


West Berkshire Local Plan Review 2022-2039
Proposed Submission Representation Form
Ref:
(For official use only)

Please complete online or return this form to:	Online: http://consult.westberks.gov.uk/kse
	By email: planningpolicy@westberks.gov.uk
	By post: Planning Policy, Development and Regulation, Council Offices, Market Street, Newbury, RG14 5LD
Return by:	4:30pm on Friday 3 March 2023

This form has two parts:

- Part A - Your details: need only be completed once
- Part B - Your representation(s): please fill in a separate sheet for each representation you wish to make

PART A: Your Details

Please note the following:

- *We cannot register your representation without your details.*
- *Representations cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.*
- *All information will be sent for examination by an independent inspector*
- *All personal data will be handled in line with the Council's Privacy Policy on the Development Plan. You can view the Council's privacy notices at <http://info.westberks.gov.uk/privacynotices>*

	Your details	Agent's details (if applicable)
Title:		MR
First Name:*		JOE
Last Name:*		CUNNANE
Job title <i>(where relevant):</i>		SENIOR PARTNER
Organisation <i>(where relevant):</i>	COLTHROP VILLAGE CONSORTIUM	CUNNANE TOWN PLANNING LLP
Address* <i>Please include postcode:</i>	ORIEL HOUSE 26 THE QUADRANT RICHMOND UPON THAMES SURREY TW9 1DL	ORIEL HOUSE 26 THE QUADRANT RICHMOND UPON THAMES SURREY TW9 1DL

Email address:*	[REDACTED]	[REDACTED]
Telephone number:	[REDACTED]	[REDACTED]

**Mandatory field*

Part B – Your Representation

Please use a separate sheet for each representation

The accompanying guidance note available at: <https://www.westberks.gov.uk/lpr-proposed-submission-consultation> will assist you in making representations.

*Your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change(s) as there will **not normally** be a subsequent opportunity to make further representations, **further submissions will ONLY be at the request of the Inspector, based on the matters and issues they identify for examination.***

Your name or organisation (and client if you are an agent):	CUNNANE TOWN PLANNING LLP (AGENT) COLTHROP VILLAGE CONSORTIUM (CLIENT)
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Please indicate which part of the Local Plan Review this representation relates to:

Section/paragraph:	6.52 – 6.63
Policy:	SP17
Appendix:	APPENDIX 2 -TSGS 2020
Policies Map:	NORTH-EAST THATCHAM
Other:	-

1. Legally Compliant

Please see the guidance notes for an explanation of what 'legally compliant' means.

Do you consider the Local Plan Review is legally compliant?

Yes

No

NO

Please give reasons for your answer:

It fails to discharge the duty to cooperate by not consulting Thames Water regarding the time needed for the provision of water and foul drainage for the proposed housing. The settlement boundary is also incorrectly drawn.

2. Soundness

Please see the guidance notes for an explanation of what 'soundness' means.

Do you consider the Local Plan Review is sound?

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF)

Please tick all that apply:

NPPF criteria	Yes	No
Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development		NO
Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		NO
Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground		NO
Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		NO

Please give reasons for your answer:

The Plan does not take into account other reasonable alternatives such as Colthrop Village. The allocation is not supported by adequate infrastructure provision to ensure delivery. The Plan is not the most sustainable option and this is inconsistent with the NPPF. Please refer to attached Reg 19 submission document.

3. Complies with the Duty to Co-operate

Please see the guidance note for an explanation of what 'Duty to Cooperate' means.

Do you consider the Local Plan Review complies with the Duty to Co-operate?

Yes

No

NO

Please give reasons for your answer:

The allocation in Policy SP17 does not adequately deal with the need for water and foul sewerage, education and health provision. Please refer to attached Reg 19 submission document.

4. Proposed Changes

Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this change will make the LPR 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.

We propose the deletion of the SP17 allocation and the allocation of Colthrop Village as a more sustainable alternative. See attached Reg 19 submission document.

5. Independent Examination

If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?

Yes

YES

No

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

In order to present the Colthrop Village effectively to the Examination.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

6. Notification of Progress of the Local Plan Review

Do you wish to be notified of any of the following?

Please tick all that apply:

Tick

The submission of the Local Plan Review for Independent Examination	√
The publication of the report of the Inspector appointed to carry out the examination	√
The adoption of the Local Plan Review	√

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.

Signature		Date	02/03/2023
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Your completed representations must be received by the Council by 4:30pm on

Friday 3 March 2023.



Colthrop Village

**A SUSTAINABLE URBAN EXTENSION TO
THATCHAM WITH A NEW ROAD BRIDGE**

REGULATION 19 SUBMISSION DOCUMENT

FEBRUARY 2023

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The Proposal



Fig. 1 Site Location Plan



Fig. 2 Site Layout Plan

The Colthrop Village urban extension will comprise:

- 950 new dwellings.
- Affordable housing
- A road bridge from Pipers Lane
- A two-form entry primary school
- A neighbourhood centre
- Recreational facilities including two sports pitches
- Primary health care provision
- An extensive green space (c. 30% of the site)
- Flood mitigation measures and surface water drainage infrastructure
- Remediation of contamination and removal of eyesores

Introduction

The development is proposed on a site of some 36.5 hectares to the South of Thatcham, Berkshire, lying between the Kennet and Avon Canal and the River Kennet.

