



**West Berkshire Local Plan Review 2022-2039 (LPR)  
 Consultation on Proposed Main Modifications  
 (6 December 2024 – 31 January 2025)**

Representation Form

**Ref:**  
 (For official use only)

<b>Please complete and return this form:</b>	<b>By email:</b> [REDACTED]
	<b>By post:</b> Planning Policy, Development and Housing, Council Offices, Market Street, Newbury, RG14 5LD
<b>Return by:</b>	<b>11:59pm on Friday 31 January 2025</b>

Please read the **Guidance Note**, available on the Council’s website <https://www.westberks.gov.uk/lpr-proposed-main-modifications>, before making your representations.

This form has two parts:  
 PART A – Your details  
 PART B – Your representation(s)

Please complete a new form for each representation you wish to make.

<b><u>PART A: Your details</u></b>		
<i>Please note the following:</i>		
<ul style="list-style-type: none"> <li><i>We cannot register your representation without your details.</i></li> <li><i>Representations cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.</i></li> </ul>		
	1. Your details	2. Agent’s details (if applicable)
Title	Mr	
First Name*	Peter	
Last Name*	Murray	
Job title <i>(where relevant)</i>	Parish Councillor	
Organisation <i>(where relevant)</i>	CAPC	
Address* <i>Please include postcode</i>	Cold Ash Parish Council The Parish Office Hermitage Road Cold Ash Thatcham Berkshire RG18 9JH	
Email address*	[REDACTED]	
Telephone number	[REDACTED]	
Consultee ID		

## **PART B – Your representation(s)**

All comments made at previous stages of the LPR have been taken into account by the Inspector and there is no need to resubmit these. Publication of the proposed Main Modifications is a regulatory stage and any representations made should relate specifically to the legal compliance and soundness of the proposed Main Modifications and should not relate to parts of the Plan that are not proposed to be modified.

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change.

Your name or organisation (and client if you are an agent):	Cold Ash Parish Council
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### **Proposed Main Modifications and Proposed Changes to the Policies Map**

**1. Please indicate whether your representation relates to the Schedule of Proposed Main Modifications or the Schedule of Proposed Changes to the Policies Map and provide the modification/change number you are commenting on below:**

Document name	
Modification/Change reference number (MM / PMC)	

**2. Do you consider the Proposed Main Modification or Proposed Policy Map Change to be:**  
(please tick/mark 'X' one answer for a and one for b)

- a) **Legally compliant**                      Yes                       No
- b) **Sound**                                      Yes                       No

*Please refer to the guidance notes for a full explanation of 'legally compliant' and 'soundness'*

**If you consider the Proposed Main Modification or Proposed Policy Map Change not to be sound, please identify which test of soundness your representation relates to:**  
(please tick/mark 'X' all that apply)

<b>Positively Prepared:</b> The LPR should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements.	<b>x</b>
<b>Justified:</b> the LPR should be the most appropriate strategy, when considered against the reasonable alternatives	<b>x</b>
<b>Effective:</b> the LPR should be deliverable	<b>x</b>
<b>Consistent with national policy:</b> the LPR should enable the delivery of sustainable development in accordance with the policies of the NPPF	<b>x</b>

**3. If you have answered ‘No’ to question 2a or 2b above, please provide details of why you consider the Proposed Main Modification or Proposed Policy Map Change is not legally compliant or is unsound, including any changes you consider necessary to make the Plan legally compliant or sound.**

*You will need to say why this change will make the Local Plan Review 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 ‘Consultation on the proposed main modifications to the West Berkshire local plan review 2022-2039 January 28<sup>th</sup> 2025’ file reference ‘LP MM consultation feedback CAPC 280125\_final.docx’*

**Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA)**

**4. Do you have any comments on the updated Sustainability Appraisal/Strategic Environmental Assessment Report – Proposed Main Modifications (November 2024)?**  
*(Please be as precise as possible)*

Page number	
Paragraph number	
Comments:	
<p>Please see attached document ‘Consultation on the proposed main modifications to the West Berkshire local plan review 2022-2039 January 28<sup>th</sup> 2025’ file reference ‘LP MM consultation feedback CAPC 280125_final.docx’</p>	

## Habitats Regulations Assessment

### **5. Do you have any comments on the addendum to the Habitats Regulations Assessment of the Proposed Main Modifications (November 2024)?**

*(Please be as precise as possible)*

Page number	
Paragraph number	
Comments:	
Please see attached document 'Consultation on the proposed main modifications to the West Berkshire local plan review 2022-2039 January 28th 2025' file reference 'LP MM consultation feedback CAPC 280125_final.docx'	

