

REPRESENTATIONS TO THE TILEHURST PARISH NEIGHBOURHOOD DEVELOPMENT PLAN REG. 14 CONSULTATION (OCTOBER 2022)

PREPARED ON CALCOT PARK GOLF CLUB AND BEWLEY HOMES PLC

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004**

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Appendix 1 – Minutes from TPNDP Steering Group meetings

1.0 Introduction

- 1.1 These representations have been prepared on behalf of Calcot Park Golf Club (CPGC) and Bewley Homes PLC (BH) in relation to the recently published Regulation 14 Draft Tilehurst Parish Neighbourhood Development Plan (TPNDP) which is in the process of being prepared by Tilehurst Parish Council (TPC).
- 1.2 CPGC is a historic and traditional members' golf club having been designed by the legendary Harry Colt and which opened in 1930. The wider landholding comprises c.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. It is recognised that the golf club contains considerable areas of woodland and green infrastructure, a small part of which has been identified for residential development to fund a new clubhouse and course improvements to protect the golf club from failure, this ensuring the long-term sustainability of the golf club and facilities for both members and, importantly, the local community.
- 1.3 As part of proposals to ensure the longevity of CPGC, consultation with club members, local Parish Council's, Ward Members and the public has taken place over the past two years, this more recently including a public exhibition held on 3rd May 2022, which was well attended and identified overall support for the club's plans, alongside a number of comments that will assist in the design development of the wider project.
- 1.4 When consulting golf club members, whose support is required by means of ballot prior to any public-facing activity taking place, there is risk of individuals or groups progressing campaigns without full knowledge of scheme details or simply to protect self-interests. It is clear from the timing of the first approach to TPC regarding the Local Green Space (LGS) allocation, directly after the first Member's presentation in July 2021 and the resultant location chosen for the proposed LGS allocation that this has been a key driver in the identification of need and specific location, rather than proper due process being followed.

- 1.5 Further, the Neighbourhood Plan group sought to impose the LGS allocation on CPGC without inviting parties to discuss matters prior, including opportunity to engage with local residents, denuding CPGC and BH's ability to properly and robustly discuss relevant planning matters before decisions were taken that will affect the operations of the club.
- 1.6 Despite setting out a clear rationale to rebut the proposed LGS allocation in a letter dated 22nd October 2021, following discussions with TPC in May 2022 regarding the need for change at CPGC and despite a number of attempts to meet TPC prior to publication of the Reg. 14 version of the TPNDP, it is noted that the land identified for residential development is still earmarked for potential designation as Local Green Space (LGS) within the TPNDP and, further, that the area now identified has been slightly amended to fully reflect the red line area for development as shown at the public exhibition.
- 1.7 As we have previously explained in our submission dated 22nd October 2021 that BH and CPGC are keen to ensure that the TPNDP is prepared in a positive and robust way which enables sustainable development and growth to take place over the entire plan period and that it is able to adapt to changes in the leisure industry and the economy more widely. BH and CPGC are particularly keen to ensure that allocations within the TPNDP are not erroneously used to act as blocking mechanisms to development; this not being within the spirit of good planning or indeed capable of being progressed through a robustly assessed and legally compliant Neighbourhood Plan process.
- 1.8 BH continues to actively promote the land earmarked as LGS through WBC's plan-making process, this being as a consequence of submissions made to West Berkshire Local Plan Review 2020-2037: Emerging Draft and, more recently, to the ongoing Housing and Economic Land Availability Assessment (HELAA) Call for Sites, which will help form part of the evidence base for housing allocations in the LPR.
- 1.9 The land interest, if successfully applied for by BH, will assist in the ongoing sustainable growth of the District and will help to secure the future of CPGC and therefore the responsible stewardship over the substantial remaining

hectares that will be retained (approximately 94%), and enhancement for golf course use. The proposals will also provide a much-needed deliverable housing site that will assist the Council in meeting its housing requirements over the plan period. The proposals in this manner could therefore provide a logical addition to the TPNDP and ensure that CPGC remains vibrant and successful into the future.

- 1.10 Notwithstanding that set out within this consultation response, BH and CPGC remain committed to engagement with TPC and recognise the desire to discuss matters as appropriate as part of the pre-application process related to the clubhouse, course and residential planning applications to come forward at CPGC.

2.0 Policy and Legislative Context

2.1 In order that the TPNDP is able to progress towards being a 'made' Neighbourhood Plan (and therefore come into force as part of the wider development plan at a later stage), it will be necessary for it to meet the 'Basic Conditions' and a number of other legal requirements.

2.2 National planning policy in the shape of the National Planning Policy Framework (NPPF, July 2021) in paragraph 37 and footnote 23 highlight that the Basic Conditions are contained in Paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990 (as amended).

2.3 These are also replicated in the Planning Practice Guidance (PPG) which accompanies the NPPF and are (as applicable):

"a) Having regard to national policies and advice contained in guidance issued by the Secretary of State.

d) The making of the neighbourhood plan contributes to the achievement of sustainable development.

e) The making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority.

f) The making of the neighbourhood plan does not breach, and is otherwise compatible with, European Union obligations.

g) Prescribed conditions are met in relation to the plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan".

2.4 The NPPF is also clear with regards to the overall scope of neighbourhood plans and distinguishes this from strategic policies which should be

contained in local plans. Paragraph 20 lists matters relating to strategic policies as:

"...an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for:

a) housing (including affordable housing), employment, retail, leisure and other commercial development;

b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);

c) community facilities (such as health, education and cultural infrastructure); and

d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation".

2.5 In contrast, non-strategic policies (those which can be covered by neighbourhood plans) are outlined in paragraphs 28 – 30 of the NPPF and cover the following areas:

- *"Allocating sites;*
- *The provision of infrastructure and community facilities at a local level;*
- *Establishing design principles;*
- *Conserving and enhancing the natural and historic environment; and*
- *Setting out other development management policies".*

- 2.6 The fundamental principle of this being that the strategic policies in local plans are developed with an evidence base that is then subject to a more rigorous examination process compared to that of neighbourhood plans. It is therefore imperative that the scope of the neighbourhood plan policies utilises the evidence available to it and applies it fairly and proportionately to decision-making to ensure that it flows from the strategic policies and contributes to the facilitation of sustainable development and does not unreasonably obstruct the normal workings of the Development Management process.
- 2.7 It is against this background that we set out CPGC and BH's representations to the Reg 14 TPNDP in the next sections of this document.

3.0 Response to proposed LGS designation

- 3.1 From review of the Reg. 14 TPNDP, the Plan proposes to allocate a number of Local Green Spaces with BH's land interest sought to be covered by one such designation. It is notable that the process of designation commenced early in 2021, indeed the TPNDP website notes the following:

"The draft plan continues to take shape, and we have been focussing on the benefits and challenges with protecting areas of Tilehurst with the "Local Green Space" designation.

We will be discussing these developments and defining our next steps at our March meeting" (Our emphasis).

- 3.2 Minutes of the March 2021 Steering Group highlights that:

"The current list contains 18 different areas (excluding Pincents Hill as the planning status is not clear). As an update on the status of the Pincents Hill planning status is not expected in the immediate future it was agreed to add Pincents Hill to the list. A discussion took place about what specific areas to include and a recommendation will be worked on by Joan and Clive.

It was agreed to remove all woodlands within the boundary of the AONB from the Local Green Spaces Shortlist. However, they will be listed in the document as areas that were only removed from the shortlist because they are deemed to already be sufficiently protected (classification of woodland, within AONB boundary etc.). If this assumption proves to be incorrect then they will be reinstated in the shortlist.

It was agreed that the shortlist should only contain those areas that have a reasonable chance of satisfying the very strict evidence criteria" (Our emphasis).

- 3.3 Taking into consideration this context, where further designation has been

deliberately and onerously applied to such a small and focused area of land, clearly after review of appropriate LGS sites had been assessed, we strongly object to this proposed designation within CPGC and the TPNDP's aim to apply this to land which is privately owned and inaccessible.

3.4 In addition, CPGC was given no notice of the intention to allocate the land as LGS, the public flyer identifying potential LGS allocations being published and circulated prior to the club receiving notification of the proposed allocation on 13th October 2021. No attempt to engage with CPGC on this matter was made by TPC before proposing the LGS allocation, nor was the site subject to consultation as part of earlier drafts of the TPNDP. The designation has instead been driven by a desire to respond to residential pressure from a small group of immediately local residents without meaningful engagement or desire to understand the rationale for progression of the site for residential development.

3.5 Minutes from TPNDP's Steering Group Minutes over the past 15 months, which are reproduced in full in Appendix 1, demonstrate a clear intention to identify the area of LGS at CPGC to block development. A summary of key dates and issues is provided below:

- July 2021 – local residents of New Lane Hill sought the LGS designation. At this time, legal expertise in relation to experience at Pincents Hill was sought. It was explained that the TPNDP LGS section would be subsequently updated.
- November 2021 – significant review of the BH/CPGC submissions to the proposed LGS designation was undertaken.
- January 2022 – discussions were held about the legal requirement for LGS to be accessible.
- February 2022 – several questions re: CPGC raised. Thought given to FOI request to WBC.