The site is comprised of pasture and a former paper mill site. It is ideally suited to new development being totally underused, well located in proximity to the railway station, fairly discrete visually and with few immediate neighbours.

The site is currently reliant on two accesses which both cross the railway on level crossings and it is therefore necessary to provide a new over- bridge from the North to release the development potential of the land. At the same time, this will deliver a big benefit to the town of Thatcham as explained below.



Fig.3 Proposed Site Layout

Improving Accessibility

Delivering the bridge and relieving congestion

This proposal will deliver a new road bridge across the railway and canal as an alternative to the railway level crossing by the station, which is a significant barrier to North-South movement. It has been a long-held aspiration to improve accessibility to and from the South of Thatcham and to relieve the high levels of congestion experienced at peak times, in particular, around the level crossing. In the peak hours the crossing is actually closed more than it is open and this causes considerable delay. It will:

- Reduce congestion and noise
- Improve air quality
- Greatly enhance connectivity and access
- Enhance resilience and safety

The new bridge is a realistic prospect but only with the development of Colthrop Village. Without it there is no likelihood of relief. Train frequency is proposed to increase and the amount of down-time on the crossing will unfortunately increase as well. The design limitations of our Victorian infrastructure will continue to be a blight on people's lives for generations to come.

The proposed road bridge has been designed and specified to current standards to accommodate two-way traffic. The new route would lead from Pipers Lane, where a new roundabout would be created at the junction with Pipers Way and the bridge would rise over the railway and canal, landing at a new roundabout on the Southern side. Here it would connect to the new development and to Crookham Hill across the River Kennet, not far from the current access to Rainsford Farm.

The engineering solution to the traffic problems of the area would need to be funded by development on the proposed site. A full analysis of costs by our design consultants to provide a figure of £16.5 million is attached to this submission. The cost of the bridge can be borne by a sizable development such as that proposed and it will be delivered first, in order to facilitate the construction of the new development.

The benefits to the locality would, in consequence be realised in the early stages of development and will be an enabler for the later phases. With the bridge would come improvements to the accessibility of the station precincts which will in turn be more accessible by train from London now that the Elizabeth Line to Reading is up and running. There would be benefits to the town centre from improvements to air quality and noise and there would be improved links across the railway for pedestrians and cyclists as well as for motor traffic.

The chosen route was one of several that have been assessed and consulted upon. It is considered that providing an access to the West of the site will provide significant advantages not only to existing users of the highway but also to the future residents of Colthrop Village itself.

Early traffic modelling suggests that there would be minimal impact on the surrounding roads as any additional diverted trips caused by the removal of congestion in Thatcham would disperse across the network. It is estimated that the bridge would not attract large

numbers of additional trips through Thatcham but will release some suppressed demand from the South of Newbury and the surrounding area. With the new development there would be approximately 190 extra vehicle movements across the bridge in a Northerly direction in the AM peak hour. By comparison, the PM peak is lower.

Discussions have been held with Network Rail which has confirmed that it would be supportive, in principle. A preliminary design for the bridge has been devised and this shows that a suitable structure and carriage way design can be achieved to meet the requirements of the Highway Authority and Network Rail design standards.

Within the development itself, there will be a network of sensitively lit pedestrian and cycle routes connecting the school, bus stops, the local centre and the surrounding area. The internal road system has been designed to facilitate provision of a bus service penetrating the site.

The road bridge itself will also support pedestrian and cycle access to the railway station and Thatcham town centre. It is also envisaged that the development will have direct access to the canal towpath thereby enhancing connectivity and opportunities for leisure.

With the bridge would come improvements to the accessibility of the station precincts which will in turn be more accessible by train from London now that the Elizabeth Line to Reading is up and running. There would also be benefits to the town centre from improvements to air quality and noise and improved links to it across the railway.

Providing Social Infrastructure

The Colthrop Village development will provide a state-of-the-art new two-form- entry primary school on the site. However, in consultation with local residents, there was a view that the Consortium should be providing a senior school because the Kennet Secondary school, which serves the town has capacity issues. However, there are currently proposals to expand the site of Park House School in Newbury as part of the Sandleford Park development. The Colthrop Village will make its contribution through the Community Infrastructure Levy (currently standing at £5,783,954).

The proposed development therefore seeks to make provision on site for primary- age children only. This will be a cutting-edge facility built to the BREEAM excellent standard required by the Council for public buildings (BREEAM is a widely - recognised industry benchmark for measuring the sustainability rating of new developments).

Local residents are concerned about health provision within the town. In a recent consultation, the most frequently mentioned need, after schools, was a GPs surgery. This will be provided within the local centre. We have worked on the basis that the development should “wash its own face” in terms of primary health-care provision. This could be a completely new business or a satellite of an existing practice such as the Burdwood surgery in town.

It is proposed that the health provision would be situated within the local centre where other social needs could be met as well including fitness, dentistry or other services that would complement those already available in the town. The objective would not be to create new facilities that would compete with the existing provision in Thatcham .

Complementary to health provision is outdoor sport and recreation. The proposal is to provide two full-size football pitches adjacent to the proposed school. There would also be extensive new footpaths through the green space, a “trim trail” and children’s playground provision to the Council’s standard.