## Notification of Progress of the Local Plan Review

### **6. Do you wish to be notified of any of the following?**

*(please tick/mark 'X' all that apply)*

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

<b>Signature</b>	<b>P J MURRAY</b>	<b>Date</b>	<b>29 01 25</b>
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**Your completed representations must be received by the Council by 11:59pm on Friday 31 January 2025.**

# Consultation on the Proposed Main Modifications to the West Berkshire Local Plan Review 2022-2039

## Response from Cold Ash Parish Council

January 28<sup>th</sup> 2025

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## 1. Introduction

- 1.1. This document represents Cold Ash Parish Council's response to the Main Modifications consultation on the West Berkshire Local Plan Review (LPR). It has been prepared by Cold Ash Parish Council (CAPC) with guidance from Alison Eardley Planning Consultants.
- 1.2. We have significant concerns about the plans being consulted on. We would like to examine these issues further with West Berkshire Council (WBC). While we disagree with the overall method presented, we understand that if new housing sites are required at this time, we want to be fully engaged in representing the opinions of our parishioners as had been promised in our Neighbourhood Development Plan enshrined in law in 2024 by WBC.
- 1.3. A summary of our concerns is provided below, followed by our detailed considerations.

## 2. Summary of our concerns

2.1. Our concerns are summarised below:

### 2.2. **The lack of engagement on the significant shift in the overall strategy for the district:**

- 2.2.1. We strongly object to the significant shift in the overall strategy for the LPR. It would appear that a decision has already been taken by WBC to extend the Plan period by two additional years, largely as a result of delays in the Examination process, but there has been no opportunity for the community to engage in this decision and the potential alternative approaches that might have been pursued.
- 2.2.2. Extending the Plan period has far-reaching consequences for our community in terms of housing numbers, location of new development and the provision of the necessary supporting infrastructure. It is a significant step away from the Regulation 18 and Regulation 19 documents that have been prepared thus far and with which we and our parishioners have actively engaged. It also fundamentally impacts the premise upon which our [Cold Ash Parish Neighbourhood Plan](#) (CAPNP) was developed in partnership with our community.
- 2.2.3. We believe that the lack of consultation on this decision is contrary to national policy and represents a fundamental flaw in the LPR process. There are examples of other local authorities who have faced a similar situation, but who have engaged with their communities to consider potential solutions as opposed to simply deciding upon an approach that effectively overturns the strategy consulted upon and agreed to date.
- 2.2.4. We would urge the Inspector to require WBC to consult on alternative approaches, which could include, for instance, retaining the original trajectory and committing to an

immediate review thereafter. This would provide certainty to communities about what is planned for and ensure a transparent process.

### **2.3. The lack of evidence underpinning the proposed allocation of additional strategic sites:**

2.3.1.If the Plan period is to be extended, this results in an uplift to the number of homes to be delivered. We strongly disagree with the approach taken to allocating additional strategic sites to make up this effective shortfall in numbers. Two of the additional sites proposed are located within Cold Ash Parish (Refs: CA12 and CA17). The sites have previously been assessed by WBC and also by Cold Ash Parish in the preparation of the [CAPNP](#). Both sites were rejected in both assessments.

2.3.2.Nevertheless, the sites have now been reviewed by WBC and are proposed to be reinstated in the LPR. We can find little evidence demonstrating how they have been reassessed and why they are now considered acceptable and deliverable. Whilst information is provided in the updated Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) Report, there is no update to the original site assessment itself and no document to enable the cross-referencing of the two.

Overall, the amended Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) Report appears to simply reverse the original findings, with little explanation. This needs to be addressed to ensure a transparent approach that we can communicate to our parishioners.

2.3.3.Notably, there has been no consideration of potential new sites that might have come forward since those submitted in the HELAA. We believe a fuller exercise to identify such new sites should have been undertaken in combination with a review of the existing sites.

### **2.4. The lack of regard for the Cold Ash Parish Neighbourhood Plan:**

2.4.1.National planning policy actively encourages communities to get involved in planning for their areas. To that end, CAPC prepared a neighbourhood plan for the parish, which was adopted by WBC on 3 May 2024.

2.4.2.Both the Parish Council and Lee Dillon MP wrote to the Secretary of State to clarify the level of importance the government attaches to neighbourhood planning. The following are extracts from the responses from MHCLG:

The National Planning Policy Framework is clear about the important role that neighbourhood plans play in our plan-led system. Once passed at referendum, neighbourhood plans form part of the statutory development plan for the local area which is the starting point in making planning decisions.

