



# Holybrook Parish Council

Proudly serving the residents of Holybrook Parish since 2000

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## Response to West Berkshire Council's Consultation for the 'Local Plan Review'

Holybrook Parish Council (HPC) supports many of the idealistic policies within the Local Plan which demonstrate West Berkshire Council's commitment to provide the required housing stock in a way that enhances and protects existing localities within its district. However, there are several elements of concern within the document as highlighted below and, many, as already stated in our previous submission which seems to have been ignored.

### The Spatial Areas 4.7

*'The four spatial areas of the West Berkshire Core Strategy (2012) have been reduced to three in the LPR, by combining the Eastern Area and the East Kennet Valley.'* (p 13)

Holybrook strongly objects to being lumped into one zone with all parishes which are not part of the ANOB or Thatcham and Newbury. Combining these, two very distinct in character areas, will create an overly diverse area with a mixture of urban and rural neighbourhoods. The only common factor is that they are not in the ANOB or in Newbury/Thatcham. The Council is concerned that less attention will be paid by planners to the circumstances/constraints of the urban parishes of the Eastern Urban area and this shows a broad-brush approach with more consideration shown for the ANOB and Newbury/Thatcham.

### The Spatial Strategy (Policy SP 1)

*'Within Newbury, Thatcham, Tilehurst, Purley-on-Thames and Calcot developments are expected to secure a net density of at least 35 dwellings per hectare.'*

This proposed 'expected' minimum density based on the net space is too high for Holybrook and, for suburban areas, may not be the most effective way of calculating the required densities. This is of great concern, especially for development close to and feeding into the A4 Bath Road not only from Junction 12 of the M4 but also from Tilehurst and Burghfield. The Government's document **Effective use of Land** states: *'dwellings per hectare, used in isolation, can encourage particular building forms over others, in ways that may not fully address the range of local housing needs...it is*

*therefore important to consider how housing needs, local character and appropriate building forms relate to the density measures being used’.*

The Local Plan does not consider the other options for the calculation of density which include habitable rooms or quantity of floor area. There is also the option to view sites in terms of their gross area which would include major distributor roads, primary schools, churches, shopping areas, open spaces and significant buffer areas required for landscape, ecological or infrastructure such as underground pipes. Again, this has not been considered. This policy is, like that for Spatial Areas, shows a broad-brush approach which fails to fully appreciate the requirements of each area and their infrastructure constraints. The Parish Council proposed that no minimum density be applied and, instead, each application is considered on its own merit with each applicant’s Design and Access Statement clearly explaining the rationale of the design and layout to justify the proposed density with reference to the accessibility to local services, the impact on infrastructure and local character, and sufficient parking provision.

The Local Plan encourages more development in an area where traffic levels are dangerously close to saturation and infrastructure simply has not kept pace. The local plan should do more to protect these urban/suburban areas from over development and complete collapse through lack of sufficient infrastructure.

HPC and its residents have made many unheeded representations to West Berkshire Council in respect of high-density development, traffic and infrastructure impact. Our residents face a regular battle with these ever-increasing issues.

*‘The individual identities of the separate settlements within this area [Eastern Area] will be maintained and the high quality landscape and environmental assets in this part of West Berkshire will be conserved and enhanced.’ (p. 17).*

Whilst it is extremely important that the individual identities between areas are maintained, it must not be forgotten that *‘there is interaction within and between all the spatial areas’* (Section 4.7 p13) and the effect of development in other areas can and does directly impact its neighbours. For example, the proposed development at Pincents Hill, which received many objections from Tilehurst residents, has also seen a significant number of objections from Holybrook residents as it is our residents who would suffer greatly from the increased traffic for example. The Parish Council is pleased that this development has now been removed from the Plan but would like to see the Plan go a step further and protect this piece of land in perpetuity.

Settlement Hierarchy Policy SP 3

*‘Development in West Berkshire will be required to comply with the spatial strategy set out in policy SP1....Eastern Urban Area (Tilehurst, Calcot, Purley on Thames).*

*The urban areas will be the prime focus for housing and economic development.’*

The Parish of Holybrook is not mentioned specifically in this policy. Does that mean it is not included in SP3 or is it grouped with Calcot? It is difficult to engender the sense of space in terms of reference within in the document if it does not relate to the area in question. It also diminishes any credibility and reputation that the Parish has built since its formation in 2000 (Holybrook is made up of two suburbs of Reading: Beansheaf Farm and Fords Farm, together with part of the older suburb of Calcot that lies south of the A4 Bath Road and a section of Southcote). 'Calcot' falls into the two very different Parishes of Tilehurst and Holybrook and it is an oversight to ignore their individuality.

