

West Berkshire Local Plan Review
Submission (Regulation 19) Consultation
Representations on behalf of Cold Ash Parish Council
March 2023

Contents

- 1. Executive Summary**
- 2. Cold Ash Parish Regulation 18 feedback 2021**
- 3. Extraordinary West Berks Council Meeting concerning Reg 19 Local Plan**
- 4. The following sections detail 2023 feedback and data covering the points of objection raised by CAPC within the LP specifically related to the impact to Cold Ash as a result of the proposed THAT20 development.**
 - 4.1 Traffic & Transportation**
 - 4.2 Spatial issues**
 - 4.3 Education**
 - 4.4 Healthcare**
- 5. Appendix A**

1. Executive Summary

Cold Ash Parish Council (CAPC) has made the following submissions in response to the West Berkshire Council (WBC) Local Plan Review (LPR) Regulation 19 (Reg 19) Consultation. The representations build on CAPC's objections to the regulation 18 *reg 18) review in 2021 and state that the regulation 19 version of Local Plan Review contains numerous significant flaws that cannot be fixed before the document is submitted for examination.

We specifically address the proposed THAT20 development for North East Thatcham, initially for 2500 homes and later for 1,500 homes, and its impact on CAPC and our residents. We expressed our opposition to this development in 2021, arguing that the proposed number of homes needed to be significantly reduced, and that the infrastructure to support any such development needed to be significantly improved and considered. Because neither point is adequately addressed in LPR Reg 19, we have the same principal objections but build on them here.

The proposed THA20 development appears to have been chosen in response to the constraints of potential development areas, rather than as a result of a balanced review of options. Concerns have been raised about the lack of consideration for necessary infrastructure, as well as the impact on surrounding villages and transportation networks. Furthermore, the impact on Cold Ash Parish's quality of life and community is a concern, and the Parish Council strongly urges West Berkshire Council to reconsider and scale back the development. If the development's size is not reduced, there are serious concerns about its long-term viability and impact on Cold Ash Parish.

This submission includes specially commissioned report data outlining the key reasons why we believe THAT20's traffic impacts on CAPC are not correctly considered and therefore flawed. It also emphasises previously argued objection points, but with new and expanded data to support those positions.

Given these flaws, our previous objections, the additional points in this submission, and the strength of feeling locally within our parish about the impact of the proposed development of THAT20, we conclude that the Local Plan Review and its accompanying evidence base are insufficient to move forward and should be either withdrawn, reworked and / or significantly reduced in housing numbers.

2. Cold Ash Parish Regulation 18 feedback 2021

CAPC provided a formal response to WBC Reg18 Local Plan consultation dated 4^h February 2021. A full copy of this response can be found at the following URL address:

<https://coldashpc.org.uk/the-council/planning/west-berkshire-local-plan-review-to-2037/>

In summary our CAPC response highlighted the following key areas of comment and objection to the proposed LP during regulation 18 consultation:

- The proposed THA20 development is in response to constraints placed on potential development areas, such as West Berkshire District Council decisions regarding AONB and other restrictions in AWE and flood zones.
- Development has been chosen in response to limiting development in the AONB, without regard for necessary infrastructure or the impact on surrounding villages and transportation networks.
- To address transportation and travel issues, significant infrastructure improvements and mitigation would be required.
- Quality of life issues will need to be addressed in this large-scale development. Historically, similar developments have resulted in issues with isolation and quality of life.
- The impact on Cold Ash Parish could result in the loss of iconic views, increased traffic, noise, pollution, and strain on recreational facilities.
- Parish Council urges WBC to scale back strategic development and more evenly distribute housing.
- Serious concerns about the development's long-term viability if its size is not reduced.
- Current traffic through the parish is already high, and WBC traffic model growth is expected to have a significant impact on the parish.
- Concerns about long-term mitigation without destroying the character of settlements, as well as firm evidence, are required.
- A limited road network with only 22% having pavements, and residents who are subjected to noise and air pollution.
- Concerns that promised facilities in the policy may not be delivered, and request for policy wording change from "expected to deliver" to "shall deliver".

3. Extraordinary West Berks Council Meeting concerning Reg 19 Local Plan

CAPC agrees with and supports the WBC councillors' proposals for consideration at the extraordinary meeting of WBC March 2nd 2023 item 3 concerning the Local Plan review. CAPC agrees that the following omissions and ambiguities clearly necessitates that the Council should abandon the consultation on the Local Plan and undertake a new Regulation 19 Consultation in the future once these issues have been rectified:

<https://decisionmaking.westberks.gov.uk/ieListDocuments.aspx?CId=116&MId=7300&Ver=4>

