

COLD ASH PARISH COUNCIL

Constituted 4 December 1894

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COLD ASH PARISH COUNCIL

Mr I Kemp, Programme Officer
Local Plan Services
PO Box 241
Droitwich
Worcestershire
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3.9.2024

Dear Mr Kemp,

Examination of West Berkshire Local Plan 2022-2039

This is a formal request from Cold Ash Parish Council (CAPC) to be involved in the next phase of the Regulation 19 Inspection of West Berkshire Council's (WBC) Local Plan. Further, we request that our Neighbourhood Development Plan (NDP), which was made in July 2024, be included in the examination documents and be reviewed by you as part of your consideration of the new proposals. Considering the nature of the proposed changes to the Local Plan, we also confirm that we wish to participate, and make a representation, in the hearing on the 2nd of October 2024 to position the feedback and interests of Cold Ash Parish Council.

Our specific interest is the proposed inclusion of the Henwick Park (CA12) and Regency Park (CA17) sites in the latest version of the plan. Our concerns naturally expand beyond the actual sites as there are strategic issues, and questions for the wider infrastructure, tied up in the new proposals.

CAPC wish to challenge the proposed changes that are happening without consultation within the community. We believe that this is inappropriate considering the nature and scope of the changes being proposed. In particular:

- The changes represent a significant change of direction from that consulted on at Regulation 18.
- The proposed extension of the timeframe for the plan, from ending in 2036 to ending in 2041, introduces the opportunity to consider other site options that may not have been brought forward based on the previous time frame.
- The timescales set for West Berkshire Council (WBC) to identify additional dwellings has provided no time for additional consultation. As a result, WBC has developed proposals based on out-of-date HELAA assessments. The proposals may well be unfair to other landowners who may have wished to bring forward proposed sites but have not been invited to do so.
- The changes do not appear to have taken any account of the Cold Ash NDP, which was successfully passed by a referendum in May 2024 and was made by WBC in July 2024.

- The additional proposals are being made in isolation, without consideration of the wider infrastructure needs nor any sustainability consideration at all.

We are aware that changes to the NPPF are in the process of being developed but are not due to come into force until December 2024, at the earliest. We believe that there are no changes planned to the role or weight of NDPs and their policies. We therefore challenge WBC's approach to the arbitrary selection of additional sites based on out-of-date information, with no public consultation and ignoring the impact of the Cold Ash NDP policies.

Whilst we appreciate that each Local Plan process is individual and considered on its own merits, we are aware of another Local Plan that is going through Regulation 19 inspection that has similar challenges to the West Berkshire Local Plan in terms of not bringing forward adequate sites within the published timeframe. In that case, the inspector provided a series of options for the local authority, who publicly consulted on these and their proposed response to them. Options for moving forward included identifying additional sites to make up the shortfall, or continuing as planned and committing to an immediate review or reducing the overall timeframe for the plan. We would wish to understand whether such options were put to WBC as to how their 'shortfall' in housing delivery might be considered?

In light of our concerns expressed above, we would request the opportunity for options to be explored including the commitment for an early review to consider new sites, as opposed to including these now. This would:

- enable other site options to be considered in the new plan; we are aware that both WBC and the local communities have recognised at least three approaches that would meet the requirements of central Government and better meet the needs of local communities;
- provide all local landowners with the opportunity to submit further sites for consideration;
- enable WBC and other key stakeholders to fully understand, and take into consideration, the changes that are to be made to the NPPF;
- enable the time and space for real community engagement and consultation; and
- enable a full and appropriate sustainability assessment of the additional impacts of development and the associated local infrastructure needs required to support it. This is an issue that has already been raised by a number of local councils in relation to the proposed North-East Thatcham Development, which is in the same vicinity as the additional sites being proposed.

We recognise that the absence of any local or community engagement from WBC on the proposed changes means that some of these points may already have been considered by yourself and shared with WBC, but they have not been shared further. We therefore have the following questions:

1. What has been requested of WBC and were a series of options considered?
2. What has WBC put forward as a response?
3. Has WBC engaged publicly on the renewed approach?
4. What is the rationale for WBC's renewed approach?
5. Have other options been considered (e.g. capping the timescale of the current plan and factoring the outstanding points into a new plan, to commence immediately following the making of this plan)?
6. Considering the proposed additional sites being in close proximity to the current proposed North-East Thatcham Development, have sustainability assessments been undertaken for the new proposed sites to ensure that the requisite infrastructure will be in place to align with the phasing of the various developments?

The main questions from our perspective are questions 4 and 5. Number 4 is important as there's no evidence that WBC has taken a robust and diligent approach in developing the new proposals. In particular:

- They have used out of date information.
- They have not taken account of their own policies that were adopted when the Cold Ash NDP was made.
- They have ignored the history of the sites in question and the fact that applications for development on the sites have been rejected on numerous occasions.
- They have not consulted with the local community which is a key element of the current Governments latest proposals

Question 5 is important as the current process does not appear to provide the time or space to consider the best options and consult appropriately. As the whole exercise is plan-led, we consider that this would address the current issue of the significant change in the direction of travel without adequate consultation.

We would respectfully request the opportunity to participate in the further hearings to take place in early October, as set out in correspondence "IN31: Further hearing sessions: 1, 2 and 3 October 2024". Whilst we did not make an individual representation at the Regulation 19 hearings, we have contributed to those of a neighbouring parish and we consider that the direction of travel of the LPR has significantly changed and we would therefore be grateful for an opportunity to input.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Rosie Jardine', written in a cursive style.

Rosie Jardine
Clerk & RFO to Cold Ash Parish Council