(Ministry of Housing, Communities & Local Government (MHCLG), December 2024)

I acknowledge your concerns over the Cold Ash Parish Council Neighbourhood Development Plan and the emerging West Berkshire Local Plan. The Government is clear that neighbourhood plans will continue to play an important role in the planning system. In recognition of this role, we continue to provide support as we have in previous years. Furthermore, under the Government's reforms to the National Planning Policy Framework (NPPF), the protections from speculative development for areas with a qualifying neighbourhood plan have been retained.

(Ministry of Housing, Communities & Local Government (MHCLG), January 2025)

2.4.3. We believe therefore that regard should be given to the neighbourhood plan, and the fact that it actively explored sites – including those proposed to be reinstated. At the time of preparing the CAPNP, three strategic sites in the parish (HSA3, HSA6, HSA7) were already included for allocation in the LPR. In addition to these, the parish was asked to allocate an additional 40 housing units through the neighbourhood plan. 19 sites in the parish – considered to be non-strategic and therefore suitable for review by way of the neighbourhood plan process - were assessed by the Neighbourhood Plan Steering Group in consultation with the community. Only two were found to be available, suitable and deliverable with both of these being within/partially within the settlement boundary. One site was ultimately selected as it would deliver the quote of homes required and it was included as an optional site in the HEELA. It was only when it was pointed out to WBC that there was already a presumption in favour of development within settlement boundaries that WBC changed its guidance removing the need to allocate such sites. Since all potential sites in the parish had been explored, WBC agreed to accept the selected site but recommended that it not be allocated through the neighbourhood plan. In light of this, WBC reduced the parish housing target to zero.

2.4.4. Of the 19 sites assessed, sites CA12 and CA17 were included, and both were found to be unsuitable. These two sites were not being considered as strategic sites (as confirmed by WBC in the SA/SEA (p.26)). Rather they were non-strategic sites and were assessed as such through the CAPNP process.

2.4.5. The proposal by WBC to allocate them at this late stage, and as strategic sites, serves to completely ignore and undermine the neighbourhood plan process, which found them to be unsound and unsupported. It undermines the approach taken by WBC in supporting the neighbourhood plan process. In the case of CA12, it undermines the green gap between Cold Ash village and Thatcham that was identified by WBC and supported in the neighbourhood plan.

2.4.6. Rather than simply reinstating the two sites in the LPR, with little evidence as to why, we would welcome the opportunity to review our neighbourhood plan, which would allow the community to be fully engaged in the process.



## 2.5. Broad locations for development with master planning:

2.5.1. We see no reason why at this stage WBC could not identify broad locations for development as opposed to identifying specific sites for allocation. This is an approach proposed by the Inspector in fact. It would allow for flexibility in terms of new sites coming forward and enable full community engagement in determining those sites. We would also call for the opportunity to be fully involved in the master planning of those sites.

## 3. Background

3.1. The adopted Local Plan for West Berkshire comprises three documents:

- [Core Strategy Development Plan Document \(DPD\)](#) – sets out planning strategy to 2026.
- [Housing Site Allocations Development Plan Document](#) – allocated non-strategic sites
- Saved policies from the [West Berkshire District Local Plan 1991 to 2006](#)

3.2. A new Local Plan is being prepared by West Berkshire Council (WBC). The Local Plan Review will cover the period to 2039 and was submitted to the Secretary of State on 31 March 2023. The documents submitted can be found [here](#).

3.3. Once adopted, the LPR will replace the existing adopted three planning documents. It will form part of the Development Plan for West Berkshire in addition to other documents including the Gypsy and Traveller Accommodation Development Plan Document, and 'made' Neighbourhood Plans. This includes the Cold Ash Parish Neighbourhood Development Plan, which was formally adopted in May 2024.

3.4. The LPR is currently being independently examined by a Planning Inspector. The Inspector's role is to assess whether the LPR has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound (positively prepared, justified, effective and consistent with national policy). If the Inspector concludes that the LPR is sound and meets the necessary tests, it can then be adopted by the Council and will form the Local Plan for the District.

3.5. Examination hearing sessions were held in May, June and October 2024 to discuss a number of issues upon which the Planning Inspector required clarification. The purpose of the discussions at the hearings was for the Inspector, the Council and participants to gain the fullest possible understanding of any Main Modifications that may be required. Main Modifications are changes that are considered necessary by the Inspector for the plan to be sound and legally compliant.