- The housing numbers for northeast Thatcham were stated to the Council as a reduction from 2500 dwellings to 1500, but the Regulation 18 Consultation only envisaged 1250 dwellings to be built, which has now increased to 1500. The number of homes proposed for this site could therefore be increased to the original 2500 when the Plan is reviewed after 5 years or in the next plan period.
- The update of the Housing and Economic Land Availability Assessment (HELAA) includes a large number of sites that have been added since the last update, which have been rejected. Councillors could not have been aware of this when they approved the Reg 19 document with its list of sites.
- The Air Quality Assessment is based on the Local Plan Review (LPR) running to 2037, not 2039, which affects the traffic levels forecast for the end of the LPR period and the resultant traffic pollution.
- The Council has not complied with its legal duty to cooperate with Berkshire West Clinical Commissioning Group concerning the size of the GP surgery promised for northeast Thatcham.
- The Council has not consulted properly with Thames Water over the time needed for provision of water and foul drainage, and therefore does not know if the houses for northeast Thatcham are deliverable in SP17 in the plan period.
- The Settlement Boundary background paper shows the Thatcham settlement boundary already extended to the line needed for the original 2500 houses, yet the plan now refers to a minimum of 1500 houses. This could be read that 2500 dwellings are still suitable and can be developed within the extended boundary.
- The new provision for secondary schools in northeast Thatcham is not consistent with Council guidelines for the minimum viable size of a secondary school.
- The Infrastructure Delivery Plan (IDP) has omitted any costs for a new secondary school in northeast Thatcham over the plan period.
- The Secretary of State's Written Statement of 6th December 2022 should be taken into account by the Council, which removed the need to maintain a 5-year housing supply for Local Authorities with up-to-date Local Plans, removed top-down housing targets, and gave a two-year transition period for LAs in the final stages of preparing Local Plans.

4. **The following sections detail current feedback, data and the points of objection raised by CAPC within the LP specifically related to the impact to Cold Ash by the proposed THAT20 development.**

4.1 Traffic & Transportation

Key Traffic & Transportation Objections to THAT20 (SP17) in the Local Plan

Following a thorough examination of the transportation evidence base (See Appendix A *Study conducted by SW Transport Planning Ltd in February 2023*), serious concerns have been raised about the dependability of the modelling outputs. The WBSTM is a broad-area, strategic traffic model designed to guide strategic decisions about the district's future growth, with a focus on key traffic corridors. According to the evidence in this report, there are concerns about the model's ability to accurately forecast impacts at the local level, including within Cold Ash parish. *Specifically:*

- Despite the widely varying levels of growth and variable mitigation assumptions built into each test, there are virtually no differences in the forecast traffic flows for each of the model scenarios, as noted in Section 3 *of our study*. A key finding from the modelling is that full Local Plan growth is expected to result in traffic flow reductions in many areas of Cold Ash parish, with only minor increases elsewhere. Given the scale of development in the Local Plan and the proximity of the THA20 site, this appears to be a highly improbable conclusion, casting doubt on the modellings reliability. The most recent Local Plan Forecasting Report recognises that modelling is an iterative and ongoing process. This review shows that more work is needed to fully understand and improve the model's functionality in the Cold Ash area, as well as possibly in other rural areas.
- THA20 consideration includes bespoke trip generation rates that are significantly lower than the default trip rates built into the WBSTM. While the principle of using bespoke rates is not unreasonable, the methodology used in this case, as described in Section 2.4 *of our study*, is flawed and underestimates the likely trip generation. In addition, additional trip discounts have been applied to account for non-highway mitigation measures. This equates to a 7.5% reduction in car trips due to assumptions about increased bus patronage and increased use of walking and cycling modes of transportation. Although it is a minor change, the predicted reduction is based on unsubstantiated assumptions and relies on aspirational mitigation measures that may not be implemented.
- Furthermore, as mentioned in paragraph 2.4.2 *of our study*, the traffic modelling currently does not include the full level of Local Plan growth required to meet the District Council's target of 5,510. There is a 759-unit housing shortage. According to the Local Plan Forecasting Report, a portion of this shortfall (325 dwellings) may need to be provided on Cold Ash sites CA12, CA16, and CA17. Clearly, this would have a direct impact on the parish's road network, but it is not currently accounted for in the modelling.

Given the above, it is believed that the WBSTM outputs do not accurately reflect the changes in traffic flows that are likely to occur within Cold Ash, and their significant impact on the parish. Thus, we conclude that the current evidence base does not provide a solid foundation for determining the traffic impacts of Local Plan growth.

Please see Appendix A for the Full detailed Traffic assessment study of the Transport Evidence Base contained in the Local Plan , its review and conclusions.

4.2 Spatial issues

We object to the THAT20 proposed development on the grounds that it would significantly impact spatial and coalescence policies detailed in our emerging Neighbourhood Development Plan (NDP). We believe that a scaled down solution or further work is needed where these concerns can be addressed properly.

Why? We state in our emerging NDP CAP 1 Policy (Reg14 underway) that Development shall *'preserve or enhance the character or appearance of the area, including the setting of the North Wessex Downs AONB'* In addition *'Such development must not individually or cumulatively result in physical and/or visual coalescence and loss of separate identity of the individual settlements in the parish (Cold Ash or Ashmore Green) from neighbouring settlements, and from each other'*

We have significant concerns that such a large development would run against these policies and eventually not allow us to uphold them within the parish. For other local parishes these spatial policies would also be broken completely.

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.*

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.

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.

Further we believe that the development would put significant pressure on our proposed 'buffer zones' to maintain our ability to protect the Cold Ash parish separation.

