

#### West Berkshire Local Plan Review 2022-2039

## Proposed Submission Representation Form

Ref:

(For official use only)

Please	Online: http://consult.westberks.gov.uk/kse
complete online or	By email: planningpolicy@westberks.gov.uk
return this	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cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.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:*		Jonathan
Last Name:*		Walton
Job title (where relevant):		Planning and Development Director
Organisation (where relevant):	Calcot Park Golf Club and Bewley Homes	Opus Works
Address* Please include postcode:	Bath Road, Reading, RG31 7RN	Gardenia House Church Lane Ewshot Farnham GU19 5BJ
Email address:*		
Telephone number:		

Calcot Park Golf Club and Bewley Homes (joint representations), made by

#### Part B – Your Representation

Your name or

organisation (and client if you are an

## 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.

Opus Works on behalf of the clients

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.

agent):				
Please indicate which part of the Local Plan Review this representation relates to:				
Section/paragraph:				
Policy:	SP1, SP3, SP7, SP8, SP10, SP11, SP12, SP14, DM39			
Appendix:				
Policies Map:				
Other:				
	Local Plan Review is legally compliant?  No			

## 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	X	
Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence	X	
<b>Effective</b> : 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	X	
Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF	Х	
Please give reasons for your answer:		
3. Complies with the Duty to Co-operate		
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3. Complies with the Duty to Co-operate		
3. Complies with the Duty to Co-operate  Please see the guidance note for an explanation of what 'Duty to Cooperate' r		

# 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.					
Please see atta	ched letter coverii	ng all representa	tions and proposed	d changes, where rele	vant.
5. Independent	t Examination				
_	ntation is seekin earing session(s		you consider it n	ecessary to participa	ate at the
Yes	х	No			
If you wish to pa be necessary:	articipate at the or	al part of the exa	mination, please o	utline why you consid	ler this to
retention of leis		o underpin a robi	ust mechanism to a	for underpin the long allow enabling develo	
			appropriate procedoral part of the exa	dure to adopt to hear t mination.	those who
6. Notification	of Progress of th	ie Local Plan Re	eview		
Do you wish to	be notified of ar	ny of the followi	ng?		
Please tick all tha	at apply:				Tick
The submission of the Local Plan Review for Independent Examination X					
The publication of the report of the Inspector appointed to carry out the examination X					
The adoption of	the Local Plan Re	eview			X
contact you. You		ır contact details	by logging onto yo	estal address at which our account on the Loc	

Signature		Date	03/03/23

Your completed representations must be received by the Council by 4:30pm on Friday 3 March 2023.



P20-2643PL

3<sup>rd</sup> March 2023

West Berkshire Local Plan West Berkshire Council Council Offices Market Street Newbury RG14 5LD

Dear Sir/Madam

Re: West Berkshire Local Plan Review 2022-2039: Reg. 19 Proposed Submission: March 2023. Representations submitted on behalf of Bewley Homes PLC and Calcot Park Golf Club.

We have reviewed the Local Plan Review (LPR) and we wish to submit our representations in response to policies and proposals, which impact upon the development plans of Bewley Homes PLC and Calcot Park Golf Club (CPGC). In the paragraphs below, we will identify the relevant policies and proposals before commenting on them either in support, or in the form of an objection, which we trust West Berkshire Council (the Council) as the Local Planning Authority (LPA) will give careful consideration before the next draft of the local plan is published for public review.

Policy SP1 - Spatial Strategy

This policy states that the overall approach to development will be based on three spatial areas:

- Newbury and Thatcham
- Eastern Area
- North Wessex Downs AONB

Calcot is within the Eastern Area, which is identified as a focus for housing development. CPGC is located on the eastern edge of Calcot/Tilehurst, within the greater Reading conurbation. Therefore, in accordance with policy SP1, it is a suitable and sustainable location for housing development.



The identification that additional development is needed and come forward within settlement boundaries to meet identified housing need in the LPR is welcomed.

Policy SP1 - Spatial Strategy is supported.

Policy SP3 - Settlement Hierarchy

This policy states that development in West Berkshire will comply with the spatial strategy set out in policy SP1. Development will be focused on the most sustainable settlements. The Urban Areas (including the Eastern Urban Area) will be the prime focus for housing and economic development, offering development potential through: regeneration of built-up areas; allocated sites in the LPR and Neighbourhood Plans; retention of settlement identity and necessary supporting infrastructure.