- March 2022 – decision to extend LGS to cover further wooded areas. Seeking to discuss further with CPGC.
- May 2022 – significant discussion re: LGS area and whether protection was required in light of TPO and BOA designations.
- July 2022 – LGS area identified as "that being the area that CGC intended to sell for development"

3.6 On this basis, it is evident that the consultation leading to the initial designation of the land as LGS was knowingly flawed. The TPNDP continues progress this allocation on false planning grounds, i.e. to wantonly block development, which runs contrary to a central tenet of the plan-making process and is indeed also inconsistent with other parts of the TPNDP, in particular, paragraph 7.13 where proposals for 66 dwellings at CPGC are identified as a potential windfall site to meet housing need within the Neighbourhood Plan area.

3.7 It is disappointing that the TPNDP Steering Group has sought to go to the lengths it has to determine whether LGS could be imposed on this site, including seeking to FOI request to WBC regarding the development proposals at CPGC. During this time, BH and CPGC have been open about the proposals, have engaged with local groups (including TPC) and have sought to progress planning in an open, inclusive and professional manner. A relevant timeline to set out the engagement undertaken between parties is set out below in this regard:

- 13th October 2021 - letter received from TPC (copy to Bewley) outlining the LGS Nomination.
- 27th October 2021 - letter dated 22nd October 2021 sent from CPGC to TPC outlining concerns over nomination of LGS and inviting them to meet.
- 1st November 2021 - letter from Pennington's (on behalf of BH) to

TPC outlining the concerns relating to the LGS - this also included the Pegasus letter.

- 4th November 2021 - meeting with TPC to discuss the wider development plans and rationale.
- 18th November 2021 - letter from TPC to BH acknowledging the letter of 1st November. This letter also stated that they would continue dialogue with the club.
- 19th November 2021 - visit to CPGC by Clive Taylor, Vice-Chair of TPC, to inspect the proposed development site.
- 15th February 2022 - letter from CPGC to TPC further outlining our position as no further dialogue had taken place. In this letter a request was made to address the full Council at their next meeting.
- 8th March 2022 - CPGC addressed TPC meeting, again outlining the proposals, opposition to the LGS and consequences of doing nothing.
- 3rd May 2022 - Public Consultation including another meeting with TPC to outline the proposals.
- 1st June 2022 - letter from TPC to CPGC suggesting that they would like to extend the LGS designation.
- 31st August 2022 – email from Opus Works Planning to TPC to request meeting to discuss the outcome of the public exhibition, next steps and the LGS designation.
- 3rd October 2022 - meeting with TPC regarding the ongoing LGS designation and associated implications.

3.8 Irrespective of the rebuttal set out in this letter, BH and CPGC remain firmly

committed to continuing the engagement process with all local stakeholders, including TPC, to ensure that a highly sustainable, beneficial and supportable residential scheme and new clubhouse development can come forward.

3.9 As part of this, however, it is crucial that a fair planning assessment can be progressed. On the basis of the detail provided above alone, the designation is wholly unjustifiable and should be removed from the TPNDP. In robustly supporting this case, BH and CPGC would note the following:

- Planning Practice Guidance (PPG) is clear that when it comes to private land, contact should be made with the landowners at an *early stage* in the plan making process when intending to designate Local Green Space (Reference ID: 37-019-20140306). This has not happened in this case and, given the clear evidence that exists to substantiate when assessment and reporting took place, the designation fails on this basis (Our emphasis).

3.10 The ability for neighbourhood plans to designate Local Green Space is covered by paragraph 102 of the NPPF. This outlines that these should only be designated in the following instances:

- In reasonably close proximity to the community it serves;
- Demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- Local in character and is not an extensive tract of land.

3.11 The PPG provides further guidance on the designation of Local Green Space in that it 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 (Reference ID: 37-007-20140306). (Our Emphasis).

- 3.12 Further, the Neighbourhood Planning toolkit identifies that "Care is required to ensure that green space policies are not being misused, for example through making designations to stop development, rather than to ensure proper green space provision" (Locality, Neighbourhood Planning – Local Green Spaces, 2021). (Our emphasis).
- 3.13 TPC has clearly undertaken a Local Green Space assessment to inform the TPNDP at an earlier date yet has sought to retrospectively justify the designation of LGS, solely and purposefully related to BH's land interests at CPGC at a time when it has become clear that residential development on-site is coming forward.
- 3.14 Whilst detail of a proposed residential development to assist the financial longevity of CPGC has been readily-available within the public domain since 2018 and certainly more formally since February 2021, when representations were made to the WBC Local Plan process; before the TPNDP March 2021 meeting, it is evident that determination to designate LGS on the identified land was not progressed by TPC until details of the potential site location was circulated to CPGC Members in July 2021 and the extent of landholding interest by BH was ascertained, hence the delayed notice on this matter against other identified sites, as well as the short timeframe then given by TPC for comment on what is an issue that goes to the very heart of CPGC's survival (and therefore its ability to successfully manage the future stewardship of the remainder of the site including facilities for the benefit of the local community).
- 3.15 In line with the PPG, Locality guidance and identified case law, mechanisms exist within the planning system to prevent communities using LGS designations to block development if the intentions of development were publicised before the plans for LGS designation (in respect of this site) were put into motion. In this case as placed into the public domain through the Local Plan representations and detail provided to CPGC members well in advance of any considerations on this subject being made by TPC. On this

basis, the proposed designation fails requisite tests and cannot be advanced in respect of the identified land at CPGC.

3.16 It is also important to identify what should fall within the remit to be determined through the Neighbourhood Plan process and what should form part of wider planning matters to be determined by the Local Planning Authority. TPNDP Steering Group minutes have highlighted the discussions held regarding existing planning designations on site and therefore whether there was a need for additional protection. In this light, it is clear that the additional designation is to block development, there is no other rationale; the Biodiversity Opportunity Area and Tree Preservation Order (TPO) designations being there to protect wildlife and woodland cover.

3.17 The need for delineation in decision-making is crucial for the planning process, which is predominantly there to ensure development can come forward in a managed manner without undue bias or influence. As such, decision-making on the merits or otherwise of any development proposals at CPGC are for West Berkshire Council to determine, taking into consideration the Development Plan for which the Neighbourhood Plan forms part, but which needs to be consistent with the strategic policies and allocations in place, and emerging documents, as is the case in this instance.

3.18 The reason for making this point is simple: decisions made at the neighbourhood local level can often overly reflect pressure brought by localised groups. In this instance, the request for LGS has resulted without consideration of the consequences of making such a designation. These are many-fold:

- CPGC needs enabling development to remedy problems with the course arising from climate change. The course was closed for approximately 20% of all playing days during winter months as a result of course closures resulting from adverse weather conditions. Climate change has also adversely affected the condition of the course during the key summer months resulting from long periods of dry weather impacting on the clay based sub soil without any ability to mitigate the impact via course irrigation/watering.

- If this pattern continues, which not only loses CPGC income but also puts it at risk of losing members to other courses that have modern irrigation and drainage in place, there will be no CPGC, putting the entire site at risk of redevelopment or misuse.
- CPGC also needs to instigate change to the clubhouse to increase income from non-golfing sources, to offset reduction in green fee and subscription income in real terms, bring forward new players to counter a currently ageing membership and provide a facility capable of meeting 21st century requirements, particularly in terms of energy and sustainability. Without the enabling residential development CPGC, which has always run on a not-for-profit basis, cannot afford changes to the club and course, putting the whole site at risk of redevelopment or misuse should the Golf Club fail
- The LGS designation does not and cannot cover the whole course as this would be an 'extensive tract of land'. Should the LGS designation be made, a planning application will still be progressed. Should this fail, an alternative site within CPGC will be chosen for development which the TPNDP would not be able to designate as LGS. This highlights the futility of the designation; it is not good planning to move the issue elsewhere to pacify one set of local residents, there will always be another set of residents at the alternative location with views of their own. BH and CPGC have chosen the best, least impactful planning location after significant due diligence and pre-application consultation. Responses to the public exhibition highlight a general supportive consensus, particularly with reference to the improved clubhouse and opportunity to open this for local use. This will be written into any planning application to ensure that the benefit can be realised by the local community. It is noted, however, that there is no current impediment to local residents using current facilities, this being possible through purchase of a very reasonably priced social membership.

