

Regulation 18 consultation on the emerging draft of the West Berkshire Local Plan Review (LPR) to 2037 – Response from Cold Ash Parish Council

The West Berkshire District Council Local Plan clearly represents a significant amount of work and provides a comprehensive response to the key issues of the day, both national/international and local. Few could be in disagreement with its aims however the challenge faced is how to achieve them in a balanced way.

The recognition of the value of protecting and enhancing the character of the varying landscapes across the district, and recognising and maintaining the distinctness of individual areas, is extremely positive. Much of West Berkshire is made up of towns, villages and local areas, whose distinctiveness and local character are very important.

The main concern around the plan is that the aims have not been met for significant areas of the district, due to a number of constraints; both those placed on West Berkshire District Council and those it has chosen to adopt.

Vision

The vision is somewhat prosaic, which is understandable to an extent given the Plan's nature, but a significant omission is the lack of reference to quality of life for residents. How is the Plan genuinely going to enhance this? How are residents going to feel about living in West Berkshire within 5 years, half-way through, and at the end of the Plan?

Strategic Objectives

Cold Ash Parish Council supports the listed strategic objectives. It is good that these are succinctly worded, which aids clarity.

Objective 10 Transport could be improved by signalling a real intent to reduce traffic journeys through the impact of increased home working. This would be a major contributor to many of the other objectives (e.g. 1, 4, 7) and would of course help to offset the impacts of all the extra dwellings built over the life of the Plan.

The reference to home working in policy DC38, mentioning increasing FTTP connections to new homes, is welcomed. Ideally there should also be incentive schemes for employers to provide greater opportunities for homeworking for their staff.

Development Strategy - North Wessex Downs AONB

The rules and regulations around development of an AONB are to be applauded and West Berkshire District Council's embracing of them is important. However, such high values need to be put in context of the overall picture of West Berkshire. As highlighted in the report, 74% of West Berkshire is covered by the North Wessex Downs AONB. Embracing AONB regulations to their fullest means West

Berkshire District Council is accepting of the increased impact of development in the non- AONB areas of the district, which is further exacerbated when taking into account the wider restrictions relating to AWE and flood zones. This just leaves 12% of the District available for development.

So, rigorous application of AONB rules is only feasible if it is balanced with allowance in the housing targets set by central government. In the situation where this isn't the case, it places an undue burden on the non-AONB areas, in terms of the amount of development they are expected to absorb. This in turn would result in a polarisation of the district into heavily urbanised areas, with little green space, and significant swathes of rural land, with little development. This polarisation cannot be good for the district, as it is likely to result in a higher incidence of mental health issues among the population that is forced into living in very urbanised areas, which will be at odds with those who are fortunate enough to live in the rural areas. Indeed, the proposals defend the aims in relation to Landscape Character and Distinctiveness of locations in relations to AONB, but at the expense of all of the other areas within the district.

What the district needs is a more balanced approach to development, with more green space retained in urban areas, more sensitive and landscape appropriate development in the rural areas and a gentle flow from urban to rural environments, thus providing a natural continuum.

The stark difference proposed, between the treatment of AONB and urban areas could also lead to an "us and them" mentality, which cannot be helpful for the district as a whole.

Strategic Policies

SP1 / SP2 - The Spatial Strategy

The demarcation into the three zones is understandable, but flawed for two main reasons:

Firstly it relies on a blanket designation of 74% of the land area as AONB. We have no argument at all with the principles of designating an AONB, but the sheer size of the AONB drastically reduces the space available elsewhere and places too much development pressure on the "leftover" areas.

Also, such a huge area will actually vary quite significantly in the quality of its landscape and views etc. Just being within the AONB does not automatically make a particular landscape area better or of special landscape quality.

Secondly there are several examples of landscape in Cold Ash Parish, outside the AONB, that are just as spectacular and important, if not more so, than areas within the AONB. We provide some example photos below.

