

Cold Ash Parish Council Objection to Croudace Homes Planning Application for CA12 CA1225/00278/FULMAJ

Executive Summary – Reasons for Refusal

Cold Ash Parish Council (CAPC) strongly objects to the planning application submitted by Croudace Homes for 236 houses on CA12 (Henwick Park). This application should be denied based on the following key concerns:

1. Disregard of, and Conflict with, the Cold Ash Neighbourhood Development Plan (NDP)

- The Cold Ash NDP (adopted May 2024), following extensive community consultation, explicitly designates CA12 as unsuitable for development due to its environmental importance and flood risk. (*Reference: LP MM Consultation Feedback, Section 2.4, p.3*)
- Section 5.7 of the NDP identifies CA12 as an area of historic environmental importance, contradicting the proposed development.
- NPPF (2021, Paragraph 30) states: CA12 Impacts

"Once a neighbourhood plan has been brought into force, the policies it contains take precedence over existing non-strategic policies in a local plan."

- Approving this application would set a dangerous precedent, allowing developers to undermine community-led planning and the Localism Act (2011). (*Reference: LP MM Consultation Feedback, Section 2.4, p.3-4*)
- 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
- **WBC LP (updated 2025) is NOT legally adopted and therefore does not yet, and SHOULD NOT, supersede in ANY WAY the enacted CAPC NDP..... which is!**

2. Repeated Rejections – Fourth Attempt to Develop CA12

- This is the fourth attempt by Croudace Homes to develop CA12, with previous applications rejected due to the site's unsuitability.
- The findings and conclusions of the prior refusal in 2016 by WBC have still not been addressed
- The continued resubmission of applications ignores previous findings and burdens the community with an unnecessary planning battle.
- Developers should not be allowed to wear down opposition by repeatedly submitting rejected applications.

3. Severe Flood Risk and Drainage Infrastructure Failures

- **The site is a critical natural floodplain** that prevents downstream flooding in Thatcham.
- It is cited as a **FLOOD ZONE 2 & 3 in the latest update March 25th 2025 of the Government Flood risk planning site** - [Map – Flood map for planning – GOV.UK](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/115544/Map_-_Flood_map_for_planning_-_GOV.UK)

- **Underground aquifers and natural water movement have not been assessed properly.**
- **The Sustainable Drainage Systems (SuDS) strategy lacks long-term maintenance planning and does not account for climate change impact.**
- **This development would increase the risk of flooding to surrounding properties, contradicting multiple legal and planning policies.**
- CA12 acts as a critical natural flood mitigation area, helping prevent surface water runoff from reaching surrounding residential areas.
- Key concerns include:
 - Does not address NDP Policy CAP5 SuDs Management
 - The main entrance is located between two existing flood basins, placing homes at risk and would require to be widened, re enforced and protected (Arco barriers) none of which is considered.
 - The 225mm foul sewer main is already over capacity, leading to potential sewage overflow. (*Reference: LP MM Consultation Feedback, Section 4, p.9-10*)
 - The proposal violates NPPF (Paragraphs 155-165), which requires developments to avoid flood-prone areas.
 - The Cold Ash Flood Warden's Report (December 2024) warns that removing CA12's aquifer will increase downstream flood risk.
 - No adequate plan proposed to address the additional surface water run off that would normally be soaked up from the existing land. Current Culverts already at 80% capacity when heavy rain occurs.
 - Too many unanswered questions regarding the Flood, drainage and SuDs planning as highlighted in our **Hydrology consultation Report: Objection to Planning Application for CA12 Development 28th March 2025**

4. Green Gap & Area of Outstanding Natural Beauty (AONB) Destruction

- The Cold Ash NDP and WBC's Countryside Designation Study (2022) identify the green gap between Cold Ash and Thatcham as essential for preventing urban sprawl. (*Reference: LP MM Consultation Feedback, Section 4, p.14*)
- Developing CA12 contradicts WBC's own landscape protection policies and irreversibly damages countryside views from Heath Lane and Bowling Green Road.
- 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

5. Unsustainable Infrastructure & Traffic Impact

- Existing roads cannot support this development, with key issues including:
 - Increased congestion on Heath Lane, Cold Ash Hill, and Bowling Green Road.