Direct access from the site to the Kennet and Avon Canal would open up wider opportunities for walking, cycling and running along the towpath with connectivity to other public-rights-of way.

Promoting Business

Colthrop Village will bring a potential 2000+ additional residents to the town and this will increase footfall in the town centre, giving a big boost to established local businesses. The local spend will increase as will the availability of the skills needed to support a vibrant economy. The added population will seek services and employment locally and thereby contribute to the vitality of the town.

Those who do not seek employment locally may have chosen to live in Thatcham for its ease of access to London and other employment centres. Whereas travel time to London Paddington is already a viable commute, the new Elizabeth Line will improve accessibility to all parts of Central London bringing Thatcham within an easy commuter’s catchment from the capital city. This will attract spending power and investment from outside of the county.

At the same time, construction work on the site, over several years, will draw-in contractors and other personnel who will bring-in business and spend some of their earnings locally bringing a further boost to the local economy.

It is proposed that the development will include some new employment floorspace. Whilst the size and format of the provision is not yet determined it will be aimed at filling any existing gaps in the local commercial market and may support new start-ups in flexible spaces as well as offering units for the larger well-established business. There is no intention for the proposed local centre to offer competing services to those already available in the town. Through the limited provision on the site it is intended to support local enterprise and to provide for the essential needs of the local community.

Protecting and Enhancing Biodiversity

- Protecting Wildlife
- Enhancing habitat
- Improving Access

The proposals include major investment in the natural environment. This will ensure that there is an overall benefit to wildlife from the new development. It will see the creation of high quality new habitats and secure its good management into the future. Large areas of the site will be retained as green space and much of this will be nurtured as a natural resource to complement the adjacent River Kennet and the wildlife it supports as well as sustaining reptiles and birds already found on the site.

We know quite a lot about the natural environment on and around the site as, in 2019, the Colthrop Village Consortium commissioned Crestwood Environmental to undertake a comprehensive set of wildlife and habitat surveys. This was updated in January 2023 and is included in this submission. It confirms that the conclusions in the 2019 report remain valid. This is a detailed assessment involving many visits to the site with sustained monitoring of many different species. It also represents a substantial investment by the consortium in trying to establish what natural assets they have to work with and around.

The whole site has been surveyed for the presence or absence of key species and the surveys have shown that the ecological interest of the site relates, principally to its position near to the River Kennet which is a valuable wildlife corridor. For instance, there are common and widespread bat species utilising the river and the site for foraging and commuting and there is evidence of otters in the area. Species actually found on the site include a small population of common lizard and two grass-snakes that have been seen in the area of the former paper mill.

The proposed development is considered to have a negligible negative effect on terrestrial invertebrates due to the fact that nothing very significant was found, no species of conservation concern were recorded and some habitat for invertebrates will be retained and created as part of the development.

A total of 25 Common Lizards and 2 Grass Snakes were recorded during the surveys and these were all found in the north-east of the site within the grassland/scrub area. Although no other reptiles were found, the site is considered to have moderate suitability for reptiles.

The River Kennet and its banks, is considered to be of high suitability for Otter and moderate suitability for Water Vole. It provides good opportunities for foraging, due to the presence of fish and amphibian prey, and acts as a wildlife corridor providing ecological connectivity to watercourses in the local and wider areas.

There is evidence of the presence of Otter along the River Kennet and there is suitable habitat on the banks as the woodland/ trees provide cover and the roots of the trees provide good opportunities for the creation of holts and couches.

No evidence of Water Vole was recorded within the Survey Area (where accessible). Although most habitat is of low or moderate suitability for Water Vole there is a stretch of the Kennet and Avon Canal (outside of the site) which is considered to be of high suitability.

There is evidence of some badger-related activity on the site. New development can only take place in proximity to badgers under a licence regime from Natural England. Their habitat is also protected so strict controls will operate to ensure that the new development is designed and implemented in such a way as to ensure their protection.

Most of the site is dominated by grassland and is considered to be of little ecological value. The River Kennet is a valuable wildlife corridor with evidence of many species in proximity to it. It is designated as a Site of Special Scientific Interest. The brownfield land is occupied by relatively diverse vegetation and offers some ecological value for terrestrial invertebrates.

The site offers suitable habitat for foraging and commuting bats, specifically the woodland edges, scattered trees, the River Kennet and the Kennet and Avon canal.

Just six trees offer moderate suitability for habitation by bats and no bats were recorded as entering or emerging the trees during the survey period. No trees were identified as bat roosts during the survey period.

Eight bat species were recorded during the activity surveys:

- Barbastelle (*Barbastella barbastellus*);
- Daubenton's bat (*Myotis daubentonii*);
- Natterer's bat (*Myotis nattereri*);
- Leisler's bat (*Nyctalus leisleri*);
- Noctule (*Nyctalus noctula*);
- Common pipistrelle (*Pipistrellus pipistrellus*);
- Soprano pipistrelle (*Pipistrellus pygmaeus*); and
- Brown long-eared bat (*Plecotus auritus*).

