

## **HOLYPORT RESIDENTS' ASSOCIATION RESPONSE TO RBWM'S**

### **EDGE of SETTLEMENT ANALYSIS for AREA 5C**

**RBWM text is in underlined italics. HRA comments in bold.**

#### Area 5C

##### Area Description

*3.327 The area lies to the south of Maidenhead, with its boundaries formed by the M4, the A308(M) and the Ascot Road. The area is approximately 25.5ha in size.*

##### Stage 2 Assessment

##### Gaps and boundaries

*3.328 The area is not located in a gap between settlements nor does it form part of the setting of a historic town.*

*3.329 The area has defensible boundaries formed by the M4, the A308(M) and the Ascot Road, which provide clear boundaries and could act to avoid the future encroachment of development.*

##### Countryside setting and topography

*3.330 The site is largely flat in nature and is characterised by open land with some mature trees and vegetation. It is not actively farmed.*

**From local knowledge this land was once a quarry back in the late 60s and early 70s from which much of the gravel was extracted for use in the construction of the J8/9 interchange and M4 embankments and some was supplied to the plant at Monkey Island Lane.**

**There is a small area close to the M4 and A330 corner of the site which was never extracted and of course the areas along the line of the Cut and a 20m strip along the line of the A330 were also undisturbed. The rest of the site had all the aggregate removed down to depths of over 8m. The land was restored to a lower level than the original, using builders skip waste of varying depths but averaging 2 - 3 m, this was then capped off with soil.**

**Builders skip waste could have been anything from wood, plastic, soil, paper, paint cans, brick rubble etc and as old asbestos was being actively removed from anywhere that it was installed it seems likely that asbestos may also be present. Can RBWM find any evidence of control on what was actually deposited there?**

**The base of the site is clay and there is a water table within the site. It seems to us that if building were ever to be agreed for this site, it would require the removal of the waste and importation of suitable hardcore, and/or major piling work.**

**In the RBWM EoS Analysis for Area 7B, situated to the South of the A308, an area that RBWM have rejected for development, the following statements appear;**

**The area consists of a former landfill site and is constrained by contamination buffers and would need to be remediated. Conclusion - Reject. Unacceptable adverse impacts of development have been demonstrated through consideration of the Stage 2 criteria. ....there are contamination / landfill gas issues.**

**These factors that resulted in Area 7B being rejected can also be said to apply to Area 5C.**

3.331 The topography of the area is generally flat, though the surrounding road network provides the appearance of the site being lower than its surrounds.

**We suggest that it is actually lower, due to the gravel removal as mentioned above.**

### 3 Area Analysis

#### Agriculture

3.332 The area has no agricultural classification.

#### Nature conservation and ancient woodland

3.333 The area itself is not designated for its ecological value.

**Like all wild areas there is little doubt that it contains a large assortment of wildlife.**

3.334 The area does not contain any ancient woodland.

#### Historic environment

3.335 The area contains a scheduled ancient monument and archaeological potential in the north.

#### Pollution

3.336 The north east of the area lies within an air quality buffer, however it is considered that the impact could be mitigated.

**RBWM have so far failed to mitigate against the vehicular air pollution at the junctions of Holyport Road and Upper Bray Road with the A308, so what mitigation could be expected in this case?**

#### Minerals

3.337 There are no mineral workings in the area, though there is a safeguarded minerals area to the north, beyond the A308M.

### Stage 2: Conclusion

#### Pass.

Unacceptable adverse impacts have not been demonstrated through the assessment of Stage 2 criteria.

**HRA considers that RBWM has failed to consider the problems of removing the waste including possibly asbestos, or other unknown contaminants; nor, in the case of a possible hospital, have they published any consideration of the major traffic increases and chaos that would result from that.**

### Stage 3 Assessment

#### Planning History / Background

3.338 There was a proposal in 1997 for a 'service area for eastbound M4 motorway traffic including fuel area amenity building travel lodge and parking' which was withdrawn. The area itself is currently open grassland with mature trees and vegetation. It is used for recreation events periodically throughout the year. There have been recent discussions about the possibility of locating a 'super-hospital' in the area.