In this case, we consider that land at CPGC is suitable for allocation in a development plan, as it lies within the settlement boundary of the most suitable and sustainable location for residential development, according to this policy.

Policy SP3 - Settlement Hierarchy is supported.

Policy SP7 - Design Principles

This policy states that new development will strengthen a sense of place through high quality locally distinctive design and place shaping. It will make places better for people, taking opportunities available for conserving and enhancing the character, appearance and quality of an area and the way it functions.

CPGC consists of 81 hectares (200 acres) of gently sloping land and woodland located within the settlement of Calcot, which is surrounded on all sides by the built-up area of Greater Reading. The golf club contains considerable areas of woodland and green infrastructure. A modest housing development for c.72 dwellings on c.5.8 hectares (14.3 acres) of land at the north-eastern edge of the golf club, see Appendix 1 for details of the proposed site location and potential site layout, will offer the opportunity to make good use of this valuable green infrastructure to create a verdant and attractive "landscape-led" scheme, which will conserve and enhance the existing landscape character and historic context of the site and its wider surroundings. The location of the site within the built-up area and on land in leisure use at present will offer unique opportunities to improve access to verdant, open areas and leisure facilities for new residents and existing ones. The health and well-being benefits of the proposal for the local population, will be significant.



Policy SP7 - Design Principles is supported.

Policy SP8 - Landscape Character

This policy states that landscape-led development which conserves and enhances the biodiversity and local distinctiveness of the landscape character of the district will be supported. With regard to development proposals, particular regard will be given to: valued features and qualities; sensitivity and capacity of area to change and ensuring that new development is appropriate in terms of location, scale and design to the context of the existing settlement form, pattern and character.

CPGC does not lie in a sensitive landscape location. The site is remote from the AONB to the west and it is surrounded on all 4 sides by urban development. It has been used historically as a practice range and more recently for accommodation of material dredged from CPGC's lake and swales. As stated above, the 81-hectare land holding contains substantial areas of woodland and Green Infrastructure (GI). The proposed development, of just 5.8 hectares, in the north-eastern corner of the GC, adjoining the existing built-up area, will be screened by dense areas of woodland on all sides. The sloping topography and the existence of significant woodland and GI, means that there are few long-distance views into the site and the development site makes a modest contribution to the landscape setting of the settlement and the surrounding area.

In this context, any planning application for development on the CPGC will be supported by a Landscape and Visual Impact Assessment (LVIA), which will demonstrate that proposed built form will not have a harmful impact on the existing settlement form, pattern and character and will come forward as part of a landscape-led scheme.

Furthermore, the proposed replacement clubhouse, which will be funded by the new residential development, will sit on the same footprint and will be surrounded by additional landscape planting and bunding, to ensure that it blends into the landscape and does not result in any additional harm over that attributable to current built form being done to the site and its surroundings, including the Grade II\* Calcot Court. The new homes and clubhouse will provide significant economic, environmental and social benefits for the local community, whilst not harming the landscape character of the area and its surroundings.

Policy SP8 - Landscape Character is supported.



#### Policy SP10 - Green Infrastructure

This policy states that the council will maximise the potential for strengthening both local and strategic Green Infrastructure (GI) across the district. Development will protect and enhance existing GI assets, create additional GI which is integrated into the overall development and take opportunities to achieve multi-functionality by bringing GI functions together. A series of criteria are then provided to set out how to protect and optimise GI within the District.

CPGC is a land holding of 81 hectares (200 acres). Only 5.8 hectares (14.3 acres) is proposed for residential development in the north-eastern extremity of the land holding. There is considerable scope available to use parts of the remaining landholding to plant new trees and other GI to enhance and protect the verdant character and appearance of the local area. Other sites that the council has selected for development do not have the scope for GI improvements on this scale. Allocation of land at CPGC will ensure that significant GI improvements will be provided as part of a landscape-led scheme. The availability of so much land in the same ownership and adjoining the proposed development will offer opportunities to make a significant net gain in GI, which will be to the benefit of the local community. Land could also be used to improve GI provision to compensate for the allocation of other small development sites in the Eastern Area, where opportunities are limited on the allocated sites. Given the location of the GI, on CPGC, which is managed by a team of experienced green keepers, it will be possible to ensure that any new planting is maintained and properly managed over the long-term, which will ensure that the GI improvements are there to be enjoyed by the local community for many decades to come.