The rural 'buffer zone', which has been identified by the community as the areas where development would most likely lead to coalescence, impacting the character of the villages. Hence development should be avoided in this buffer zone, but any development that significantly compromises or reduces the green space buffers between any of the settlements will not be supported by policy CAP1.

We state in our emerging NDP (CAP 1.3) that *'In determining development proposals substantial weight will be given to the value of using suitable brownfield land within the settlement boundaries for either homes and/or other identified needs, or to support*

appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.'

We feel that this has not been adequately considered in the LP and additional work is required to explore the potential this approach would bring. Indeed CPRE (The Countryside Charity) Berkshire is encouraging members to take part in a public consultation on West Berkshire's Local Plan Review, which will include future development and housing distribution. The organisation is advocating for a review of the current site selection process and the use of brownfield sites rather than sacrificing countryside or overburdening local villages with development. According to CPRE Berkshire, there are 359 brownfield sites in Berkshire that could accommodate over 21,000 houses, with West Berkshire alone having 53 such sites capable of providing 2,837 new homes without the need for building on farmland or countryside. CAPC supports this view as stated in our Cap 1.3.

4.3 Education

The education plan presented in the Local Plan Review is inadequate and requires additional work before it can be fully considered. The plan lacks coherence, is contradictory and incomplete, and fails to meet West Berkshire Council's obligation to provide educational facilities for children.

The provision for education in the Local Plan Review is not clearly defined, with no end-to-end plan presented. As a result, West Berkshire Council's obligation to provide educational facilities for children is breached, rendering the plan for a large new housing development completely unsound.

The lack of effective or justified education provision across the various proposed developments makes estimating the subsequent impact on traffic impossible. The placement of a secondary school in the North East Thatcham development under policy SP17 would result in a significant increase in traffic throughout the Thatcham area, which has not been adequately considered in the LPR's traffic plans and modelling.

Furthermore, the provision for primary school education is ambiguous and contradictory, with no data or evidence on planned school numbers or 'form entry' requirements. While the LPR proposes that £12 million will be sourced from the SP17 developers to fund primary education provision, there is no recent data to assess whether this funding would be sufficient to deliver the required education provision.

Secondary Education Concerns:

- Policy SP17 in the Regulation 18 emerging draft Local Plan (2020) stated the expectation of a new 8FE secondary school
- Policy SP17 of the Regulation 19 consultation reduced the provision to only land for secondary provision
- Thatcham Strategic Growth Study indicates that planned strategic development at a 6-8FE secondary level is likely necessary to meet demand
- The provision of land sufficient for a 2.5FE Secondary School is below the minimum viable size for a Secondary School
- West Berkshire Council School Places Plan 2010 states that a 6FE secondary school will be considered as a minimum requirement for major new housing developments
- Department for Education's 'A guide to new mainstream free school revenue funding 2022 to 2023 (June 2022)' states that secondary provision should have a minimum of 4 forms of entry of 30 pupils (total of 120)
- Provision in SP17 for "Secondary provision - Land to meet the impact of the development" is inconsistent with West Berkshire Council's own policy for secondary education and would not receive funding from Government
- Kennet School and Trinity School are currently at full capacity, and there is no capacity in these schools to serve the expected number of secondary pupils of the proposed development
- The Infrastructure Delivery Plan of January 2023 only has a figure of £5,027,613, which cannot be the cost of a new secondary school, and the policy is silent on how the building costs for a secondary school would be funded.

The situation for Bucklebury and Cold Ash secondary school students is unclear, with no details on the location of the land to be provided for secondary education provision, and thus no way of assessing its suitability, deliverability, or achievability. With a 40% reduction in housing allocation in the 2023 LPR (2022 to 2039) to 1500 houses, a secondary school

simply cannot be sustainable or deliverable in this location, according to the Thatcham Growth Study.

Furthermore, the Thatcham Growth Study noted that the education provision was based on WBDC data on pupil yield from a 2011 study, rendering the use of 11-year-old data insufficient. Although the LPR now states that land will be provided for development, the secondary school provision plan remains unsound for the following reasons:

- There is no convincing evidence of the number of students the school will serve.
- It is unclear where a school would be located within the proposed development.
- The number of Form Entries is not specified, but anything less than a 6FE school is considered unsustainable.
- There is no evidence that the proposed funding is sufficient to meet the Council's obligations to provide education because the timing and responsibility for funding are unclear and have not been adequately costed in the viability appraisals.

West Berkshire Council is required to make arrangements for adequate school provision, but the LPR does not define or demonstrate how this obligation will be met across all school years. As a result, it is clear that the education plan presented in the Local Plan Review requires additional work before it can be fully considered, and the inspector should reject it in its current form.

4.4 Healthcare

CAPC is concerned about the provision for Healthcare in the LP and its potential knock on to that provided to existing parishes. Specifically:

The proposed GP surgery should have been evaluated for viability as part of Policy SP17's Sustainability Appraisal. Healthcare is identified as a key sustainability issue in the Sustainability Appraisal, but the single sentence in Appendix 5 is insufficient and appears to have been written without taking into account the specific proposals in Policy SP17. As a result, the Sustainability Appraisal is not legally compliant.