**It should be noted that the Service Area Plans were vigorously fought against by local people under the banner of the Holyport Preservation Society. The proposal was defeated rather than being just withdrawn.**

**The identification of this area for a 'super-hospital' was done only by noting that Area 5C is an undeveloped site equidistant to major conurbations. The selection of 5C took no account of topography, flooding, local road conditions and access or potential for expansion.**

**M4 Junction 8/9 is an extremely bad location for a hospital because traffic on the road network local**

to J8/9 is already far too congested especially at peak times, and there can be no access to Area 5C from the M4 or Junction 8/9.

Traffic volume in this area is already so great that there is no way that the area can sustain the further increases in traffic which would result from a hospital. It seems very unlikely that emergency vehicles could with any certainty urgently emerge from or gain access to a hospital in this location.

MP Dr Lee's report advises that he envisages the hospital handling 729,448 patients per year, and that some 6,526 staff would be required. The amount of extra housing required for the staff and their families and the further pressure that the staff transport vehicles and their family transport vehicles would apply to local roads is a further problem. The staff would also impose extra housing requirements, whilst RBWM is already struggling to meet Central Government's current housing requirements.

The volume of traffic from vehicles bringing visitors to the 1015 patients would add to the staff traffic and the traffic bringing in-patients and taking them home. Further, as 1015 multiplied by 365 days per year equals 370,475, and Lee has already said that the hospital would handle 729,448 patients per year, it appears that Lee intends to deal with 729,448 minus 370,475 equals 358,973 out-patients per annum. These out-patients then, amount to an average of 983 per day, and their transport would add further chaos to the situation.

The Maidenhead Advertiser advised that 2,820 car park spaces would be required. This appears to be far from sufficient as we see also that the staff number alone will be 6,526.

Before RBWM asked for residents opinions on a hospital in this location, RBWM should have commissioned, (as this is a Central Government proposal, at Central Government expense - not at RBWM ratepayers expense), a comprehensive rigorous assessment of the numbers of and the origins and destinations of traffic within a 5 mile radius of Junction 8/9.

This assessment should particularly determine the traffic situation in the rush hours on all roads leading to or from J8/9. There have been instances where traffic is backed up from J8/9 as far as the Oakley Court Hotel on the A308, and beyond Holyport on the A330. On these occasions Holyport Road (an extension of the B3028 from Bray to Holyport) which connects the A330 with the A308, becomes completely filled with traffic from the A330 to the A308. At the last Holyport Road traffic survey of which I am aware (July 2013), Holyport Road was subject to 7,049 vehicles per day.

Regarding housing proposals, local residents have already been subject to unwelcome canvassing by property developer Bloor Homes despite the site's designation as Green Belt.

#### Green Belt and Countryside Character

3.339 The area comprises open land in the Green Belt. Whilst contributing to the Green Belt, it is not in a gap or the setting of a historic town. The strong physical boundaries to the area in the form of major roads stops potential future encroachment, however the containment also means that development would not be viewed against other built up areas from some perspective in the countryside.

3.340 The area forms part of the green 'entrance' into Maidenhead. Highly prominent development would impact upon this character. Mature vegetation screens views towards the sites from the Ascot Road, particularly the western side of the area. Whilst views are possible into the site from the M4 and the A308(M), the most prominent views are to the western side.

The site forms part of the valued green gap between Holyport and Maidenhead. It contributes to the rural nature of the area and as detailed is the green entrance to the Maidenhead area from the M4. As part of the Metropolitan Green Belt its function is to prevent the merging of towns and villages and maintain an area of openness. Development of this site would impact unfavourably on this ethos and present harm to the Green Belt.

3.341 The area is within the 'Settled Farmed Sands and Clays' landscape character area. This landscape

*has a diverse yet generally intact rural character. The M4 motorway corridor (west of Junction 8/9), which dissects this landscape, has only a localised impact on character due to the low lying nature of the landform and the presence of woodland copses and hedgerows which intercept views. The landscape character assessment considers the perceived quietness of this landscape and rural character make it sensitive to increases in traffic, noise and lighting, through farm diversification and residential development, for example.*

**Residents are supportive of these comments; restrictions presented by the surrounding road network impacts any development options. The land is not farmed other than as grazing.**