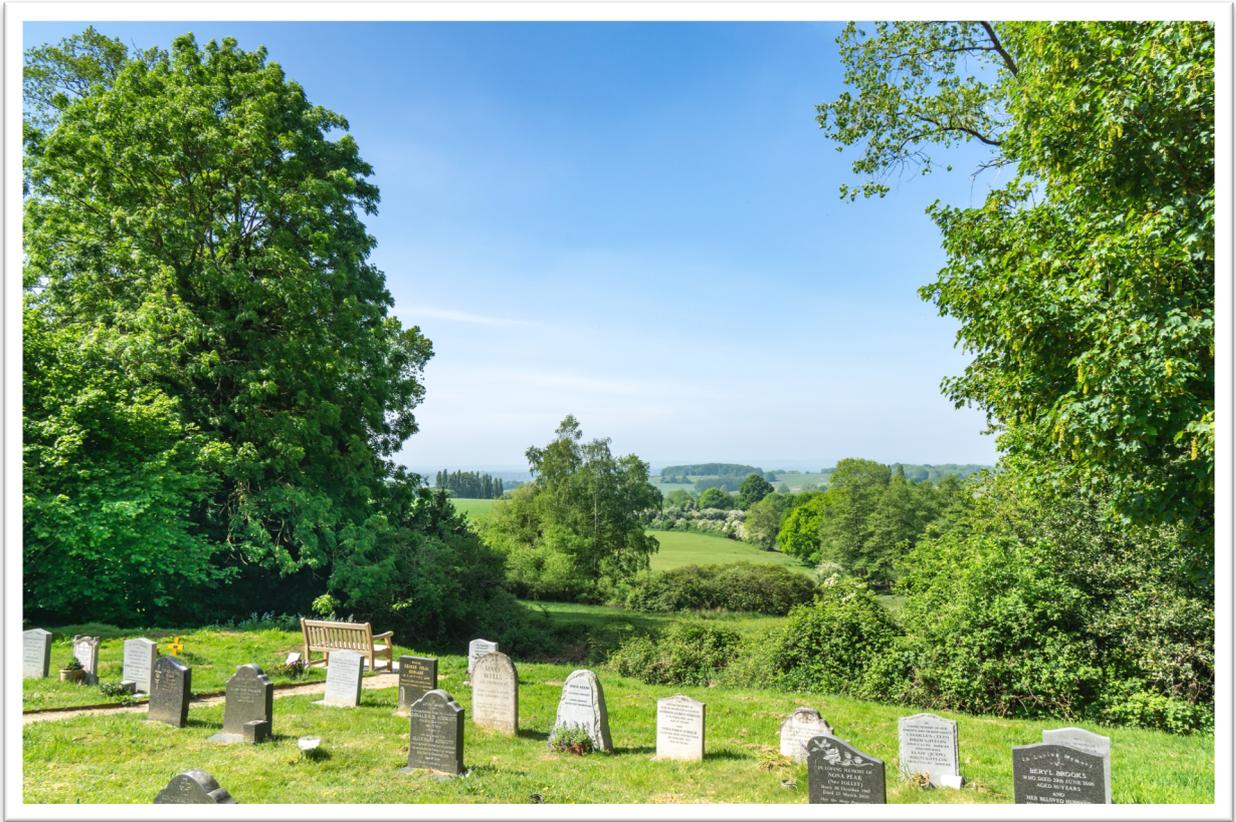


Figure 1 - The view west from St. Mark's Church, Cold Ash



Figure 2 - The view from Cold Ash Hill towards St. Gabriel's Farm, Cold Ash



Figure 3 - Looking towards Cold Ash from Ashmore Green

There would be plenty of scope for increasing development within the AONB without jeopardising its character or the identity and integrity of communities.

SP5 – Responding to Climate Change

Cold Ash Parish Council supports this policy.

SP6 – Flood Risk

Cold Ash Parish Council supports this policy.

SP8 – Landscape Character

Cold Ash Parish Council supports this policy and notes that there are many areas outside of the AONB that require protecting.

SP10 – Green Infrastructure

Cold Ash Parish Council supports this policy.

SP11 – Biodiversity and Geodiversity

Cold Ash Parish Council supports this policy.