- Underestimated traffic impact in the Transport Assessment, failing to reflect real peak-hour movements. (*Reference: LP MM Consultation Feedback, Section 4, p.11-12*)
- Lack of safe pedestrian/cycle routes to local schools and shops.
- No clear planning consideration for safety splays on the new Bowling Green road access and the detail of how the existing sit entrance at Health Lane would be made fit for purpose which it will not be today.
- Medical facilities in Thatcham & Cold Ash are over capacity—new residents would be forced to register further afield.

6. Noise, Visual & Environmental Impacts

- Noise pollution from construction and increased vehicle movements will permanently alter the peaceful character of the area.
- Loss of green space & biodiversity: The ecological survey confirms CA12 is a habitat for protected species, which will be displaced. (*Reference: LP MM Consultation Feedback, Section 4, p.10*)
- The scale and density of the proposed development are out of character with Cold Ash's village setting. (*Reference: LP MM Consultation Feedback, Section 4, p.14*)

7. Inconsistency in Site Allocation – Better Alternatives Exist

- CA12 was previously deemed non-strategic, but WBC has reversed this without clear justification, nor additional analysis but have merely 'changed their minds now'. (*Reference: LP MM Consultation Feedback, Section 2.3, p.3 & Section 2.5, p.5*)
- The Planning Inspector recommended a broad locations approach, yet this has not been considered.
- Brownfield & more suitable sites exist, such as the approved North East Thatcham development, making CA12 unnecessary.
- Continued offers from CAPC to aid in the allocation of housing through local consultation ignored.

Final Recommendation – Reject the Application

Cold Ash Parish Council urges WBC to refuse this planning application because it:

- ✓ **Contradicts the Cold Ash Neighbourhood Development Plan (NDP) and the Localism Act (2011).**
- ✓ **Ignores flood risk, road congestion, and environmental concerns.**
- ✓ **Threatens the green gap and countryside protections.**
- ✓ **Fails to justify CA12's inclusion when better alternatives exist.**
- ✓ **Disrespects past planning rejections and community objections.**

🗨️ Cold Ash residents have spoken—this site is NOT suitable for development. We call on WBC to reject this application and uphold fair, sustainable planning!

Detailed Objection Submission

1. Disregard for the Cold Ash Neighbourhood Development Plan (NDP)

The **Cold Ash NDP (adopted May 2024)** was developed in collaboration with the community and assessed **19 potential sites for development**, including CA12. It was determined that CA12 **should not be developed** due to:

- Its **critical flood mitigation role**.
- Its **importance in preserving the green gap** between Cold Ash and Thatcham.
- The **lack of infrastructure to support development** in this area.

Legal Basis for Objection:

- **NPPF (2021, Paragraph 30)** states:

"Once a neighbourhood plan has been brought into force, the policies it contains take precedence over existing non-strategic policies in a local plan."

- The **Localism Act (2011)** reinforces that **NDPs must be respected** in planning decisions.
- **Cold Ash NDP was enacted as a statutory document**—ignoring it undermines democratic planning. (*Reference: LP MM Consultation Feedback, Section 2.4, p.3-4*)
- 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). **See Figure A**

Figure A

PM12: Land at Henwick Park, Bowling Green Road, Thatcham

Annex K

NB: Annex K (PM12) 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.



15

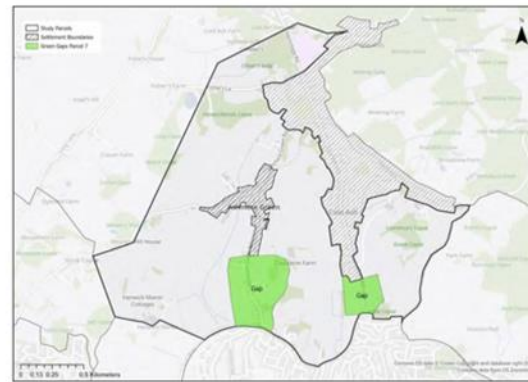
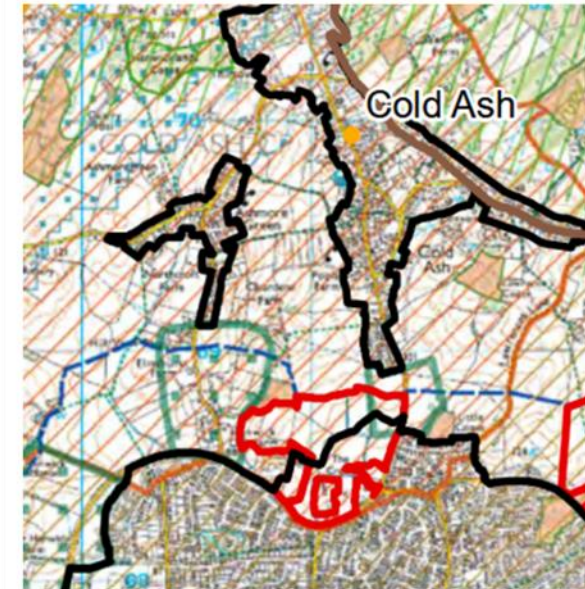