*The study deems the overall capacity for change as being low.*

### Area Analysis 3

#### Settlement and Townscape Character

*3.342 The eastern side of the area is in proximity to the residential properties in Willow Drive, Windsor Road and Priors Way. Notwithstanding the the self containment of the site, caused primarily by the surrounding main roads, development here may feel slightly detached and it would be more difficult to integrate development into the wider area.*

**We agree; the A330 is an extremely busy road and it is considered that little or no communication would take place between homes on opposite sides of the road. There is no sidewalk on the A330, and it is obvious that residents in any new development on Area 5C would have to drive to and from their destinations. If a hospital were to be built here the resulting traffic would make life intolerable for those living in the areas mentioned above.**

*3.343 The area predominantly is in proximity to the 'Late 20th Century Suburbs (1960s onwards)' townscape character area (10 X). This area type is characterised by medium density residential suburbs consisting of long curvilinear feeder streets with short subsidiary roads culminating in cul-de-sacs/dead ends. The area is also linked to the 'Industrial and Commercial Estates' townscape character area (17 N) and 'Villas in a Woodland Setting (14C)'. The former area is characterised by low density industrial and commercial development including industrial estates, business parks and offices, where development is within large plots, accessed by roads terminating in dead ends. The latter character area is characterised by an extremely low density residential suburb comprising large villas set in large, irregular plots, with dwellings occupy large footprints, set within extremely large garden plots.*

**The location of the site is more conducive to low key leisure and recreational use displaced from other areas rather than residential for the reasons stated if it has to be developed at all. The 'separate' nature of the site and therefore security of the site would be conducive to this use.**

#### Historic Environment

*3.344 This area contains a nationally important Mesolithic site, designated as a Scheduled Ancient Monument (NHL ref 1006974), known to be overlain with equally significant Saxon settlement. Lithic finds from the site suggest occupation through the late Mesolithic and into the Neolithic period, as well as some exploitation in the Bronze Age. Such finds do not occur in isolation and there is potential for similar deposits throughout this area. Any associated remains would be considered to be regionally or nationally important, and require preservation in situ, as well as consideration of their setting, which should also be protected.*

*3.345 However, large parts of this site outside of the scheduled area have been affected by gravel extraction and construction works which will have had a severe impact on archaeological deposits, usually resulting in serious truncation or total removal. Therefore archaeological assessment within a heritage statement should focus on known and demonstrable previous impacts, identifying (and testing) areas where potential is thought to have been removed, and assessing through field evaluation any areas outside the former gravel workings, where archaeological remains of significance may still survive. These works should be carried out prior to any detailed designs, so that appropriate mitigation*

can be ensured.

The historic environment should ensure that this site be excluded. The work involved in developing - removing the possibly toxic waste and piling into the clay subsoil - would damage the site as outlined in RBWM's paragraph 3.344.

As mentioned earlier, in the 1960's/70's this area, with the exception of the woodland, the border with the Cut and a narrow corridor around the site boundary, was excavated for gravel down to 8m. Some of this gravel was used for banking for the M4 extension. The land was then 'made good' with builders refuse, paint cans etc. Given the era of this work and lack of awareness at the time, this site could contain any manner of builders waste, including asbestos or worse.

Use of such an area for building would require the removal of this infill or substantial deep piling to reach solid ground. The nature of the infill also explains the lack of agricultural classification for this site.

The risks and costs of such an operation for an already restricted site with green belt status are prohibitive.

Residents report that unregulated disposal of highway maintenance waste, overlain with some soil, then grassed, has also recently impacted central drainage channels resulting in increased flooding on the site.

#### Biodiversity

3.346 The habitat of the area is predominantly grassland, with some mature lowland mixed deciduous woodland bordering the A308M and M4 to the west and south.

3.347 Some trees along the east side of Ascot Road are protected through Tree Preservation Orders.

There is a large area of mature woodland on the site which provides diverse habitats. Grasslands are occasionally used for the grazing of horses. Due to the rather private enclosed nature of this land residents generally cannot observe and monitor wildlife.

#### Flooding

3.348 The Cut runs along the northern boundary of the area. Approximately half of the area to the north and west is within floodzone 3a (high risk), with additional land within floodzone 2 (medium risk). The SFRA states that areas of 'high' probability of flooding are assessed as having a 1 in 100 or greater chance of river flooding (>1%) in any year, and are referred to as Zone 3 High Probability. Development within these areas may only be considered following application of the Sequential Test and where necessary the Exception Test. More vulnerable development (e.g. housing) should be avoided wherever possible. As such it is deemed inappropriate to propose land for housing on the south west of the site in floodzone 3. Any development on land covered by floodzone 2 would require an application of the Sequential Test. Therefore any development in this area should be focused towards the east.