Given the expanding range of NHS healthcare services provided through primary care, we are concerned about the viability of the proposed 450 sq. metre GP Surgery in North East Thatcham under Policy SP17. We also question the lack of any discussions between West Berkshire Council and healthcare groups about the size and impact of the proposed surgery, and propose that a Health Impact Assessment be conducted before finalising the facility's size in the draft Local Plan to avoid potential risks.

5. Appendix A

West Berkshire Local Plan Review of Transport Evidence Base

Cold Ash Parish Council

February 2023

Contents

1. Executive Summary	2
2. Cold Ash Parish Regulation 18 feedback 2021	3
3. Extraordinary West Berks Council Meeting concerning Reg 19 Local Plan	4
4. The following sections detail 2023 feedback and data covering the points of objection raised by CAPC within the LP specifically related to the impact to Cold Ash as a result of the proposed THAT20 development.	5
5. 5.1 Traffic & Transportation	6
6. 5.2 Spatial issues	7
7. 5.3 Education	9
8. 5.4 Healthcare	11
9. Appendix A	12
10. Introduction and Background Context	1
11. Review of Evidence Base	2
11.1 Scope	2
11.2 Phase 1 Transport Assessment (December 20)	2
11.3 Phase 2 Transport Assessment (July 21)	3
11.4 WBSTM Local Plan Forecasting Report (March 22)	4
12. Traffic Forecasts and Impacts	7
12.1 Assessment of Model Outputs	7
13. Objections to Local Plan	12
13.1 Points of Concern	12

6. Introduction and Background Context

- 6.1 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 THA20 comprising 2,480 dwellings and 189 jobs; the largest single allocation within the WBLP.
- 6.2 The site lies on the boundary of Cold Ash Parish and will have significant implications for the road network within the parish.
- 6.3 The WBLP is supported by an extensive evidence base, underpinned by the West Berkshire Strategic Traffic Model (WBSTM). The traffic modelling work is presented in a number of technical reports prepared for West Berkshire Council. The latest publicly available document is the March 2022 "WBSTM Local Plan Forecasting Report". Outputs from this report suggest that the Local Plan proposals, including THA20, have virtually no impact on traffic within Cold Ash with many sections of highway experiencing reductions in traffic volumes in peak periods and only modest increases in other areas. This seems counterintuitive given the scale of growth in the Plan and the close proximity of the THA20 site.
- 6.4 In view of this, Cold Ash Parish Council (CAPC) has instructed SW Transport Planning (SWTP) 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 Local Plan.

7. Review of Evidence Base

7.1 Scope

7.1.1 The key documents underpinning the WBLP transport evidence base are:

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

7.1.2 The three reports catalogue the development of the Local Plan strategy and traffic modelling work to date. The modelling is described as an iterative and ongoing process with further testing to follow as the Local Plan evolves.

7.1.3 For background context, a brief review of the reports is set out below and detailed consideration of the latest information follows in Section 3.

7.2 Phase 1 Transport Assessment (December 20)

7.2.1 The report clarifies that three separate but linked traffic models have been developed to support the Local Plan Review. In addition to the district-wide WBSTM mentioned above, two further localised models have been developed for Newbury and Thatcham, providing more detailed analysis for these two urban areas. The parish of Cold Ash sits outside the Newbury and Thatcham models and is covered only by the WBSTM.

7.2.2 The modelling undertaken in the Phase 1 assessment comprised two future (2036) development scenarios as follows:

- Scenario 1 – HELAA Sites (as of February 2020)
- Scenario 2 – As above but also including Henwick Park (plus two adjacent smaller sites)

7.2.3 The modelling also included an 'Core Forecast' scenario based on committed developments and background national traffic growth forecasts. However, no details are provided for the levels of committed development or the amount of background growth assumed.

7.2.4 The outputs from the model reported in the Phase 1 TA are limited to 'Level of Service' statistics based on categories of delay at junctions graded from 'A' to 'F' with 'A' representing the lowest delays. None of the junctions in Cold Ash parish are reported. No forecasts of traffic flows or changes in traffic flow are included.

7.2.5 In discussing the delay statistics, paragraph 5.8 notes *"In some areas the Local Plan development causes delays to increase and the junction or link to progress to a higher (worse) category of delay. This is the case for example along the A4 corridor (and adjoining links) in Thatcham in the vicinity of the THA20 site. This is to be expected for the proposed allocation of approximately 2,500 homes at North East Thatcham and highlights the need for further investigation into appropriate mitigation measures"*.

7.3 Phase 2 Transport Assessment (July 21)

7.3.1 The Phase 2 TA takes forward the previous Phase 1 traffic modelling. Paragraph 1.4 states *"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)"*.

7.3.2 Paragraph 3.4 of the TA notes that a set of revised trip rates has been developed specifically for the 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.

7.3.3 The TA puts forward concept design solutions for highway mitigation measures at key junctions along the A4 corridor. Paragraph 3.10 notes that the designs require further development and that further modelling will be required to assess their impacts alongside other non-highway mitigation measures.

7.3.4 Paragraph 3.32 describes the full range of traffic model scenarios used to assess the impacts of THA20 and other Local Plan proposals.