The 2023 data search revealed the additional species: *Myotis* species, Nathusius pipistrelle (*Pipistrellus nathusii*), pipistrelle bat species, serotine (*Eptesicus serotinus*), barbastelle and whiskered/ Brandt's bat (*Myotis mystacinus/brandtii*).

Bat activity was recorded across the entire site and the highest levels of activity were recorded along the River Kennet, the Kennet and Avon Canal and the woodland edges.

The proposed development is considered to have a low negative effect due to the retention of the habitat adjacent to the River Kennet which was where the majority of bat activity was recorded and which maintains ecological connectivity throughout the site and habitats in the local and wider areas.

We will

- Ensure that the biodiversity of the site is not only conserved but greatly enhanced by ensuring that a suitable mosaic of habitats is created to complement the River Kennet corridor and to sustain the species of interest currently found on the site.
- Create 8.4 hectares of green space including extensive areas of new habitat and a new swale that will increase the interest and diversity of the flora and fauna.
- Provide a minimum 10m stand-off from the River Kennet and Kennet and Avon Canal for all works regarding the proposed development. This will ultimately be incorporated into the wide belt of landscaping that runs along the Southern side and through the heart of the development. It will help to protect essential habitat for the flora and fauna that have been identified as important such as foraging and commuting bats and otters that may visit the site from elsewhere.
- Maintain ecological connectivity to the local and wider areas post-development.

- Adopt precautionary working measures during construction to ensure that the biodiversity of the site is protected. There may be the need to translocate the small population of reptilian species elsewhere within the site but we will ensure that suitable habitat for reptiles is retained as part of the proposed development layout.
- Create new hibernacular for reptiles and an area protected from any disturbance during the development.
- Incorporate bat boxes into the scheme to provide additional roosting opportunities for Bats.
- Implement a sensitive lighting scheme to prevent unnecessary light-spill into naturally dark corridors currently used by nocturnal species (including Bats) – the River Kennet and Kennet and Avon Canal and along the periphery of the site boundary.
- Create areas of grassland with wildflower mixes sown to improve the suitability of the habitat for reptiles as well as other wildlife and to improve overall biodiversity.
- Create grassland habitat in the southern extent of the site, enhanced with wildflowers.
- Plant hundreds of new trees.
- Ensure that any landscaping designs take into account the use of plant species that attract a diversity of invertebrates that will also benefit a variety of bat species, as well as being of benefit to other wildlife such as birds. Nectar-bearing and fruit-bearing plant species, as well as plant species that provide cover for overwintering invertebrates.
- Utilise native species, prevalent to the local area including Hawthorn, Hazel, Oak and various Wildflower mixes.

Improving The Landscape

The site is visually dominated by the presence of electricity pylons and high voltage cables striding across the fields. They are a significant disfigurement to the landscape and a potential deterrent to development of the site. The proposal includes provision for the complete “undergrounding” of the cables across the site and removal of the associated pylons. Initial discussions with the electricity company have been favourable. In fact initial works to “underground” the section across the railway are already in-hand in connection with the electrification of the railway. At no expense to the public purse, the removal of the remaining above-ground infrastructure across the site would be funded entirely by the Colthrop Village project. This will include the removal of the ugly concrete water tower and the pipes and gantry that lead from the site across the Kennet and Avon Canal. This will result in a significant improvement to visual amenity.

In addition to the removal of unsightly “grey” infrastructure there would be significant investment in new “green” infrastructure. The new development will be set within a framework of indigenous new planting with hundreds of new trees and thousands of

smaller plants providing a canopy of vegetation across the site. From the formal tree-line boulevards to winding riverside walks there will be a wide variety of planting requirements but all will serve to enhance the landscape qualities of the area. Whilst built-form will dominate in the housing zones, the overall development will have 30% of its area dedicated to publicly accessible green space. This will amount to over 10 hectares of high quality landscape for residents to enjoy. It will provide valuable screening of the new buildings and will help to integrate them visually into the landscape.

Providing Much Needed Housing

A wide range of homes to meet local need.

The development will provide high quality design, larger houses for families and 40% affordable homes.

Colthrop Village will incorporate affordable housing and our survey shows that there is support for this in the locality. The Borough Council expects 40% of new housing to be affordable according to the Government's definition. The allocation of the Colthrop Village site would potentially provide 380 affordable dwellings many of which would be houses suitable for families. The mix of units will respond to the Council's own assessment of the housing market needs. The units would be spread across the site and integrated visually with the market housing to create a "tenure-blind" development. It will deliver well-designed, energy-efficient, new affordable housing in a pleasant environment with all essential services to hand.

The provision of new housing on a scale envisaged at Colthrop Village would greatly assist the Council to meet the identified local need, a sustain a five-year housing supply into the future and to meet their aspirations for growth in the emerging Local Plan. Difficulty in bringing forward strategic allocations such as the Sandleford Park site in Newbury shows the need to have a ready supply of suitable sites that meet the Council's strict requirements.

The Colthrop Village scheme is well suited to meet the identified need. It is all within a short walk of the railway station, it will have no adverse impact on neighbours, it utilises a brownfield site, it will provide a high quality environment for its residents to enjoy and it will deliver the much needed associated infrastructure requirements. There is an opportunity here to create an exemplar urban extension to Thatcham that will provide for a low-carbon future and support a highly-sustainable life-style.

