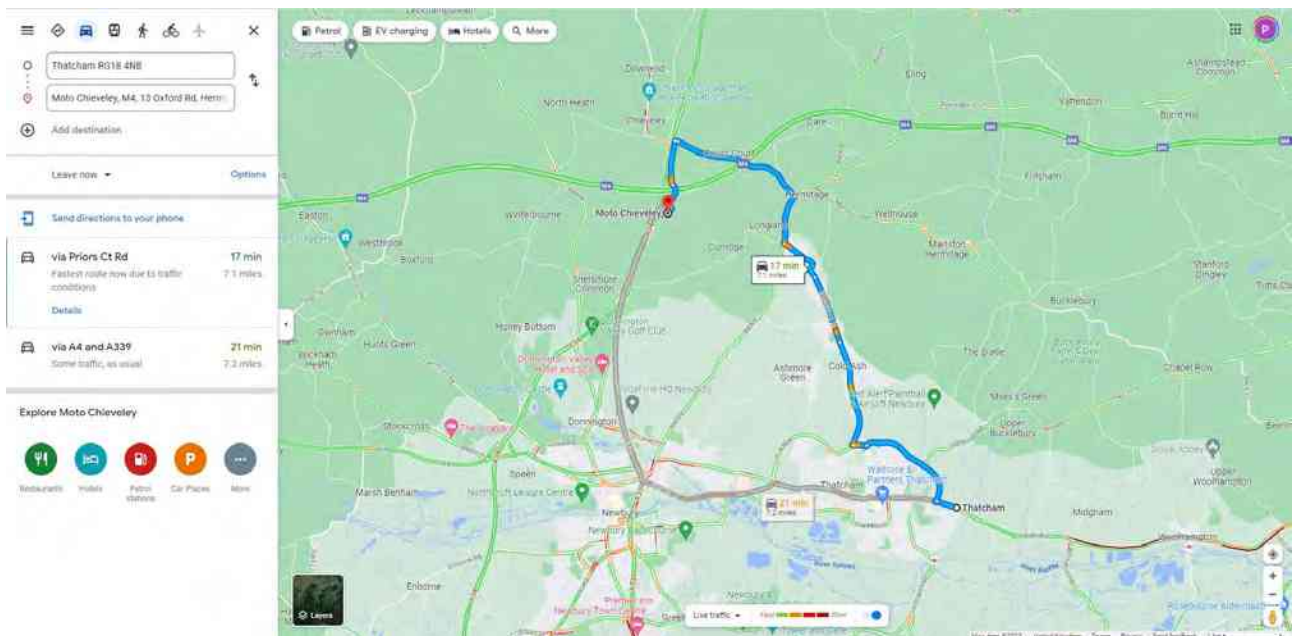
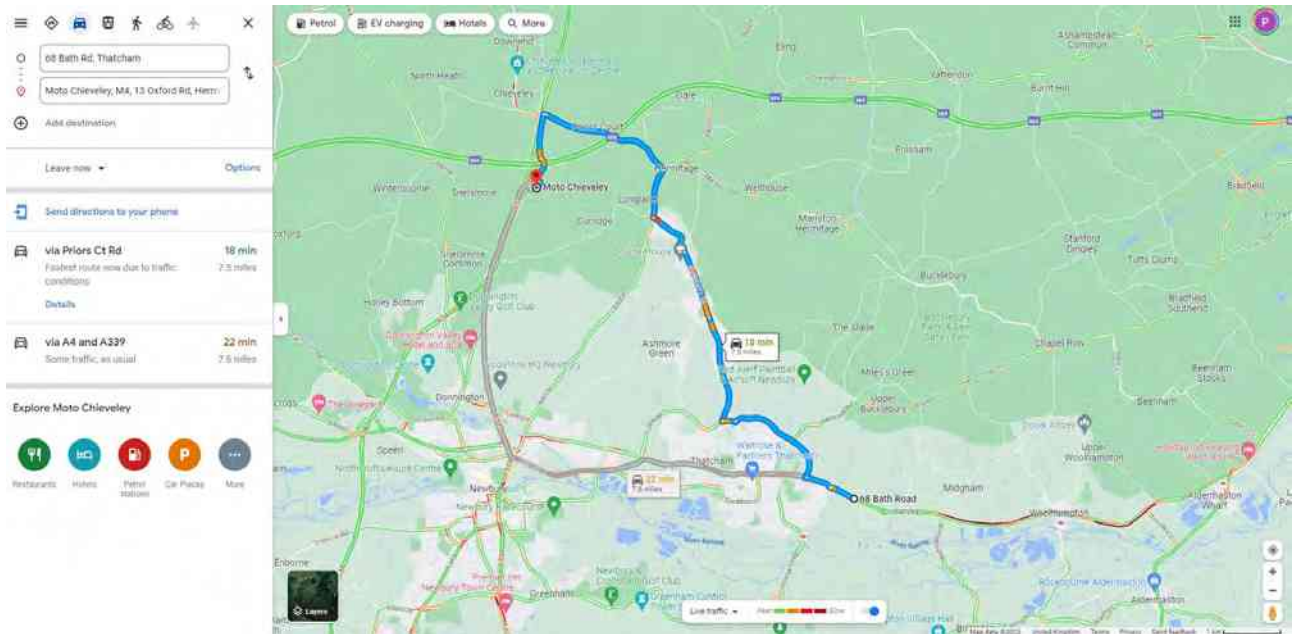


Journey Times towards Reading, PM Peak Hour – 17/02/2023

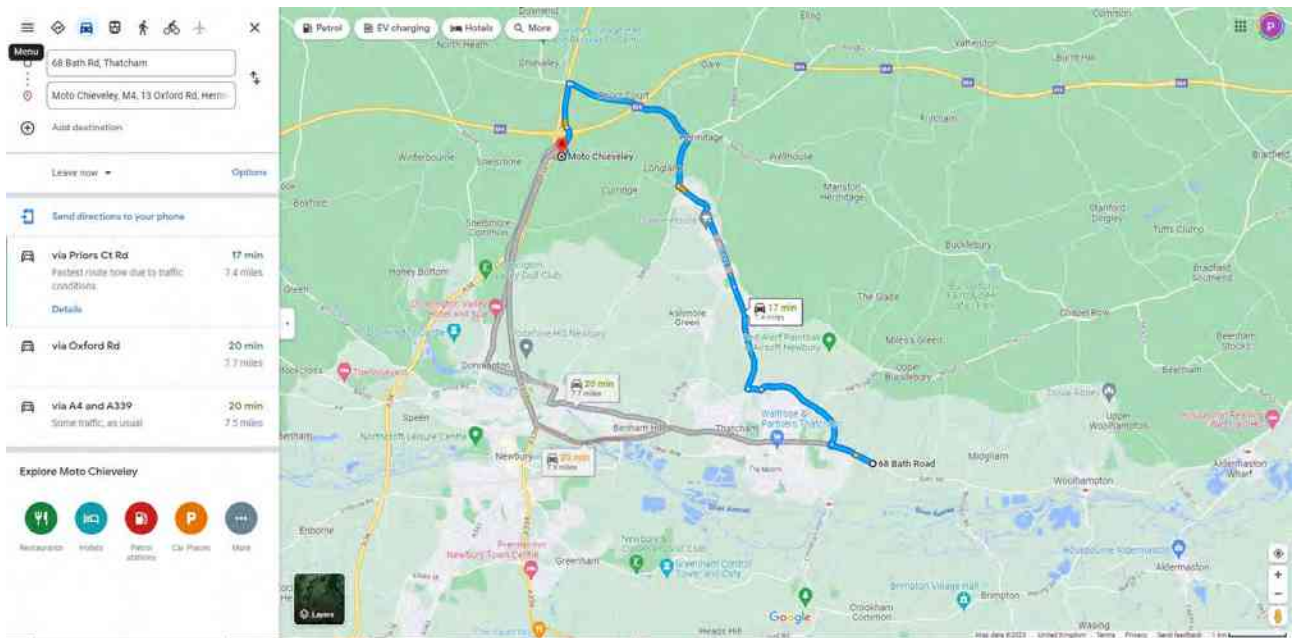
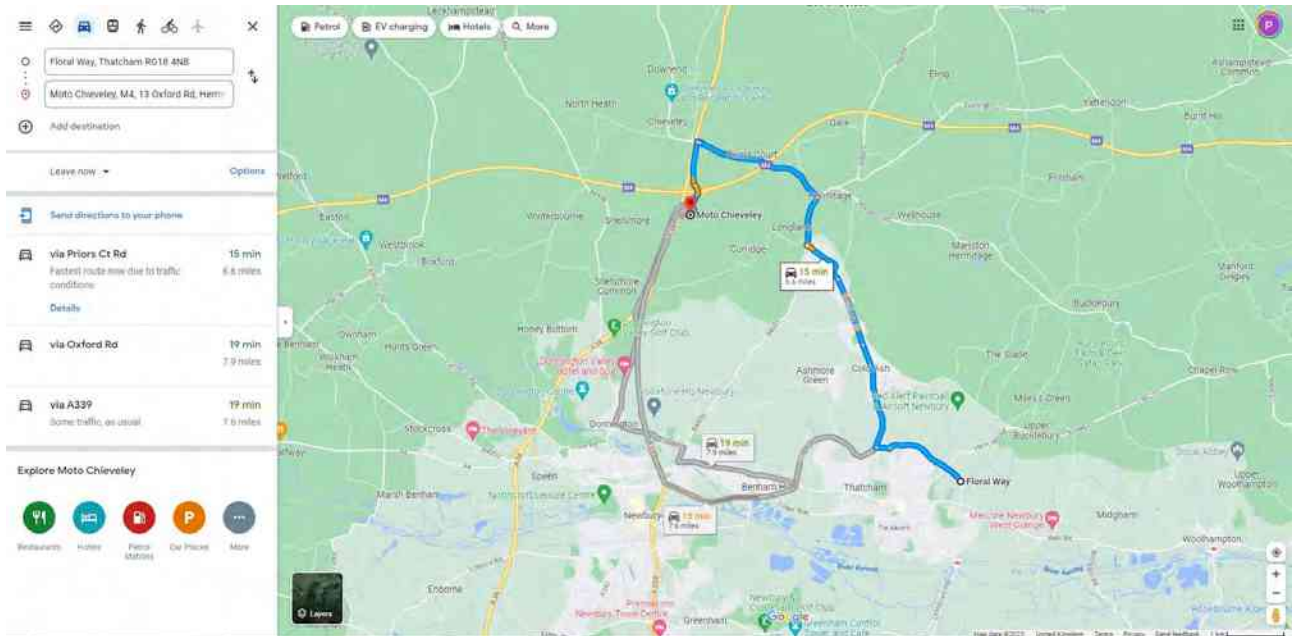