3.19 Responding to some of the additional matters raised by the TPC in seeking

LGS designation, we dispute many of the findings set out within the Reg.14 TPNDP paragraphs F10 to F17 and would note that, save for recreational areas identified in the TPNDP, the other areas identified as LGS, namely CPGC and Pincents Hill have been so done in relation to proposals for residential development. In providing our response, we cite the guidance provided in "West Berkshire Council Neighbourhood Planning Advice Note 11: Local Green Space designations", which sets out six criteria to help evidence if the space is "demonstrably special to the local community":

The proposed space is of particular local significance because of its beauty / The proposed space is of particular local significance because of its richness of wildlife

- The land has principally been used as a practice area, which was formed between 15-20 years ago, but was formally closed towards the end of 2019 following the members' decision to approve the land disposal.
- Since that time, the land has been subject to earthworks, which commenced when the course was forced to close due to Covid-19. The works included removal and storage of material resulting from ditch and drainage works around the course, with that material in turn being used around the course as well as towards creating a newly formed bund to the north of the 8th hole.
- In addition, topsoil and earth was taken from land previously forming the practice area for both purposes. These works were carried out over a period of several months commencing April 2020. Separately, externally sourced material was transported on to the land and used towards creating the bund.
- The land subject to the majority of the potential LGS is therefore neither beautiful, unspoilt or rich in wildlife. TPC has no evidence of its own to support the assertion that the LGS site in isolation possesses a 'richness of wildlife' and any reference to the WBC 2008

Assessment is outdated as it precludes the very significant changes to landform and disruption to land that has occurred since closure of the practice range.

- The land in question is not a natural habitat area developed without human interference. The land was predominantly a practice range, which in itself would have been regularly mown, treated and subject to significant activity from movement and ball strikes acting as a deterrent to the establishment of meaningful flora and fauna. As noted above, the land has subsequently been subject to earthworks and other activity which reinforce this issue.
- Justification is made on the grounds of 'beauty' in paragraph F12 on grounds that the natural habitat area has developed without human interference for over 40 years. This statement is not correct. As noted above, the majority of the LGS area has been used as a practice ground and more recently has been subject to earthworks. Other areas forming the proposed LGS area are as identified in paragraph F12 and are formed of existing tall trees and woodland for which an existing Tree Preservation Order is in place. It is noted that any planning application for residential development would need to fully consider such designations, alongside ecology, biodiversity and landscape considerations. As set out earlier in this document, planning guidance is clear regarding what falls to be considered under Neighbourhood Plans and what should fall to be considered under the Local Plan and Development Management process. In this case, sufficient planning protection exists in respect of the site, which will need to be balanced against the benefits of bringing forward proposed residential development.

The proposed space is of particular local significance because of its historic significance

- The response provided in para F13 primarily relates to the wider landholding at CPGC, which is indeed of historical significance and relates back to the formation of Calcot Park and its grounds (as well

maintained by CPGC since 1929). In line with paragraph 102 of the NPPF (as revised 2021), the:

"Local Green Space designation should only be used where the green space is...

c) local in character and is not an extensive tract of land".

Clearly, an LGS designation cannot extend to cover 81 hectares, which would be defined as an extensive tract of land and therefore consideration has to be given to what is appropriate. Given the focus of the proposed LGS designation in this instance, it is clear that the assessment has not been focused upon the most important heritage assets; the ancient woodland is beyond the red line area and therefore does not form any part of the proposed development. Irrespective, review of the site and adjacent habitat would form part of the wider ecological and character assessment, whilst the more important heritage assets are located towards the middle of the golf course, away from the proposed LGS land. In this context, the designation is both vexatious and obstructive and not within the spirit of the plan-making process.

The proposed space is of particular local significance because of its recreational value

- The land has always been contained within the curtilage of the Calcot Park estate, as enclosed, which is private land inaccessible to the public and has continued to be during stewardship under CPGC. Although the majority of land at CPGC has been accessible to golf club members, access to this land is prohibited for all members of the public and there are no defined footpaths or recreation/amenity areas for their enjoyment (beyond the former practice area and its sole use). Importantly, the use as a practice area would have precluded use and enjoyment on safety grounds, following which the land has been subject to earthworks which would similarly have

limited potential use and enjoyment.

At paragraph F14 of the TPNDP it is noted that the site is accessible to its approximate 550 members and visitors together with the estimated 100 residents within homes within the golf club land. This is wholly incorrect. The land historically may have been used by members and visitors for golf practice, but this in itself provides no public recreational value as the land is private and can only be used by those paying for the privilege. This extends to all residents on the golf club, who unless they are playing members will have had no access to any part of the grounds save for roads connecting to properties and the clubhouse itself.

Taking the above into account, it is clear that the land has never been available to, or used for, the recreational benefit of the public or Parish other than CPGC members (for practice facility only), who make up a very small percentage of residents. Against this, a planning application for improvement of the Golf Club and its course, enabled through residential development, can provide tangible benefits to the locality and its residents, not just limited to public access into the identified area and improved built form and facilities at CPGC, but also through a strengthened financial position for CPGC which translates into longevity of the golf course and stewardship of the wider estate as a whole entity.

The proposed space is of particular local significance because of its tranquillity

- Paragraph F15 of the TPNDP suggests that the proposed LGS has a uniqueness in that it provides a secluded habitat which...is extremely quiet and peaceful. For the reasons noted above, the proposed space has not, in its entirety, been of local significance because of its tranquillity. The land, until very recently, has been used as a practice range, which by its nature requires maintenance, mowing, ball collecting and is subject to regular ball strikes and the noise and disturbance that this creates. Practice ranges typically allow for a

greater level of ball strikes, as many players can occupy the same space and are not constrained by walking between shots. As such, practice ranges cannot and do not fall into any categorisation that could be surmised as 'tranquil'.

The proposed space is of particular local significance because of another reason not covered by criteria 6-10

- In addition to the points made above, the land in question offers no visual amenity for the benefit of the Parish, either from New Lane Hill or any other vantage point. Essentially the only beneficiaries of the LGS in terms of protection of views and any associated visual amenity are the occupiers of Kendrick Gate. Against this, any planning application will enable public access into this area, as well as substantive improvements to club and course, the planning balance being significantly positive in consideration of wider community benefit.
- It is important to note that the properties at Kendrick Gate that benefit from a view over the proposed LGC were developed in the early 2000's by Millgate Homes partly on land formerly owned by CPGC, and which was previously sold by CPGC as a single parcel of land which also facilitated the development of the two large detached dwelling houses on New Lane Hill immediately to the south of the entrance to Kendrick Gate. The land was sold to a former member (now deceased) who originally resided at Calcot Cottage, New Lane Hill, and not to Millgate Homes.

4.0 Conclusions

- 4.1 These representations to the TPNDP have been prepared on behalf of Calcot Park Golf Club and Bewley Homes PLC. Both parties are keen to be involved in the ongoing evolution of the TPNDP to ensure it is a robust document which meets the 'Basic Conditions' and which allows the area to benefit from considered and appropriate development.
- 4.2 As set out in this response to the Reg. 14 Consultation, this development is necessary to ensure the longevity of CPGC, in turn protecting the significant majority of parkland and woodland that has been subject to Calcot Park's stewardship over the past 92 years.
- 4.3 National planning policy and guidance is clear that neighbourhood plans should be prepared in a positive manner and should be aspirational and deliverable.
- 4.4 In respect of the proposed LGS designation at CPGC, the TPNDP fails to do this and Calcot Park Golf Club and Bewley Homes PLC objects to the TPNDP as a result of this. As noted above, it is considered that the proposals represent an opportunity for the locality, helping to deliver useful and accessible open space and much-needed residential development, whilst protecting a local sporting and community asset. It is considered that the TPNDP could better reflect this opportunity and work with BH and CPGC to bring this to reality.
- 4.5 BH and CPGC would therefore request that the TPNDP is positively prepared in line with the emerging strategic policies of the area and seeks not to unreasonably block sites such as BH's land interest at CPGC from being developed. This position is clear from review of the work undertaken by TPNDP to date and it is considered that this is contradictory to the approach in national planning and guidance which outlines that neighbourhood plans should support local development and not promote less development.
- 4.6 On this basis, the TPNDP currently fails the 'Basic Conditions' required to

allow it to be 'made' as set out in paragraph 37 of the NPPF and corresponding footnote 23. It attempts to do this by applying constraints on the land by seeking to erroneously apply an LGS designation to a very focused portion of land for the reasons made above.

- 4.7 The proposed designation has been put forward without sufficient evidence to justify it and, in particular, there is no rationale given for why this specific portion of land, out of all 81 hectares of land available within CPGC, has been identified. If applying an LGS designation to land within CPGC it is clear that there are more visually interesting, beautiful and potentially accessible areas, rich in wildlife other than that selected. The designation therefore has to be viewed for what is plainly is; a crude attempt to obstruct potential development for which normal planning processes should apply.
- 4.8 As such, Calcot Park Golf Club and Bewley Homes PLC strongly object to the proposed LGS designation and instead would suggest that the TPNDP needs to acknowledge the proposed residential allocation on Bewley Homes PLC's land interest, in turn enabling development to come forward that does accord with the wider principles of conservation and stewardship of land at CPGC that the club wishes to continue, albeit with some recognition that some change in required to ensure longevity.
- 4.9 Taking all this together, it is abundantly clear that the TPNDP, as currently proposed is fundamentally flawed, does not meet the Basic Conditions and so cannot progress meaningfully towards a 'made plan' on this basis. As such, the approach to designation of LGS needs to be amended, with the allocation at CPGC removed in order for it to become a robust plan which is positively prepared.