The proposed development will provide high quality housing that is fully compliant with increasingly demanding construction standards and finished to a very good specification. The layout of the buildings and spaces within the development will be designed with an eye to good urban design. Building heights, the enclosure of space and the use of details such as boundary treatments and soft landscaping will all be used to provide a variety of different spaces connected by safe and visually pleasing streets and footpaths/cycleways.

The spatial interplay between the urban streets and the extensive open spaces, tree-lined streets and the canalside footpath will create a pleasant series of varied and interconnected spaces where all residents have easy access to open space and the

therapeutic environment of the river or canalside footpath. This would be no ordinary development but would provide a truly sustainable, healthy and pleasant living environment.

The proposed masterplan layout shows how the distribution of different housing types and formats could be achieved and distributed across the site. This would provide a potential mix of dwellings as shown in Table 1. This dwellings mix reflects the latest research carried-out by the Council.

Type	Total	Grand Total
1b Flats	143	
2b Flats	214	
3b Flats	48	405
2b Houses	71	
3b Houses	285	
4b Houses	190	546
<i>Total Units</i>		<i>951</i>

Fig. 4

Mitigating Flooding

- Proposed Flood Alleviation and Mitigation Measures
- Sustainable Drainage

The proposed site is partly at risk of flooding at times of peak rainfall due principally to its proximity to the River Kennet. Although records of historical flooding events show that actual flooding was limited to the banks of the river and isolated ponding on the site, the proposed development would need to be “future-proofed” against the potential effects of climate change. Surface water flood risk is coincident with a number of small drainage channels that run through the site from North to South.

A Flood Mitigation Strategy was prepared by engineers Peter Brett Associates that involved modelling potential river and surface water flooding and devising a solution to ensure that the flood waters could be dispersed without impacting on the proposed development. This strategy utilised a hybrid solution between an Environment Agency commissioned mapping exercise that employed topographical survey data for the water course channels and further detailed independent flood plain profiling. To this was added the requisite allowance for the impact of climate change and a potential flood extent was generated.

Taking the extent of predicted flooding shown by this exercise a strategy was adopted to formalise and constrain the flooding to a new route to be cut through the site and profiled

as a swale (or open channel). This swale would form an integral part of a landscaped green corridor running from the North-West across to the River Kennet in the South East and would constrain the flood plain extent to that part of the site during a one-in-one-hundred-year event (allowing for climate change). To protect the housing from a worst-case climate change scenario the ground floor levels of any proposed housing would be elevated 300mm above the predicted flood levels in accordance with Environment Agency requirements. Safe access arrangements would also be provided to all dwellings to protect against the effects of an extreme event.

The Consortium also commission a Surface Water Strategy to complement the flood mitigation proposals and to complement the local geology. This proposes attenuation storage within open features in addition to lined permeable pavements.

The modelling work, carried out on the Consortium's behalf, has been validated by the Environment Agency. It shows that the site can be safely developed for the purpose intended taking account of a realistic and future-proofed worst-case scenario.

The site is not therefore precluded from allocation for new housing on the strength of potential flood risk despite its situation between two water courses.

Utilising Brownfield Land

Removing redundant structures and cleaning-up the site.

The former paper mill site is vacant following the closure of the business. With regard to the pylon and undergrounding - this has already been completed under the canal and railway and the new pylon erected as agreed on Rainsford farm land. The Paper Mill brown land, the water tower and the hard standing are the only remaining structures on the site. There remain extensive areas of hardstanding and a series of ponds associated with the works.

Former slurry pits have been filled and the residue of industrial processes remains. A preliminary assessment of the risk of contamination has been carried out focussed principally on the former industrial works.

This has identified a history of manufacturing on the site since Victorian times (latterly of paper and cardboard production) and the storage and use of raw materials and bi-products as well as residual demolition material and landfill. The extent and nature of the landfill and made-up ground have not been recorded historically and further investigation would be required to establish this. It will also need to be established if there remain ongoing impacts on the ground water and surface water as well as any gassing from decomposing waste.

The initial assessment, combined with some historical studies suggests that there are no current issues with contamination causing harm to the surrounding environment but any new development will need to ensure that there is likely to be no harm to the future occupants and users of the site.

A Community For The Future

SUSTAINABILITY -Energy Efficiency and a Low Carbon Community

In Colthrop Village we aim to design places that help meet the challenges of climate change by using as little energy as possible. We are investigating this at all levels from large site-wide installations to local building-level design and technology.

We aim to reduce the energy demand of the development through the fabric design and orientation of buildings. This will target high levels of insulation, low air permeability and optimised glazing specifications. It will maximise use of natural daylight whilst limiting unbearable summer heat. This approach will reduce the energy demand for heating, lighting and cooling and will include the specification of energy efficient lighting and building services providing further efficiencies.

In line with West Berkshire's policy CS 15 for Sustainable Construction and Energy Efficiency we will be following the latest best practice guidance to achieve a zero-carbon development through the use of renewable and/or low/ zero carbon technologies.

There are various options to consider when looking at technologies, and we will take into account local planning requirements, land use, noise and air quality as well as overall energy and CO2 reduction.

We are keen to embrace the very latest thinking on designing highly efficient buildings, and will be using the principles set out in The London Energy Transformation Initiative's 'Climate Change Emergency Design Guide' and Passivhaus guidance to inform our design.

