From:
To:
PlanningPolicy

Subject: Local Plan representation formPl Date: 30 January 2025 17:20:08

Attachments:

Please find enclosed completed representation form

Regards

Clive Taylor Labour Ward member, Tilehurst Birch Copse



## West Berkshire Local Plan Review 2022-2039 (LPR) Consultation on Proposed Main Modifications (6 December 2024 – 31 January 2025)

Representation Form

Ref:

(For official use only)

Please complete and	By email: planningpolicy@westberks.gov.uk
return this form:	<b>By post:</b> Planning Policy, Development and Housing, Council Offices, Market Street, Newbury, RG14 5LD
Return by:	11:59pm on Friday 31 January 2025

Please read the **Guidance Note**, available on the Council's website https://www.westberks.gov.uk/lpr-proposed-main-modifications, before making your representations.

This form has two parts:

PART A - Your details

PART B – Your representation(s)

Please complete a new form for each representation you wish to make.

	PART A: Your de	tails
Please note the follow	wing:	
<ul> <li>We cannot registe</li> </ul>	er your representation without your	details.
Representations	cannot be kept confidential and will	l be available for public scrutiny.
	ntact details will not be published.	γ,
, ,	Your details	2. Agent's details (if applicable)
Title	Cllr	
First Name*	Clive	
Last Name*	Taylor	
Job title (where relevant)	West Berks District Councillor	
Organisation (where relevant)	West Berks District Council	
Address* Please include postcode		
Email address*		
Telephone number		
Consultee ID (if known)		

<sup>\*</sup>Mandatory Field

## PART B - Your representation(s)

All comments made at previous stages of the LPR have been taken into account by the Inspector and there is no need to resubmit these. Publication of the proposed Main Modifications is a regulatory stage and any representations made should relate specifically to the legal compliance and soundness of the proposed Main Modifications and should not relate to parts of the Plan that are not proposed to be modified.

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change.

Your name or organisation	Clive Taylor
(and client if you are an	Ward Councillor for Tilehurst Birch Copse Ward
agent):	West Berkshire District Council

### Proposed Main Modifications and Proposed Changes to the Policies Map

1. Please indicate whether your representation relates to the Schedule of Proposed Main Modifications or the Schedule of Proposed Changes to the Policies Map and provide the modification/change number you are commenting on below:

Document name	Schedule of Proposed Main Modification
Modification/Change reference number (MM / PMC)	MM3, MM45

2.	Do you consider the Proposed Main Modification or Proposed Policy Map	Change to be
a)	please tick/mark 'X' one answer for a and one for b)	

a) Legally compliant	Yes x	No
b) Sound	Yes	No x

Please refer to the guidance notes for a full explanation of 'legally compliant' and 'soundness'

If you consider the Proposed Main Modification or Proposed Policy Map Change not to be sound, please identify which test of soundness your representation relates to: (please tick/mark 'X' all that apply)

<b>Positively Prepared:</b> The LPR should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements.	x
<b>Justified:</b> the LPR should be the most appropriate strategy, when considered against the reasonable alternatives	x
Effective: the LPR should be deliverable	x
<b>Consistent with national policy:</b> the LPR should enable the delivery of sustainable development in accordance with the policies of the NPPF	x

3. If you have answered 'No' to question 2a or 2b above, please provide details of why you consider the Proposed Main Modification or Proposed Policy Map Change is not legally compliant or is unsound, including any changes you consider necessary to make the Plan legally compliant or sound.

You will need to say why this change will make the Local Plan Review 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.

Firstly, I do not feel qualified to say whether the modifications are legally compliant and would have preferred a "don't know" response option. However, I don't believe the plan is sound due to the inclusion of the 138 house allocation at the Pincents Lane site in Calcot (MM45) and the associated extension to the settlement boundary (MM3) to include the part of that site proposed for development.

I am an elected representative of the residents of Tilehurst Birch Copse Ward in which the proposed 138 house Pincents Lane site is located and believe the views I express here are broadly representative of most residents in this ward. I am also the Chairman of Tilehurst Parish Council which covers a considerably larger area than the ward I represent.

### **MM45**

I request that the 138 house allocation at Pincents Lane site is removed from the plan

My reasons for believing this is not sound are as follow:

- All previous planning applications for housing at this site have been refused. At the last application, which appears to be similar to that currently being proposed, West Berkshire Council's Eastern Area Planning Committee rejected the application unanimously. It was then referred to the councils District Planning Committee who rejected the application overwhelmingly with particular reference to the site being outside the settlement boundary and the impact of traffic on access to the site which has only one access road through a retail and warehouse estate including a large IKEA store which results in heavy traffic particularly at weekends and bank holidays. The whole planning process, which was for outline and access permission only, from application to decision, was over three years. I believe the applicant intends to sell to a developer if a planning application is successful with the potential for further delay.
- Traffic conditions I believe have and will continue to worsen due to a new care home (50 units), which has planning permission, immediately opposite the site entrance at Pincents Manor. There is evidence of increased occupancy of warehouse and office units off Pincents Lane. There is increased housing being built in Theale and Reading as well as other areas that will increase the weekend visitor traffic, particularly to IKEA.
- There are flood risk concerns at the site and issues with Thames Water that were not resolved at the time of the last application.
- There are concerns with the suitability of the emergency vehicle access from the north via a lengthy winding single track lane which is prone to freezing over in winter due to streams running down the roadway.