5.0 Moving Forward

- 5.1 Calcot Park Golf Club and Bewley Homes PLC remain open to meaningful engagement with TPC, as well as with all local residents and stakeholders whilst they prepare plans to protect the future of the Golf Club.
- 5.2 It is considered beneficial for discussions to take place regarding the future of the Golf Club and how the residential development proposed will secure this and enable CPGC's plans to open up the clubhouse for more community uses. Locals will be able to enjoy what will be a unique, welcoming and high-end food and beverage and event offer in the locality.
- 5.3 The planning process allows for consideration of all relevant factors, so that a balanced decision can be made. In this regard, BH and CPGC make a respectful request for open, ongoing and wide-ranging engagement with TPC so that this can form part of outreach to the wider local populous and more appropriately and effectively help to influence the development proposals at CPGC. The planning process needs to be positive and look for solutions, rather than barriers to issues and the TPNDP has been predominantly produced in this manner.
- 5.4 It is notable that the proposals can meet a number of stated aspirations of the TPNDP:
1. *To encourage and make it possible for people to live the whole of their lives in the parish* – provision of a mix of different tenures can meet housing need as identified in the TPNDP on a more strategic site, whilst bringing forward wider benefits such as uplift of the existing clubhouse (with this in turn providing an improved, more accessible offer for community use);
 2. *To endeavour to ensure that any new residential developments will be within the existing Settlement Boundary and not in the NWD AONB or other green spaces* – the site is located within the settlement boundary on land that has been subject to use as a practice ground and which is

of low biodiversity value. In turn, the development enables protection over the remaining 94% of CPGC lands.

3. *To make provision for the future needs of the community. For example, lifelong housing, cycle paths, children's centres, youth and sports facilities and business hubs* – the proposals will help to provide lifelong housing as a consequence of delivering M4(2) or M4(3) housing, will enable greater youth outreach in terms of golf training opportunity through improvement to the existing course to make it more playable and provision of indoor swing studios and flexible internal spaces. The proposals also secure the future of the golf club and the lands within its stewardship in doing so meeting the future sports and leisure needs of the community whilst providing flexible accommodation for varied business uses – creche, pilates, conferences, workspaces.

5.5 Without repeating further aspirations set out in paragraphs 2.9 to 2.13 of the TPNDP, it is also clear that:

- More strategic development of this sort would better contribute towards healthcare provision through appropriate S106 contributions or CIL;
- The development proposals would help to provide the community/business hub identified in the TPNDP as a benefit;
- The residential development will be bespoke and sensitively designed. It is also notable that the site is highly self-contained and offers a unique opportunity to bring forward housing in a low-impact manner;
- It is proposed to provide accessible green space within the development for the benefit of all local residents;
- The residential development would meet stated requirements in terms of solar panels and other energy-saving measures, low water

usage and EV charging;

- Access to state of the art broadband will be in-built into project design;
- The proposals will achieve biodiversity net gain and, more importantly, will lead to the long-term protection of one of Tilehurst's largest biodiversity assets;
- The proposals will enable the retention of an existing facility and will introduce further beneficial facilities in a sympathetic, modern and sustainable manner.

5.6 Taking the above into account, BH and CPGC welcome opportunity to discuss how the development proposals can form a positive and beneficial part of the TPNDP, helping to deliver on a number of well-considered local aspirations.

Appendix 1 – Minutes from TPNDP Steering Group Meetings

**Minutes of Tilehurst Parish Neighbourhood Plan Steering Committee held Wednesday
21st July at the Calcot Centre commencing 7.30pm**

1. **Present:** Committee: Kevin Page, Clive Taylor, Peter Cross, Alan Wade, Julia Gentle, Joan Lawrie
Members of the Public: Nick Pflaeger, Sandra Vickers and 4 others all representing New Lane Hill residents
2. **Apologies:** Fred Williams
3. **Opening remarks by the Chair:** Kevin welcomed everyone and members of the public attending for the first time. He gave a brief outline of the purpose and history of the Steering Committee, and committee members gave brief introductions.
4. **Representation from members of the public**
Nick Pflaeger spoke on behalf of residents attending from New Lane Hill and explained that, following a meeting with Clive, he had submitted an application on behalf of the group for inclusion of an area of Calcot Golf Course to be designated as Local Green Space. A discussion followed led by questions from Peter concerning the precise position of the land in question, covenants on the land, the history of sale of the land and the recreational value and public access to the land. Nick responded to these points including the land registry reference designation and emphasised the biodiversity of the site that was largely unspoilt due to lack of public access.
It was suggested that Joan could advise the group based on her legal expertise and experience in relation to Pincents Hill
Nick would provide some photos of the land
Peter would update the Neighbourhood Plan LGS section based upon the information received at the meeting.
5. **Declarations of Interest** - None
6. **Minutes of the Last meeting** were approved and had been posted on Teams.
7. **Matters Arising** - Clive would chase District Cllr Jo Stewart concerning the Pincents Hill ecology report
8. **Budget, finance & fundraising update**
Nothing to report other than the expenses cheque amount had yet to be provided by Jacky to Peter. Kevin would chase this.
9. **Correspondence**

Kevin advised the meeting that Liz had advised the committee that she had left Bell Cornwell but was prepared to continue to advise the group on a free of charge basis. After discussion it was agreed to accept Liz's generous offer.

10. Draft Plan

10.1 Local Green Space designation

After further discussion it was formally agreed to include proposed designation of the land behind New Lane Hill and on Calcot Golf Course in the Neighbourhood Plan. At this point members of the public left the meeting.

10.2 Cycle Storage Sheds

After discussion wording, for inclusion in the NDP was agreed as proposed by Peter.

10.3 Paving over front gardens

General discussion on this matter but it was agreed that the NDP should quote existing policy and that the Parish Council should raise awareness amongst residents of these policies.

10.4 Next Steps

It was agreed that with the final changes just agreed, together with an amendment concerning flood risk suggested by Julia to be included, that the plan should be submitted to WBC for further review and discussion.

We would request a response from WBC within 2 weeks and that there should be a round table discussion with WBC.

We would also be seeking clarification of the total proposed housing for Tilehurst Parish that had been stated in the draft West Berks Local Plan and how this figure was calculated. With regard to obtaining feedback and agreement to the plan from Parish Councillors, we would hope to complete this by or at the September council meeting. The overall aim was that we should get to referendum within 6 months

10.5 Review of actions from last two “informal” meetings held on 29/06 and 06/07 (not previously covered)

- Action to create a spreadsheet for inclusion in the Neighbourhood Plan that relates policies to outcomes. This could be done when finalising the plan. (on 6th July Alan advised that he had started this)
- Kevin to distribute the new homes policy document (provided by Liz) to the rest of the committee. Kevin reported he had loaded this into our Teams folder.
- Feedback from Parish Councillors on current draft - copy sent to all councillors but still awaiting feedback, action in progress
- Liz to look into lighting policy that relates to the AONB and neighbouring areas and advise on best use of low-level lighting in any future developments. - Kevin to chase Liz

- WBC desktop publishing tool that could be used to smarten up the plan. To be progressed towards completion of the plan and Kevin would discuss this further with Liz. It was also broadly agreed that the executive summary could be distributed as a separate leaflet.

11. **Next Meeting** : As scheduled on Wednesday 18th August at 7.30pm. Venue to be confirmed.

**Minutes of Tilehurst Parish Neighbourhood Plan Steering Group meeting held
Wednesday 15th September 2021 at the Calcot Centre, High View commencing
7.30pm**

1. Present : Peter Cross (Chair for this meeting), Joan Laurie, Alan Wade, Julia Gentle, Clive Taylor (minutes)

2. Representations from members of the public - None

3. Apologies : Fred Williams, Kevin Page

4. Declarations of Interest : None

5. Minutes of the Previous Meeting held 18th August had been distributed were agreed as a true record.

ACTION: Clive to post minutes on Teams

6. Matters Arising :

Clive referred back to earlier minutes where it had been agreed to submit a freedom of information request for a habitat report on the land east of Pincents Land (owned by U+I) that had been posted on the planning portal for the Pincents Hill planning application but then removed. This had been raised by a member of the public at an even earlier meeting and it was felt that the information contained in the report could be important in both determining the planning application and to the Steering Group in supporting the designation of this land as Local Green Space. An FOI request had yet to be submitted as a local district councillor had advised the Steering Group Parish Councillors that a request for a similar report, though not for Pincents Hill, had been refused by West Berks Council and subsequently upheld by the Information Commissioner, as that do do so would reveal the location of protected species.