We are thinking about the way that people will use their homes and buildings in the future and how best we can facilitate a low energy community and encourage residents to engage with energy saving to lower their carbon footprint.

CLIMATE CHANGE PROOF - In addition to flood mitigation we also need to consider other potential impacts of climate change such as overheating and the durability of materials in the design and specification of the proposed buildings. Overheating analysis will be undertaken for both residential and non-residential buildings against current and future weather scenarios. The results of this analysis will be used to inform designs to ensure that thermal comfort and ventilation levels are maintained in the event of hotter summers and cooler winters. Specification of façade materials will also consider performance under more extreme weather conditions which may be a feature of future climate change, to minimise degradation and maintenance requirements.

As well as increasing the likelihood of high intensity rainfall events and associated flood risk, climate change could also lead to water shortages during periods of summer drought. Therefore, the specification of low water use WCs, taps and showers will be targeted as a key part of minimising the water demand of individual dwellings and other buildings. Drought resistant planting and opportunities to utilise rainwater recycling to provide for irrigation of individual gardens and communal green spaces will also be incorporated.

SUSTAINABLE LIVING - We are committed to delivering a sustainable community at Colthrop Village, with housing and schooling provision supported by opportunities to work and shop locally in both a neighbourhood hub, but also in the established town centre of Thatcham. This requires a holistic approach at both strategic and building level to deliver a development which "meets the needs of the present without compromising the ability of future generations to meet their own needs."

BREEAM, the UK's "Building Research Establishment's Environmental Assessment Method" has provided a holistic framework for both guiding and assessing the environmental performance of new or existing buildings for over 20 years. BREEAM Communities was added as a new way of measuring the environmental credentials of a community design at a strategic level.

We are inspired to follow this best practice methodology across the development, as this approach will also serve to support the BREEAM Excellent ratings required for the proposed school and neighbourhood centre under local planning policy. BREEAM sets stretching environmental performance criteria to be met in the design and construction of buildings in each of the categories: Management, Health and Wellbeing, Energy, Transport, Water, Materials, Waste, Land Use and Ecology, Pollution and Innovation.

For dwellings we aim to follow the principles of similar best practice criteria included in the 'Home Quality Mark' scheme. A voluntary standard which has superseded Code for Sustainable Homes, like BREEAM, this provides a framework for measuring site level sustainability, as well as the design and specification of individual dwellings.

For all buildings, apart from energy and water efficiency, key considerations will relate to specification of materials to minimise embodied carbon, which takes into account the energy used to produce materials over the entire life-cycle. Responsible procurement will also aim for materials to be sourced locally where possible, both to support the local economy, but also to reduce climate change impacts related to transport emissions. All timber products will be FSC/PEFC certified and other materials sought from manufacturer's with certified environmental credentials.

Consideration of health and wellbeing issues has come to the forefront of building design and operation, driven by new schemes such as WELL and fitwel. The development will seek to optimise daylighting, acoustics and indoor air quality of buildings informed by both of these, BREEAM and HQM standards. Both physical and mental health will be well supported by provision of extensive green space across the entire development.

The Colthrop Consortium (representing, jointly, the owners of the land) have been pursuing the allocation of their site through the Local Plan for ten years. The site in question represents a deliverable, available and viable development opportunity which would support high sustainability credentials and would be potentially far less contentious than other sites within the district that are currently being promoted for development.

In 2013, they responded to the Council's invitation and put forward the land for consideration in an assessment of the opportunities for housing development within the district. This Strategic Housing Land Availability Assessment (or SHLAA) considered all of the sites that had been promoted and ranked them according to the availability, deliverability and developability. The Colthrop Village site was deemed to be "not currently developable" on the basis of the following constraints:

- (i) flooding;
- (ii) the potential of contamination;
- (iii) heritage; and
- (iv) the perceived 'poor relationship' with Thatcham and connectivity issues due to the level crossing.

Following the SHLAA feedback, the site owners commissioned a number of technical reports: a Highways Statement with an indicative bridge design; a Flooding Assessment; an Heritage Appraisal, and a Contaminated Land Assessment.

A Realistic Prospect

In conclusion, this development is a realistic prospect. It is deliverable and viable and the land is available now.

All landowning parties with an interest in the site and the proposed new access route are supportive of the scheme in principle. There have been long-standing negotiations to establish the best and most easily delivered access route and this has now been concluded. Construction of the bridge is dependent upon some third-party land but negotiations are well advanced and an in-principle agreement has been reached with Network Rail.

The main site is not occupied by any development and the grazing land can be made available for development at short notice. Therefore, the majority of the site is deliverable, developable and available now subject to provision of a viable access.

The only part of the site that may not be immediately available is the former paper mill land where it is likely that some remediation work will be required. This is not a problem as the development can be implemented on a phased basis to enable delivery from the Western end of the site, working Eastwards with the land that may require some preparatory works left to the back-end of the build programme. This will help with the financing of the development leaving the bridge and principal road access as the essential pump-priming investment.

This development can be delivered. A Viability Report is attached demonstrating this point.