Policy SP10 - Green Infrastructure is supported.

#### Policy SP11 - Biodiversity and Geodiversity

This policy states that development proposals will conserve and enhance biodiversity and/or geodiversity and will deliver net gain. Development proposals across the district will be expected to deliver 10% net gain for biodiversity either within the site boundary or as off-site compensation where appropriate.

On a landholding of 81 hectares, with only 5.8 hectares proposed for residential development, there will be considerable scope for the provision of biodiversity net gain. This will be available not only for the c.72 dwellings proposed by CPGC, but it could potentially be available for other smaller residential sites to utilise. To support the forthcoming planning application, a bio and geodiversity assessment will be undertaken



to establish what measures should and could be taken to provide at least a 10% net gain. The results of surveys and recommendations by ecologist experts will form part of this process and ensure that the proposal will make a positive contribution to bio and geodiversity in the local area to the benefit of the local community, both in visual and well-being terms. Such improvements will ensure that CPGC contributes positively the bio and geodiversity of the locality for the foreseeable future.

Policy SP11 - Biodiversity and Geodiversity is supported.

Policy SP12 - Approach to Housing Delivery

This policy states that 8,721 to 9.146 net additional homes are required for the period 1 April 2022 to 31 March 2039, equating to 513 to 538 dwellings per annum. It is noted that the higher figure provided does not constitute a ceiling or cap to development. New homes will be located according to policies SP1, SP3 and DM1. It is important for the council to ensure that the reference to the housing target figure not being a "ceiling or cap to development" is retained in the policy. This is because, this is a positive message to send out, whilst there is a nationally recognised shortage of housing in the UK and any policy that seeks to facilitate additional housing provision at this time is to be encouraged.

The policy states that new housing will be focused in and adjoining the larger settlements, including the three growth areas, of which the Eastern Area is relevant to CPGC. Therefore, a development of c.72 dwellings on land at CPGC, on the eastern edge of Tilehurst, will comply with policies SP1 and SP3, which will enable housing to be provided to meet the Council's housing requirements, as set out in policy SP12. The proposed dwellings will make a valuable contribution to the housing needs of the district (potentially including affordable housing, depending on agreed development quantum and subject to viability). The allocation of land at CPGC within the Eastern Urban Area will comply with this policy, by helping to provide much needed new housing in a sustainable location, where the impacts of development can be satisfactorily mitigated.

Policy SP12 – Approach to Housing Delivery is supported. However, it is considered that the text should not be amended to remove reference to the delivery of housing over and above the "target figure" of 538 dwellings per annum.



Table 2 Housing Supply at 31 March 2022

Supply category	Net Units Outstanding
Core Strategy: Sandleford Park Strategic Site	1,580
HSA DPD Sites	990
Stratfield Mortimer NDP Site	82
Subto	al 2,652
Local Plan allocations not being retained (due to site being at an advance stage of construction)	d
Core Strategy: Newbury Racecourse	465
HSA DPD Sites	256
Subtoo	721
Existing planning commitments on unallocated sites	1,958
Existing planning commitments for C2 Use Class communal accommodation	57
Windfall allowance to 2039	1,949
TOTAL	7,337

Paragraph 6.12 states that the requirement of 9.146 dwellings minus the supply of 7,337, means that sites for a further 1,809 homes need to be found. In addition, there needs to be some built-in flexibility to allow for phasing issues and to allow for non-delivery, particularly of larger sites, which need a great deal of up-front investment in roads and other infrastructure. Therefore, it is important to make it clear that the current shortfall of 1,809 dwellings should also be a minimum and not a ceiling or a cap to development, as required by policy SP12 (see above).