Journey Times towards M4 Chieveley, AM Peak Hour – 20/02/2023

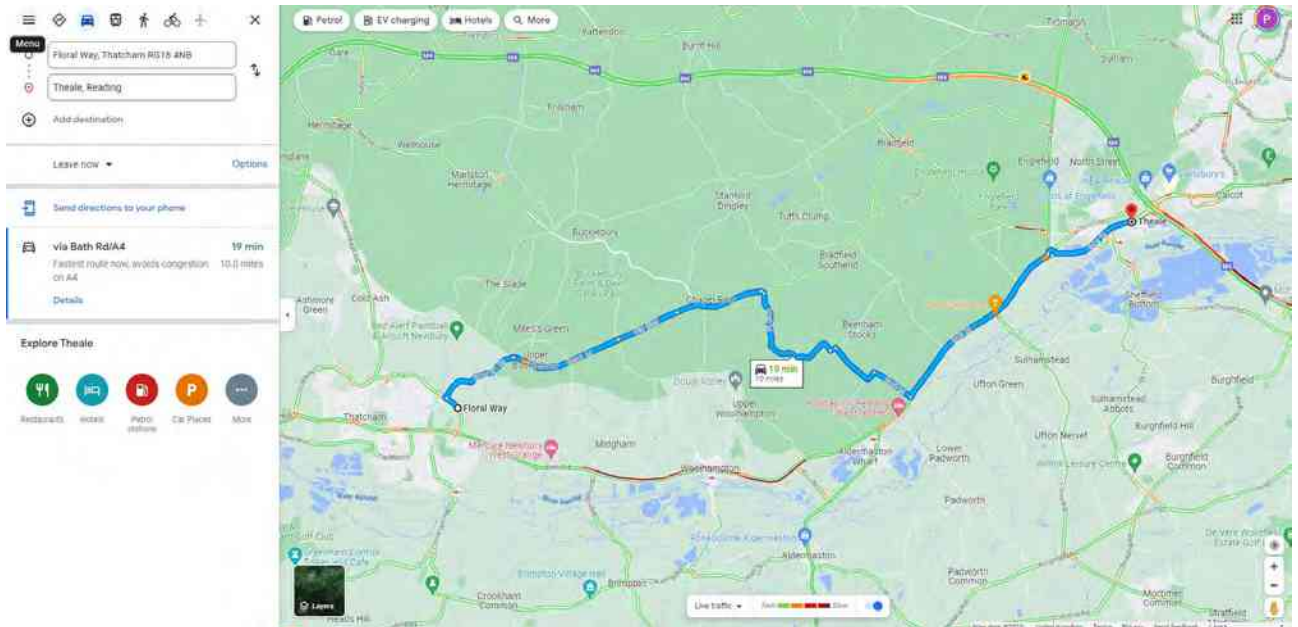




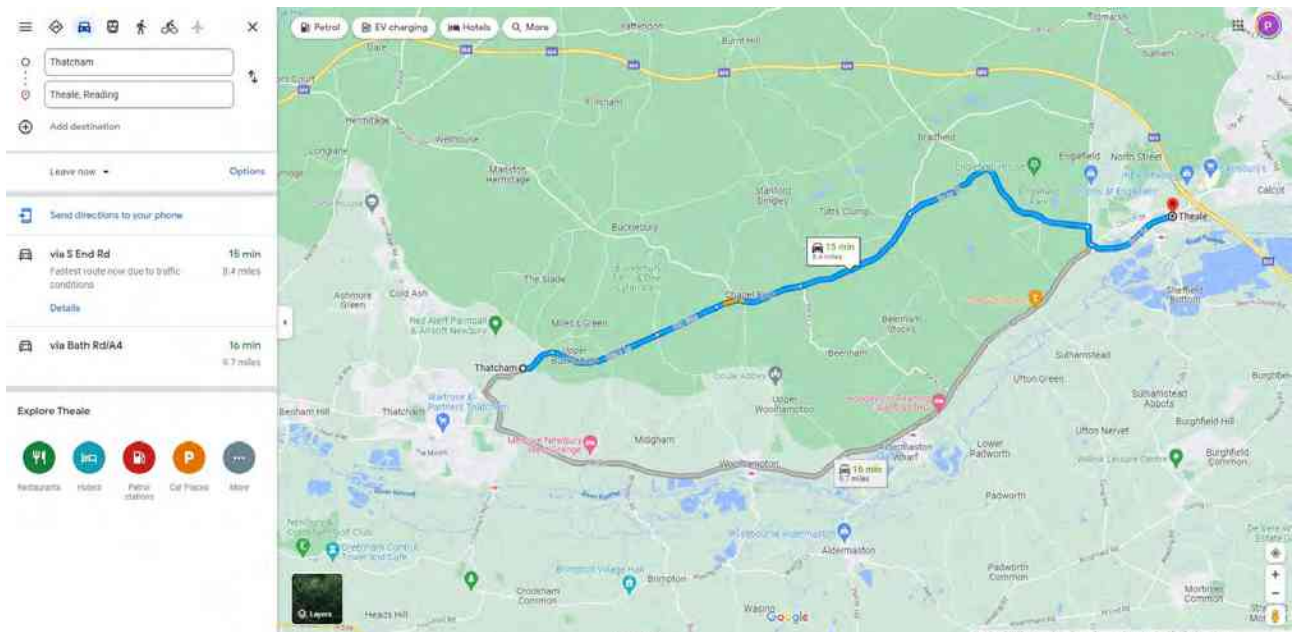
Journey Times Towards M4 Chieveley, PM Peak Hour – 20/02/2023