Figure 5: WBC proposed green gaps in Cold Ash Parish (source: West Berkshire Appropriate Countryside Designation Study)



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

2. Flooding and Water Infrastructure Risks

- **CA12 acts as a natural flood defence**, absorbing surface water before it reaches residential areas.
- **Built up areas would channel surface water and amplify it into existing channels and could easily overwhelm them**
- **CAPC NDP CAP 5 SuDs Management is critical and is not addressed by the applicant: -**
 - *Applications for major developments, and those in a flood risk area, as identified by West Berkshire Council and on Environment Agency mapping, shall be accompanied by a drainage scheme maintenance and management plan. Other developments shall be accompanied by details that make clear the responsibilities for the long-term management of all surface and land drainage components on the site. This strategy should include:*
 - *What actions the developer will take to adhere to the published and approved SuDS plans.*
 - *How, if at any point, the defined targets/goals/standards of this plan are not met, this would be mitigated.*
 - *How the developer will ensure the residents understand the performance and progress of the plan in the long, medium and short term.*
 - *What safeguards, steps and mitigation are proposed should the management company fail, or is taken over, to ensure the SuDs commitment for the development is maintained.*
 - *Clarification of who maintains responsibility for the longer term oversight of any management body set up to enforce a SuDS agreement on behalf of the developer and/or the residents.*
 - *Specifics as to how communication and appropriate working relations with the Parish are to be put in place should SuDs based issues or mitigations be required.*
 - *All applications for development will be expected to consider the potential risk to the surrounding environment and in particular the impacts of surface water, ground water and sewage systems to properties and residents further down the flood risk chain from any high ground.*
- **The Cold Ash Flood Warden (December 2024) report states:**

"Removing the aquifer from this site would send millions of litres of water directly into the River Kennet, increasing flood risk downstream."

- **WBC's own HELAA assessment (2020) concluded** that development on CA12 could only be "potentially suitable in part" due to major flood risks.
- **It is cited, and is not being adequately considered, as a FLOOD ZONE 2 & 3 in the latest update March 25th 2025 of the Government Flood risk planning site - [Map – Flood map for planning – GOV.UK](#)**

⚠ This contradicts the updated SEA/SA, which downplays flood concerns without evidence.

(Reference: LP MM Consultation Feedback, Section 4, p.9-10)

- See Hydrology Consultation Report for CAPC: Objection to Planning Application for CA12 Development Date: 28/03/25

3. Harm to the Green Gap and AONB

- The **West Berkshire Countryside Designation Study (2022)** identified CA12 as **essential to maintaining separation** between Cold Ash and Thatcham.
- The **Cold Ash NDP supports this, prioritising protection of natural landscape buffers.**
- Development here would **set a precedent for further erosion of green space, contradicting Local Plan policies on sustainable development.**

⚠ **Loss of greenfield land goes against national and local landscape protection policies.**

(Reference: LP MM Consultation Feedback, Section 4, p.14)

4. Lack of Infrastructure, traffic and Unsustainable Location

- **No safe active travel route** exists for children to walk to school.
- **Existing GP surgeries (Thatcham Medical Practice & Chapel Row) are already over capacity—** new residents may struggle to register locally. So too is the local Dental Health provision
- **Traffic congestion will worsen**, especially at key junctions along **Cold Ash Hill & Bowling Green Road.**
- **Proposed site entrances on Bowling Green Road have no consideration for safety splays, nor the bank / Hedge removals required, to ensure an appropriate and safe southerly entrance to the site**
- **Proposed site entrance at Health Lane using the existing road to the roundabout is shown as a 4.8 m carriageway only. Normal 2 way entrances would need to be at least 5.5 m. Also the road currently runs between the detention ponds, thereby requiring for safety, widening, bank engineering support and barrier installation plus footpaths to be viable. None of this is covered in the proposed planning rendering it unfit for purpose**