After discussion it was agreed, however, to proceed with an FOI request on behalf of the Steering Group and to state that we would accept a paper copy and with redactions, if necessary, to protect species and that the report would be for the steering group members only.

ACTION: Clive to submit the foi request.

7. Budget and Finances :

Peter reported everything was now up to date and that he had received the outstanding information from Jacky

8. The NDP - The Plan

Various actions and next steps were reviewed as follows and largely following feedback from WBC both at the recent meeting and subsequent written comments :

8.1 Contact with landowners regarding designation of land as LGS (Local Green Space). Clive had distributed a draft letter prior to the meeting that was discussed and approved with some minor changes/corrections. Clive would re-draft and check the land owners addresses on Land Registry then get the letters issued on Parish Council headed paper probably with Kevin's sign off.

ACTION : Clive to prepare final copy of letters to landowners

8.2 Alan had drafted a flyer to be distributed to residents with a summary / update on NDP progress, for review by other committee members but at least some present could not recall receiving it. Alan would re-distribute following the meeting.

ACTION : Alan to redistribute the draft flyer (was done immediately after the meeting)

8.3 Regarding distribution of the flyer Clive had received a response from Karen at Tilehurst Directory but it wasn't clear that they could do the work. Clive agreed to chase Karen for a decision the following day. It was agreed that a fall-back option would be to obtain a distribution quote from Abracadabra.

ACTION: Clive to chase Karen

8.4 It was agreed that an update page/post on progress should be added to the NDP website and it was believed that Kevin had agreed to do this. It could be a copy of the flyer. It was also felt that a copy of the draft plan should be available on the web site

ACTION: Kevin to update website

8.5 Peter to send the WBC comments to Liz Alexander for her comments/advice

ACTION: Peter

8.6 Maps of the LGS nominated sites had been produced by Fred from copy provided by Clive. Action complete. Peter and Alan to determine whether some West Berks maps provided by Laila could be used to replace maps we currently use.

ACTION: Peter and Alan

8.6 There was some discussion on whether to contact Reading University requesting assistance in finalising the NDP as suggested by West Berks Planning. Kevin was understood to be pursuing this. It was felt that at this stage it could be more of a hindrance than a help. Contact with a previous group member Jenny to see if she could assist was suggested due to her experience. Peter would see if he could make contact with her.

ACTION: Peter

8.8 Setting of Deadlines for completing the plan - Agreed to defer as West Berks "Transport" are understood to want to review the plan which would add to the timescales. Also the extent of the comments to be reviewed from WBC planning (far greater than expected) would further add to timescales.

8.7 Alan and Peter would start to work through the comments from WBC planning starting with the more basic/easier points first.

ACTION: Alan and Peter

9. Other Business

9.1 Clive reported that the developers for the Pincents Manor site would be presenting their plans at our next meeting in October.

9.2 The problems of printing off the NDP with the WBC comments for committee members without a PC or Teams to review was discussed but not resolved.

9.3 Julia drew attention to a press article concerning a consultation on West Berks plans to combat flooding. Clive noted the details and agreed to check with the Parish Clerk as to whether Tilehurst Parish had been contacted regarding this consultation.

10. Next Meeting: Wednesday, 20th October 2021 at the Calcot Centre

Minutes of Tilehurst Parish Neighbourhood Plan Steering Committee held 7.30pm,
20th October 2021 at the Calcot Centre

Present : Peter Cross (Acting Chair), Clive Taylor (minutes), Julia Gentle, Momina Ahmed

Apologies : Kevin Page, Alan Wade, Fred Williams, Joan Lawrie

Declarations of Interest : None

Representations from members of the public : Momina confirmed that she would like to join the group and this was agreed unanimously

Minutes of the previous meeting were agreed

Matters Arising:

- Clive confirmed that he had submitted a freedom of information request for a Pincents ecological report and was now awaiting the outcome
- Clive confirmed that the letters informing land owners of Local Green Space designation had been sent by Kevin. Land registry details for Pincents were still to arrive and might reveal other parties with ownership interest in the land.
- Website updating - update required from Kevin
- Peter confirmed that Jenny had expressed an interest in assisting the group
- Setting of deadlines - deferred until next meeting

Progress of the Plan:

Peter outlined the position we were in regarding reviewing the plan against the West Berks comment and progress made in updating some sections but still much work to be done. Also noted that West Berks had suggested we consider some council owned areas as LGS. This would be considered as part of our plan review. Peter would be meeting with Alan within the next week to further review the plan.

Flyer Review : Kevin had revised a flyer drafted by Alan and had distributed a copy for further review just prior to this meeting. Clive read out the leaflet and it was agreed to suggest two changes to tidy up wording of one section and to clarify the wording on site allocations. Clive would email proposed changes to Kevin, Peter would check printing timescales. The printed copies are required for supply to Tilehurst Directory by 30th October.

Clive advised the meeting that he had spent approximately £70 on Land Registry documents that he intended to claim back. This was agreed.

Peter to send Momina a copy of the draft plan with the WBC comments

The meeting closed

Next formal meeting: Wednesday 17th November 2021

Minutes of Tilehurst Parish Neighbourhood Plan Steering Group meeting held 17th November 2021 at the Calcot Centre, High View commencing 7.30pm

1. Present: Kevin Page, Peter Cross, Alan Wade, Joan Lawrie, Clive Taylor, Nick Pflaeger, Sandra Vickers and 5 other members of the public
2. Representations from members of the public
Nick speaking on behalf of residents living close to Calcot Golf course raised the following points - all in italics below

Letter from Penningtons Manches Cooper

First para - There is confusion about how the response is structured. PMC state they are a client of Bewley Homes, whereas Pegasus state they are a client of both Calcot Golf Club and Bewley Homes. There are inconsistencies between the PMC and Pegasus documents, these are detailed later in this document. We assume TPC will address these issues with CGC

Page 2, 4th Para starting, 'For the reasons set out...'. – PNC state that 'and more recently has been used to deposit soil from other parts of the golf club land, ...' whilst Pegasus 3.11, bullet points 2 and 3 provide a different explanation. We believe this is an inaccurate representation of the facts. Local residents contacted the Environment Agency regarding the importation of a very large amount of low grade soil onto the site which was buried in the practice ground and also used to build an earth bank. Local residents have reported through the Rt Hon Alok Sharma, MP, our local MP, concerns about the fact this importation was carried out without an EA Licence and that the removal of trees and building of an Earth Bank was carried out without prior planning approval. We don't believe any of this is relevant to the application to designate the site as Green Space

Page 2, para 5 – 'to stop development rather than to ensure proper green space provision'. Local residents have not received any communication from either CGC or Bewley about any proposed development on this site.

Furthermore we have checked with TPC, WB Planning, our local WB Councillor and our local MP and all have stated that they are unaware of any development plans for this site. Furthermore the site is not included in the WB HELAA nor is it included in the current development plan. It would be helpful if CGC are able to reference any document or formal communication to local residents that mentions proposed development plans for this site.

Page 2, para 6 – this is not our understanding, we leave this with TPC to resolve.

Page 3, penultimate paragraph, 'We ask this is received within 21 days of the date of this letter'. As Bewley is not the owner of the land and only has an option, residents question whether Bewley can issue such an ultimatum.

Pegasus Report

1.4 – residents have commented that they are unclear what point Pegasus are making by stating BH is a South – East based builder. We note they did not explain that BH is owned by a trust located in an off shore tax haven.

1.7 – ‘BH has actively promoted this land through WBC’s plan-making process.’ We have been in contact with the CEO of West Berkshire through our local MP, Rt Hon Alok Sharma. We have been informed in writing that neither knows of any development plan for this site. There has been no communication to local residents.

The land is not included in the HELAA or DPD plan.

1.8 – is there any link from this assertion to an application for Green Space ?

3.3 – ‘has been deliberately and onerously applied to such a small and focused area of land’ - local residents are willing to fund through TPC an independent assessment of the area of natural habitat and have them report on biodiversity. Regarding size we are most focused on the area of natural habitat and from pictures available from Google we calculate this is a significant portion of the site.

3.9 – ‘Whilst detail of a proposed residential development ...has been readily available within the public domain since 2018’. Residents are incensed by this statement. As previously detailed in our response residents have consistently reported that enquiries about this site have been blocked. Not only has there been no response from direct enquiries, there is no information about this site in any WBC plan or call for sites document. We ask TPC to check with CGC whether they have communicated any messages to members about the release of information concerning their development plans.

3.10 – we repeat, local residents have absolutely no information about this site and this issue has been included within correspondence with our local MP, so can be easily checked.

3.11, bullet points 2+3 – please refer to our earlier response, the statements in this section are inaccurate. We also repeat all of this work was undertaken without planning approval and we are in correspondence with the CEO of WB and our local MP about this situation.