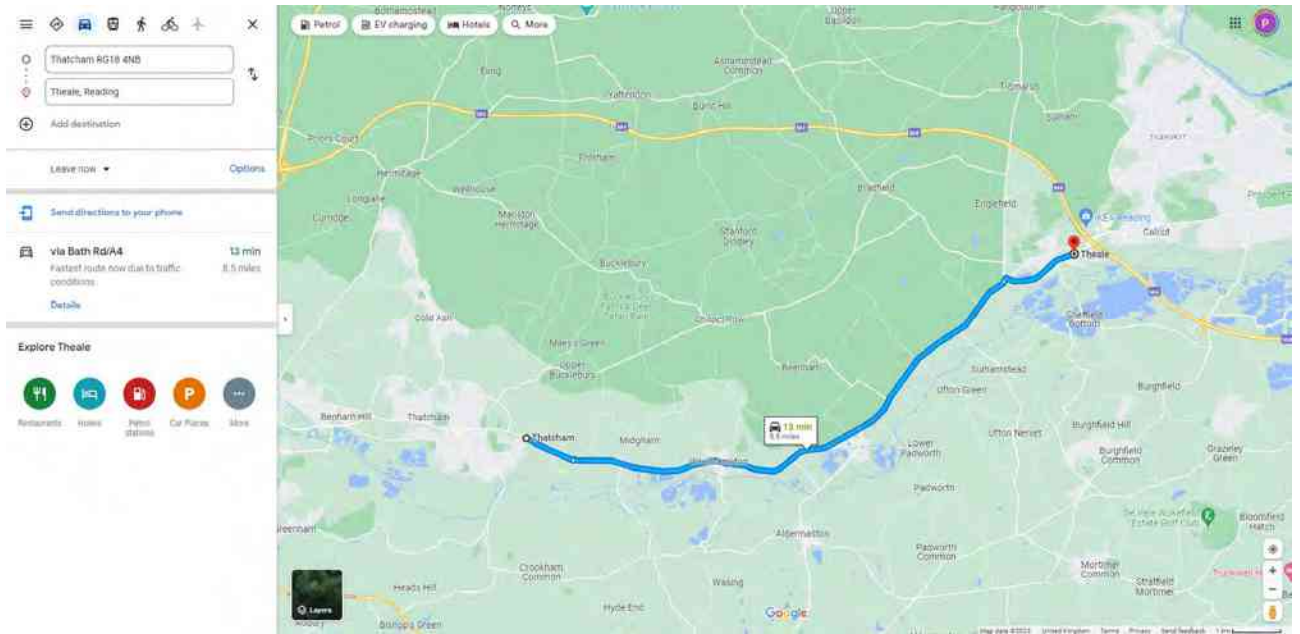


Journey Times towards Reading, AM Peak Hour – 20/02/2023

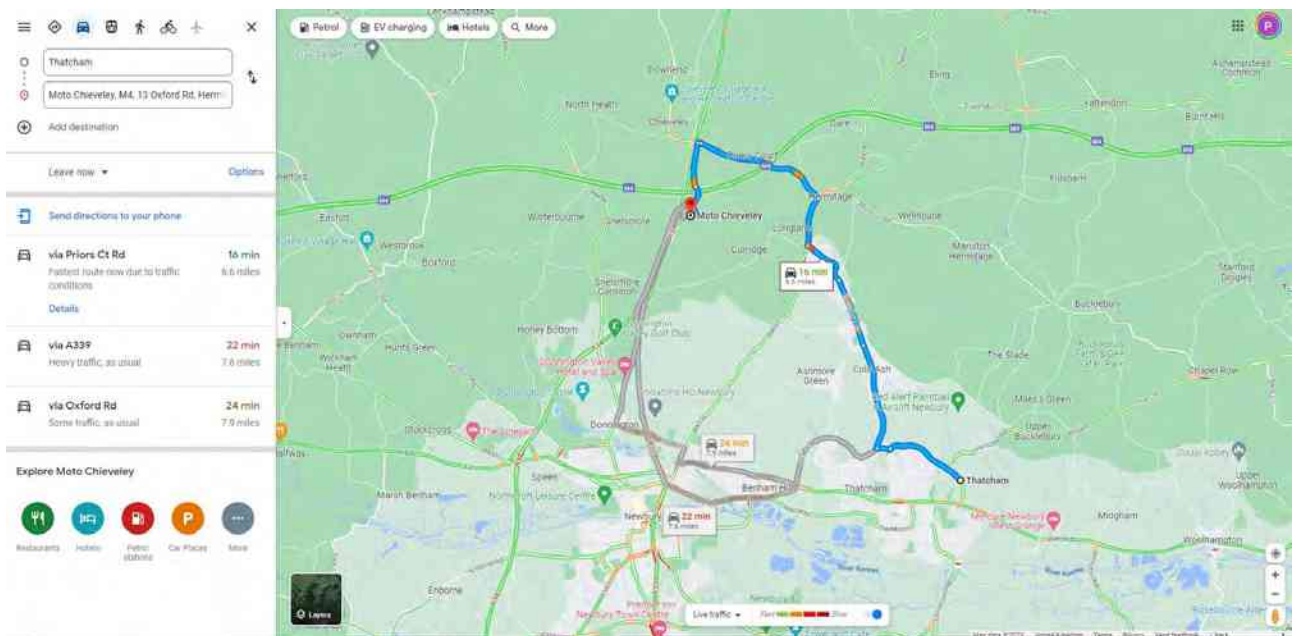


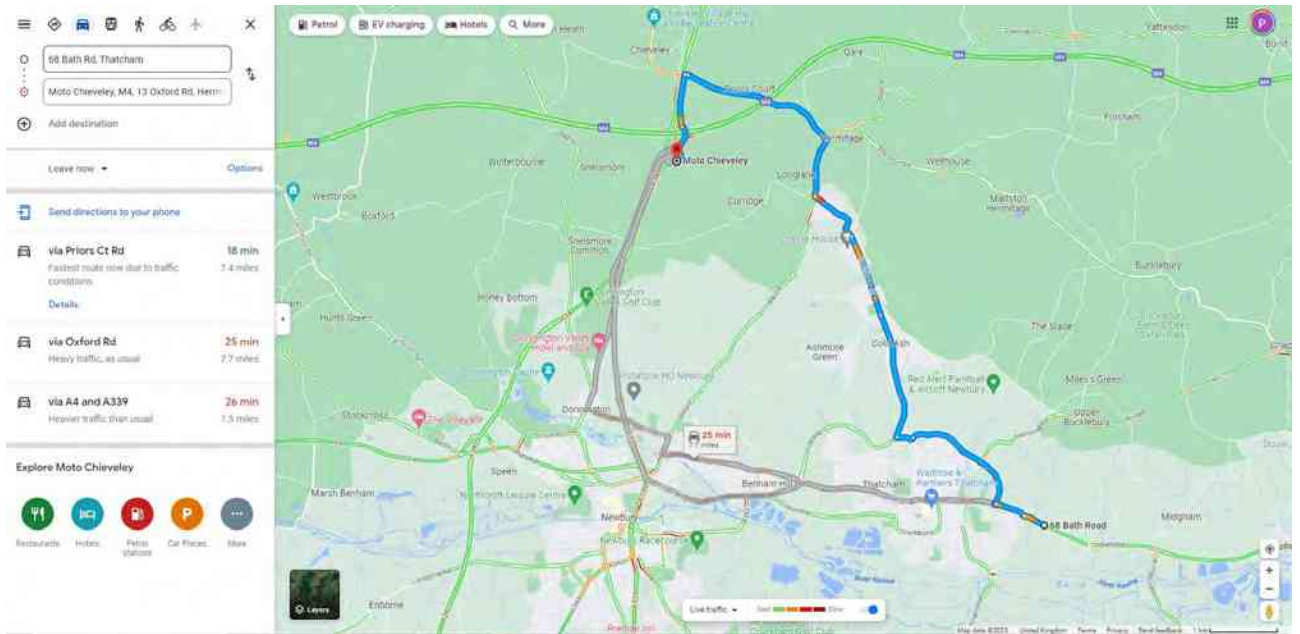
Journey Times towards Reading, PM Peak Hour – 20/02/2023



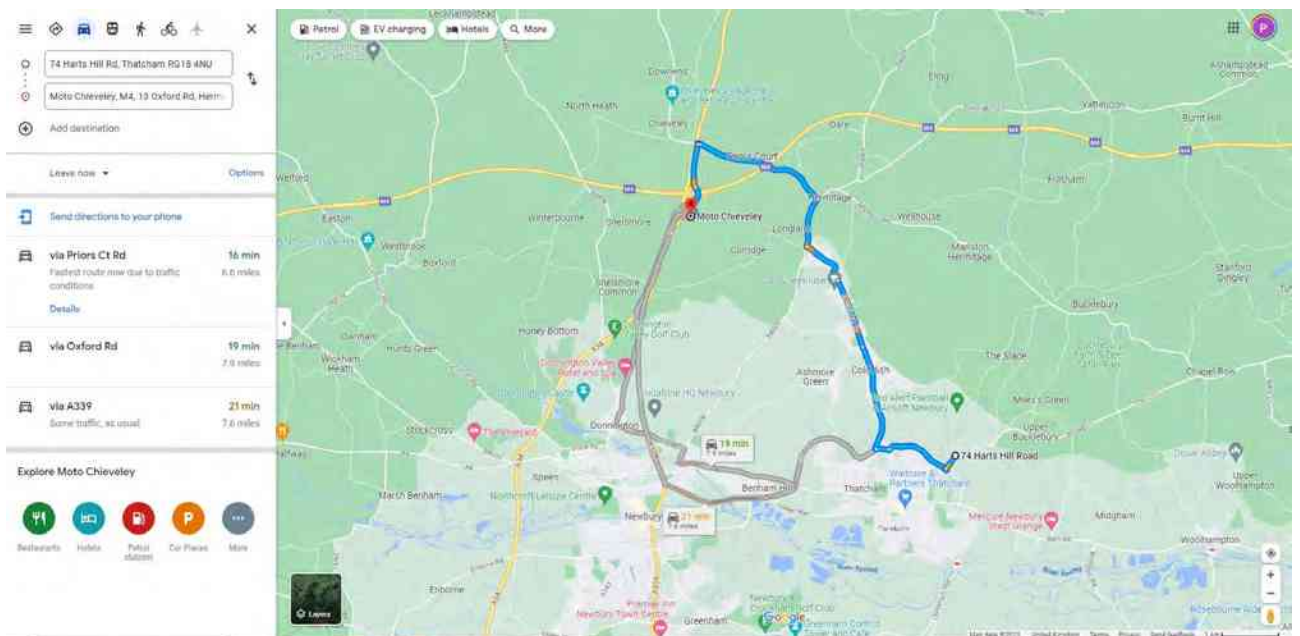


Journey Times towards M4 Chieveley, AM Peak Hour – 21/02/2023

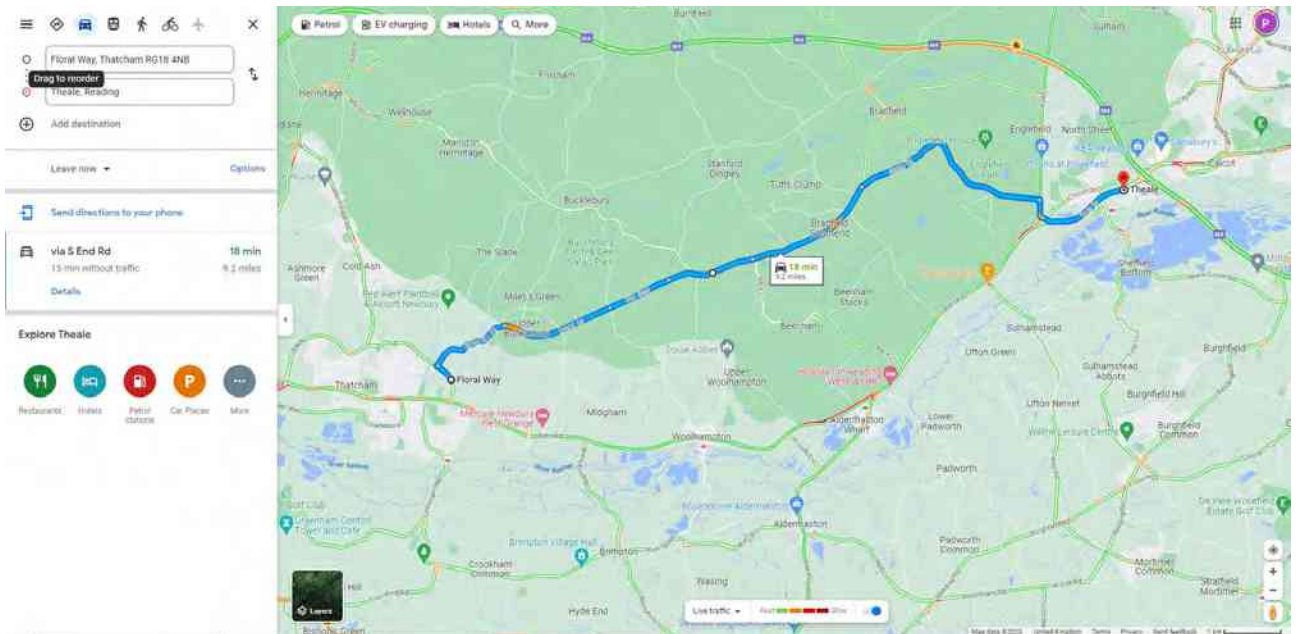
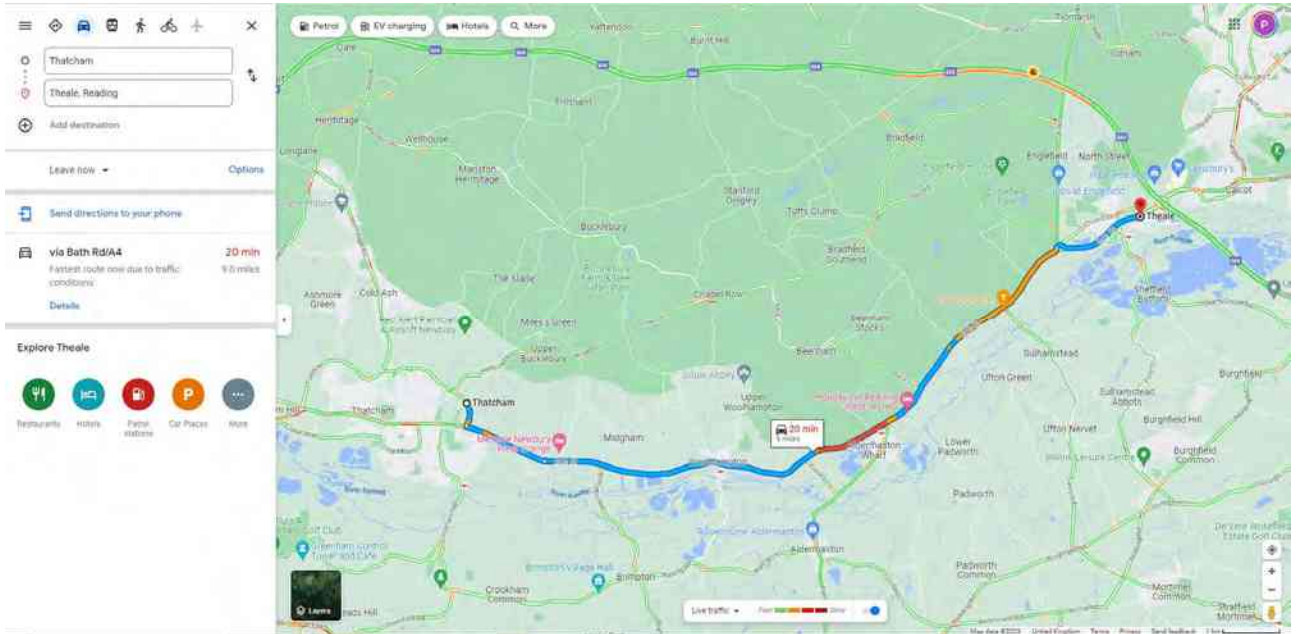