It is likely that larger sites will have some problems with delivery. It is unlikely that they will deliver the housing numbers predicted in the suggested timescales, because larger sites are more likely to encounter issues with such matters as site assembly, ownership and title issues, capital funding, infrastructure costs and delivery, planning permissions and legal undertakings, such as section 38, 106 and 278 agreements. Some larger sites, such as North-East Thatcham, are also the subject of vehement objections from residents and may not actually come forward in the local plan period, particularly as sales enquiries and corresponding build rates start to recognisably decline. Overall, it should be expected that the larger sites will not deliver the housing numbers needed in a timely fashion and there is a real need for more medium-sized and smaller sites, of less than 100 dwellings, to help to fill the gaps. Smaller sites can be delivered in shorter time frames, as they do not have the depth of issues that the larger sites have. Therefore, the Council should allocate more smaller sites to ensure that housing needs are met in the short to medium-term.



Table 2 and Paragraph 6.12 – Housing Supply at March 2022 is supported. However, it is considered that it should be made very clear that the current shortfall of 1,809 dwellings is a <u>minimum</u> provision and not a ceiling or cap on development.

Policy SP14 – Sites allocated for residential and mixed-use development in the Eastern Area.

The policy lists a number of sites of varying sizes, which are proposed to be allocated for residential development.

Within Tilehurst only a 65 bedspace care home, equating to c.35 dwellings is allocated. As part of the HELAA, which helps to form the evidence base for the LPR, there is an identified need to build 175 dwellings over the next 15 years, yet there are no allocations for housing development proposed in the Tilehurst Neighbourhood Plan (TNP), which is at a relatively advanced stage.

It is considered that provision of c.72 dwellings at CPGC would help to meet identified local need and remove any requirement to impose housing numbers and allocations upon the TNP given that it covers the most sequentially preferable location for development in the District.

The 5.8 hectares of land at CPGC, is gently sloping with limited long distance views. It is heavily screened and fully enclosed by existing woodland and there are considerable opportunities available to provide a landscape-led scheme that will enhance and improve the visual amenity of the local area and at least 10% biodiversity net gain. Use of land owned by CPGC to enhance the natural environment within a sustainable location, as part of a modest development of c.72 dwellings will lead to considerable improvements to the amenities, wellness and mental health of both existing, and future, local residents.

In its current form, it is therefore considered that Policy SP14 has not allocated sufficient sites to help meet the District-wide shortfall of 1,809 dwellings identified in the Local Plan; this number having increased by 148 units since the earlier Reg 18 consultation. As the site at CPGC is sustainably-located, well-screened, can provide substantial GI improvement and will enable the significant improvement and long-term retention of a well-recognised leisure and community facility, it is considered that Policy SP14

Policy SP14 – Sites allocated for residential and mixed-use development in Eastern Areas is Objected to, because insufficient land is allocated to meet identified need. CPGC needs to be included in the list of larger sites (1ha or larger) for the allocation of c.72 dwellings.



Should the LPA consider the representations made in support of allocation of the land at CPGC for residential development to have merit, CPGC respectfully suggest the following policy wording:

Proposed Policy RSA XXX - Land at Calcot Park Golf Course, Calcot

This 5.8 hectare site lies within the north eastern perimeter of Calcot Park Golf Club, adjacent to the Tilehurst residential area. The site will deliver high quality, sustainable development that will:

- a) Provide for c. 72 dwellings at a mass and density that reflects the character of the adjoining settlement;
- b) Respond positively to the special characteristics and sensitivities of the landscape to minimise any visual impacts;
- c) Respond positively to the surrounding heritage assets, particularly Grade II\*
  Listed Building Calcot Court, to avoid harm to the significance of the Listed
  Building and its setting;
- d) Provide significant Green Infrastructure improvements in line with Local Plan Policy SP10;
- e) Avoid or mitigate adverse impacts on key species and habitats whilst ensuring at least 10% biodiversity net gain in line with Local Plan Policy SP11;
- f) Ensure adequate infrastructure is provided for sewage and surface water drainage;
- g) Ensure appropriate measures are put in place to mitigate impacts on the highway network;
- h) Improve the long-term viability of the golf course through enabling the redevelopment of the Calcot Park Golf Club clubhouse and other improvements to the Golf Course, this to be secured by S106.
- i) A Viability Report will be required to identify the level of affordable housing capable of being supported by the proposed, enabling residential development.