- 3.6. Based on the outcomes of the hearing sessions and the additional work undertaken, at the request of the Inspector, the WBC has now prepared a Schedule of Proposed Main Modifications to the LPR, together with a Schedule of Proposed Changes to the Policies Map arising as a result of the Proposed Main Modifications to the Plan.
- 3.7. WBC suggests that the Inspector has made it clear that at this stage of the Examination, he has concluded that the proposed Main Modifications are all necessary to address soundness issues and will be effective in doing so. However, this is without prejudice to his final conclusions which will ultimately be made having regard to representations in response to the public consultation, in addition to all of the evidence currently before him.
- 3.8. It is important that any proposed Main Modifications do not undermine the sustainability process that has informed the preparation of the LPR. WBC has therefore updated the Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) Report and produced an addendum to the Habitats Regulations Assessment (HRA), both of which accompany the LPR.
- 3.9. Any proposed Main Modifications to the LPR require consultation, and the Inspector has instructed the Council to progress to consultation.

#### **4. Detailed considerations**

- 4.1. CAPC's fundamental concern relates to the decision to extend the LPR period by two years to run to 2041 instead of 2039. Our understanding is that this was decided by WBC in response to the Inspector's Preliminary Question 19 ([PQ19](#)) and an acknowledgement of the need for the Plan to cover full financial years post adoption, which coincide with the planning monitoring year. An adoption date of September 2024 would fall within monitoring years 2024/25 and as such an additional year would need to be added to the plan period to ensure a full 15 years. A second year has then been added to account for the time required to complete the Main Modifications process, hence the end date of 2041.
- 4.2. A key contributing factor to this decision is the sheer length of time it has taken to draft the LPR. The Plan was submitted for examination in March 2023 and it has taken over one and a half years to reach this stage.
- 4.3. The consequences of extending the Plan period are significant, notably the knock-on effect on housing numbers and WBC's proposals simply to reinstate sites formerly discounted for robust reasons to achieve this. This represents a major shift in the spatial strategy for the district as set out in the Regulation 18 and 19 consultations. It has been undertaken largely without community input.
- 4.4. The lengthening of the Plan trajectory would lead to the need to increase the overall housing need for the district. Consequently, the net additional homes requirement is proposed to be uplifted from a range between 8,721 to 9,146 to: *"Provision will be made for at least 9,270 ~~8,721 to 9,146~~ net additional homes in West Berkshire for the period 1 April 2023 ~~2022 to 31~~"*

March 2041 ~~2039~~; ~~513 to 538~~ a minimum of 515 dwellings per annum net additional homes in West Berkshire for the period 1 April 2022 to 31 March ~~2039-2041~~", as stated in the Main Modifications consultation document.

- 4.5. To accommodate this additional need, it would appear that no further site work has been undertaken to identify any newly arising sites since the HELAA was published. In addition, limited work appears to have been undertaken to review more fully the existing list of sites in the HELAA.
- 4.6. CAPC does not consider that all reasonable alternatives to a plan extension were fully explored. For instance, it is not clear why the option to retain the existing period, but with a commitment to an immediate review, has not been considered. Such an approach could have negated the need for any significant site work to the LPR and potentially avoid further lengthy delays to the examination process. There is a precedent to such an approach in Tunbridge Wells borough ([https://tunbridgewells.gov.uk/\\_data/assets/pdf\\_file/0020/466103/TWLP\\_115-TWBC-Response-to-the-Inspectors-Initial-Findings-28-March-2024.pdf](https://tunbridgewells.gov.uk/_data/assets/pdf_file/0020/466103/TWLP_115-TWBC-Response-to-the-Inspectors-Initial-Findings-28-March-2024.pdf)), with Tunbridge Wells Borough Council's agreed approach, following local consultation, being as follows:

**Commitment to an early review of the Local Plan**

The Council had set out its intention of producing a Local Plan that plans to meet its growth needs for a full 15 years. However, it is now faced with uncertainties not only in relation to having a sound Plan as set out in the Initial Findings, but also in relation to the changing policy framework.

The assessment of the Initial Findings as summarised above is supported with additional evidence and a Sustainability Appraisal addendum. It is considered by the Council that the most appropriate way forward is to revise the development strategy in order to accommodate the above proposed changes which will still enable the identification of a 10 year supply of housing sites within an adopted plan.

Under this approach the Council would agree to commit to an immediate review of the plan following its adoption.

This would have the key benefit of allowing the proposed allocations in the Local Plan to be adopted and, hence, provide a statutory 'development plan' context for bringing suitable sites forward, in a sustainable manner, to contribute to boosting housing delivery.