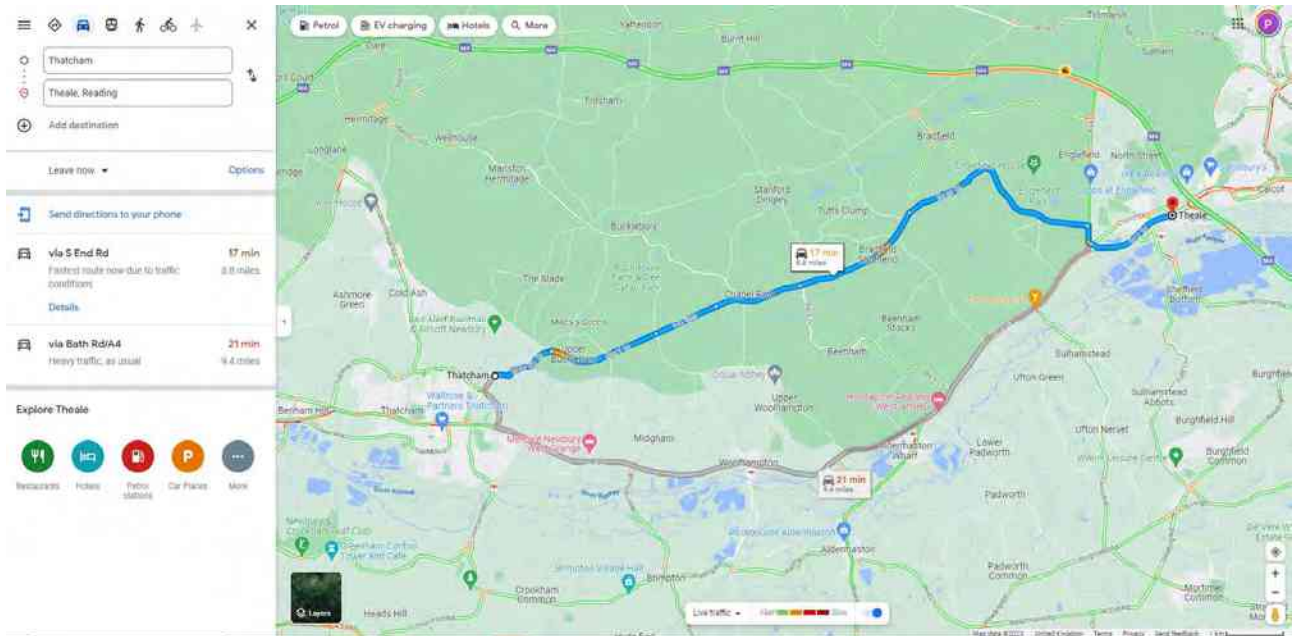


Journey Times towards M4 Chieveley, PM Peak Hour – 21/02/2023

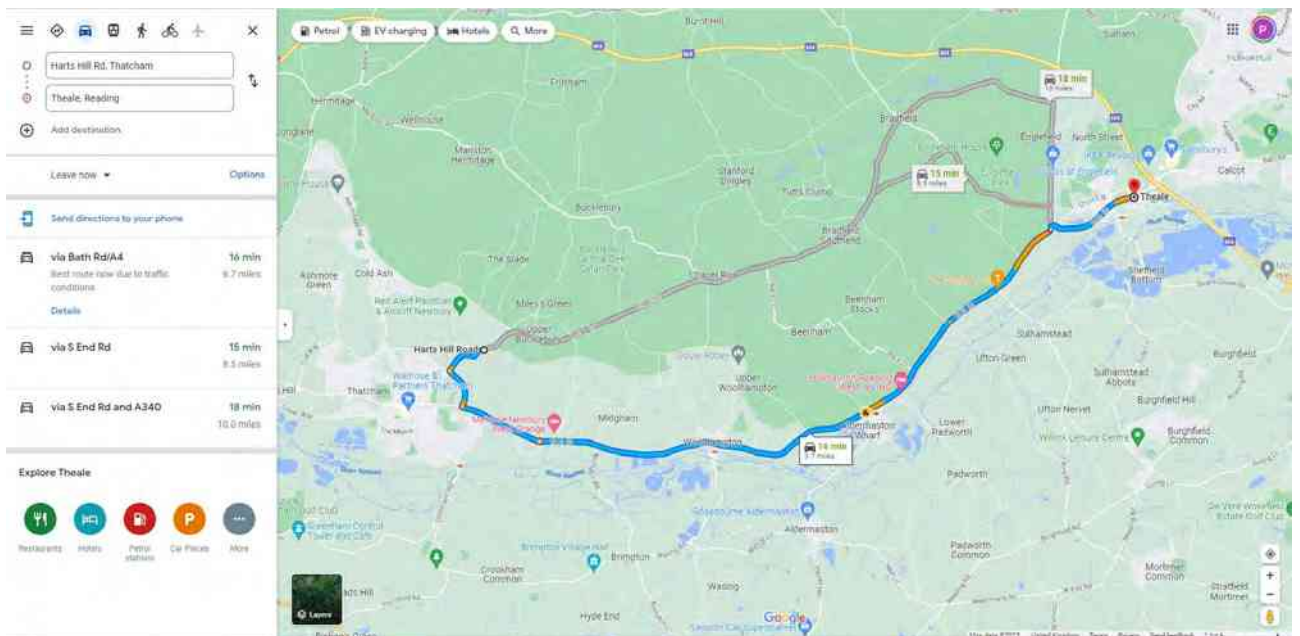


Journey Times towards Reading, AM Peak Hour – 21/02/2023