SP12 – Approach to Housing Delivery

The upper number of the range of annual new build homes is stated as not a cap or maximum, which reduces certainty and the reliability of the Plan for residents and any other organisations wishing to know the impact of development over the life of the Plan.

Moreover, with the new Government Planning Framework being trailed last year, it is highly likely that a new National Planning Policy Framework will take effect during the Local plan period, which presumably will increase the likelihood of extra housing targets being applied.

SP13 – Sites Allocated in Newbury & Thatcham

The allocation of 40 houses for the Cold Ash Neighbourhood Area is out of keeping with the allocation that has been specified for other NDPs. Of the 8 NDPs, Cold Ash has a much higher allocation than more than half of the others. The only two that are higher are Hungerford (55, but a rural service centre, not a service village, so one would anticipate a higher number) and Tilehurst (175, but it is urban).

We recognise Cold Ash village's designation as a service village, but in reality, we do not have many facilities in the village. Cold Ash village has a village shop/PO with car parking for four cars and a village hall. The hamlet of Ashmore Green has nothing except for a parish notice board and a salt bin. Moreover, our road network needs to be taken into account and seen for what it is – basically a network of adopted farm tracks, one unclassified main road, with very limited off-street car parking and pavements. Consider Lambourn, which is a service centre and has significantly more facilities and yet has only been allocated 25 dwellings; this is not fair or consistent with the settlement hierarchy and appears to be another result of the skewing caused by the spatial strategy.

So, to summarise, we are very concerned that our indicative requirement is double the number allocated to Hermitage (20) and Lambourn (25) parishes (which have more facilities than Cold Ash village), with the remaining three parishes actually receiving an allocation of zero. We are concerned that our allocation of 40 dwellings does not sufficiently take into account all the issues and pressures uniquely faced by our parish.

Also see section below with respect to the treatment of Cold Ash Parish in the consultation document.

SP17 – North East Thatcham Strategic Site Allocation

The proposed THA20 development seems to be a reaction to the constraints, previously mentioned, that have been placed on potential areas for development; those being the decisions taken by West Berkshire District Council, in relation to AONB, and those set by others, in relation to AWE and flood zones.

It seems quite clear that the proposed development has been settled upon in response to the strong desire to limit development in the AONB, rather than the outcome of a balanced review of options. This conclusion is arrived at due to the absence of appropriate consideration of the infrastructure that would be necessary to support such a development and the impact on the surrounding villages, and the Thatcham and Newbury transport networks. As a minimum, to make the proposals viable from a transport and travel perspective, it would require significant infrastructure improvements and mitigation to address potential traffic issues into Thatcham and Newbury, the level crossing at Thatcham Station and mitigating the impact on the surrounding parishes of Bucklebury, Cold Ash, and the A4 east and Greenham Common area.

There are also questions to be addressed on the quality of life in such a large development. A similar scale development took place in Lower Earley, south east of Reading, in the 1980's. The resulting problems with young mother's feeling isolated during weekdays are well known to anyone who lived in the area.

With regards to the impact of this strategic site on Cold Ash Parish this huge development so close to us could well transform our parish forever, severely impacting on quality of life and sense of our community for many of our parishioners. Important iconic views could well be lost for good. As well as increased traffic, noise and pollution, there is also likely to be increased pressure on our recreational facilities (something we have seen in recent years even without the prospect of thousands of new homes just over a mile away), which will force us to protect them and prioritise them more overtly for our parishioners.

Therefore, given the Parish Council's views on the spatial strategy's over-protection of the AONB, then we strongly urge WBC to fundamentally rethink and scale down the strategic development described in this policy, with the bulk of the allocated housing distributed more widely and equitably across the whole of West Berkshire.

If the size of this strategic development is not reduced then CAPC has severe reservations as to the sustainability of the proposed development and its impact on Cold Ash Parish.

With regards to traffic, given that the WBC traffic model is incomplete, it is difficult to make definitive comments, however at this stage we would draw attention to the following points:

- Current traffic is high through the parish, particularly at certain "pinch-points" such as Hermitage Road/The Ridge, and Red Shute Hill.
- WBC traffic growth in the strategic model appears very high on the main

routes through Cold Ash parish and we anticipate further significant impact on our parish from THA20.