Policy DM39 - Local Community Facilities

CPGC is a leisure-based business, located within the Eastern Area, adjacent to many homes and local residents who make use of its attractive open spaces to play golf and



visit the facilities. The sport of golf is currently under a great deal of pressure. Player numbers are on a long-term downward trend and balance sheets around the world have been hit hard by Covid-19 related closures. Against this, it is important for the local community to have access to sports and recreation facilities, especially ones that provide opportunities for exercise in the open air, which is good for fitness, health and mental well-being. In this regard, it is noted that in supporting text to Policy DM39, paragraph 12.62 identifies 'Areas or places for community outdoor sport or recreation' within the definition of local community facilities.

CPGC is a leisure facility located in a highly accessible location. It is a business that supports 17 FTE jobs and it maintains c.81 hectares of attractive and maintained land, which would otherwise suffer from lack of stewardship. There are significant community, well-being and environmental benefits accruable from ensuring that the golf club is retained and encouraged to thrive into the future.

Policy DM39 provides support for new and expanded provision of local community facilities, subject to meeting a number of criteria relating to need, accessibility, design, engagement and use of spaces. The proposals at CPGC have been subject to lengthy and meaningful engagement and consideration to identify how to best respond to changing needs and demands in the golf industry and to deliver on inclusivity and diversity ambitions.

The new clubhouse will have much improved facilities for use by members and the general public. The enhanced facilities will create opportunities for greater training, work with schools and the local community. Significant landscape and biodiversity improvements will be possible; the golf club ownership of c.81 hectares of rural land offers tremendous scope for investment in the local area. It will not just be a case of allocating 5.8 hectares of land and getting c.72 dwellings in return. The benefits of the allocation of the proposed enabling development will be substantial and will ensure that the community gains considerable tangible benefits from the scheme over many years.

A scheme of c.72 dwellings is currently proposed, which has been subject to significant due diligence at pre-application stage and identified as a quantum that could provide both the enabling development desired and the delivery of affordable housing. Therefore, should a lower quantum of housing be considered appropriate on-site further to discussions with the Council, it would need to be acknowledged that retention of long-term golf at CPGC is the scheme driver and that there will be consequential reduction in the delivery of affordable housing; to be determined by Viability Assessment.



The improvements to the clubhouse and course will help to attract new and varied membership, diversify income streams and ensure that the future of the golf club will be secure for decades to come. However, this will only be possible in these testing times, if an enabling development of c.72 dwellings on surplus land, which adjoins the existing settlement, is permitted in order to fund the redevelopment of the clubhouse and to provide capital to ensure the golf club is robust and can thrive into the future.

Taking this into account, it is considered that Policy DM39 should provide a mechanism to enable the funding of new and expanded community facility provision.

Whilst 'enabling development' is a concept set out in the 2021 NPPF in reference to funding the retention and repair of heritage assets, this has a wider scope beyond the protection of heritage assets as confirmed through legal judgements such as R (on the application of Thakeham Village Action Ltd) v Horsham District Council, 29 January 2014 where paragraphs 213 and 214 of that judgement state that:

"I do not believe that the principles of enabling development are limited to ventures that would protect a heritage asset or a facility that serves or is accessible to the public. And I also reject the submission that those principles do not extend to a financial contribution that would support development undertaken by another company on another site.

The jurisprudence does not support either of those concepts. The scope for enabling development is wide. There are many ways in which it may serve a proper planning purpose. It may fund works of repair or improvement to a listed building. It may fund the protection of a particular habitat. It may fund the provision of a swimming pool for public use, or some other public facility. But that is far from being an exhaustive list of the benefits it may help to provide."

Accordingly, appropriate wording should be added to the policy to provide greater flexibility and allow for proactive assistance to be given to community assets that will otherwise fail, as follows:

"Enabling development will be permitted in circumstances where the capital generated will be used to underpin the improvement the Local Community Facilities, such that it can continue to provide economic, environmental and social benefits for the community in the long-term future. Planning permission will only be granted for enabling development schemes, if sufficient justification is provided to demonstrate that the investment is necessary and that the level of capital generated is proportionate to the cost of providing the improved facilities, this being secured by \$106".



I trust that the above comments and suggestions can be given due consideration in the evolution of the local plan. If you have any queries regarding these representations, please do not hesitate to contact me.

Yours faithfully



Jonathan Walton

**Planning and Development Director** 



Appendix 1: Proposed Enabling Development, Site Location and Current Proposed Layout