⚠ **No credible mitigation measures have been proposed to address these issues.**

(Reference: LP MM Consultation Feedback, Section 4, p.11-12)

5. Inconsistency in Site Allocation and Alternative Options Not Considered

- **CA12 was previously assessed and rejected—its reinstatement lacks justification.**

In 2016, **West Berkshire Council (WBC) refused planning application 16/01508/OUTMAJ** for the development of **land at CA12 (Henwick Park)**. This decision was made based on **strong objections from local authorities, planning officers, and residents.**

WBC Planning Inspectors Key Reasons for Refusal in 2016 which remain unchanged today:

1. Contrary to Local Planning Policies

- The site **was not allocated** in the **West Berkshire Local Plan. (Currently NOT in adopted plan but being amended 2025)**
- The development **conflicted with the Core Strategy's spatial planning for Thatcham. (Still currently the case)**

- The proposal **reduced the green gap between Cold Ash and Thatcham**, leading to potential urban coalescence. *(Still currently the case)*
- 2. **Significant Flooding Concerns** *(Still currently the case)*
 - The site acts as a **natural drainage area**, and development was deemed to **increase flood risks downstream** in Thatcham.
 - The **Thatcham Flood Forum objected** due to the **unresolved risks posed by the SuDS strategy**.
 - The **Local Flood and Watercourse Warden confirmed that technical shortcomings remained** and flooding risks persisted.
- 3. **Severe Traffic and Highway Impacts** *(Still currently the case)*
 - The development would **significantly worsen congestion** on local roads, particularly **Heath Lane, Cold Ash Hill, and Bowling Green Road**.
 - **Sustainable transport options were inadequate**, increasing reliance on private vehicles.
 - The **Travel Plan was deemed flawed**, and mitigation measures were considered insufficient.
- 4. **Failure to Meet Local Housing Needs & Infrastructure Limitations** *(Still currently the case)*
 - **Local medical practices and schools lacked capacity** to accommodate additional residents.
 - **Thatcham Medical Practice opposed** the inclusion of a new surgery, stating that **there were no available GPs** to staff it.
 - The **education impact assessment noted that new school places would be required**, but no specific plans were in place.
- 5. **Contradiction to Landscape Protection Policies** *(Still currently the case)*
 - The **Landscape Consultant raised concerns about harm to the visual separation between Cold Ash and Thatcham**.
 - The development would **urbanise an agricultural area**, damaging the rural character of the village.
- 6. **Local and Statutory Objections** *(Still currently the case)*
 - **Cold Ash Parish Council, Thatcham Town Council, the Cold Ash Community Partnership, and numerous residents strongly objected**.
 - **Natural England and West Berkshire Council Planning Policy teams raised concerns** about impacts on the AONB and settlement patterns.
 - **43 public objections** were received, citing **flooding, traffic, infrastructure strain, and environmental damage**.

Given these facts, the **same reasons for refusal in 2016 apply today**—if not more so. **West Berkshire Council must reject this application once again to uphold its own policies, protect the local community, and respect the Cold Ash NDP.**

- The **Planning Inspector recommended a "broad locations" approach**, which would allow proper site assessments and community input, but **this was ignored**.
- **Alternative brownfield and smaller-scale developments** should have been considered before relying on greenfield sites.

⚠ This approach contradicts the principles of sustainable and evidence-based planning.

(Reference: LP MM Consultation Feedback, Section 2.3, p.3 & Section 2.5, p.5)

Final Recommendation: Reject the Application

Cold Ash Parish Council urges WBC to reject this application on the grounds that it:

- **Contradicts the NPPF, Localism Act (2011), and Cold Ash NDP.**
- **Fails to mitigate flood risk or provide sustainable infrastructure.**
- **Jeopardizes the green gap and AONB protections.**
- **Lacks evidence-based justification for site selection.**

🚩 **Cold Ash deserves better planning! We call on WBC to reject CA12 and respect our community's voice.**