From:	[redacted]
To:	PlanningPolicy
Subject:	Consultation on the Proposed Main Modifications to the West Berkshire Local Plan Review 2022-2039
Date:	21 January 2025 12:23:35
Attachments:	image001.png image002.png image003.png Representation_Form.pdf

This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.

Dear Sirs,

Please find attached representations for consideration.

Regards

Mike Cole
Partner
BA(Hons) DipTP MRTPI
[redacted] | bell-cornwell.co.uk

bell cornwell
CHARTERED TOWN PLANNERS

West Berkshire Council	**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 return this form:	**By email:** planningpolicy@westberks.gov.uk
	By post: 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 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cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.*

	1. Your details	2. Agent's details (if applicable)
Title		Mr
First Name*		Michael
Last Name*		Cole
Job title *(where relevant)*		Partner
Organisation *(where relevant)*	Central Corporation (WHM) Ltd previously Central Corporation Projects Ltd	Bell Cornwell LLP
Address* *Please include postcode*	C/o Agent	Unit 2, Meridian Office Park, Osborn Way, Hook, RG279HY
Email address*		[redacted]
Telephone number		[redacted]
Consultee ID (if known)		Representors No: 141387

**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 *(and client if you are an agent):*	Bell Cornwell LLP on behalf of Central Corporation (WHM) Ltd previously Central Corporation Projects Ltd

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 Modifications and Proposed Changes to the Policies Map**
Modification/Change reference number (MM / PMC)	**See below**

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

a) Legally compliant	Yes		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)

Positively Prepared: The LPR should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements.	
Justified: the LPR should be the most appropriate strategy, when considered against the reasonable alternatives	**x**
Effective: the LPR should be deliverable	
Consistent with national policy: 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.

***MM5** - It is contester that the Council has not demonstrated the exceptional circumstances which justify allocating the sites identified in the LPR within the AONB. As there are alternative sites outside of the AONB such as RSA10 that should be considered first.*

***MM18** – Housing numbers need to be reviewed in light of the recent NPPF changes as Readings LHN has increased from 878 to 1028 under the new standard methodology. In light of this Readings view may have changed and may expect West Berkshire LPR to make specific provision for the unmet need. This also applies to other adjacent authorities or any of the other authorities within the Wester Berkshire HMA that are not protected by the transitional arrangements of the revised NPPF 2024.*

Although West Berks are protected by the transitional arrangements in the NPPF (2024) in that it is to proceed under the former NPPF (2023), one cannot ignore West Berkshires increase in LHN to 1070 on the horizon under the new standard method. Every opportunity should be taken to increase housing numbers and densities within the allocations proposed in this plan to work towards this whilst the opportunity is available.

***MM19** – it states that "Reading Borough Council now expects to deliver enough homes over the remainder of its adopted Local Plan period (to 2036) to more than meet its own adopted housing requirement including its previously identified unmet need. Reading Borough Council therefore does not expect the West Berkshire LPR to make specific provision for the unmet need as outlined in the adopted Reading Borough Local Plan." This needs to be reviewed in light of the recent NPPF changes as Readings LHN has increased from 878 to 1028 under the new standard methodology.*

***MM44** – RSA 10 remains at the reduced figure of 40 dwelling, down from 100 as originally proposed in the allocation. Policy SP1 supports the making optimum use of land and in areas such as RSA10 requires such allocations to be "a net density of 30 dwellings per hectare outside of the AONB" as is the case here. Also, the modification notes that "The Eastern Urban Area will continue to be a focus for housing development through existing commitments, allocated sites and regeneration and change in the existing built up area."*

The proposed site albeit on the edge of the AONB, there are no long views from or to the AONB identified as important, and the landscape character of land associated with RSA10 is not complementary (as required in MM5) to the AONB for reasons already detailed in our submissions.

Retaining the reduced capacity of 40 dwellings contradicts the proposed density requirements in this area detailed in SP1. An area that, albeit close to the AONB, does not complement it due to intervening development and infrastructure of the road network and pylons etc and extant permission for a hotel.

It is not justified to seek alternative new sites such as that at Pincents Lane, Tilehurst (Site Ref: TIL13) nearby. We do not consider the allocation of TIL13 s justified and will achieve sustainable development on the site.

The Pincents Lane site has a series of issues to consider that we highlight below:

1. ***Transport***

Policy requires the TIL13 development to provide two points of access (one emergency) via Pincents Lane, the only existing highway bordering the site. Pinsents Lane is a narrow country road once past the business park to the south. The main point of vehicle access is just opposite the Grade II listed manor house. There is no detailed consideration of the impact of the access on the listed building and this could jeopardise the delivery of the site, particularly with the access and traffic generation requirements from the new development and likely highway improvements required to enable pedestrians to walk safely from the site to near by facilities.

