

10.12 Critical need to address inaction regarding WBC's core strategy, carbon reduction

An urgent Air Quality improvement plan is a critical outage from the LPR 2037. Carbon reduction is a key issue for West Berkshire since it was introduced as a Core Strategy in 2016 to deliver carbon neutral development. Despite a reduction in CO₂ emissions 2005, emissions are 3 times higher than national England and 4 times worse than rest of Berkshire and South East. Yet, there is no specific action plan to address the Climate Emergency facing us.

Table 5 : Full Set and Sub Set* Per Capita Carbon Dioxide emissions (tonnes) at local authority level in 2017, listed by difference			
Area	Full Set data	Sub Set data	Difference
West Berkshire	8.2	5.8	2.4
Windsor & M'hd	5.7	4.5	1.2
Wokingham	4.7	3.6	1.1
Slough	5.0	4.1	0.9
Reading	3.4	3.3	0.1
Bracknell	3.7	3.7	0
South East	4.8	4.2	0.6
England	5.1	4.3	0.8

The LPR 2037 should have been the perfect opportunity to set out actions to remedy this. Without a specific plan to do this, West Berkshire's 15-year growth ambitions for housing, office and industry will simply worsen an already dangerous situation.

Your own consultants highlight road traffic emissions as the primary cause. It is unacceptable WBC Highways bases its transport thinking with traffic surveys that are six-year-old! ATC road strip surveys which monitor volume, vehicle type and speed are low in cost and can be produced in a matter of weeks. This data collection and planning inaction is unacceptable. The continuing problem of unchecked and growing traffic pollution will impact on everyone and will derail West Berkshire's vision to make this a place people want to live in, work from and invest in.

While cycling and walking are to be encouraged, since 90% of land area is rural, road vehicles are sadly the primary transport option for most rural communities of villages and small parishes given, a) the inadequate rural bus network which is underfunded and stretched, and b) outside Newbury, the rail network is small with timetables not attractive and conducive to greater use.

The LPR lauds the location opportunities for industry highlighting the M4 and A34 crossroads in the centre of West Berkshire. But the reality is our road network beyond that motorway with just junctions 13 and 14, is made up of a few A and many small B roads. Where is the thinking and planned investment to improve the links between major roads to access industrial areas like Membury? With goals to develop these places significantly, actions must be taken to accommodate heavy vehicles as they commute to and from the M4 over small country roads not designed to carry HGV's. The B4000 requires constant road repairs, which will worsen as traffic volume increases. Urgent signage and speed enforcement measures to slow traffic to safe limits are required now. Where are those plans and how will WBC tackle the lack of bus services, let alone provide any kind of safe cycling and walking routes?

New ideas are desperately needed to create a sustainable traffic policy. Why not consider ideas such as: serious traffic calming measures to ensure slower vehicle speeds equals less fuel burn; educating businesses to lessen HGV diesel emissions and noise with potential "congestion" charging to encourage environmentally safer alternatives; providing and marketing new, regular rural mini-bus services; incentives to encourage job sharing schemes; etc.

Top WBC management commitment and resource must be given to tackling something that is strategically critical and requires urgent actioning if WBC's Local Plan 2037 is to succeed. Simply adding "sustainability" aspirations within each policy is not going to fix this. A huge amount of work needs to be done by Highways to obtain up to date traffic data, strategies to tackle the issues, new ideas and measurements to generate an air quality improvement program.

If climate emergency is a core strategy, we are way behind target, and urgent measures are needed to get us back on track. Time is running out

WBC Planning decisions are made in advance of public consultation

This Local Plan's ambitions as well as Policy guidance/constraints in strategic terms by West Berkshire Council is very similar to what was drafted two years ago for consultation with the Public. For example, Policy SP2n states that in the North Wessex Downs Area of Outstanding Natural Beauty (AONB) will have appropriate and sustainable growth that conserves and enhances its special landscape qualities. Development will be required to respond positively to the

local context, conserving and enhancing local distinctiveness, sense of place and setting of the AONB. The strong sense of remoteness, tranquillity and dark night skies, particularly on the open downland, should be preserved. The conservation and enhancement of the natural beauty of the landscape will be the primary consideration in the assessment of all development proposals. Development in the North Wessex Downs will be required to support its local communities and rural economy in a manner commensurate with the statutory status of the AONB as a nationally valued landscape. Planning permission will be refused for major development in the AONB except in exceptional circumstances, and where it can be demonstrated to be in the public interest.