3.11, page 12, bullet point 1. ‘Essentially the only beneficiaries of the LGS in terms of protect of views and any associated visual amenity are the occupiers of Kendrick Gate’ - this statement is not correct. During the production of the application for Green Space a representative from TPC viewed the area of natural habitat from New Lane Hill in addition to Kendrick Gate. We have attached a google diagram which shows that the viewing access area from NLH is much larger than KG. This site can also be accessed by members of Calcot Golf Club and until recently members regularly used the practice area.

Section 4, Second paragraph – ‘Bewley Homes PLC is a regional housebuilder...’ residents are unclear what relevance this has to an application for designation of Green Space. The key comment from local residents about BH is that they are

owned in an off shore tax haven whilst at the same time are benefitting from UK tax payers through the 'Help to Buy' scheme.

Further discussion followed around the above points and also covering the potential access from New Lane Hill which local residents viewed as dangerous with some history of past accidents.

Regarding nominations to the Steering Group , the Steering Group needed to clarify the number of vacancies on the committee. The New Lane Hill group indicated they could nominate up to two new members. Later in the meeting it was clarified that the committee had nine members so we would advise Nick that their group could nominate one formal steering group member to be endorsed at the next meeting.

Clive advised that he would be meeting with Calcot Golf Course staff later in the week to view the site, possibly with Alan and would report back. It was also anticipated that a meeting would shortly be arranged involving residents, CGC, the developer and the steering group.

3. Apologies: Fred Williams, Julia Gentle, Liz Alexander.
4. Declarations of Interest : None
5. Minutes of the previous meeting held on 20th October had been distributed and were approved.
6. Matters Arising:
 - Clive advised that his FOI request for the Pincents environmental report had been rejected on grounds that it contained sensitive information. It could be taken to an appeal stage but it was reported that a copy might be accessible from when the report had previously been published. Joan agreed to pursue this.
7. Progress of the Plan:

Discussion took place on progressing through the WBC comments and incorporating feedback from Liz. Discussion turned to the prospect of proposing recreational land owned by TPC and WBC as Local Green Space. Clive was actioned to identify the land areas concerned and then to liaise with Peter for inclusion in the plan. It was noted that caveats might be possible for recreational development only eg replacement of the Cotswold Centre.

Kevin reported that he had posted a project plan on Teams taking the project right through to referendum. Kevin outlined the key milestones (see Teams for details).
8. Budget & Finance - Peter reported on the need to provide evidence of expenditure for grants received which he was working on providing

The meeting closed

Next monthly meeting: Wednesday 15th December 2021

Additional Clarification to item 7 (Kevin P)

It was agreed that Kevin would approach Liz to review section 8 and the Design Brief, following on from her valuable input on previous sections.

Clive agreed to review and update section 9 with the revised Local Green Space information. Kevin also agreed to contact Fred to ascertain his availability to continue membership of the steering group.

Minutes of the Tilehurst Parish Neighbourhood Plan Steering Group Committee Meeting held on 15th December 2022

Present : Kevin Page, Peter Cross, Alan Wade, Julia Gentle, Joan Lawrie, Liz Alexander, Momina Ahmed , Sandra Vickers

1. Apologies: Clive Taylor, Fred Williams
2. Committee Co-option : Sandra Vickers was confirmed as a member of the committee
3. Declarations of interest : None
4. The minutes of the meeting were agreed with the addition that Liz was to review section 8 and Clive to review section 9 (both had happened) and Kevin was to talk to Fred.
5. Actions arising from the minutes - None that wouldn't arise later in the meeting
6. Budget, Finance and Fundraising: Peter reported he had met with Jacky and that the accounts were all up to date. Peter had submitted a report on the £5000 grant and as no feedback had been received within the stipulated timescale it could be assumed to have been accepted.
7. Plan Review :
Chapter 7 : Liz's comments (see draft plan comments for details) were presented and discussed with some further amendments agreed. In light of comments Liz would further review the wording.
Chapter 9 : The Parish Recreation Grounds were now included as proposed LGS sites along with 3 West Berks recreation sites. Liz would review the wording of this section to make it a policy.
Justification and protection of the AONB and close by green area to be better defined. Liz to review and propose new wording.
Further Actions:
Action: Joan's AOL email address to be used in future due to problems in accessing her NDP email address.
Action: Incorporate winning photos or a gallery of photos from the photo competition into the plan.
Action : A letter needs to go to WBC regarding the proposed LGS designations of WBC owned recreation areas/playing fields

There was discussion around having a policy or project that better defined Tilehurst Parish. Maybe running fairs or events to promote Tilehurst Parish as Holybrook Parish had done. Also leaflets and/or an emblem to better define the Parish. Improved engagement with schools could help and possibly documenting and publicising parish history.

There was further discussion around some of the West Berks comments on the plan and how best to respond, if at all.

Kevin outlined the project plan going forward through the various consultations and that we should be ready for referendum towards the end of 2023

Action to aim to have a finalised draft plan by our January meeting that could then be endorsed by the Parish Council and forwarded to WBC Planning for further Review.

Noted that we had completed distribution of a NDP progress update leaflet to every household in the parish in November/December 2021.

8. Next Meeting: Wednesday 19th January 2022, 7.30pm at the Calcot Centre

Minutes of the Tilehurst Parish NDP Steering Group held on 26 January 2022

Present : Kevin Page, Peter Cross, Alan Wade, Julia Gentle, Joan Lawrie, Liz Alexander (part meeting) , Sandra Vickers, District Cllr Joanne Stewart (as member of the public), Clive Taylor (part meeting only)

1. Apologies: Fred Williams, Clive Taylor (would arrive late)
2. Representations by members of public. Joanne Stewart said she had spoken with Clive after the last Eastern Area Planning committee meeting and comments made by a committee member during the meeting that the Tilehurst NDP should consider alternative sites for housing to Pincents Hill. Also Joanne wanted to consult with the group on whether the Pincents Manor application should be “called in” for consideration by the Eastern Area committee. Agreed to discuss both these items later in the meeting.
3. Declarations of interest : None
4. Minutes of the previous meeting had been issued and were approved.
5. Actions arising from the minutes - Kevin still to write to WBC to formally advise of our proposal to designate WBC recreational areas as LGS within the NDP.
6. Budget, Finance and Fundraising: Peter advised that grant monies were now exhausted and the committee was now being fully funded by Parish Council funding. It was reported that the survey monkey licence had been renewed.
7. Plan Review :

Impact of the Pincents Hill decision to refuse the application:

Joan reported on the possible traffic impact issues also affecting the Pincents Manor application as Pincents Lane had been refused on issues relating to traffic access to the site as well as planning policy issues and possibly water drainage matters. It was noted that Tilehurst Parish was not objecting to the Pincents Manor application though they had made some comments. We now await written confirmation of the reasons for refusal of the Pincents Hill application and whether the applicant will appeal, submit a further revised application landbank until a later date or take other action. Liz clarified the timescales should the applicant appeal.

Discussion took place on the 175 houses WBC expected Tilehurst to allocate as per the suspended local plan and the justification for that number. Also noted that a new HELAA was expected and might include new possible sites. Other previously developed sites were discussed that might be acceptable though these were not likely to be in the HELAA. Agreed we needed to discuss the proposed housing numbers and site allocations at our next meeting with WBC.

Pressures from Reading for more housing was discussed and the move towards working from home but with the need for good transport/rail links with Reading better served with Reading station vs HELAA.

Agreed we should proceed for now in refining the plan with assumption of not allocating sites and submit to WBC for review. We would review any new sites in the HELAA once its contents became clear.

LGS discussion :

Discussion around the legal definition of LGS and the need for the land to be accessible which appeared to be a requirement in the West Berks documents but not in national policy. Agreed however to continue with inclusion of all previous proposals for LGS designation. We were still awaiting a response for CGC regarding a meeting with residents and the developer. Liz would also look into some past case history as this might help with our justification.

AONB wording in the NDP had been reworded with Liz's comments. This was agreed.

Agreed Peter/Alan would contact Lynda for help in finalising the NDP front page and map content issues.

Project Plan : Kevin reported that we still appear to be on target for a referendum in first half 2023 and to commence formal regulation 14 consultation shortly. This would need to involve considerable publicity to ensure community involvement but would need to follow further consultation with WBC.

Next meeting with WBC - suggested we try to hold the meeting face to face as might be more productive. Kevin would request this. Agenda would need to include review of the revised draft plan, the HELAA and housing numbers.

8. Any other business

Pincents Manor Planning Application Call In

Cllr Stewart outlined reasons for calling the application for consideration by the Eastern Area Planning committee. The differences between this application and the Stonehams application were discussed, the Pincents Manor facility being more of a hybrid facility.

After discussions and consideration of the traffic issues the committees view was that the it should be called in if the planning department were expected to refuse the Application.