A second emergency access is required further north along Pincents Lane. Pincents Lane, which is a narrow, single track, country lane as it travels north towards Tilehurst. Any emergency access on the northern boundary of the site will likely be challenging to deliver and will significantly impact the character of the rural lane.

It is noted that SA/SEA note highlights that further traffic modelling is being carried out as the proposal will generate circa 828 vehicle movements a day. The results are not known and therefore it remains the case that there is no certainty whether the new homes can be delivered.

In April 2022 a hybrid planning application for 165 dwellings was refused due to the impact of the proposed access along Pincents Lane, which was considered not suitable and that it would have an unacceptable impact on highway safety and the flow of traffic (19/00113/OUTMAJ, appendix 2).

We question the practicalities, highway safety and impact of the access, all of which require further evidence and detailed consideration. Without confidence and evidence that a suitable, safe access and emergency access can be achieved there is no certainty that the site can deliver the homes proposed.

Whilst the site may on the face of it appear in close proximity to a range of services, we would question the accessibility by foot or bike to many of the services and facilities within 800m of the site. Currently Pincents Lane is a single carriage way track until the edge of the business park, at which point a lit footpath is provided but this creates an elongated route through to Sainsburys, extending journey lengths / time. There are public footpaths providing more direct connections, but these are unlit and unmade so would require significant improvement that would have a visual impact on the footpath and surrounding countryside. We have seen no evidence to demonstrate how walking and cycling route could be improved and the financial implications of that on the viability of the scheme. The SA/SEA assess the site as having positive social sustainability impacts as it is close to facilities but does not appear to consider the route pedestrians and cyclist would need to take to reach these facilities.

2. ***Impact the AONB and Character of the area***

Directly to the north west of the site is the AONB / National Landscape. Landscape assessment work highlights that the site has a "strong rural character" and "results in a perception of the area being far removed from the nearby urban environment" in a more sensitive location than

RSA 10 and not traversed by major infrastructure and additional impacts on the Grade II listed Pincents Manor. The Council's SA/ SEA Note confirms that the site's "open nature prevents the coalescence of Theale/ Calcot and Calcot/ Tilehurst". Whilst we note the policy requires housing development to be focused in the south west section of the site, concern remains that development on this section of the site will significantly change the character of the area.

TIL13 also only has a neutral effect in the SA/SEA, whilst RSA10 has a positive effect.

3. ***Surface water drainage***

The draft allocation focuses development in the south western section of the site for landscape reasons. However, tellingly this area is identified on the OS mapping as marsh and EA mapping confirms that there are areas at risk from surface water flooding running through this part of the site from north to south, which could significantly impact the delivery of the development. Unlike the work undertaken on RSA10. There is no evidence to demonstrate if this surface water flooding can be mitigated and if not, what implications there would be on the masterplan for the site and on the delivery of housing.

In addition, a stretch of Pincent's Lane is also at risk of surface water flooding, which could impact the ability to access the site / use of the emergency access. There is no evidence to demonstrate how this can be mitigated and how it will not impact delivery of the site as a whole.

4. ***Ownership***

It is understood from SA/SEA note (PA77) that the site is in multiple ownership, only one of those owners being a developer where as RSA10 is in a single ownership. As noted above, due to the site constraints the housing development is concentrated in the south west section of the site. There is no evidence to demonstrate how the site will deliver the comprehensive development envisaged and the community parkland and public open space considered necessary in the plan to limit the landscape impact on the AONB.

Conclusion MM44

There remain significant concerns in regard to the delivery of the site, specifically in relation to the highway impacts. Without that evidence there can be no guarantee of a clear and realistic prospect that the site will be able to deliver 138 dwellings by the end of the plan period.

It is our view that RSA10 should be enlarged to that originally submitted, 100 units rather than 40, in advance of the TIL13 which is a more sensitive location with outstanding concerns.

***MM54** – Includes revised text to note that "The special characteristics of the North Wessex Downs AONB mean that development will be modest" yet the developments proposed in the AONB, particular RSA18, is 3.5 times larger than RSA10. RSA10 was reduced by 60 dwellings on the grounds of its impact on the AONB, albeit not located within it. MM54 also introduces a further site (RSAX) within the AONB for 25 dwellings, which is unnecessary and could be accommodated in RSA10.*

***MM57** – Policy RSAX is unjustified for those reasons detailed above and should be deleted with the housing quota of 25 dwellings be added to RSA10.*

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:	
N/A	

Habitats Regulations Assessment

5. Do you have any comments on the addendum to the Habitats Regulations Assessment of the Proposed Main Modifications (November 2024)?
(Please be as precise as possible)

Page number	
Paragraph number	
Comments:	
N/A	

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	*X*
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	**Bell Cornwell LLP**	**Date**	**21/02/205**

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 http://info.westberks.gov.uk/privacynotices.

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 https://www.gov.uk/guidance/local-plans#plans-privacy-statement.