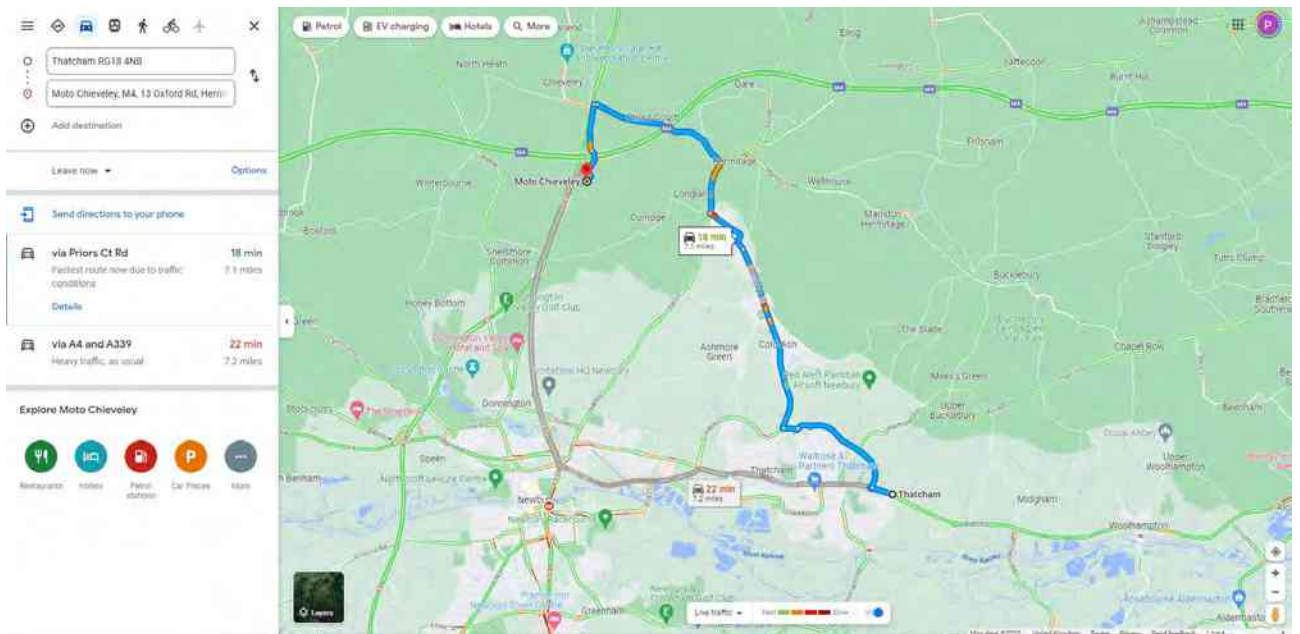
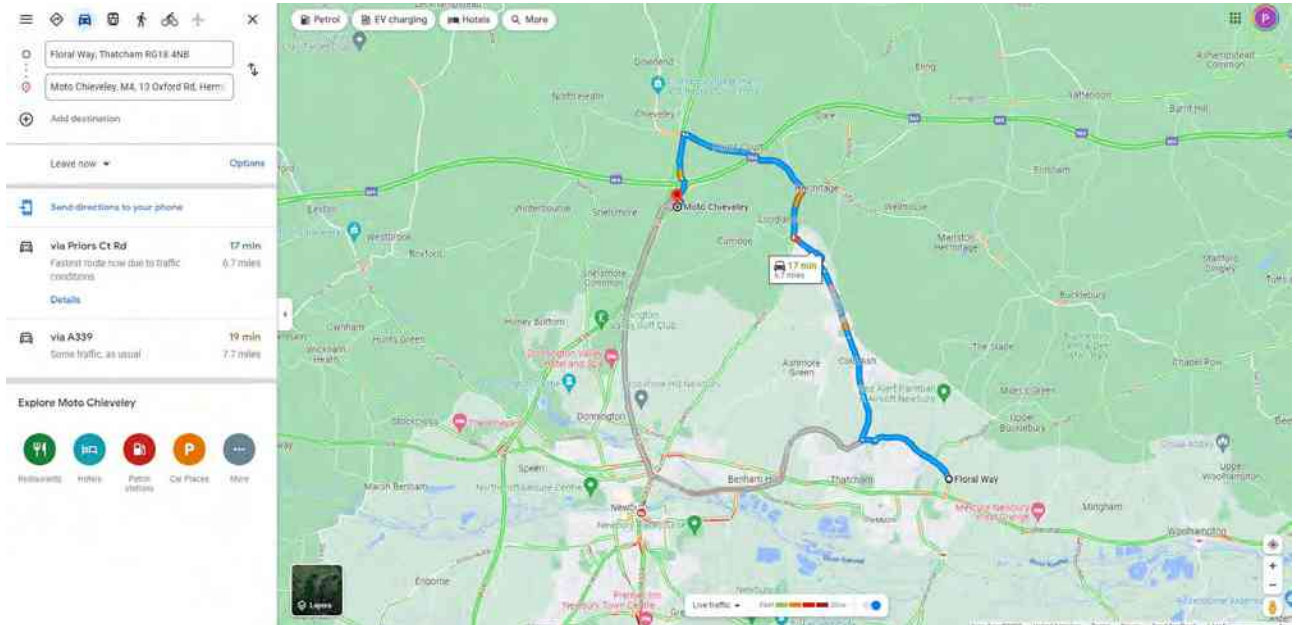




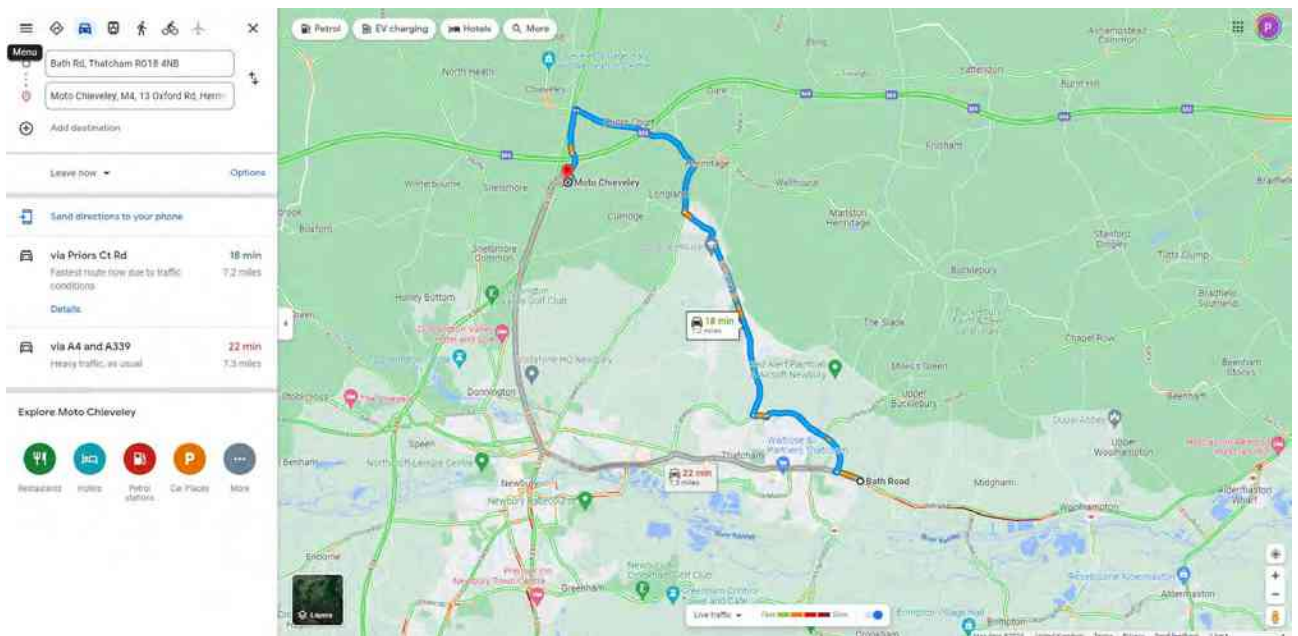
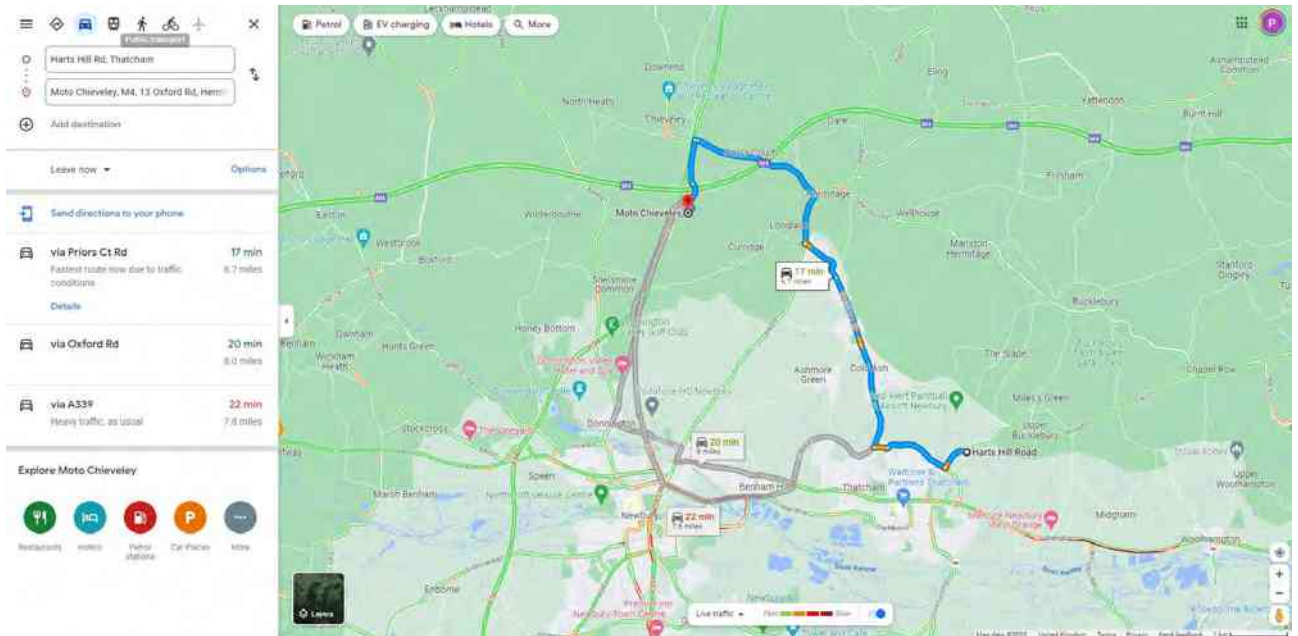
Journey Times towards Reading, PM Peak Hour – 21/02/2023