*'The revised and updated settlement hierarchy ensures that new development planned throughout the Plan period continues to be directed to the more sustainable settlements, is appropriate for the settlement in question and is adequately supported by infrastructure and service'. (4.28 p24).*

*'The main focus for growth will, therefore, be Newbury, Thatcham and the east of the District. Focusing further growth in these areas has the potential to make the best use of previously developed land and house residents close to jobs, shops, leisure and cultural facilities and public transport'. (4.1 p22)*

Whilst it is understood that it is desirable to build new homes near jobs, shops etc; what about other, the very important infrastructure, such as healthcare, schools and roads which is under strain? These services, in the Eastern Area, have not kept pace with development and are under immense pressure. The Local Plan has ideological theory stating that any development should be supported by infrastructure and service (SP24 p83) and yet does not seem to address the current deficiencies and certainly not potential future deficiency; community infrastructure levy monies seems to be thrown out as the answer to this problem but how can the healthcare provision be improved when the doctor surgeries are over-subscribed, support services, such as pharmacies have closed and the CCG previously stated it has no plans for more surgeries in the Eastern Area (the most recent posting found on the internet refers to the closure of the Underwood Road Surgery, September 2010); how can schools offer better service when they are full and are running out of land to develop with some schools even selling off their playing fields; how can roads cope with more capacity when there is no space for widening and how can more sustainable transport modes be encouraged when there is no way for, for example, improved cycle lanes? There is no room on our roads for improved cycle lanes unless pavements are used and these are far too narrow for use by pedestrians and cyclists.

#### Policy SP 6 Flood Risk (p28)

Holybrook Parish Council would like to see the floodplain in the Eastern Area protected and, ideally, made into conservation areas. It is noted that the plan encourages Flood Risk mitigation measures but, in practise, these are rarely upheld. Many roads are flooded and stay that way for long periods of time because drainage trenches are not dug and those that are, are not maintained often being overgrown and full of litter. The north side of the A4 Bath Road being a perfect example of this issue.

The Holy Brook is owned by several private landowners but part is also owned by West Berkshire Council. The Holy Brook river is integral to the history of the Parish and is a highly valued asset yet the management and protection of this asset is not mentioned or referenced in the Plan.

Preserving the floodplain and maintenance of the Holy Brook should be an integral part of WBC's Climate Change Policy.

Policy SP 7 Design Quality (p33)

*'New development will be required to strengthen a sense of place through high quality locally distinctive design and place shaping. This will enable healthy place making, creating places that are better for people, taking opportunities available for conserving and enhancing the character, appearance and quality of an area and the way it functions.'*

HPC welcomes this policy but would like to see it strengthened to state: *'cut and paste' design of substantial housing developments will not be permitted*'. By way of example, the Bellway sites at Dorking Way, Calcot and Old Forest Road, Wokingham are identical in format and yet are in very different localities. In addition, the permitted Dorking Way development is in stark contrast to the existing character and design of Holybrook detracting from the Parish's previous distinctive design and it changes the shape and character of the area.

Policy SP 14 Sites allocated for residential development in Eastern Area (p57)

The Local Plan is used by developers and, as a result, development proposals are not sufficiently modified to take account of local needs and objections because the plan is not strong enough in favour of protecting neighbourhoods as per our comments.

Policy SP18 Housing Type and Mix

Holybrook welcomes the statement in this policy:

*'All dwellings should be delivered as accessible and adaptable dwelling in accordance with Building Regulations M4(2).'*

But would like to see this strengthened to specifically state *that 'All dwellings, including change of use, should be delivered.....'*. Accessibility and inclusivity must be given Material Planning Consideration status, especially where the change of use is from a dwelling to a care home. Holybrook has been subjected to planning approvals for change of use where accessibility, in particular, has been ignored at the planning stage and told that accessibility comes under Building Regulations. Where a building is new or is undergoing a change of use it is vital that accessibility formulates part of the planning proposals and where plans do not meet accessibility regulations, it should be refused.

Policy DM 12 Registered Parks and Gardens

*'Proposals for development that could affect designed landscapes identified on the  
'Register of Historic Parks and Gardens of Special Historic Interest in England'*

The Linear Park is not on the 'Register of Historic Parks and Gardens of Special Historic Interest in England'. However, the Park has been Awarded Green Flag status for more than 11 consecutive years and it should, therefore, be listed by the Council as a protected local asset.

*'Policy DM 15 Trees, woodland and hedgerows'* is welcomed.

Overall, the West Berkshire Local Plan review reads more like set of statements and not a direct plan of action for development. There is too much room for developments to be passed without due consideration for distinct areas, such as Holybrook, which have been completely ignored and this takes away their identity. The Parish of Holybrook has found that, in practice, the wording within policy documents does not always marry with the reality of what developers produce. Our Parish has been subjected to many developments in the recent years resulting in the loss of distinction, loss of habitat and loss of green space all whilst our infrastructure has been put under immense pressure and is close to collapse.