- The site is adjacent to the National Landscape, North Wessex Downs National Landscape and a grade 2 listed building (Pincents Manor) on which it will have considerable visual impact.
- Noise from the M4 is considerable with council officers previously recommending on the last planning application that some windows in the new housing would have to be sealed.
- Windfall sites in other parts of West Berkshire can more than compensate for a loss of 138 houses. I'm not clear that windfall is being accurately or fully considered when calculating housing delivery. There are, for example, some very large potential sites in central Newbury
- There appears to be disagreement between the council and the developer as to the number of houses that should be built here which might lead to a planning application not coming forward and/or delays in processing it due to disagreement over potential housing numbers at this site.
- There were over 3000 individual objections to the previous planning application and Tilehurst, Holybrook and Theale Parish Councils (3 Parish Councils) all objected. Over 1000 people signed a petition objecting to the development. There can be no doubt all that there is extensive opposition to building at this site.
- The existing and two previous members of parliament objected to development at this site. Members of all three main parties have publicly stated their opposition to this site being allocated for housing. There is high risk that a future application would be called in as would have happened with the last application had it been approved (Sir Alok Sharma, then MP for Reading West had called the site in should it have been approved, for further assessment at central government level). This would have caused further delay.
- Development of this site would create as isolated community of houses separate from the existing settlements of Tilehurst, Theale and Calcot
- The Tilehurst and Calcot communities would lose a valuable green space much loved and used for exercise, a chance to relax an unwind, walk their dog, to observe the abundant wildlife, plants and trees (many TPO's). Public rights of way run across the site with many additional well used paths. Natural England enforcement may delay progress at this site if rare species are present. Bats and badgers are both know to be present at this site. The neighbouring Pincents Manor site is currently held up due to outstanding Natural England permissions over 2 years after planning approval.
- This is a historic site with evidence of settlement going back to Roman times.
   Evidence/findings of past surveys are held in Oxford. Delays could occur if further historic findings were discovered.
- Tilehurst Parish Council is seeking to have the site designated as local green space as part of its Neighbourhood Development Plan, which was supported in a local resident's survey. This is anticipated to be decided upon during 2025 as the plan is in its final stages and may restrict the ability to build here.

There are ongoing infrastructure concerns in the Tilehurst, Calcot and Theale areas particularly in relation to GP services. The nearest surgery to Pincents Lane is in Theale and as with many local surgeries waiting times for a GP appointment are considerable and sometimes weeks as has been my own personal experience (at another surgery). There is little public confidence at present that increased housing will lead to increased infrastructure. The nearest primary school to this site is the Calcot Schools which is currently planned to reduce in size from a 3 form entry to 2 form entry. I am a school governor at this school, and I am concerned that our future schooling for an increasing population is not well planned

For all the above reasons I find it very hard to believe that a planning application can or should succeed here.

The proposed inclusion of this site after so many previous applications and appeals is of considerable distress and concern to the Tilehurst and Calcot community. Immense time will be spent by many people in processing a future application. I would urge careful consideration as to whether this will be time well spent. There must be a better and quicker way to resolve our housing needs.

### MM3

In relation to the proposal to extend the Tilehurst Settlement Boundary to include the 138 house Pincents Lane site, I request that this proposal is removed from the local plan as it is not sound and for the following reasons:

- This has only been proposed to increase the likelihood of the site being developed.
- The boundary has existed for many years to prevent urban sprawl into green space and to protect the strategic gaps between Tilehurst, Calcot and Theale
- There has been no consultation whatsoever with Tilehurst Parish Council on this proposed change nor with its NDP Steering Group
- Due process should be followed in consulting and talking to the communities and their representatives that this proposed change affects, eg Tilehurst Parish Council and Ward councillors This hasn't happened apart from in this hurried local plan consultation.

# Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA)

4. Do you have any comments on the updated Sustainability Appraisal/Strategic Environmental Assessment Report – Proposed Main Modifications (November 2024)? (Please be as precise as possible)

Page number			
Paragraph number			
Comments:			

## **Habitats Regulations Assessment**

Page number			
Paragraph number			
Comments:			

5. Do you have any comments on the addendum to the Habitats Regulations Assessment of

# **Notification of Progress of the Local Plan Review**

6. Do you wish to be notified of any of the following? (please tick/mark 'X' all that apply)

The publication of the report of the Inspector appointed to carry out the examination	х
The adoption of the Local Plan Review	X

Please ensure that we have either an up-to-date email address or postal address at which we can contact you. You can amend your contact details by logging onto your account on the Local Plan Consultation Portal or by contacting the Planning Policy Team.

Signature		Date	30th Jan 2025
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Your completed representations must be received by the Council by 11:59pm on Friday 31 January 2025.

### Please note - Personal/Contact Details

All submitted representations will be made publicly available, including on the Council's website, with the person/organisation making the representation being identified. A copy of all submitted representations will also be made available to the Planning Inspectorate and the person appointed by the Secretary of State to conduct the examination.

To ensure an effective and fair examination, it is important that the Inspector and all other participants in the examination process are able to know who has made representations on the LPR. The Council therefore cannot accept anonymous representations – you must provide us with your name and contact details. Address details will not be made publicly available. 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 <a href="http://info.westberks.gov.uk/privacynotices.">http://info.westberks.gov.uk/privacynotices.</a>

The Council will also need to make sure that the names and full addresses of those making representations can be made available and taken into account by the Inspector. By submitting a representation, you confirm that you agree to this and accept responsibility for your comments. The Planning Inspectorate's privacy statement for local plan examinations is available at <a href="https://www.gov.uk/quidance/local-plans#plans-privacy-statement">https://www.gov.uk/quidance/local-plans#plans-privacy-statement</a>.