The Cut regularly floods, and lakes of standing water are frequently observed centrally on the site created by groundwater emergence. Additional areas of water are observed near the woodland and NE of the site. Capturing images is difficult as motorways or fencing surround the area. As flooding is spread throughout the site development would be difficult and could pose a threat to nearby housing as rainwater run-off normally absorbed by the fields could increase flooding in the nearby roads. The land level was also lowered following gravel extraction.







**EA Map shows that very little of Area 5C is outside the main floodzones.**

3.349 All sides of the area are likely to be subject to noise pollution, and other associated air quality issues from the strategic highway network, and A-roads. However it is considered that the adverse impact could be mitigated through careful design.

HRA3 RBWM LP 5C.doc

**development.**

Resources

3.350 This area is not classified as agricultural land.

**The area would be suitable for grazing providing boundaries were secure. Arable farming could be problematic due to risk of exposing builders' waste infill. Residential development would incur the issues already raised above.**

3 Area Analysis

3.351 The area falls within groundwater Source Protection Zone (SPZ) 3. Residential development is considered unlikely to cause adverse impacts on water quality.

Infrastructure

3.352 Thames Water has significant concerns regarding Waste Water Services in relation to this area.

Specifically, the sewerage network in this area at present is highly unlikely to be able to support the demand anticipated from this development. Significant drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a detailed drainage strategy would be required from the developer to determine the exact impact on the infrastructure and the significance of the infrastructure to support the development. It should be noted that in the highly likely event of an upgrade to assets being required, there could be a period of over 3 years required for the delivery of the infrastructure.

3.353 The local network is small diameter, or may have rising mains, so new and upsized network would be required. The cumulative impact of other areas would be significant. Therefore would need to assess impact on network and Sewage Treatment Works.

**Sewage currently emerges from manhole covers in nearby housing areas in Hearne Drive and Ascot Road at times of heavy rainfall. The local system is currently over-subscribed and would require an extensive upgrade to cope with existing housing let alone new developments. See below.**

**Both primary and secondary schools are over-subscribed with forward forecasts showing a shortfall of places without new housing development.**

**5C represents one of the last areas of open green space between Holyport and Maidenhead and holds far more scope for leisure activities and continues community event use.**



**Hearne Drive Sewer overflow**

3.354 Currently local primary schools are mostly full and there are limited opportunities for further expansion.



*It is therefore likely that a new primary school would need to be built, particularly if other areas locally were developed. There is space on secondary school sites to expand, although this may be needed for children already in Maidenhead primary schools.*

**There is currently a waiting list for the local Primary School. It is unacceptable that local children be driven out the area to other schools if new developments are approved without the infrastructure being in place first.**

*3.355 The Maidenhead area has a shortfall of provision in terms of total amount of open space balanced against the recommended local standard for each typology. The total shortfall of open space provision is primarily due to significant shortfalls in natural and semi-natural greenspace.*

*3.356 The area has access to existing community facilities in Maidenhead town centre and Holyport.*

**Access to any educational, community or other facilities would only be practical by car, adding to the existing traffic problems.**

#### Highways and Accessibility

*3.357 The area has frontage and direct access to the A330 Ascot Road and this road is the site's connection to the rest of the highway network primarily via the roundabout junction at Bray Wick. This roundabout junction already has five arms; another arm off the roundabout junction to serve the area is considered to be unsuitable since it would likely cause problems with conflicting vehicle movements and drivers misinterpreting signals.*

*There may be scope to provide two points of access (with right turn facilities) to the Ascot Road but this would require careful consideration of junction spacing between any additional access to this site and existing points of access. Subject to agreement from the Department for Transport/ Highways Agency (Dft/HA) there may be another way to provide secondary access to the site and that would be by way of an entry only off the A308(M).*

**We consider that Dft/HA is very unlikely to approve such an access off the A308(M). We understand that access off the motorway network has to be onto an A road as a minimum.**

