

Consultation Response

West Berkshire Local Plan Review 2022-2039

Tilehurst Parish Council, Tilehurst Parish Council Neighbourhood Plan Steering Group

General Observations

The aim of delivering carbon neutral by 2030 and thereafter is encouraging.

We welcome recognition of the outstanding value of the North Wessex Downs landscape and the abundant biodiversity in settlements and surrounding countryside.

Policy wording changes generally improve the readability and effectiveness of the plan.

Detailed Comments

1.34 States that once the Regulation 19 stage is complete, the Council will submit an **updated** Draft LPR to the Secretary of State. Our understanding is that the submitted document should not differ from that used for the consultation:

“1.3. The plan that is published for consultation at Regulation 19 stage should be the plan that the LPA intends to submit to the Planning Inspectorate for examination. This is a key premise of delivering an efficient examination timetable.” – Procedure Guide for Local Plan Examinations (<https://www.gov.uk/government/publications/examining-local-plans-procedural-practice/procedure-guide-for-local-plan-examinations#section-1-before-submission>)

3.5 Strategic Objectives

The modifications to objective 2 (Housing) are welcome- the inclusion of affordable and specialist housing types, tenures and sizes recognizes the changing needs of the community. We approve of the additional wording stating that development should be in appropriate and sustainable locations.

Figure 1 (West Berkshire Constraints)

Map has no scale.

Legend refers to DEPZ, but this abbreviation is not explained until 4.16, several pages later in the document.

Policy SP1

Removal of the expectation of housing allocations through NDPs is to be welcomed.

6. Housing Delivery

We note that this section describes how 513-538 dwellings per annum will be provided from existing planned developments, windfall within settlement boundaries, the defined sites and allocations within named neighbourhood plans. Whilst we understand these numbers are not a limit, it is good

to see that no further development is necessary outside settlement boundaries to meet the anticipated housing need and that the plan delivers the anticipated need. It is also reassuring to see that windfall sites of 10 units or more are not included in the calculation of future supply, so there is no need for large-scale development within settlement boundaries.

Maps

Maps throughout the document have no scale. Some have no North indicator. Size of text makes crown copyright illegible.

Policy Wording

Some policies are more than a page long and contain multiple paragraphs. Paragraphs within policies are not numbered, making it difficult to precisely reference them.

Housing and Economic Land Availability Assessment January 2023 Update

https://www.westberks.gov.uk/media/54057/HELAA-January-2023-Update/pdf/HELAA_January_2023_Update.pdf?m=638097446500870000

This council is not aware that there has been any consultation on this modified HELAA. We have no record of contact or request for feedback.

HELAA: Appendix 4- Assessment of Sites

https://www.westberks.gov.uk/media/54056/HELAA-Appendix-4-Assessment-of-Sites/xls/HELAA_Appendix_4_HELAA_Site_Assessments.xlsx?m=638097446157870000

It is not clear where or how the figure of 138 dwellings has been generated. The developer has submitted multiple unsuccessful planning applications over many years, the latest being for 265 dwellings, revised to 165. This was refused at committee in April 2022 and the decision was not appealed. It is noted that Stage 2a Development Potential states “Up to 138 dwellings **but known issues exist which are likely to decrease this number**”. This statement has not been carried into Appendix 8b (below). Additional important details that contribute to rejection of this site from the Plan have also not been transferred to the SA/SEA. Some examples are detailed below.

Local Green Space Designation (Stage 2b Suitability): it should be noted that part of the land has been identified as being suitable for LGS designation in the Tilehurst NDP which recently completed Regulation 14 Consultation.

TIL19 *New Site* Calcot Park Golf Club, Calcot, Reading.

This site has been added to the HELAA site assessment. Tilehurst Parish Council has no record of being consulted on the inclusion.

The site is inside the settlement boundary so it is not clear why it is assessed here. Its inclusion is making an already complex Planning Process even more incomprehensible and concerning to local residents, particularly when they see references to potential development of 130 houses or up to 335 flats. The “Availability” determination for this site has multiple “unknowns” - legal issues, timeframe for bringing forward for development, potential timeframe for development, and

whether a developer/housebuilder is involved. Since the site promoter has been sufficiently involved to indicate a number of dwellings it seems odd none of these other factors are known yet.

For clarity it should be noted again that the Local Plan Review clearly defines how expected housing need will be met through strategic site allocations outside the settlement boundary, allocations from named NDPs and small scale (less than 10 units) windfall inside the settlement boundary. Windfall development on this scale within the settlement boundary will not be required to meet the anticipated need.

Appendix 8b – SA/SEA of New Residential Site Allocation Options

TIL14 Pincents Lane, Tilehurst.

P.31 States “Parish/Town Council: No comments”

This council is not aware of any request for comment on this document or the revised HELAA.

Whilst this Council agrees with the decision not to include this site in the updated Plan, it feels the sound planning reasons behind this decision are not adequately explained in this document. Numerous important points from the updated HELAA site assessments have been poorly summarized or omitted altogether from the summary tables.

For example, under “Air Quality, Pollution & Contamination” (Stage 2b Suitability) the HELAA Site Assessment states-

“The site is close to the M4 and A4.

Significant worsening of nitrogen dioxide and particulate matter.

Medium risk of contamination.

Medium risk to future occupants from nearby commercial uses. Medium risk to neighbours”

Yet in the summary table of this document, it merely states “The site is unlikely to impact on air quality”. The HELAA wording is relegated to a footnote and does not seem to have been taken into account in the summary.

The HELAA Site Assessment notes-

“The site will generate circa 828 vehicle movements per day with circa 83 during peak hours. **There is much concern regarding the impact along Pincents Lane and along the A4.**”

No reference is made to this in the summary table of this document under “To promote and maximise opportunities for all forms of safe and sustainable transport”, except to note “Locally there are significant concerns regarding access to the site.” It is not clear why this text is under the heading “mitigation/enhancement”.

It is concerning to local residents familiar with the history of this site to see the words “At the time planning permission is sought for development at this site...”. This implies a planning application is

expected despite the numerous failed previous attempts and this site's rejection as not developable in the proposed Local Plan Review.

Local Plan Map

https://www.westberks.gov.uk/media/53788/Local-Plan-Review-Policies-Map/pdf/Local_Plan_Review_Policies_Map.pdf?m=638095646380970000

Too many layers are displayed simultaneously- it is impossible to accurately read detail on the map. For instance, the settlement boundary through Tilehurst Parish has been reviewed and (we believe) is largely unchanged- but we cannot accurately see what (if any) differences there are from the current settlement boundary. Without road detail displayed, the site of the proposed retail park designation in Calcot is unclear and we cannot comment on the detail of its proposed outline.