Yet, the Western Area of WBC's Planning Committee gave permission in 2021 to build a giant logistics warehouse on 10,381 square metres of AONB land allowing Membury businesses to expand across protected AONB land (Lam 6) despite fierce local and parish objections: the building scale is out of keeping with its rural surrounds; the transport links to the site are unsustainable using a B-road already over-crowded with HGV's, no close buses, unsafe cycling and walking access to the site etc.

It seems WBC Planning decides what it wants to happen well in advance. The LAM-6 site was already set out as an "approved" development site by WBC consultants, Stantec in their 2020 report. This was several months before that decision was "formally" made by the Planning committee. In this report, it is suggested the site would be part of future industrial expansion plans to provide 19% of growth targets. This seems disingenuous since WBC clearly decided it would go ahead in discussions with their industrial development consultants 3 years ago.

So why seek consultation for LAM-6 in this plan if a) it is now a done deal and b) it contravenes so many sensible "strategic" constraints, yet have been waived? It makes a mockery of any meaningful dialogue via a public consultation when Planning decides major developments beforehand on.

Promises not kept

Policy ESA 2 states the LAM-6 site (Land west of Ramsbury Road, Membury Industrial Estate, Lambourn Woodlands) will be developed in accordance with various provisions. One of the provisions to mitigate the community impact industrial developments on the local road network is the need for a transport assessment: *C) Measures will be provided to mitigate the impact of development on the local road network. A Transport Assessment will be required*

Again, there has been no genuine assessment of the likely impact on traffic from this specific development. Via tactical "chicanery" the applicant used a "Personal Condition" to avoid having to use TRICS to forecast standard traffic volumes. Instead, their own internal estimates based on old data was used to determine a forecast. This allowed a lower traffic estimate to be debated vs data via TRICS, which at 750 extra HGV's per day, was significantly higher.

The provision to mitigate the impact of this development on our roads should use real numbers that are not disguised and are current. This should lead WBC Highways to provide a transport plan that mitigates issues for the benefit of road users and the local community. Accepting the Applicant will use Agency shift workers from Reading and Swindon via mini-bus to 'pick 'n pack' at the new warehouse on minimum wages, all outside the local employment zone, does not mitigate the hundreds of extra HGV's this development will bring on a daily basis. WBC Highways have delivered no road mitigation plan.

Policies must genuinely be followed if LPR 2037 is to retain credibility

12.19 WBC's 2019 Landscape Character Assessment outlines that rural areas are more at risk from piecemeal development:

It is especially important to consider the impact that developing a site will have on conserving/enhancing local distinctiveness and sense of place. A successful development in the countryside depends on having a clear understanding of the site's significance, its setting in the wider landscape and sensitivity to and capacity for change

With a further 5,200 square metres of industrial development plans at Membury under LAM-10 (Land to the south of Trinity Grain, Lambourn Woodlands), together with LAM-6, the combined area will contribute almost 30% of industrial land 15-year growth targets. That is such a significant increase it demands that funding for risk assessments are carried out. No longer can it be acceptable that the need for an Environmental Impact Assessment is ignored. With flooding, excess lighting, noise, pollution and emissions, these are all ramping up as major issues at the Membury site. This plus the lack of a proper transport assessment to resolve issues and a plan to carry out appropriate measures must be committed to. Extraordinarily in my view is there any reference to addressing these problems to make industrial expansion plans succeed for the benefit to the area.

Unless Policy DM 35 is genuinely addressed to sustain a prosperous rural economy, the industrial development at Membury will increasingly destroy the rural surrounds of Lambourn's agricultural and equine community. It will certainly drive out those living and working in the Lambourn Woodlands area, rather than encouraging them to stay and prosper.