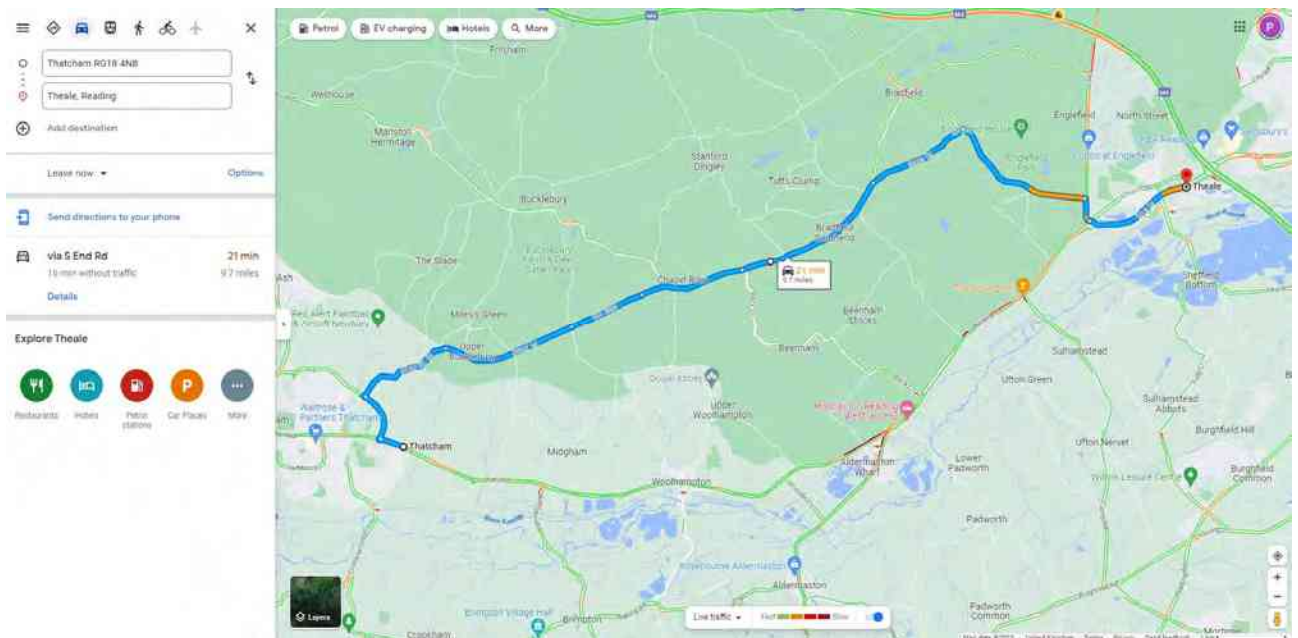
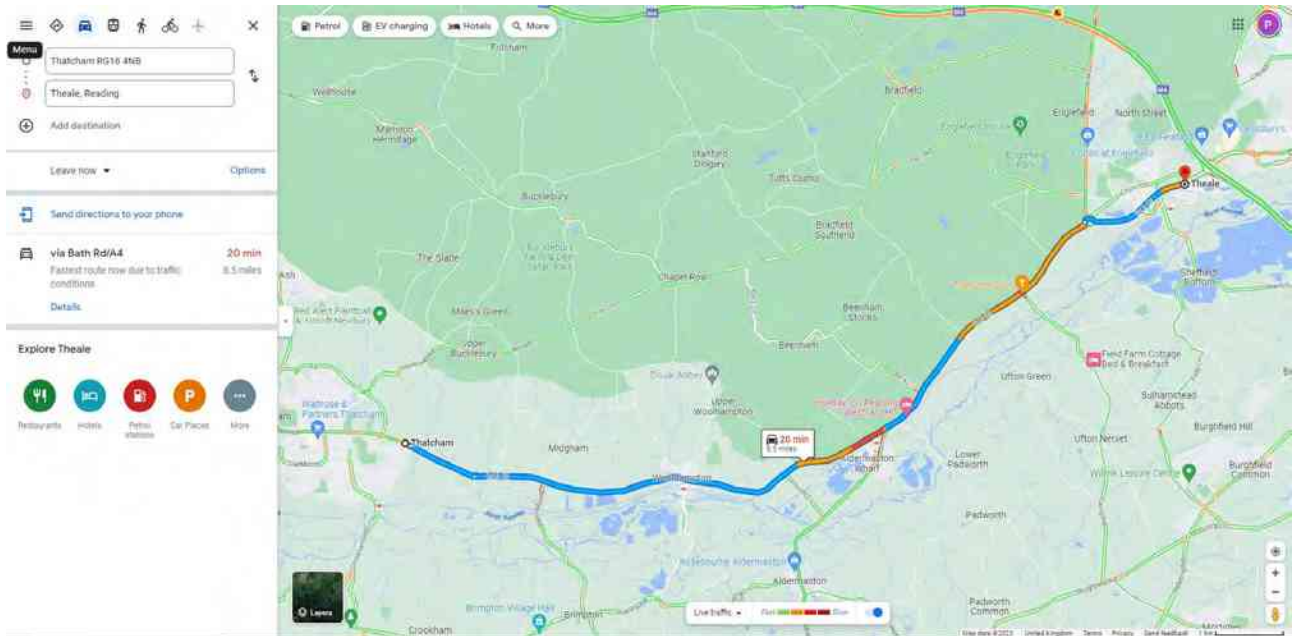
Journey Times towards M4 Chieveley, AM Peak Hour – 22/02/2023

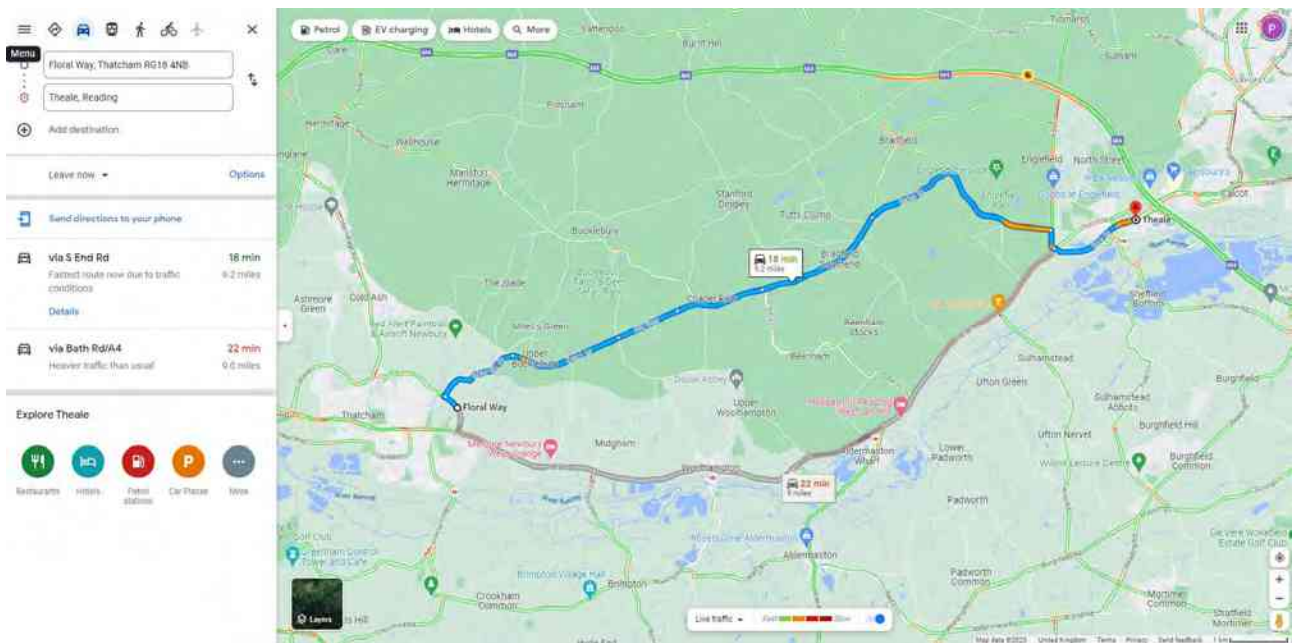
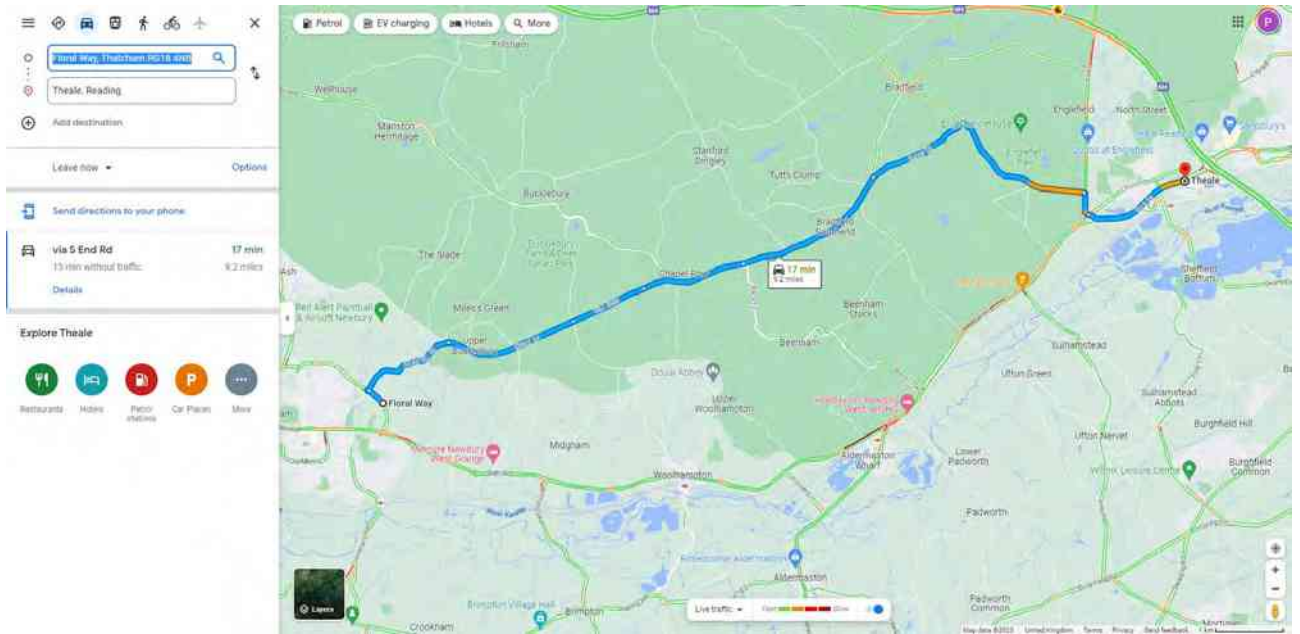