- 2018 Base Year – Existing Conditions (pre-Covid-19)
- 2036 Core – No Local Plan, but includes TEMPro growth across the district
- 2037 S1 – With Scenario 1 Local Plan sites, TRICS trip rates for all sites
- 2037 S1R – Scenario 1 with revised trip rates for THA20
- 2037 S1R With Mitigation – Scenario S1R with highway local improvements

7.3.5 The TA presents high-level statistical outputs from the model, comprising network-wide delays and journey time data extracted from the Thatcham and Newbury traffic models. There are no outputs from the WBSTM for the road network in Cold Ash parish.

7.3.6 Paragraph 3.42 states *"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 in both the 2036 Core and 2037 Local Plan growth scenarios"* and notes that there is a need to develop a package of non-highway based mitigation in addition to the proposed localised highway capacity improvements.

7.3.7 Section 8 of the TA considers 'Next Steps' and identifies the need for further model runs to test the evolving development scenarios and to refine the package of mitigation measures.

7.4 WBSTM Local Plan Forecasting Report (March 22)

7.4.1 This report is approaching 12 months old but represents the latest traffic modelling information currently available. The report outlines that the WBSTM has been further developed including the production of a new Reference Case, which supersedes the previous Core Forecast along with further development of the Local Plan scenarios with and without mitigation. The model scenarios presented in the report consist of:

- 2037 Reference Case – No local Plan but includes committed development and growth
- 2037 Scenario 1R2 (S1R2) – Includes Local Plan sites but no mitigation
- 2037 Scenario 1R2 Mitigation 1 (S1R2 Mit1) – Local Plan with demand management
- 2037 Scenario 1R2 Mitigation 2 (S1R2 Mit2) – Above with highway capacity improvements

7.4.2 Table 3 of the report clarifies that the Local Plan development scenarios include a total of 4,751 households plus 7,374 jobs. Paragraph 2.3.6 notes that, due to the shortfall in total housing numbers against the District Councils' target of 5,510, a further 325 dwellings may need to be considered on Cold Ash sites CA12, CA16 and CA17, plus a further 434 on unidentified windfall sites. Currently this shortfall is not accounted for in the modelling.

7.4.3 Because of the strategic nature of THA20 a separate trip generation and distribution analysis has been carried out, along with the application of a site-specific trip generation reduction factor to account for a proposed sustainable travel mitigation package.

7.4.4 The revised trip generation is taken from a separate Technical Note prepared by the THA20 Consortium's transport consultants TPA (a copy is included in Appendix C of the Forecasting Report). The methodology adopted by TPA focusses solely on employment-based statistics from the 2011 Census and contains estimates of the numbers of residents of working age and in employment, plus their likely travel mode shares, to derive car trip numbers generated by THA20.

7.4.5 This approach ignores all other journey purposes, such as education, leisure, shopping, health care and other personal business. As a result, the total trip generation for the site is likely to be significantly underestimated. Table 1 (next page) compares the TPA trip generation forecasts against the default trip rates used in the WBSTM.

Table 1 – Trip Rate Comparison (THA20 Site)

Assessment Period	TPA Consultants		WBSTM		Difference	
	Trips	Trip Rate	Trips	Trip Rate	Trips	%
AM Peak	1129	0.452	1290	0.516	-161	-12%
PM Peak	910	0.364	1280	0.512	-370	-29%

- 7.4.6 The table demonstrates that the revised peak hour trip rates used for THA20 are between 12% and 29% lower than the standard trip rates used within the WBSTM; resulting in a potential underestimate of peak hour trips of between 161 and 370 vehicles per hour. The methodology used to derive the revised trip cannot be considered reliable or robust, due to the failure to consider the full range of journey purposes. For example, education trips are likely to be a significant component of overall trip generation, particularly in the AM peak. Policy SP17 of the Local Plan Review references the provision of two new primary schools and one secondary school linked to the North East Thatcham Strategic site allocation (THA20), yet no allowance has been made within the traffic modelling to account for these trips.
- 7.4.7 If the schools are to be provided on-site their catchment areas will extend beyond the site boundary and will draw traffic from a wider area. Conversely, if the schools are to be located off-site then residents will need to travel outside the site for education. In either scenario, trips external to the site will be generated for education purposes. In view of these considerations, the use of the reduced trip rates for the THA20 site cannot be justified.
- 7.4.8 The “Mitigation 1” model scenario is based around a package of sustainable travel initiatives including an aspirational new bus service operating on a 15-minute frequency between the site, Thatcham railway station and Thatcham centre. In addition, it is assumed that comprehensive Travel Plan measures will be provided with, currently unquantified, high-quality walking and cycling improvement measures.
- 7.4.9 Based on these measures the peak hour car trip generation has been reduced by 5% to allow for increased take up of active travel modes and a further 2.5% for bus usage. Given the uncertainty of securing a long term 15-minute bus service frequency and the further uncertainty that this and the undefined active travel measures will achieve the stated levels of modal shift, the current modelling work is likely to underestimate the trip generation from the site and therefore fails to provide a robust basis for traffic impact analysis.
- 7.4.10 The “Mitigation 2” scenario includes concept schemes for specific highway capacity improvements at the A4 junctions with Pipers Way and Colthrop Lane, plus widening of the A4 to two-lanes in each direction between these two points.