- 4.7. CAPC do not consider that this approach has been fully discussed in the context of the LPR and would press for this to be explored.
- 4.8. If additional sites are to be pursued, CAPC is concerned that alternative potential sites have not been sought, beyond those in the HELAA, which might accommodate the additional need. The HELAA was published in February 2020 and has not been updated since January 2023. It is possible that additional sites may be available beyond those already recorded. It would appear that no further site work has been undertaken and this needs to be rectified.
- 4.9. AP14 (Site selection) of document [IN14](#) (Action Points from week one hearing session 14 May 2024) required WBC to clarify whether the information currently available to the examination, including the HELAA, sustainability appraisal and any evidence submitted with regulation 19 representations that the Council considers relevant, adequate and proportionate, indicates

that there are any sites (including, if appropriate, smaller parts of areas assessed in the HELAA) suitable and available for residential development that are not allocated in the Plan. If there are any such sites they should be listed and identified on a map, and an explanation provided for why each was not allocated in the Plan (for example because the Council decided they were not needed or because more recent evidence has become available that changes the assessment made when the Plan was prepared).

4.10. WBC's response to this point is set out in [EXAM26](#) (WBC response to IN14 action points from week 1 hearing sessions), with three sites identified as now being available and suitable for allocation and a further two being suitable but not necessarily available. CAPC's particular concerns relate to HELAA Site Refs CA12 (Land at Henwick Park, Bowling Green Road, Thatcham) and CA17 (Regency Park Hotel, Bowling Green Road, Thatcham), both of which are now proposed for inclusion having been previously discounted.

4.11. [Site Ref CA12 \(Land at Henwick Park, Bowling Green Road, Thatcham\)](#) – this site has an indicative development potential of 225 dwellings. It was not taken forward as an allocation because it was considered in WBC's assessment to be too remote from the North East Thatcham sites to deliver a cohesive development. It was also considered to be non-strategic. The [HELAA Site Assessment \(Appendix 4\)](#) assessed the site as follows:

4.1.1. Suitability: Development of the whole site would be unacceptable because it would result in the coalescence of Thatcham and Cold Ash. Development of whole site would also result in harm to the AONB. Part of the southern area of the site may be suitable but further assessment is required.

4.1.2. A major surface flood flow route passes through the site towards the east side and in the south east and south west corner. Substantial attenuation measures required to mitigate for this which will have some impact on the developable area. Because of this the site is partially suitable for development subject to adequate attenuation measures being provided along the routes of the surface water flood flow paths which will limit the developable area.

4.1.3. Allocation would be dependent on a review of the settlement boundary for Thatcham in the Local Plan Review, and the outcome of appropriate ecological surveys. Outcome: **Potentially suitable in part.**

4.1.4. Achievability: **Achievable**

4.1.5. Deliverability: The site is potentially available (there are several landowners, however there is an option agreement with a developer) and achievable as there are no known market, legal, cost, ownership fragmentation or delivery issues.

4.1.6. Development of the whole site would be unacceptable because it would result in the coalescence of Thatcham and Cold Ash. Development of whole site would also result in

harm to the AONB. Part of the southern area of the site may be suitable but further assessment is required.

- 4.1.7. A major surface flood flow route passes through the site towards the east side and in the south east and south west corner. Substantial attenuation measures required to mitigate for this which will have some impact on the developable area.
- 4.1.8. Whether the site is considered developable is also dependent on further assessment through the plan-making process, in relation to whether circumstances exist to support the change to the settlement boundary. Outcome: **Potentially developable in part.**
- 4.1.9. Overall, the site was assessed as being too small, on its own, to be of a strategic nature as it would not be able to provide the level of infrastructure required to support the development. A further option was explored as to whether the site could be combined with the sites at North East Thatcham. WBC concluded that in this case, the site would be too remote from the North East Thatcham sites to deliver a cohesive development (see [SA/SEA Environmental Report \(Main Modifications\)](#), p.26).
- 4.1.10. As a result the site was not included in the [Regulation 19 LPR](#). It is noted that in their response to the Regulation 19 consultation, Nexus Planning on behalf of Croudace Ltd suggested that WBC had dismissed the Henwick Park site (CA12) as a strategic site but not even considered it as a non-strategic option by the [SA/SEA \(Nexus Planning obo Croudace Ltd Regulation 19 response, 7.4 p.50\)](#). This is incorrect. Cold Ash Parish Council assessed the site as a non-strategic site as part of its neighbourhood plan process and found it to be unsuitable.
- 4.1.11. Incidentally, [CAPC's Regulation 19 response](#) set out additional information about the unsuitability of this site in relation to traffic impact. In addition, the site sits within Flood Zone 1. The updated SEA/SA suggests that mitigation would be possible, which would mean that flooding has an overall neutral sustainability impact. This is incorrect and fails to fully describe the flood issue. The latest report from the Cold Ash Flood Warden (December 2024) states:

*"The area [covering this site] has some real water issues. The Land North of Heath Lane, is important to the natural water drainage of Cold Ash hill. The underground flows, from the hill of Cold Ash, flow into an aquafer under those fields.*

*This aquafer slow release a small part of it's water volume out into the water course which start there, but the there greater volume is retained underground and slowly soaked up the surround trees and vegetation.*

*In the last Planning Appeal Croudace's water expert stated, "there was an aquafer there and he had not calculated the volume, but it was in the millions of litres".*

Yes it would be possible to drain that area to build on, but would mean that you would be sending a large volume water, quickly during heavy rain periods to the river Kennet. During the last three storms, when we didn't have that much rainfall, there were over 10 flood warnings in place in the surrounding area, both up-stream and down-stream.

Therefore, removing the aquifer to build on those fields is clearly going to add greater danger to surrounding river systems and the properties abutting them.

-  
The 225mm dia Foul Sewer Main (FSM) in Cold Ash Hill, is already running over its design capacity. Adding a large number of houses into an already overloading FSM will cause more sewage outflows into properties."

- 4.2. HEELA Site ref: CA17 (Regency Park Hotel, Bowling Green Road, Thatcham) – this site has an indicative development potential of up to 55 dwellings, although known issues exist which may reduce this number OR as part of mixed-use development with up to 28 dwellings. The site was not taken forward as an allocation because it was considered to be too remote from the North East Thatcham sites to deliver a cohesive development. The [HELAA Site Assessment \(see Appendix 4\)](#) assessed the site as follows:

4.2.1. Suitability: The site adjoins the settlement boundary, there will be a review of settlement boundaries as part of work on the Local Plan Review. The site has potential however this is subject to a series of mitigation measures to conserve and enhance the AONB; and to maintain the character of the land north of Thatcham. Outcome: **Potentially suitable.**

4.2.2. Achievability: **Achievable**

4.2.3. Deliverability: The site is available (in single ownership, and the owner is a developer) and achievable as there are no known market, legal, cost, ownership fragmentation or delivery issues.

4.2.4. There are a number of factors which would need to be investigated further to confirm that the site is developable - a series of mitigation measures to conserve and enhance the AONB; and to maintain the character of the land north of Thatcham. Further information also required on ecology before a robust decision can be made.

4.2.5. Whether the site is considered developable is also dependent on further assessment through the plan-making process, in relation to whether circumstances exist to support the change to the settlement boundary.

4.2.6. Further information required on ecology before a robust decision can be made.  
Outcome: **Potentially developable.**

- 4.2.7. In reviewing this site, there remains a question mark over its availability. Whilst it was available at time HELAA was prepared, WBC has contacted the promoter to confirm whether site still available, and no response has been received ([SA/SEA Appendix 8, p74](#)).
- 4.3. In parallel with the HELAA process, CAPC was preparing a Neighbourhood Plan for Cold Ash Parish.
- 4.4. As part of this, the Parish originally considered allocating sites to meet its housing requirement. At the time, Policy SP13 of the LPR set out a requirement for the Parish to deliver 40 dwellings. This was in addition to the three strategic allocations identified within the parish: Policy HSA3 - Land at Coley Farm, Stoney Lane, Newbury – 75 dwellings; Policy HSA6 - Land at Poplar Farm, Cold Ash (site reference COL002) – 10 to 20 dwellings; Policy HSA7 - St Gabriel’s Farm, Cold Ash (SHLAA site reference COL006) - 5 dwellings.
- 4.5. With the support of WBC, CAPC undertook its own assessments of those sites put forward via the WBC Call for Sites to identify how the parish housing requirement might be delivered. The detailed assessment process, which was undertaken in consultation with the local community, and the results of this can be found in the [Cold Ash NDP Evidence Underpinning the Spatial Strategy for the NDP](#), submitted as evidence with the Neighbourhood Plan. The findings for Site Ref CA12 and CA17 were as follows:
- 4.6. Site CA12: The site was considered to have potential for community benefit in the form of possible community sports facilities and new public open space. However, it was deemed unsuitable for development for the following reasons:
1. It represents an important gap between the settlements of Cold Ash and Thatcham.
  2. It is a natural sink and forms a key service in the parishes flood defences.
  3. The number of potential dwellings represents an unacceptable level of urbanisation.
  4. The site sits in an area that is a particular traffic hotspot (ie. traffic leaving the site that needs to join the strategic road network [M4/A34] will add to traffic issues on Cold Ash Hill / Hermitage Road / Red Shute Hill).
  5. Development boundary within in 100m of Grade II listed building.
- 4.7. Site CA17: The site was considered to have little/no community benefit. The site was not recommended as it sits between the Cold Ash and Thatcham settlements and development here would represent urban creep from Thatcham into the parish, blurring the gap and seriously eroding the separate identity of Henwick and Cold Ash villages.
- 4.8. Of the 19 sites assessed as part of the Neighbourhood Plan process, one site was considered to be the most favourable (Ref: CA10: Sims Metal Management & B6J. Passey & Son Butchers, Turnpike Road, Newbury) and would deliver in the region of 42 homes, meeting the housing requirement. A guidance note issued by WBC in October 2021, however, set out that sites within settlement boundaries should not be allocated in neighbourhood plans. As a result of this, the requirement for 40 homes was removed.