9. The meeting closed - next meeting scheduled for Wednesday 16th February 2022, 7.30pm at the Calcot Centre.

Minutes of the Tilehurst Parish NDP Steering Group Meeting held on 22nd Feb 2022

Present: Kevin Page, Peter Cross, Alan Wade, Julia Gentle, Joan Lawrie, Liz Alexander, Sandra Vickers, Clive Taylor, District Cllr Tony Linden

1. Apologies: Fred Williams
2. Representations by members of public. None, though Cllr Tony Linden was attending as a member of the public and during the course of the meeting updated the committee of the status of the East of Pincent's U+I planning application, in so much as he was able to do so, and which still awaited written confirmation of the planning refusal.
3. Declarations of interest: None
4. Minutes of the previous meeting had been issued and were approved. Clive said he would reissue final copy to Kevin as he had noticed a couple grammatical errors.
5. Actions arising from the minutes -
 - Liz clarified that LGS did not have to have public access. This had been checked via National Planning Guidance which supports the NPPF. Liz would distribute to committee members
 - Kevin to write to WBC to formally advise of our proposal to designate WBC recreation areas as LGS

ACTION above on Kevin

6. Budget, Finance and Fundraising: Peter had nothing to report other than he awaited details of the survey monkey expenditure from Jacky. Kevin agreed to provide Peter with this information.
7. Plan Review (and related matters):

Kevin advised that Calcot Golf Course had requested to speak to the next Parish Council Meeting concerning the proposed LGS designation. This had been agreed and they would address the Parish Council at its March 2022 Meeting.

A general discussion took place around housing numbers, the two Pincent's applications, possible development at Calcot Golf Course and speculation that Reading Borough might look to the West Berks areas of Reading to achieve their housing numbers. There was uncertainty in all of these areas but this could be discussed at the forthcoming NDP meeting with Bryan Lyttle in March.

Kevin reminded the meeting that we would look at any new sites in the HELAA but a new HELAA wasn't imminent (expected summer at the earliest). Given that Pincent's U+I proposal has been now refused we should now challenge the 175 figure for Tilehurst Parish. It remained difficult to see how we could allocate sites in the present circumstances.

Kevin proposed that we press ahead with the current plan and start to prepare for the next stages of consultation (regulation 14). Liz volunteered to check the regulations as to consultation requirements and report back. We needed to think about how we ask questions on the plan utilising both on-line and off-line access for the public. Kevin would prepare a draft set of consultation questions. A public display/open day session or two (probably one at Calcot and one at Cornwell) would need to be arranged. Kevin would send the original display board info from the NDP launch to Alan who would review and draft updates for the new display. The need to make access to the consultation smart phone-compatible was also important. Kevin to check with Parish office on possible dates for the open days.

ACTIONS in above para on Liz, Kevin and Alan

Kevin mentioned the need at some point to “smarten up” the NDP but it was agreed to do this between the next consultation stage and the formal consultation that would then follow. Discussion took place around obtaining photos including ariel photography. Lynda may be able help us with this. Various photo ideas were discussed.

Also need to produce a new flyer. Clive advised that the next Tilehurst Directory would not be distributed until early May with ready to print date by around 16th April. Clive would check with the Directory to see if they could distribute again and report back.

ACTION: Clive

We would therefore aim to start the consultation from 1st May until 1st July end date which would cover an 8-week period.

It was noted that some minor NDP changes would be needed prior to the consultation mainly covering the Pincents Hill planning refusal (if confirmed).

ACTION: Alan/Peter

Sandra asked several questions concerning potential development Calcot Golf Course and the availability of related information but these couldn't be answered as no planning application had been submitted at this stage and Tilehurst Parish would not be formally consulted until an application had been submitted. Clive pointed out that Freedom of Information requests could be submitted by an individual to WBC to see if information could be released.

Discussion took place relating to the Pincents Manor application which the Parish Council had made some comments on but had not objected. It had not as yet appeared on the Eastern Area Committee agenda and if it went to committee the Council would have to decide whether to make further representations.

Next Meeting: Wednesday 16th March 2022, 7.30pm at the Calcot Centre

Minutes of the Tilehurst Parish NDP Steering Group Meeting held on 16th March 2022

Present : Kevin Page, Peter Cross, Alan Wade, Julia Gentle, Joan Lawrie, Liz Alexander, Sandra Vickers, District Cllrs Tony Linden and Jo Stewart and from WBC Bryan Lyttle

1. **Bryan Lyttle, WBC Transport and Planning Policy Manager** was welcomed to the meeting and was invited to speak regarding the Neighbourhood Plan and housing number requirements.

Key Points :

- Clarification of the the housing numbers required in Tilehurst which Bryan described as not straight forward. As background information the Eastern Urban Area of which Tilehurst Parish is a part, is proposed to be merged with East Kennet Valley area making a larger area. However, the revised AWE safety zones and flood plains restricted the area for development and the NPPF has strengthened restrictions on developing in the AONB. As a results areas for future development are restricted.
- The HEELA also has to be assessed for suitable housing allocations. A decision is finally made by planning officers of the numbers that can potentially be built in a specified area/parish. Bryan described the methodology to be used in calculating housing need numbers as required by central government. At present 509 + 10% new houses per annum are required in West Berks, but the method for calculating these numbers may change in future. There is a further complication in that Reading is amongst the top 20 urban areas in the UK and Greater Reading includes Tilehurst Parish along with many other areas outside Reading Borough and requires a further 30% up lift in housing pa. Liz questioned this additional 30% as she believed it was recently scrapped. Bryan would double check this point.
- With regards to the Tilehurst Parish Neighbourhood Plan, Bryan noted that the steering group were proposing no site allocations and that as a result if this decision stood it would be for the West Berks local plan to make the allocations. This might become an obstacle to our plan being passed by WBC as other ward councillors might raise questions/concerns regarding our zero allocation. Bryan also clarified that as guidance NDP site allocations should be for development outside the settlement boundary as there was a general presumption of approval for developments within a settlement boundary. So, for example, the Pincents Manor site could be allocated as outside the settlement boundary, but Calcot Golf course should it become a HEELA site, would be within the settlement boundary and should be treated as windfall.
- Bryan further advised that strategic gaps between settlements, an argument against the East of Pincents Lane development, had ceased some years ago (this needs to be double checked as it had been a reason for refusal being upheld at the last appeal).

With regard to the ongoing East of Pincents Lane planning application Bryan clarified that a senior WBC officer had determined that as there were potential issues with the Eastern Area decision to refuse the application, it was safer and would lessen the risk of appeal or legal related costs to seek the decision of the higher level District Planning Committee before making any final decision.

- The West Berks local plan is expected to be delayed by one year. We will need to keep in close contact with WBC to ensure the Tilehurst NDP remains in line , as far as possible, with the WBC local plan.

- Bryan advised that inclusion of a “Village Design Statement” into the NDP was recommended but we effectively had this though under a different name. We should consider changing the name in our plan. Liz advised we might qualify for additional funding if we had a VDS in the NDP.
 - There was discussion around any advantages of the NDP allocating sites but as the number of available sites in the HEELA was limited the likely developed sites would be the same whether in the NDP or not. However it was noted, from Bryan’s earlier comments that the Pincents Manor site could be allocated and possibly the Calcot Best Western site if that could be determined to be available for redevelopment.
 - There was discussion around the traffic implications/highways report relating to both the Pincents Manor and the U+I development and whether the reasons for refusing the U+I development on “land locking” grounds should also apply to Pincents Manor.
 - Bryan expressed some concern over some of our LGS designations relating to size and that they might have to go to full examination. We felt we had carefully considered the criteria for LGS including size but accepted this might well be subject to close examination by inspectors. We would seek comparisons with other LGS designations in other parishes. Bryan was thanked for his contribution to the meeting and he left the meeting at this point.
2. **Review of Calcot Golf Course LGS** - After discussion it was agreed to extend the area of this LGS to cover other wooded areas in the northern part of Calcot Golf Course. Alan/Peter would revise the map to show the precise area to be covered including the names of the copses/wooded areas to be included.
 3. **Apologies:** Fred Williams, Clive Taylor
 4. **Representations by members of public.** None
 5. **Declarations of interest :** None
 6. **Minutes of the previous meeting** had been issued and were approved with inclusion of Alans corrections and correction of the date of Bryan Lyttle’s attendance.
 7. **Actions arising from the minutes** -
 - Liz advised that she had distributed information on LGS as agreed from the last meeting.
 - Kevin to write to WBC to formally advise of our proposal to designate WBC recreation areas as LGS
 - Kevin advised that he had posted missing minutes on the website
 8. **Budget, Finance and Fundraising:** Peter reported everything relating to the accounts was up to date

9. Plan Review and preparation for public consultation :

- Kevin had posted the display boards used at the earlier public meeting that Alan would review and revise as appropriate
- Date for the public consultation sessions need to be determined - Kevin to check on date availability in our community centres and make bookings.
- Liz to check with Leila at WBC Planning on the names of consultation bodies to be contacted and report back
- Survey questionnaires - Kevin would prepare a survey monkey mock up questionnaire
- Flyer for Tilehurst Directory to be drafted for April deadline - Alan would draft words, Kevin would do the desktop publishing

10. Any other business

Alan raised issues over road surface conditions near the Stonehams development in Long Lane and delays in making or completing improvements. It was suggested that he contact WBC Highways for advice. Jo would also check on this against WBC's road works plans and if necessary escalate to the WBC portfolio holder.