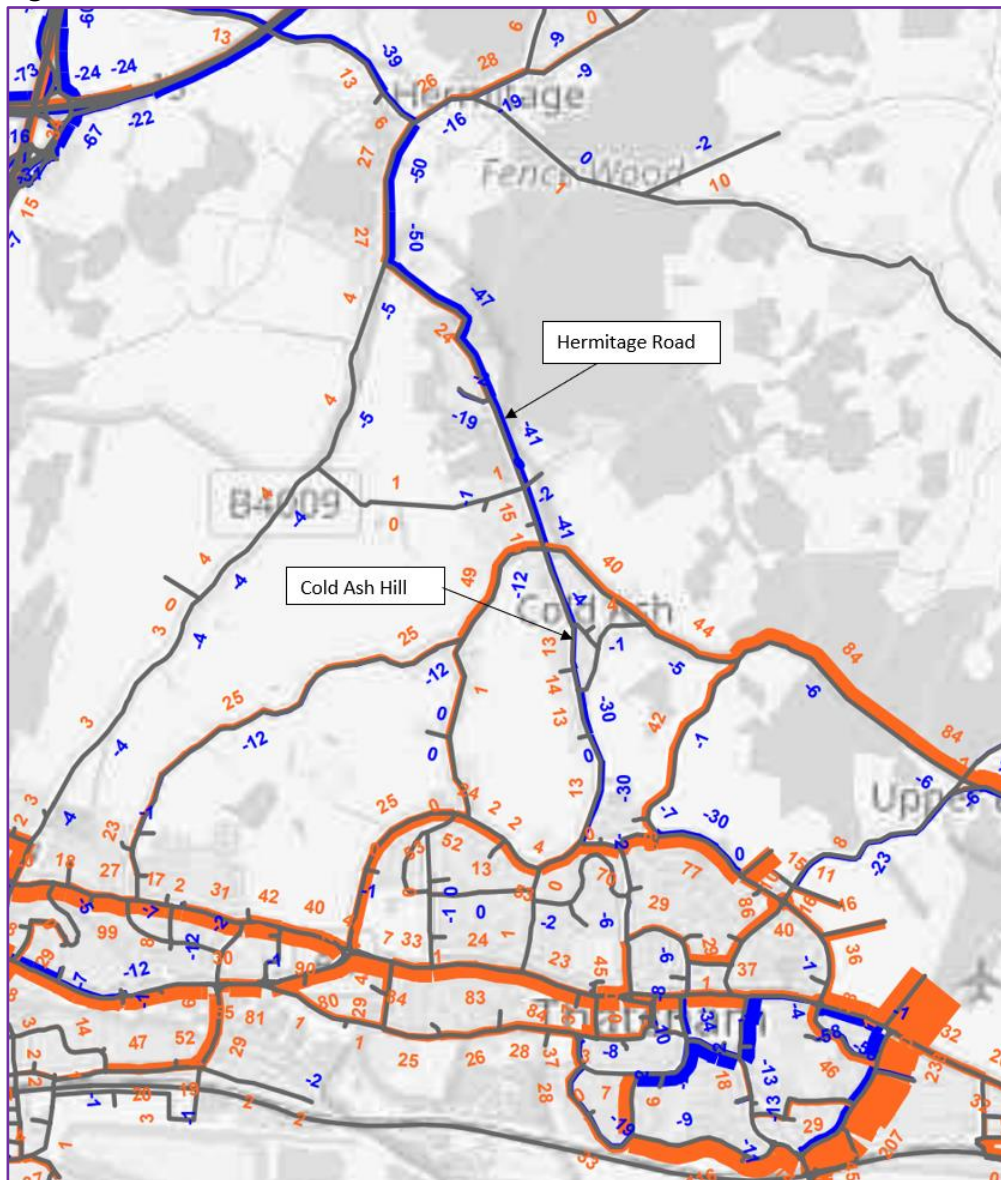
- 7.4.11 Section 3 of the Forecasting Report presents the results of the model runs including link and junction delay statistics, journey time comparisons and flow plots showing forecast traffic flows across the network. The tabulated delay and journey time statistics presented in the report do not include any details for the road network in Cold Ash. However, the flow plots in Appendix G of the Forecasting Report do provide information about predicted traffic flows in the parish. These are considered in more detail in Section 3.
- 7.4.12 The Forecasting Report concludes that traffic flows and delays will increase across all parts of the network by 2037 based on the Reference Case and that further increases arise from the Local Plan scenarios but that these are largely off-set by the combination of Mitigation 1 and Mitigation 2 measures. It also acknowledges that it will not be possible to mitigate all the impacts.

