

## West Berkshire Local Plan Review 2022-2039 (LPR) Examination

### West Berkshire Council response to IN32

The main issues raised in the additional representations<sup>1</sup> received to the proposed allocation of Land at Pincents Hill, Tilehurst (TIL13) are set out below, along with the Council's response to the issues raised.

- **A general concern about the process of allocation**

The LPR is informed by a robust evidence base, part of which is the Housing and Economic Land Availability Assessment ([HELAA](#)). The HELAA is the starting point for the site selection work for the [LPR](#) and makes an assessment of a site's suitability and potential for development. Land at Pincents Hill was promoted to the Council as part of the HELAA process and was assessed as 'potentially developable in part'.

The LPR is currently undergoing independent examination to test the soundness of the Plan. The NPPF states that strategic policies in Local Plans must set out an overall strategy for the pattern and scale of growth and make sufficient provision for housing.

At the point that the LPR was submitted for examination, the Plan was able to demonstrate a sufficient supply of housing sites to meet the housing requirement across the plan period. Evidence put to the examination explains that the site was not previously allocated within the LPR due to Council concerns that the development would have an unacceptable impact on the local highway network. However, further detail and assessment of highways matters was undertaken to inform the recent planning application ([19/00113/OUTMAJ](#)), and whilst it was found that there will be additional impact on Pincents Lane it is not considered to be severe. In addition, it was demonstrated that technically acceptable access arrangements can be achieved, subject to conditions and as such no objection was raised on highway grounds to the application.

Over the course of the examination circumstances have resulted in the Inspector identifying a shortfall in the housing supply over the plan period and as such has requested the Council propose modifications to identify additional sites for development. The Council undertook a review of all the sites within the HELAA and identified Land at Pincents Lane as one of four sites across the District that had been assessed as suitable and available. It is therefore being proposed for allocation.

- **The site lies outside the settlement boundary**

Under the current Local Plan the site lies adjacent to, but outside of the Tilehurst settlement boundary where existing policies place a presumption against development. However, the Council is undertaking a Local Plan Review (LPR) to

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<sup>1</sup> Matter 7.17 – TIL 13 Pincents Lane Additional Submissions

identify the development that is required to meet local needs, to set out the strategy for distributing development, and to outline policies for conserving and enhancing the natural and built environment until 2041. Upon the adoption of the LPR, it will supersede the three documents that make up the current Local Plan.

As part of this work a [review of the settlement boundaries](#) was undertaken across the District. A list of criteria used in this review is set out in Appendix 2 of the LPR. The appendix sets out what will be included within boundaries, and one of the criteria listed is 'residential sites allocated through the Local Plan and neighbourhood plan processes.'

The LPR process also involves the identification of sites for future development, including greenfield sites outside of existing settlement boundaries. Identified sites are known as allocated sites or site allocations. As Land at Pincents Hill is proposed to be an allocated site within the LPR this site would then meet the criteria set out in Appendix 2 for inclusion within the revised settlement boundary of Tilehurst.

- **Loss of gap and identity of individual settlements/communities**

Visual breaks and a sense of openness between individual settlements can be very important in maintaining both a physical and perceptual separation, enabling each to maintain their own identities. The proposed policy acknowledges this and ensures that physical separation is maintained in perpetuity through the requirement for the establishment of a community parkland in the eastern part of the site.

- **Policies in the emerging Draft Tilehurst Neighbourhood Development Plan (NDP)**

A NDP is being prepared for Tilehurst by the Tilehurst NDP Group. The draft Plan includes a proposal to designate part of the Pincents Hill site as local green space (LGS). The Council is in the process of preparing comments on the draft NDP and anticipates providing these to the Tilehurst NDP Group by the end of October.

The NPPF at paragraph 105 states that *"...the designation of land as Local Green Space should be consistent with the local planning of sustainable development..."* and at paragraph 106 (c) is clear that LGS designations should not be extensive tracts of land.

Furthermore, the PPG (Paragraph: 007 Reference ID: 37-007-20140306) which states that: *"Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making."*

- **Impact on the landscape**

The site is located within the setting of the North Wessex Downs National Landscape (AONB). To inform the LPR a [Landscape Capacity Assessment](#) was carried out for the site in 2015, and its recommendations have been incorporated into the proposed

policy for the site. The policy requires development to conserve and enhance the AONB, to retain the open links between the recreation ground and the AONB and the wooded edge to the north and east, and to contain the development below the 75m AOD contour. The policy also requires a full detailed Landscape and Visual Impact Assessment (LVIA) to inform the design and layout of the development.

Further detail and assessment of these matters was undertaken to inform the recent planning application (19/00113/OUTMAJ), and the Council's landscape consultant was satisfied that, with conditions, an appropriate development could be achieved on site.

- **Impact on biodiversity**

BBOWT, Natural England, the Council's Ecologist and Tree Officer were all consulted during the preparation of the HELAA. Given the site is directly adjacent to ancient woodland and Local Wildlife Sites there is potential for adverse impacts from development if appropriate mitigation measures are not put in place. The proposed policy requires that the development will be informed by an Ecological Impact Assessment (EclA) to establish current site conditions and the presence of protected species on the site. This assessment will also identify appropriate avoidance and mitigation measures to ensure designated sites and/or protected habitats and/or species are not adversely affected.

Further detail and assessment of these matters was undertaken to inform the recent planning application (19/00113/OUTMAJ). Overall, it is considered that the impacts of the development can be adequately mitigated and enhanced.