- 4.9. The Neighbourhood Plan did not therefore allocate sites, an approach agreed with WBC and the housing target was reduced to zero.
- 4.10. In the context of the LPR need to identify new sites, Sites CA12 and CA17 have been reassessed by WBC. The [Updated Sustainability Appraisal/Strategic Environmental Assessment \(SA/SEA\) Report - Proposed Main Modifications \(November 2024\)](#) states that both sites have been “reconsidered” and are now suitable in part.
- 4.11. For CA12, it states that *“the policy is likely to have an overall neutral impact on sustainability. Positive impacts have been identified in relation to all types of sustainability - social sustainability as the site seeks to set out the requirements for new houses on the site, as well as requirements for good access routes to local services and facilities. Impacts on environmental sustainability are likely to be positive as the policy sets out the measures required to protect and enhance biodiversity and landscape character. Economic sustainability will benefit from new development in a sustainable location where there is good access to services and facilities include employment opportunities. No negative sustainability impacts have been identified. Other policies in the plan will ensure that overall there is a positive impact on all elements of sustainability.”*
- 4.12. For CA17, the same is stated: *“the policy is likely to have an overall neutral impact on sustainability. Positive impacts have been identified in relation to all types of sustainability - social sustainability as the site seeks to set out the requirements for new houses on the site, as well as requirements for good access routes to local services and facilities. Impacts on environmental sustainability are likely to be positive as the policy sets out the measures required to protect and enhance biodiversity and landscape character. Economic sustainability will benefit from new development in a sustainable location where there is good access to services and facilities include employment opportunities. No negative sustainability impacts have been identified. Other policies in the plan will ensure that -overall there is a positive impact on all elements of sustainability.”*
- 4.13. There appears to be little if any evidence setting out how the sites were reassessed and how (and if) the findings from the community by way of the CAPNP were considered. The statements prepared for each (as above) mirror one another and are, in part, incorrect. For instance, for site CA12, the statement that the site is likely to have a positive impact on social sustainability as it is located close to existing community infrastructure is not supported. In fact, the site is within the catchment area of St Marks for primary education and the Downs School for secondary education. There is no safe active travel route to St Marks for primary children and secondary children must go by bus to Compton. The sites are within the areas of both Thatcham Medical Practice and Chapel Row. However, as the former is over capacity, they are likely to need to register with the latter.
- 4.14. It is unclear whether a review of the settlement boundary for Thatcham has been undertaken and whether appropriate ecological surveys have been completed, as required in the original WBC site assessment.

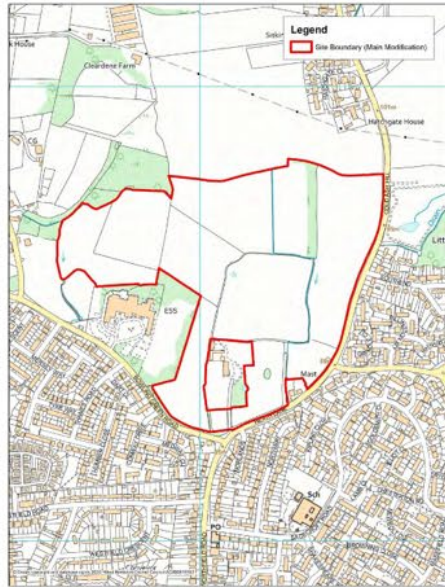


- 4.15. Furthermore, it is unclear how partial development of this site would deliver the numbers stated as feasible via the entire site. If density were to be increased, for instance, it is unclear how the site would meet the requirements of the adopted Policy CAP2 of the CAPNP relating to local character.
- 4.16. Finally, site CA12 extends into the buffer zone which has been identified in the NDP following on from the West Berkshire Appropriate Countryside Designation Study (November 2022), which was prepared by WBDC to inform the identification of green gaps between settlements to restrict coalescence (see images below) (see also CAPC Feedback regarding Planning Application 23/00798/OUTMAJ, available on the planning portal).