8. Traffic Forecasts and Impacts

8.1 Assessment of Model Outputs

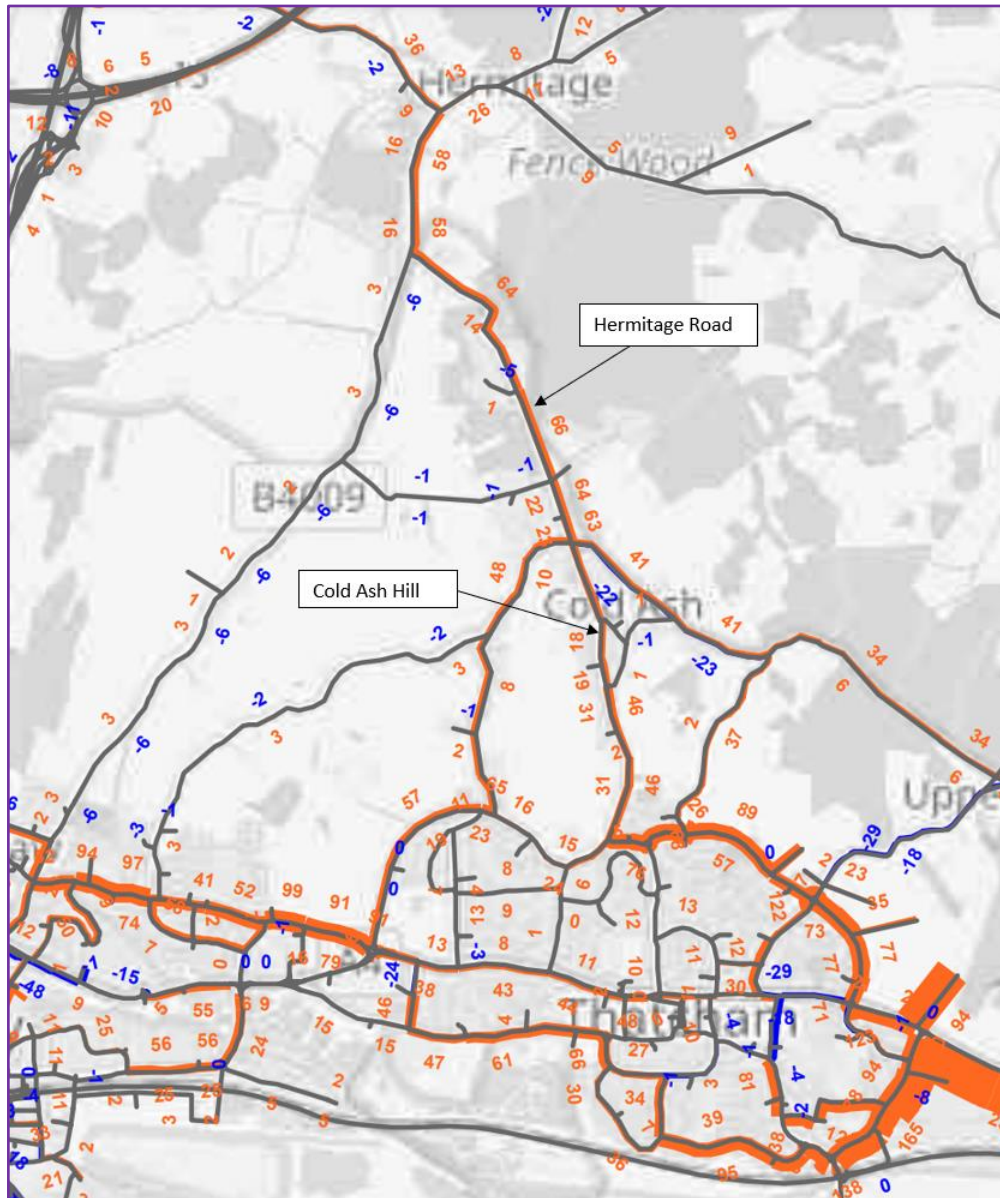
- 8.1.1 The Forecasting Report described in Section 2 provides a district-wide assessment but focuses mainly on strategic road links and the urban areas of Newbury and Thatcham, with no discussion or analysis of more rural areas. However, the flow plots from the WBSTM do provide a basis for understanding the predicted effect of Local Plan growth within Cold Ash.

Figure 1 - AM Peak Hour Flow Difference (2037 S1R2 Mit2 minus Ref Case)



8.1.2 Blue text represents a reduction in hourly traffic flows and orange text indicates an increase. This suggests that traffic flows on many parts of the network in Cold Ash (and further afield) are predicted to reduce in the AM Peak as a result of the Local Plan development. Results for the PM peak are shown in Figure 2.

Figure 2 - AM Peak Hour Flow Difference (2037 S1R2 Mit2 minus Ref Case)



8.1.3 There are fewer reductions in the PM Peak forecast but where increases are predicted they are of relatively low magnitude, according to the model.

8.1.4 Given that the difference between the 'Reference Case' and the 'S1R1 Mitigation 2' tests is the addition of all the proposed Local Plan growth, i.e. 4,751 houses plus 7,374 jobs, the results seem illogical; particularly within the Cold Ash area given that the largest housing allocation (THA20, 2,480 dwellings) is located on the edge of the parish.

8.1.5 Data from the flow plots for each of the model scenarios has been extracted for key roads in Cold Ash. The results are shown in Table 2.