*3.358 New priority T-Junction access points to the area from the A330 Ascot Road should be provided, and a speed check should be carried out. If speeds are consistently being exceeded then it may be prudent to introduce appropriate mitigation measures as part of any development. In any event, a series of crossing points at least by way of pedestrian refuges and junction protection traffic islands together with environmental features should be introduced to help address any future issues that may arise with regard to safety and severance.*

*The proposal would add to peak hour congestion which would need to be tested together with any other areas that emerge. This would be in addition to junction operation modelling testing which would be undertaken through a Transport Assessment. Although the area has local highway issues, suitable mitigation measures can be sought to overcome these issues.*

**It is already well known that speeds and traffic volumes on the A330 are too high.**

*3.359 The nearest local centre is approximately 750m away to the south. The nearest health facilities are approximately 750m to the south of the area.*

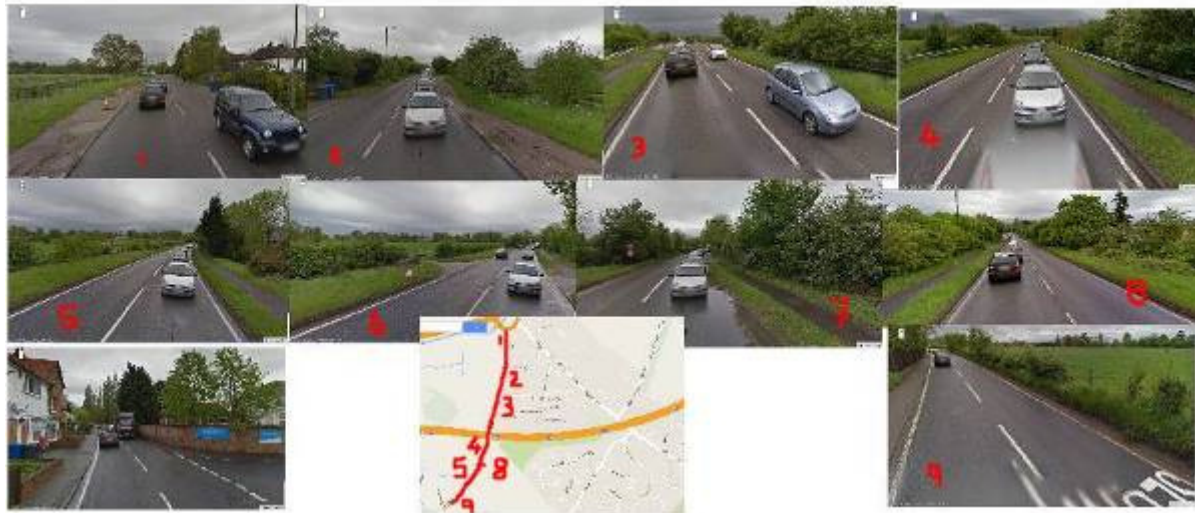
**Access to any educational, community or other facilities would only be practical by car, adding to the existing traffic problems**

*3.360 The area is approximately 150m away from the national cycle network, benefits from bus routes along Ascot Road to the east, and is 1.7km away from Maidenhead train station. The strategic road network is easily accessible to the north.*

**The site is bordered on 2 sides by motorway; the remaining border is the very busy A330 Ascot Road which regularly has traffic jams of half a mile to over a mile to access the Braywick roundabout at**

peak times. There is no continuous footpath along this route. Traffic leaving the motorway and heading in the Bracknell direction can be dangerously fast moving until re-crossing the M4 and encountering the first bend at speed. Additional approved house-building in the Bracknell area will compound the problem as will the new Holyport College, resulting in a very busy over-subscribed road. There is little possibility of widening without loss of protected ancient hedgerow and the A330 south quickly reaches a very narrow stretch enclosed by housing and high brick walls.

Cycling on this road would be very dangerous.



