

**From:** [Ivor Mcardle](#)  
**To:** [Steve Carnaby](#)  
**Cc:** [Laila Bassett](#)  
**Subject:** Re: Cold Ash Neighbourhood Development Plan - Examiner Questions  
**Date:** 28 November 2023 12:34:37

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Dear Steve,

Having reviewed WBDC's response to Question 1 (Green Gaps) we, CAPC, feel that we need to add our views.

In summary, it is our view that our NDP is aligned with the, currently unadopted, Local Plan and fully meets the Basic Conditions. The reason we say this is that WBDC's strategy is to avoid coalescence of towns and villages, and to avoid urban creep into the countryside. Our NDP fully supports this strategic aim and builds on it, at the neighbourhood plan level. Where we believe the disjoin has occurred is not at a strategic or policy level but in the solutions that have been proposed to meet them. We are of the opinion that WBDC's proposed solution does not meet the strategic aims as:

1. Their Green Gaps have been set adjacent to the villages of Ashmore Green and Cold Ash, and so do nothing to reduce urban sprawl
2. Their Green Gaps would not achieve the aim of non-coalescence, as they are too small and inappropriately placed to achieve the aim.

We believe that our proposed Green Gaps meet the aims of WBDC's strategy and aligned policies contained in our NDP. As we've set out in our current response, Green Gaps have been included in other NDPs, so a precedent has been set for NDPs to include these.

We contend that the NDP has to be in conformity with the **adopted** Local Plan, in this case the Core Strategy. Our approach does conform to that. We have also been mindful of the emerging Local Plan (given its progress), but it is not yet adopted policy. We believe that our plan is also in conformity with it at both strategic and policy levels. The only question is whether the solutions proposed are in line with these or not.

As further supporting information, we would highlight the following points:

- Policy ADPP1 sets out the spatial strategy for the borough, effectively dividing it into four spatial areas. One of these spatial areas is 'Newbury and Thatcham', the strategy for each contained in Policies ADPP2 (Newbury) and ADPP3 (Thatcham). The strategy for Thatcham does not specify Green Gaps or buffer zones. Clause 2 states that "Opportunities will be taken to maintain and enhance the identity of

Thatcham, separate to that of Newbury and the surrounding rural settlements”.

- WBC set out that The West Berkshire Appropriate Countryside Designation Study was prepared in October 2022 to determine if a specific planning designation was needed to safeguard the unique characters and separate identities of the individual settlements within the Newbury and Thatcham Spatial Area. The Study assessed the area to the north of Thatcham (including the settlements of Cold Ash and Ashmore Green) and recommends that two parcels of land within the designated Neighbourhood Area are designated as Green Gaps. Policy DM2 (Separation of Settlements around Newbury and Thatcham) of the submission of the LPR identifies these two parcels of land as Green Gaps. In defining the extent of the gap, WBC considered that no more land than is necessary to prevent the coalescence of settlements has been included. CAPC considers that the two proposed buffers do not extend sufficiently far enough to achieve their aim of maintaining the identity of Thatcham as separate to the surrounding rural settlements. The Green Gaps are placed adjacent to the villages (Cold Ash and Ashmore Green) but it is the rural areas adjacent to this that are also vulnerable to development and which would lead to further coalescence (effectively circling around the green gaps and towards the villages). The pressure for development in such areas is clear, demonstrated by planning applications being received to WBC. An example is the recent planning application (Ref: 16/01508/OUTMAJ), of which a substantial part is located outside the green gap proposed by WBC, but which would significantly encroach on the village of Cold Ash in particular.
- The need to maintain separate identities is a strategic policy. The employment of Green Gaps is one mechanism to achieve this and the CAPNDP seeks to add additional local detail to those proposed in the emerging Local Plan, in accordance with Para 28 of the NPPF, which states that communities should, within their Neighbourhood Plans, set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment and setting out other development management policies. This approach conforms to Policy CS19 of the adopted Core Strategy.

Please let us know if you require anything further from us.

Ivor McArdle

Chair, Cold Ash NDP Steering Group & Vice-Chair, Cold Ash Parish Council

On behalf of Cold Ash Parish Council