Advantages over North East Thatcham

LIMITATIONS OF THE CURRENT STRATEGY

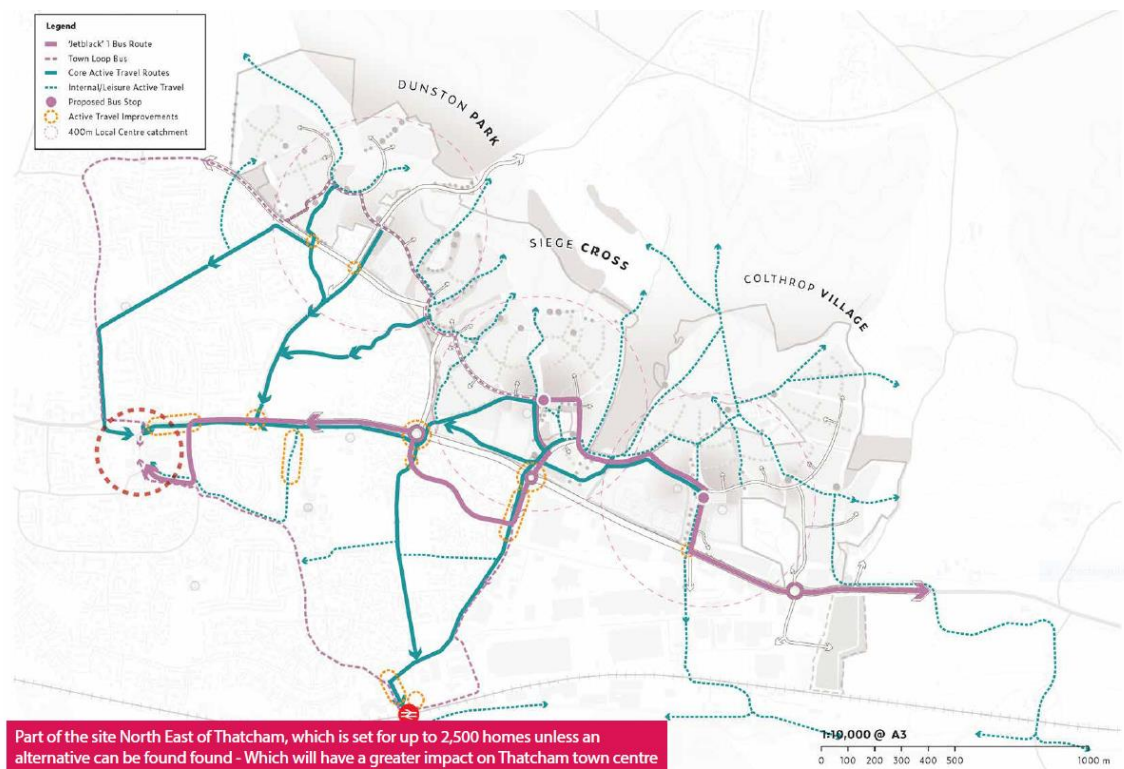


Fig. 5

Thatcham needs more homes to meet rising local demand. Where they are built will have a long-lasting and irreversible impact on the town.

There is only one opportunity to get this right.

Developing up to 1,500 homes (with the potential to increase to 2,500) on the North East side of the town is seen by many as the wrong choice.

There are a host of drawbacks and concerns regarding the major development area currently being proposed in the emerging Local Plan. These include:

- Building more homes in Thatcham than are currently locally needed.
- Negative impacts on the local highways network – the proposals generate significantly
- more traffic in the Town Centre with less potential to encourage use of the railway.
- Significantly changing the character of Thatcham – delivering a major growth area

- rather than smaller more distributed growth.
- Development would significantly encroach countryside towards Upper Bucklebury.
- Potentially negative impact on the North Wessex Downs AONB due to scale of development.
- Not addressing wider infrastructure issues, such as the level crossing at southeast Thatcham, but proposing a secondary school that is not going to be required when the development is built.
- Construction work that could last over two decades concentrated in a single area.

AN ALTERNATIVE, BETTER SOLUTION FOR THATCHAM

Reasons To Support Colthrop Village:

- A new road bridge over the railway and canal, replacing the congested level crossing.
- 950 homes, including 40% affordable housing.
- 40% of development built on brownfield land.
- 18.4 hectares of public open space.
- Vehicle access from Crookham Hill and Pipers Lane.
- Removal of redundant structures and redeveloping Colthrop Paper Mill, which is a brownfield site.
- A new primary school, and contributions to increase secondary school places.
- Two full-size football pitches.
- Primary healthcare facilities.
- A sustainable development within easy walking distance of Thatcham Station.
- 10% Biodiversity net gain.
- Less impact on the highway network.

Building 1,500 homes (with the potential to increase to 2,500) on greenfield land beside Thatcham can be avoided; there is a genuine alternative.