Alan also asked if we should amend the NDP to include the need to review road infrastructure improvements where new developments take place.

11. The meeting closed

Minutes of the Tilehurst Parish NDP Steering Group Meeting held on 18th May 2022

1. **Present** : Kevin Page, Peter Cross, Julia Gentle, Liz Alexander, Sandra Vickers, Clive Taylor, District Cllr Tony Linden plus one member of the public
2. **Representations from Members of the public** : None
3. **Apologies**: Fred Williams, Alan Wade, District Cllr Jo Stewart
4. **Declarations of Interest**: None
5. **Minutes of Last Meeting**: Agreed with minor corrections received from Alan
6. **Matters Arising**: Cllr Tony Linden made some comments relating to the recent East of Pincents Hill application refusal by the District Planning committee leading to some discussion around WBC planning policy relating to this application and the merits or otherwise of the still outstanding Pincents Manor application.
7. **Budget and Finance** - Peter advised nothing to report other than that the Good Exchange had advised that any applications for funding from April 1st 2022 would be fee free.
8. **The NDP - Local Green Space** : There was considerable discussion around defining the proposed LGS extension area for Calcot Golf Course agreed at the previous meeting. There was also discussion around tree preservation orders and biodiversity opportunity areas that applied to Calcot Golf Course and it was agreed that we needed to check the extent of the protection that this already provided. It was concluded however that LGS should provide greater protection. It was further agreed not to define the extended area of LGS designation other than that we had decided to extend it to a wider area and that we would propose discussion with CGC before finally determining the boundaries of the proposed extended area. This was agreed and Kevin would write to CGC to advise of this decision.
9. **The NDP - Site Allocations** : Further to discussion at the previous meeting Liz confirmed that WBC were within their rights to only recognise site allocations that were outside the settlement boundary. With that in mind Clive suggested that the only site outside the settlement boundary that we could consider allocating was the brownfield development at Pincents Manor, though a decision on that development might happen soon. It was also noted that one of the New Lane Hill sites, though inside the settlement boundary, had been sold and was therefore no longer expected to be developable . Liz offered to write some notes for possible inclusion in the NDP that covered both anticipated windfall developments within the settlement boundary and a possible allocation of the Pincents Manor site and that would explain and justify our NDP argument for only limited, if any, site allocations.
10. **The NDP - Next steps and progress to formal consultation** : After discussion it was agreed that Kevin would chase WBC Planning for any further feedback on the NDP, then to target for completion of consultation with the Parish Council by its July

meeting on July 12th and then commence public consultation for an 8 week period through August and September 2022. Clive would request a quote from Abracadabra for distribution of a flyer in 2nd half of July.

11. **Next Meeting:** Scheduled for Wednesday 15th June but likely to be changed to 22nd June (check for email confirmation)

Minutes of the Tilehurst Parish NDP Steering Group Meeting held on 22nd June 2022

1. **Present :** Kevin Page, Peter Cross, Joan Lawrie, Julia Gentle, Liz Alexander, Clive Taylor, District Cllr Tony Linden, District Cllr Jo Stewart
2. **Representations from Members of the public :** None
3. **Apologies:** Alan Wade, Sandra Vickers, Fred Williams
4. **Declarations of Interest:** None
5. **Minutes of Last Meeting:** Agreed with correction to name spelling and month of next meeting
6. **Matters Arising:** None (or would come up under other agenda items)
7. **Budget and Finance -** Nothing to report
8. **The NDP - Local Green Space :**

Kevin confirmed that he had written to Calcot Golf Course advising them of our decision to seek to extend the area of the LGS beyond the previously specified boundary. An acknowledgement of that letter had been received today (22 June). Clive advised that Alok Sharma had called a meeting to discuss the possible housing at CGC for 24 June that Clive could not attend but Jacky would represent the Parish Council. Clive would update Jacky on anything arising from this NDP meeting that might be relevant to Alok's meeting,
9. **The NDP - Site Allocations :**

Liz reported that she had started to draft the section on our approach to site allocations but had yet to complete it. She intended to distribute a final draft within the next few days.

In response to questions it was confirmed by several present that the Pincents Manor application had yet to be determined and that as yet no appeal had been made by U+I against the East of Pincents Lane application though there was still 3 months to run in which they could decide to appeal.
10. **The NDP - West Berks response and next steps**

There had been no further feedback from West Berks Planning. The possibility of escalating the need for feedback was discussed and it was agreed to escalate though Jo once our final draft was agreed and together with a timetable containing a summary of the latest changes to the NDP and deadlines in order to achieve a May 2023 referendum.

There was some discussion around the wording of the LGS section as we hadn't agreed on the precise boundary of the CGC LGS and agreed to explain in the draft wording that this was subject to further discussions with CGC.
11. **The NDP - Regulation 14 Consultation**

The next step once the final wording was agreed would be to agree to kick-off formal

Reg 14 consultation at the next Parish Council meeting. Clive advised that this could be done at the July Parish Council meeting with just this item on the agenda.

Kevin would discuss available dates for two public consultation sessions with Jacky, ideally one in the evening and one at the weekend, one being at the Calcot Centre and one at the Cornwell Centre.

The wording of the flyer which Alan had drafted would need to be agreed and further advertised through links to Tilehurst facebook groups and through the Parish Council. The flyer should be on Teams to review (Kevin to check).

Clive would chase Abracadabra for their quote to distribute and would also check on Tilehurst Directory's distribution schedule. The likelihood was that we would arrange the leaflet printing and contract distribution to Abracadabra.

Display boards would need to be created/updated for the public sessions. Alan was understood to have looked at this.

A video presentation would be further considered.

Kevin would action design of a survey for public feedback during the consultation..

Liz would draft some letters to go to other organisations who we were required to consult with.

It was agreed to hold a zoom meeting on Monday 4th July to agree the final wording of the draft plan that could then be approved at the July parish council meeting.

10. **Next Meeting:** Scheduled for 7.30pm on Wednesday 20th July 2022, 7.30pm at the Calcot Centre

Minutes of the Tilehurst Parish NDP Steering Group Meeting held on 20th July 2022

1. **Present** : Kevin Page, Peter Cross, Joan Lawrie, Julia Gentle, Clive Taylor, Alan Wade
2. **Representations from Members of the public** : None
3. **Apologies**: Liz Alexander, Sandra Vickers, Cllr Jo Stewart
Kevin took an action to contact committee members Fred and Momina to see if they wished to remain committee members
4. **Declarations of Interest**: None
5. **Minutes of Last Meeting**: Agreed with no amendments
6. **Matters Arising**: Joan asked if Clive had made any progress with the WBC footpaths officer in determining if any new paths on Pincents Hill could be considered for recognition as public rights of way. Clive took an action to raise this question with the WBC footpaths officer and would report back to the next meeting.
7. **Budget and Finance** - Nothing to report other than offer of trees from the Greenham Common Trust.
8. **The NDP - Local Green Space** :
There was considerable discussion around the wording relating to the proposed Calcot Golf Course Local Green Space in the final draft plan. The outcome of this was to agree to leave the wording in the draft as the originally proposed Calcot Golf Course LGS area, that being the area which CGC intended to sell for development. The associated consultation document would however explain that it was now proposed to extend that LGS area but not to set new boundaries until any further discussions with CGC and the results of the forthcoming public consultation. Kevin would also update our website to this effect.

It was noted and confirmed by Peter that all other comments/changes had been agreed and incorporated into the final draft.

10. **The NDP - West Berks response and next steps**
Kevin reported no further feedback from West Berks Planning. Kevin would now send the final draft, once received from Alan, to WBC Planning with a copy to Jo Stewart who might be able to help in speeding up a response from WBC.
11. **The NDP - Regulation 14 Consultation**
It was noted that the Reg 14 consultation had not started as the July Parish Council meeting had been cancelled when it became clear that the quorum would not be achieved. The next opportunity would be the August meeting where a quorum appeared to be possible.
The following actions were agreed :
 - Alan to amend the consultation leaflet to go to all homes in the parish

- Kevin would give WBC a deadline of 4 days before the Parish Council meeting on 9th August to respond to our final draft
- Survey design for public feed back to be completed - Kevin
- Bookings for 3 public walk-in sessions to be booked through Cindy - Kevin
- Review display boards from previous walk-in sessions and revise/add to as appropriate - Alan
- Obtain written quote from Abracadabra including leaflet printing as well as distribution - Clive
- Confirm zoom details for follow-up call to review progress on the above points and other outstanding actions listed in the previous minutes - Kevin

12. Project Plan Review

Kevin ran through the current project plan explaining the key milestones and expected duration of each stage. It was generally concluded that the timescales were tight for a May 2023 referendum but not impossible to achieve.

The meeting closed.

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