Table 2 – WBSTM Flow Data for Roads in Cold Ash

Road / Location	Scenario	AM Peak Hour			PM Peak Hour		
		N'bound	S'bound	Two-Way	N'bound	S'bound	Two-Way
Cold Ash Hill (North of Heath Lane)	2037 Ref Case	381	365	746	328	313	641
	2037 S1R2	396	354	750	288	366	654
	2037 S1R2 + Mit 1	395	353	748	282	367	649
	2037 S1R2 + Mit 2	395	335	730	359	358	717
	Change (S1R2 + Mit 2 minus Ref Case)	14	-30	-16	31	45	76
Hermitage Road (North of The Ridge)	2037 Ref Case	748	551	1299	537	571	1108
	2037 S1R2	768	512	1280	562	638	1200
	2037 S1R2 + Mit 1	766	507	1273	551	639	1190
	2037 S1R2 + Mit 2	763	509	1272	559	634	1193
	Change (S1R2 + Mit 2 minus Ref Case)	15	-42	-27	22	63	85
The Ridge (East of Collaroy Road)	2037 Ref Case	276	327	603	226	225	451
	2037 S1R2	320	321	641	250	288	538
	2037 S1R2 + Mit 1	311	318	629	236	284	520
	2037 S1R2 + Mit 2	319	322	641	267	202	469
	Change (S1R2 + Mit 2 minus Ref Case)	43	-5	38	41	-23	18

8.1.6 Again, the rows highlighting the change from the 'Reference Case' to the 'Local Plan Mitigation 2' scenario illustrate the apparent very small changes in traffic flows resulting from Local Plan growth. The table also demonstrates that there are effectively no differences between the various model runs with and without mitigation.

8.1.7 The implication of this is that virtually none of the traffic from THA20, or the other Local Plan sites, utilises the road network in Cold Ash and that there is no reassignment of traffic, via Cold Ash, from the A4 or other routes, due to congestion effects elsewhere on the network. Indeed, if the modelling is to be believed there will be some reductions in traffic flow as a result of local plan growth. An incomprehensible conclusion given the scale of development in the Local Plan and the proximity of the THA20 site.

- 8.1.8 The lack of any material differences in flows between the various model runs would indicate there are factors preventing or restricting the assignment of traffic in the Cold Ash area. This could be congestion effects elsewhere in the wider network that are constraining flows such that there is no capacity for additional traffic to enter or leave the local network. There may be other explanations but without detailed interrogation of the model to establish the cause(s) it is not possible to deduce the explanation for the apparent minimal impacts of Local Plan sites.
- 8.1.9 Another possible explanation for the apparent lack of impacts arising from the Local Plan could be due to the Reference Case presenting a pessimistic view of the 'no Local Plan' case, making comparisons against the future 'with Local Plan' tests look more favourable. Again, a detailed interrogation of the growth assumptions embedded within the reference case scenario would be needed to understand if this accounts for the apparent lack of change.
- 8.1.10 It does however appear that the model is not accurately reflecting the likely impacts of Local Plan growth in this part of the network and in view of this the model outputs should be treated with caution.

9. Objections to Local Plan

9.1 Points of Concern

- 9.1.1 Following a detailed review of the transport evidence base, there are doubts concerning the reliability of the modelling outputs. The WBSTM is a wide-area, strategic traffic model with the primary aim of guiding strategic decisions about future growth in the district and with a focus on key traffic corridors. From the evidence of this report, there are concerns regarding the ability of the model to accurately forecast impacts at a local level, including within Cold Ash parish.
- 9.1.2 As noted in Section 3, there are virtually no differences in the forecast traffic flows for each of the model scenarios despite the widely different levels of growth and variable mitigation assumptions built into each test. A key finding from the modelling is that full Local Plan growth is predicted to lead to reductions in traffic flows in many areas within Cold Ash parish, with very modest increases elsewhere. This seems a highly improbable conclusion given the scale of development in the Local Plan and the proximity of the THA20 site and casts doubt over the reliability of the modelling. The latest Local Plan Forecasting Report acknowledges that the modelling is an iterative and ongoing process. It is evident from this review that further work is needed to fully understand and improve the functionality of the model in the Cold Ash area and possibly in other rural areas.
- 9.1.3 The consideration of THA20 includes bespoke trip generation rates significantly below the default trip rates built into the WBSTM. Whilst the principle of using bespoke rates is not unreasonable, the methodology used in this case is flawed, as set out in Section 2.4 and underestimates the likely trip generation. Added to this, further discounts to trip numbers have been applied to account for non-highway mitigation measures. These amount to a 7.5% reduction in car trips due to assumptions about improved bus patronage and increased use of walking and cycling travel modes. Although a relatively small adjustment, the predicted reduction is based on unsubstantiated assumptions and relies on aspirational mitigation measures that may not materialise.
- 9.1.4 Furthermore, as noted in paragraph 2.4.2, the traffic modelling does not currently include the full level of Local Plan growth needed to meet the District Councils target of 5,510. There is a shortfall of 759 dwellings. The Local Plan Forecasting Report notes that part of this shortfall (325 dwellings) may need to be provided on sites CA12, CA16 and CA17, within Cold Ash. Clearly this would directly impact the road network in the parish but is not currently accounted for in the modelling.

- 9.1.5 In view of the above, it is considered that the WBSTM outputs do not accurately reflect the changes traffic flows that are likely to occur within Cold Ash and therefore the current evidence base does not provide a robust basis for determining the traffic impacts of Local Plan growth.