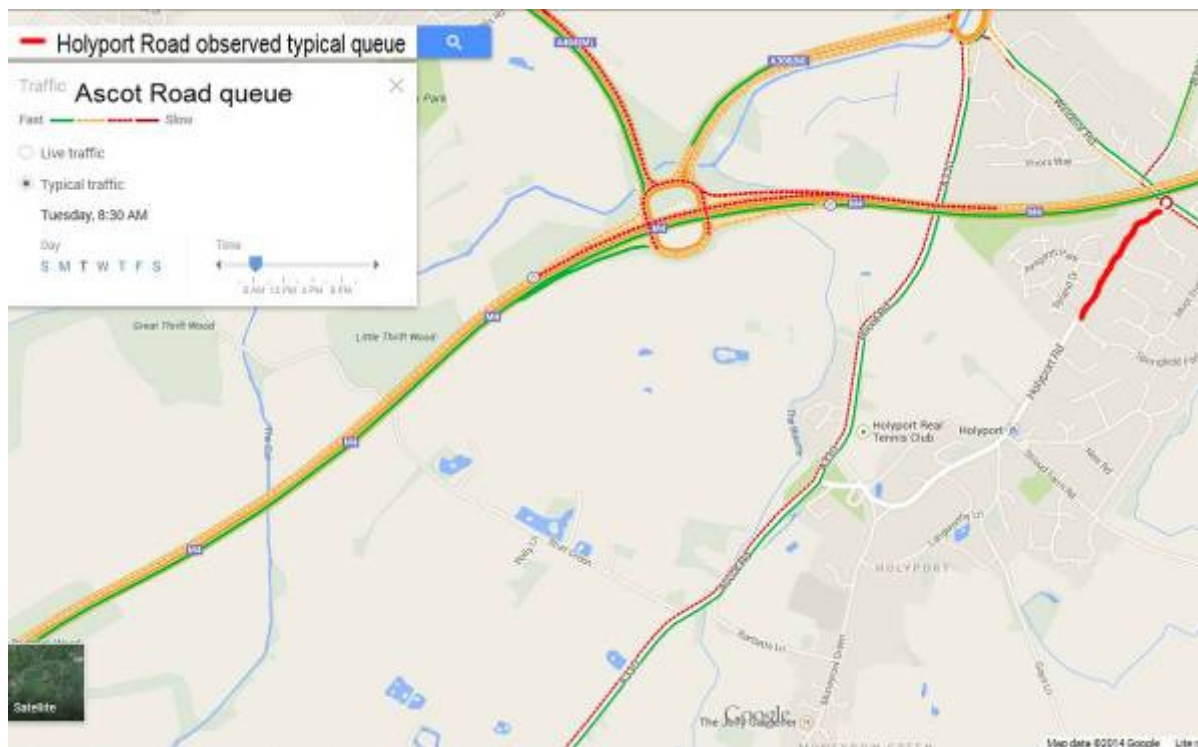
‘Travelling’ along the length of a typical morning peak jam looking in each direction, measured on Google Earth at 0.5 miles in May 2012. Bottom left is tight squeeze by Holyport Green.



Above by Lodge Farm Below past farm crossing M4 - Tail back from roundabout to Lodge Farm



Roundabout in sight after half a mile





**Google map monitoring traffic on a Tuesday 8.30 am slow traffic back to Sturt Green 1.2 miles**

**Holyport Road not in statistics however observed jam of over a quarter of a mile. Google date for the morning peak on weekdays monitors slow moving tailbacks from between 0.4 miles to 1.2 miles.**



**The narrow point approaching Hearne Drive travelling north.**

**Below - Lorries on the Ascot Road through Holyport.**



Sustainability Appraisal

3.361 The area scored -14 when assessed against sustainability appraisal objectives.

Housing: Edge of Settlement Analysis (Jan 2014) 73

Area Analysis 3

Availability

3.362 The entire area has been promoted through the SHLAA (ref: WM BR 0018). The promoted land equates to approximately 25.5ha.

Sustainability for housing is very low however the availability of the land is the result of a land owner keen to sell their holding especially for a premium if for housing.

**CONCLUSIONS**

Flooding, traffic, sustainability and infrastructure simply do not support housing development on this land before even addressing green belt issues.

Lack of formal agricultural use other than perhaps some grass cutting for animal feed presents an area that can appear neglected and vulnerable to unauthorised occupation. In private ownership the opportunity for the general public to enjoy the open space is limited.

There is some potential for leisure use perhaps for those facilities displaced from elsewhere. The area is too small for a golf course. The location of any administration buildings would require careful positioning mindful of the ex-quarry landfill. Noise and lighting pollution could however affect local amenity.