- **Loss of informal recreational opportunities**

At present the site is privately owned and public access is limited to the Public Rights of Way (PRoW) through it, although this is not enforced by the landowners and the site is currently open except for the fenced areas for horse grazing. It is acknowledged that the PRoW are very well used by local people who have also benefited from the informal use of the wider site. As such many representations relate to the loss of the existing green space and the potential for restricted access as a result of development.

The establishment of a community parkland is to be provided as green infrastructure and public open space in perpetuity on the eastern part of the site and this requirement is clearly set out in the proposed policy. This element of the site would enhance the green infrastructure, and secure and formalise wider public access with long term maintenance and protection. The proposed policy also requires the existing PRoW to be protected and enhanced. In addition, it involves a requirement for the dedication/acceptance of a public footpath running north/south through the community parkland to be considered, along with pedestrian links to the recreation ground.

- **Access to the site and impact on the local highway network**

The site is considered to be in a sustainable location and offers a wide range of opportunities for sustainable travel choices. The site is within walking distance to a range of local services and facilities including schools. It is also close to cycle routes into the centre of Reading, the wider Reading area cycle network and towards Theale. The proposed policy includes requirements for walking and cycle routes which further promotes connectivity within and through the site. In addition, there are bus stops at Ikea and Calcot retail park within reasonable walking distance that offer frequent services during the day to Reading and a service towards Theale and onwards to Thatcham and Newbury. Theale train station is 1.4km away which is accessible by foot and cycle via the M4 footbridge. The proposed policy requires a Travel Plan to further improve accessibility.

The Council's Highways Team were consulted on the site as part of the HELAA and advised that access to the site will be obtained via Pincents Lane, with an emergency access also to be provided. It was highlighted in the comments received that there is an existing pinch point in Pincents Lane with another likely as Pincents Lane enters the site, however these are considered of adequate width.

Representations received to the LPR have raised concern regarding Pincents Lane being opened up to the north. The policy is clear that access is to be obtained from Pincents Lane from the south. Access to the north along Pincents Lane is only considered for an emergency services access and the potential for pedestrian and cycle links.

The proposed policy requires a Transport Assessment to inform the development proposals, and this will take into account any further development recently undertaken within the area and identify measures to mitigate any impact from the development.

Further detail and assessment of highways matters was undertaken to inform the recent planning application (19/00113/OUTMAJ), and whilst it was found that there will be additional impact on Pincents Lane it is not considered to be severe. In addition, it was demonstrated that technically acceptable access arrangements can be achieved, subject to conditions and as such no objection was raised on highway grounds to the application.

- **Impact on local services – education and health**

Policy SP24 of the LPR requires new development to deliver the infrastructure necessary to meet the needs of the development without placing undue burdens on existing infrastructure facilities and services. The LPR is clear that to ensure new development within West Berkshire is sustainable, it needs to be supported by adequate and appropriate infrastructure in a timely manner. This can be both onsite and offsite provision. This policy is supported by the Council's Planning Obligations Supplementary Planning Document.

The Council's Education Team do not foresee that the development on this site will require additional education infrastructure to be provided. The site sits across two

primary catchment areas and there are a number of other primary schools close by. It is considered the impact on secondary provision is modest and will likely displace a small number of pupils that seek a place from outside the catchment area/District. Should infrastructure be required in the future, funds from the Community Infrastructure Levy would be sought to address this need.

In terms of GP provision, this will be considered further in conjunction with the Integrated Care Board (ICB) at the planning application stage to determine the most appropriate provision at that time.

- **Impact on existing infrastructure – water resources and waste water**

Policy SP24 of the LPR requires new development to deliver the infrastructure necessary to meet the needs of the development without placing undue burdens on existing infrastructure facilities and services. The LPR is clear that to ensure new development within West Berkshire is sustainable, it needs to be supported by adequate and appropriate infrastructure in a timely manner. This can be both onsite and offsite provision. This policy is supported by the Council's [Planning Obligations Supplementary Planning Document](#). As part of any planning application utility providers will be consulted.

As part of the recent planning application (19/00113/OUTMAJ) Thames Water raised no objection with regard to foul water sewerage and surface water network infrastructure capacity. It recommended a condition on water network infrastructure so that the necessary network reinforcement works can be made to ensure capacity and a condition relating to construction location and methods.

- **Flood risk**

The site is located within Flood Zone 1 which has the lowest annual risk of probability of flooding, although parts of the site are at risk of surface water flooding. Where the site is greater than 1 hectare a flood risk assessment (FRA) would be required under planning policy, and this is clearly set out within the proposed policy for the site. A FRA would be required to demonstrate that development: would not impact on flood water storage capacity, or the flow of fluvial flood, surface or run-off water; can implement appropriate flood risk management measures; provide safe access and exit under frequent and extreme flood conditions; and provide long term maintenance and management of flood protection/mitigation measures as part of the development.

In addition, sustainable drainage methods are required to be incorporated to manage surface water in all development in accordance with best practice, national standards and attenuate to greenfield run off rates and volumes.

The existing landform on the site means that there will be further work on managing surface water run off in a sustainable way to inform future development proposals, but the information submitted as part of the recent planning application (19/00113/OUTMAJ) demonstrated that it is feasible for surface water run off to be managed subject to conditions.

- **Noise levels**

The site is in close proximity to the M4 and A4, as well as a commercial area, and so there is a risk of increased noise levels for future occupiers. The proposed policy requires a noise and air quality survey to inform the development and advice on appropriate mitigation measures.

As part of the recent planning application (19/00113/OUTMAJ) mitigation measures were recommended for dwellings where noise levels were considered to be an issue. In addition, mitigation measures and conditions were identified to be required for residential properties considered to have above maximum noise levels in private gardens.