A GENUINE ALTERNATIVE FOR THATCHAM

Comparison	Major development area North East of Thatcham	Colthrop Village
Total number of homes	Up to 2,500	950
Using an element of brownfield land	No	Yes – the derelict Colthrop Paper Mill site will be redeveloped
Ease level crossing congestion southeast of Thatcham	No	Yes – a new road bridge would be provided allowing for the level crossing to be closed
Delivering homes within easy walking distance of Thatcham Station	No	Yes – Colthrop Village is within easy walking distance of Thatcham Station
Ensure Thatcham does not encroach on local villages	This would be a major strategic urban extension and significantly reduce the gap between Bucklebury and Thatcham	
Identified as suitable by the Planning Inspectorate	Yes - Part of the site at Siege Cross Farm	
Traffic in central Thatcham?	Higher traffic impact on A4 town centre corridor within Local Plan period and significantly higher for full development than alternative.	Significantly less impact on A4 Town Centre corridor and real scope for modal shift to train.
Is development inevitable?	There is an alternative	This is the genuine alternative

There are serious flaws in the North East Thatcham proposal. These are set out in a Committee report being considered by the Council at an Extraordinary Committee meeting on the 2nd March 2023. The main flaws are as follows:

- The number of dwellings being reduced from 2,500 to 1,500 is not correct. The 1,500 number is now stated as a minimum with an eventual potential for 2,500 units;

- A large number of sites that have been referred to the Council have not been considered by Members at their meeting on 2nd December 2022 when they resolved to make this Reg 19 submission;
- The air quality assessment is flawed in that it has the wrong end date;
- The Council has not properly consulted with Thames Water;
- The settlement boundary for Thatcham is incorrect;
- The provision for secondary schools is not consistent with Council policy;
- The IDP has not taken account of the cost of a secondary school.

These flaws render the Reg 19 document unsound and could not be supported by an Inspector at Examination.

THE NEED FOR MORE SCHOOLS

The key reasons West Berkshire appear to be supporting a strategy of major growth at North East Thatcham is the need to deliver secondary education; the argument being that smaller more distributed sites around the town would not be of a scale to deliver such a major facility.

The problem with this justification is that school places are needed now, with the demographics of the area showing a reducing school age population over the local plan period. The proposed secondary school will not be needed to accommodate the growth in homes at Thatcham at the point that growth happens.

The general forecast over the plan period shows a decline in the school age population and, on average a decline in all groups up to age 60. This population trend has an impact on education planning.

Within the Newbury and Thatcham Spatial Area (for Education) this trend follows through with secondary education need (Year 7 Cohort) with forecasts expected to 'peak' in 2021/22 (i.e now) when assessing the Local Plan period up to 2037.

When looking at projections for secondary need at the end of the Local Plan Period, the shortfall in secondary spaces is reducing despite the fact that more homes are being built. Based upon the existing secondary schools (plus the expanded school) and assuming 100% occupancy there would be a shortfall of 216 secondary school places across the area. This shortfall would not support the building of a new secondary school. Additional places to accommodate this would need to be found through the expansion of existing schools in the catchment.

The assertion that North East Thatcham is the only way to deliver essential educational infrastructure is therefore misguided.

Should a Secondary school be viable it would need to be at least a 5 form entry. This would equate to approximately 3,900 new dwellings – considerably more than planned at North East Thatcham.

To conclude, neither the North East Thatcham proposals or the Colthrop Village alternative would trigger the need for a new secondary school – especially within the Local Plan period. To justify such high levels of growth at North East Thatcham on this premise is therefore misguided.

TRAFFIC MOVEMENT

The new development will have an increase on traffic wherever it is located. However, an important planning consideration when allocating growth must be to identify strategies that can potentially reduce traffic impact – specifically within areas that are identified as congested and / or have identified air quality issues caused by traffic such as the Air Quality Management Area on the A4 from Harts Hill Road to the Broadway. The Colthrop Village Consortium do not consider that West Berkshire Council has given enough consideration to achieving modal shift away from the car or assessing traffic impact in its consideration of the strategy for North East Thatcham.

The Colthrop Village Consortium have carried out a comparison of the North East Thatcham proposal with its alternative strategy. This has used the same assumptions as set out by the Council's own technical work.

The conclusions show that considerably more traffic will travel along the A4 corridor from North East Thatcham within the Local Plan Period than that generated by our alternative strategy. This is because our strategy will distribute traffic more widely on the network due to the location of our sites to the north and south of the town. In reviewing this work we have NOT reduced our traffic assumptions to take into account the proximity of Colthrop Village to the Thatcham train station, but in reality we would assume that walking to the station would provide an attractive and viable option for many and as such our traffic impact is likely to be lower.

It is also important to note that the above relates to similar levels of development growth in the Local Plan Period. Of course the North East Thatcham proposal will continue beyond the Local Plan period to add traffic from an additional 1,500 dwellings onto the network – focussing on the same corridor.

CONCLUSION

This Regulation 19 submission demonstrates that the Colthrop Village proposal can meet a substantial amount of the housing required for the Plan period on a sustainable site. The proposed North-East Thatcham site in the Regulation 19 document is far less sustainable than the Colthrop Village site. Therefore the Colthrop Village site should be the preferred option. There is no doubt that other sites will be coming forward through the Regulation 19 process that will make up the shortfall of approx. 550 units throughout the Plan period, e.g. the Henwick Park proposal.

The North East Thatcham proposal is seriously flawed in several respects as set out in the Extraordinary Committee report and in this submission document. Therefore it cannot go forward for Examination. The whole Reg 19 procedure should be paused and a fresh document prepared which deals with the flaws in the current document and properly examines all options including Colthrop Village, the subject of this submission.