Journey Times Towards M4 Chieveley, PM Peak Hour – 22/02/2023

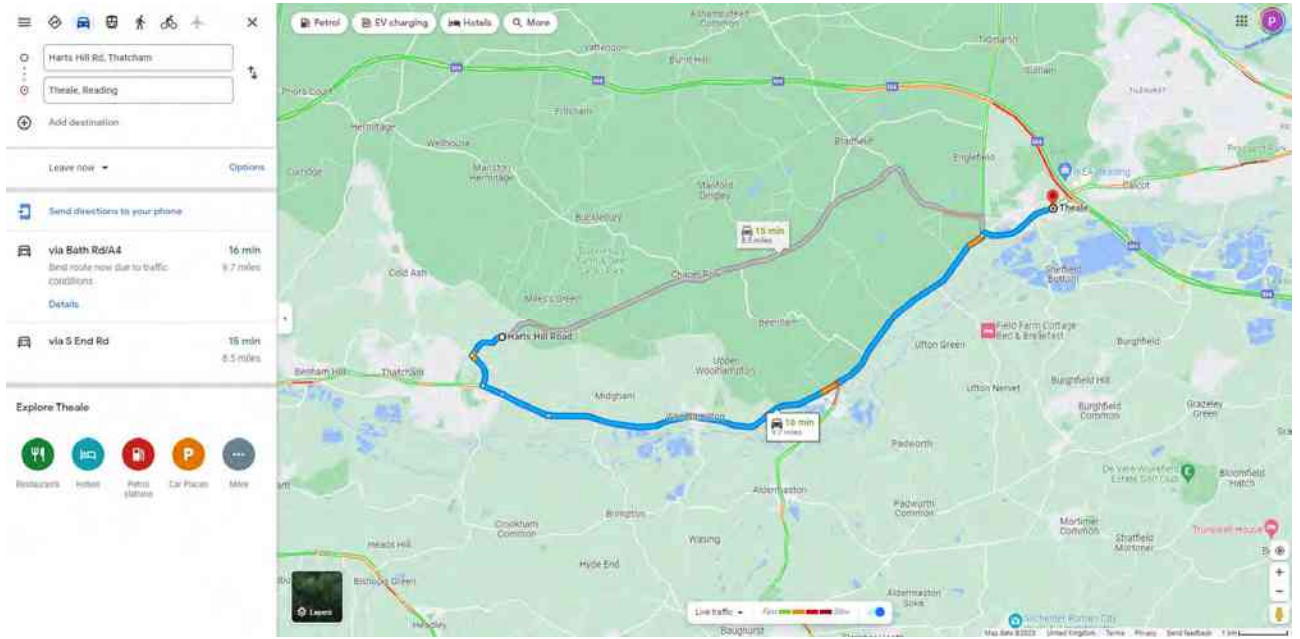


Journey Times towards Reading, AM Peak Hour – 22/02/2023

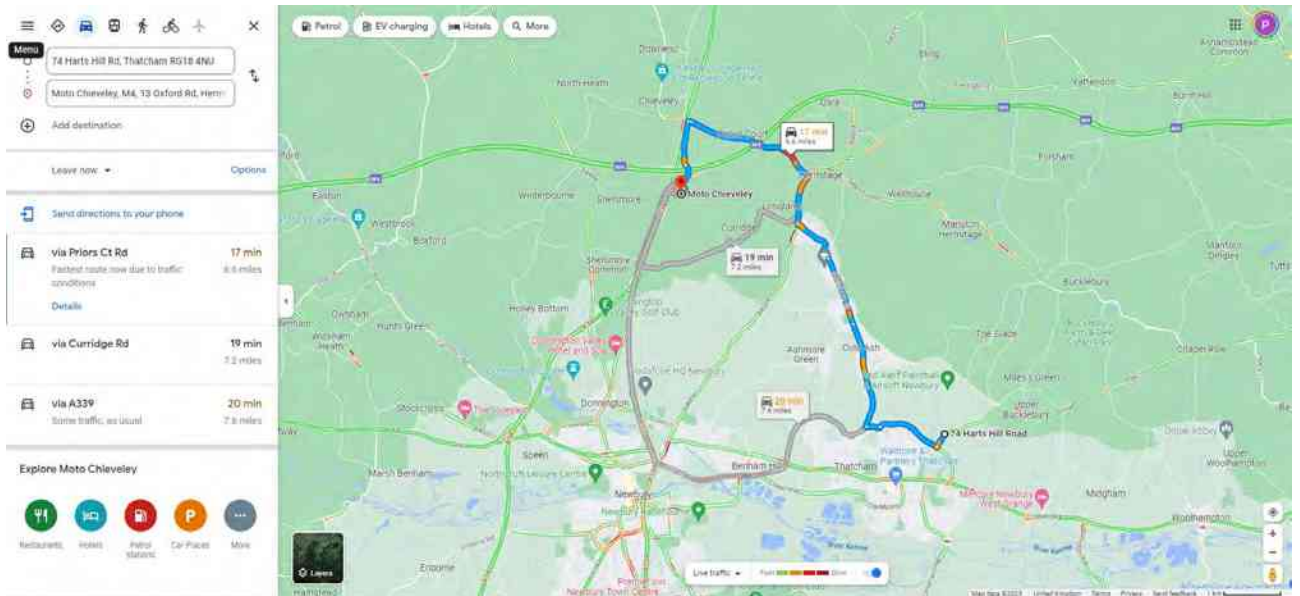


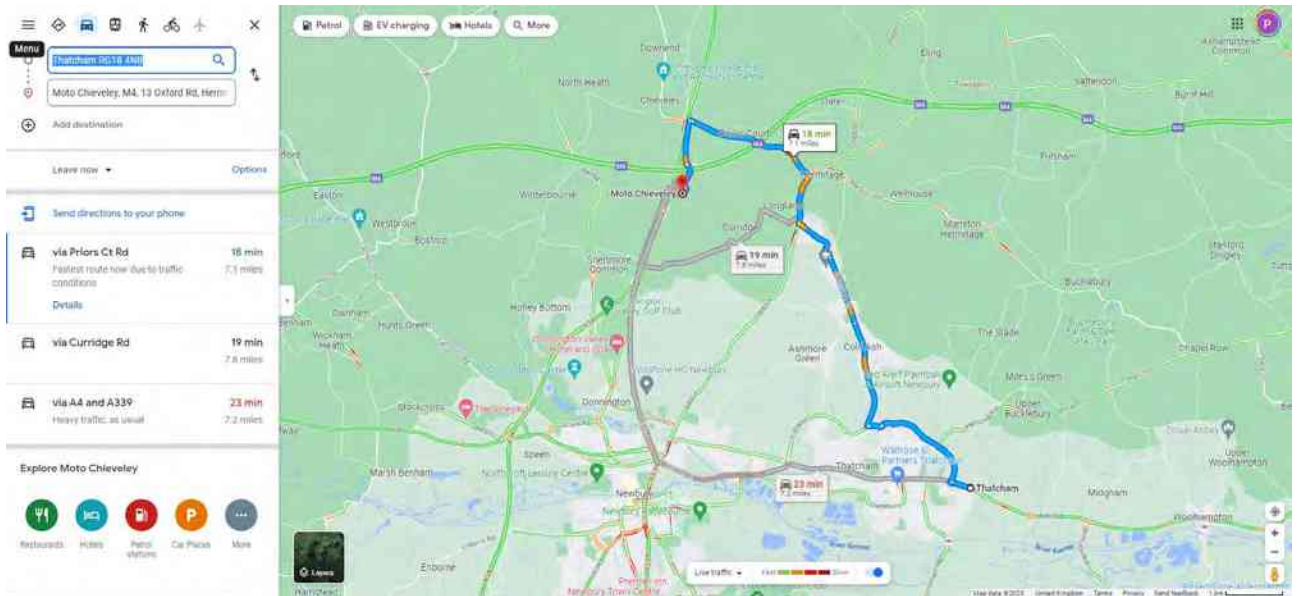


Journey Times towards Reading, PM Peak Hour – 22/02/2023

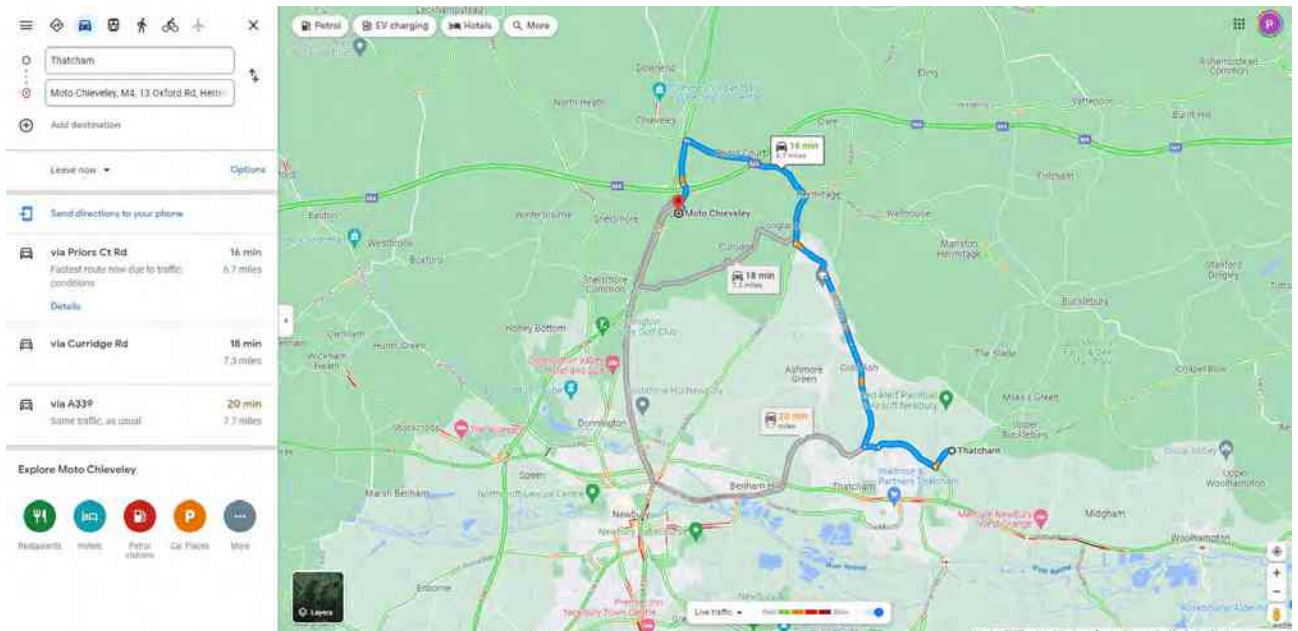


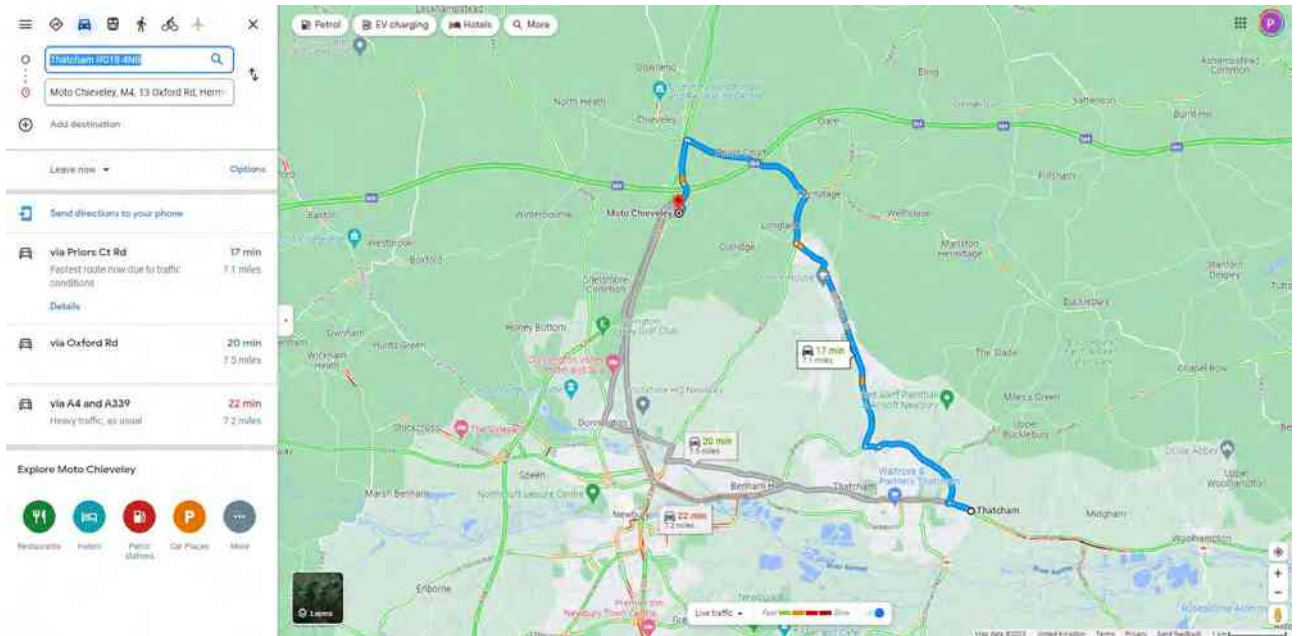