PMC12:

**Land at Henwick Park, Bowling Green Road, Thattham**

*NB: Annex K (PMC12) in the Schedule of Proposed Changes to the Policies Map – November 2024, published on 6 December 2024, did not show the correct site boundary for Henwick Park in accordance with Main Modification 42 (MM42). The correct boundary is now shown below.*



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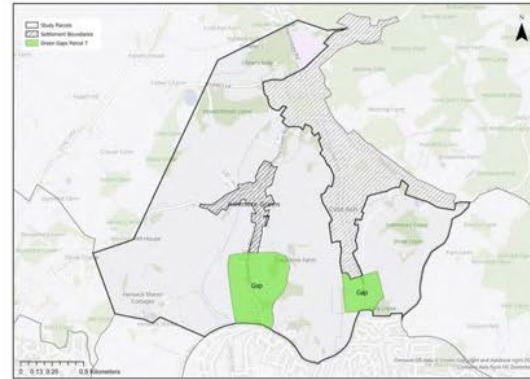
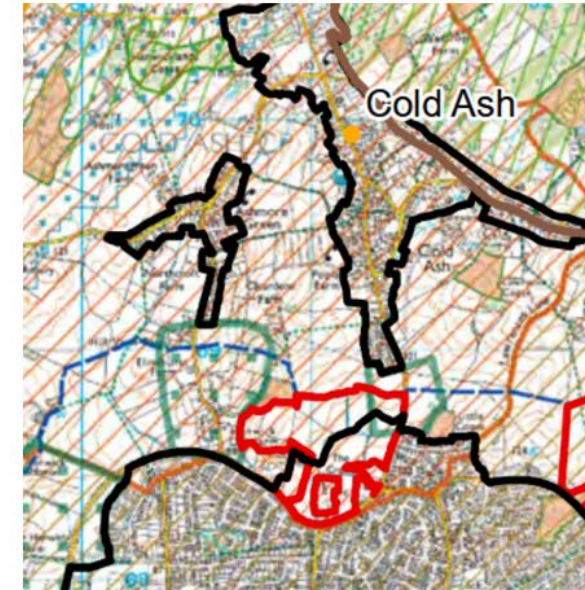


Figure 5: WBC proposed green gaps in Cold Ash Parish (source: West Berkshire Appropriate Countryside Designation Study)



**Extracts showing Site Ref CA12 infringing into the Rural Gap to the south of Cold Ash**

4.17. Rather than allocate specific sites, the Inspector allows for a ‘broad location’ to be identified for additional sites, which may be preferable to enable fuller studies to be undertaken (flooding, ecology) to inform any housing in this area.

## 5. Conclusion

- 5.1. There has been no consultation with the community on the major shift from the original spatial strategy as proposed in the Regulation 18 and 19 versions of the LPR. There has been limited or no regard whatsoever to the adopted Cold Ash Neighbourhood Plan, which assessed sites Ref CA12 and CA17 in consultation with the community and, in agreement with WBC, found them to be unsuitable.
- 5.2. We strongly question the robustness of the evidence that has been prepared to inform the Main Modifications, notably how sites originally discounted for allocation have been reassessed. There is no new additional documentation demonstrating how the statements now published in the amended SA/SEA have been evidenced.
- 5.3. If the LPR trajectory is to change, we consider that a fuller process, incorporating a new call for sites, would be prudent. This would allow for a transparent process, taking on board community feedback, enabling additional sites or broad locations to come forward, which in turn would more effectively enable sustainable development.
- 5.4. Clearly such an approach would add time onto the process, which is why we would press for the original timescale of the LPR to be reinstated, but with a commitment to an immediate review. This in turn could enable us to review our neighbourhood plan, which would enable a community-led approach to any additional allocations in the parish.
- 5.5. In the UK, there are precedents (Tunbridge Wells) where inspectors and councils have successfully consulted with their communities to address increases in local plans.
- 5.6. Community engagement is promoted by the UK National Planning Framework, Housing Ministry, local MPs, and the Deputy Prime Minister. However, it is now being neglected. There should be no excuse for not doing so.