- We would like to see firm evidence of sustainable mitigation and be genuinely involved in such plans because we do not believe that successful mitigation will be possible without destroying the character of our settlements.
- Our parish road network is strictly limited and not all lanes are truly bi-directional, with widths as low as 2.8-5.8m.
- Only 22% of our 22.5 km of roads have any pavements, and only 10% on both sides,
- Our parishioners living on the main thoroughfare suffer problems of noise and air pollution.

In addition, CAPC is concerned that should this development go-ahead the promised facilities in this policy will actually be delivered. It has often been the case in the large developments that the original proposed facilities never materialise. As such we request that the policy wording be changed from “*Development of the site will be expected to deliver:*” to “*Development of the site shall deliver:*”.

The treatment of Cold Ash Parish

It has been accepted by West Berkshire District Council that Cold Ash Parish is in a quite unique position. This can be explained by the fact that it has been placed within the same spatial area as Thatcham and Newbury and has also been recognised as a service village. This leaves it in a confusing position, as the development expectations of each are quite different; the Thatcham and Newbury spatial area has higher development density expectations, whilst service villages are “smaller rural settlements” that “may offer some limited and small-scale development potential, appropriate to the character and function of the village, in order to meet local needs”. Also, part of the parish is in the North Wessex Downs AONB. The plan doesn’t balance this dichotomy, as the allocated number of houses is significantly higher than similar service villages, even though there are already c100 dwellings due to be built in response to the DPD.

Also, Cold Ash village is strategically placed between Thatcham and the strategic road network of the M4 and A34. This results in a high volume of transit traffic through the parish, which would be greatly exacerbated by the building of up to 2,500 houses in the North East Thatcham Strategic Site. It needs to be borne in mind that the parish’s road network is predominantly made up of adopted tracks, many without pedestrian paths.

It’s clear that the landscape, character and distinctiveness of Cold Ash is very important to its parishioners. It also provides a valuable flow between the urban areas of Thatcham and Newbury, to the south, and the rural landscape and AONB, to the north, due to its balanced blend of sensitive housing and semi-rural road network, and an appropriate amount of green space. As such, any overdevelopment or urbanisation, with excessive housing and an upgraded road

network, is likely to destroy the nature, character and distinctiveness of the area, which will be a loss not only for the parishioners of Cold Ash, but also to those of the surrounding areas, both urban and rural.

Summary

Cold Ash Parish Council acknowledges the hard work that has gone into the production of the Local Plan Draft through periods of political uncertainty and recently the corona virus disruption. We would particularly like to highlight the role played by the Planning Policy Team who have engaged with us over the last 18 months and thank them for their diligence and responsiveness.

The Plan is by its nature complex and wide-ranging and there is much in it that we support, particularly from a more general perspective – for instance references to the importance of combating climate change, biodiversity and maintaining the character and identity of settlements and communities.

However, we believe there are some fundamental flaws in the Plan, most especially its spatial and development strategies being too skewed to protecting the AONB, and its lack of recognition of the unique situation and challenges facing our parish, resulting in an over-allocation of dwellings here. We ask WBC to consider carefully all the points raised in this response, but particularly draw your attention to the following key items:

1. We object to the number of 40 dwellings allocated to our Parish and ask WBC for a fairer, lower allocation akin to Lambourn or Hermitage.
2. We urge WBC to reconsider the Spatial Strategy and amend it to provide for greater (but still contained) development within the huge 74% of land within the AONB.
3. We strongly recommend a re-think and scaling back of the THA20 development to a sustainable number, both for Thatcham itself and neighbouring parishes such as ours.
4. We ask WBC to ensure that the Local Plan:
 - a. formally acknowledges Cold Ash Parish's unique situation within the District
 - b. confirms that WBC will not allocate any strategic sites within our parish.
5. We request that WBC facilitate further additional processes of engagement between parishes regarding THA20.