Journey Times towards M4 Chieveley, AM Peak Hour – 23/02/2023



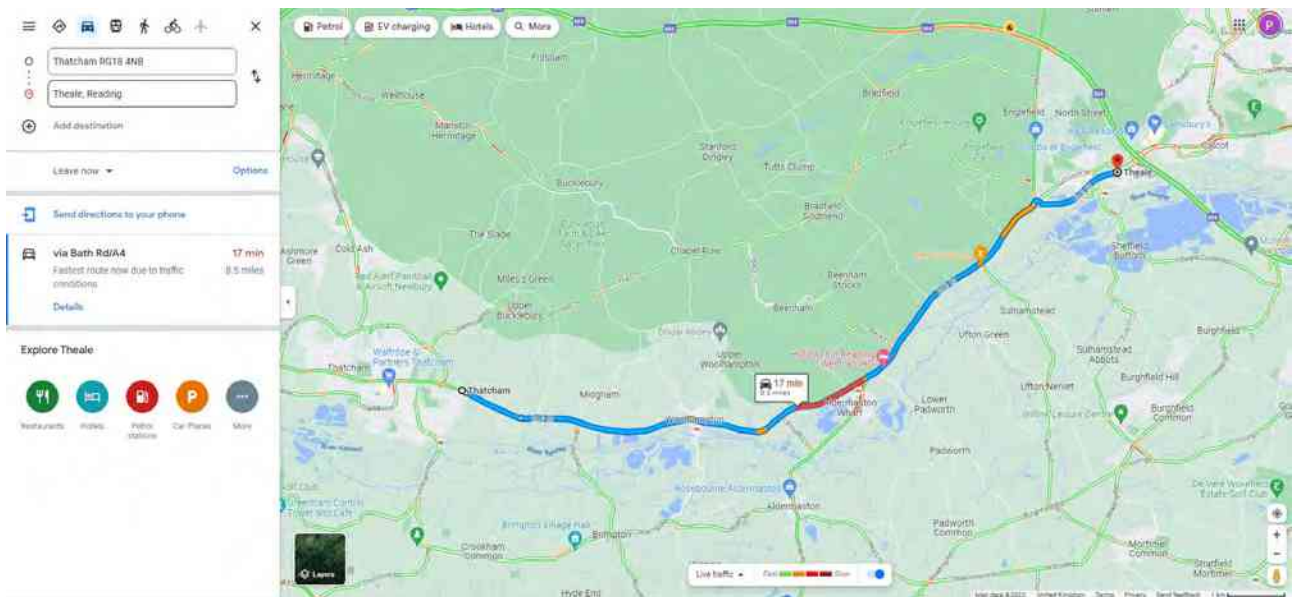


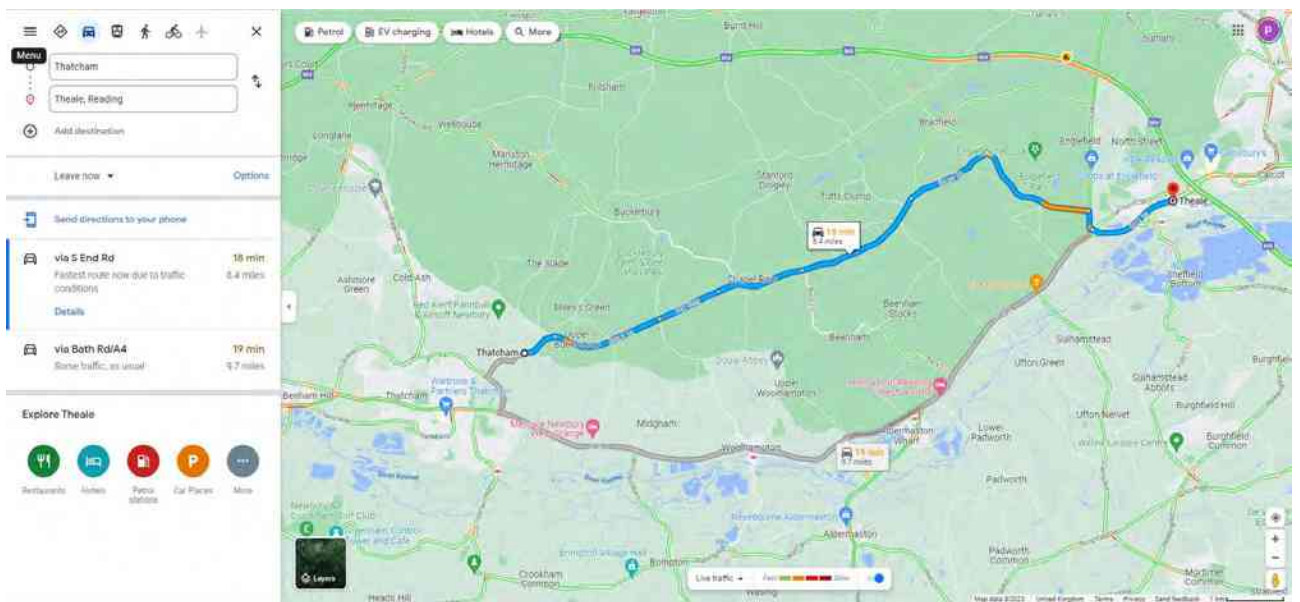
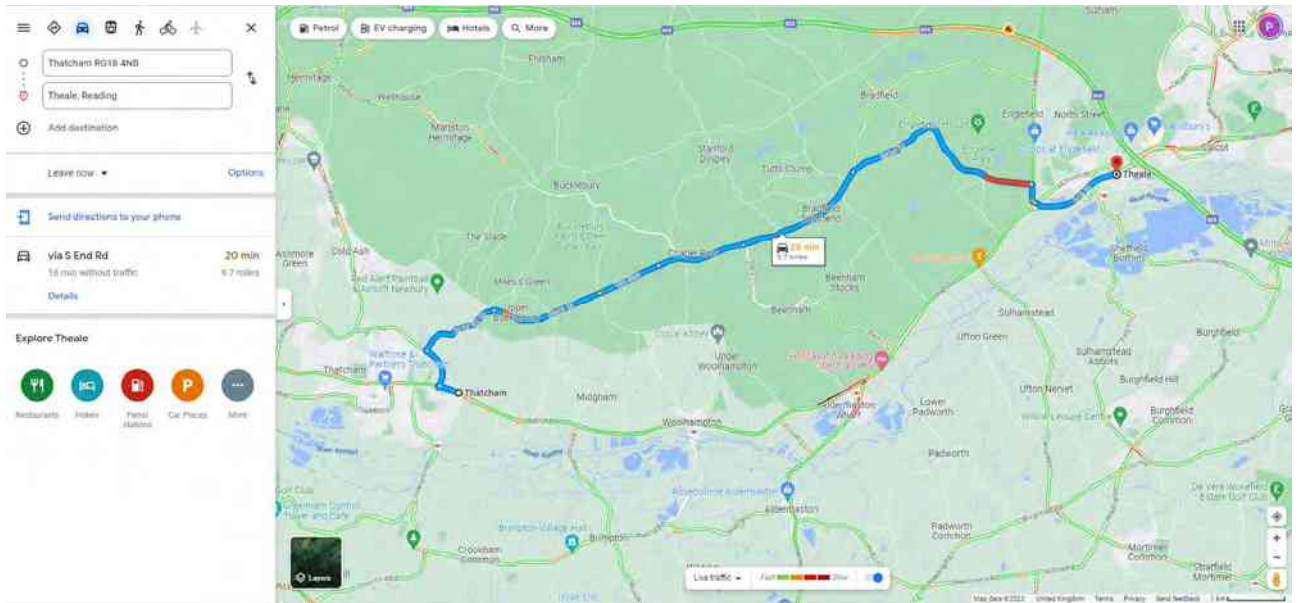
Journey Times Towards M4 Chieveley, PM Peak Hour – 23/02/2023





Journey Times towards Reading, AM Peak Hour – 23/02/2023





Journey Times towards Reading, PM Peak Hour – 23/02/2023

