


West Berkshire Local Plan Review 2022-2039
Proposed Submission Representation Form
Ref:
(For official use only)

Please complete online or return this form to:	Online: http://consult.westberks.gov.uk/kse
	By email: planningpolicy@westberks.gov.uk
	By post: Planning Policy, Development and Regulation, Council Offices, Market Street, Newbury, RG14 5LD
Return by:	4:30pm on Friday 3 March 2023

This form has two parts:

- Part A - Your details: need only be completed once
- Part B - Your representation(s): please fill in a separate sheet for each representation you wish to make

PART A: Your Details

Please note the following:

- *We cannot register your representation without your details.*
- *Representations cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.*
- *All information will be sent for examination by an independent inspector*
- *All personal data will be handled in line with the Council's Privacy Policy on the Development Plan. You can view the Council's privacy notices at <http://info.westberks.gov.uk/privacynotices>*

	Your details	Agent's details (if applicable)
Title:	Ms	
First Name:*	Bridget	
Last Name:*	Fox	
Job title (where relevant):	Regional External Affairs Officer (South East)	
Organisation (where relevant):	Woodland Trust	
Address* <i>Please include postcode:</i>	Kempton Way GRANTHAM Lincs NG31 6LL	
Email address:*	[REDACTED]	

Telephone number:		
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**Mandatory field*

Part B – Your Representation***Please use a separate sheet for each representation***

The accompanying guidance note available at: <https://www.westberks.gov.uk/lpr-proposed-submission-consultation> will assist you in making representations.

*Your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change(s) as there will **not normally** be a subsequent opportunity to make further representations, **further submissions will ONLY be at the request of the Inspector, based on the matters and issues they identify for examination.***

Your name or organisation (and client if you are an agent):	Woodland Trust (Ms Bridget Fox)
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Please indicate which part of the Local Plan Review this representation relates to:

Section/paragraph:	
Policy:	DM15 Trees, Woodland and Hedgerows
Appendix:	
Policies Map:	
Other:	

1. Legally Compliant

Please see the guidance notes for an explanation of what 'legally compliant' means.

Do you consider the Local Plan Review is legally compliant?

Yes

No

Please give reasons for your answer:

Yes - the policy recognises that ancient woodland and related habitats are irreplaceable, in line with the NPPF.

This is strengthened by the robust guidance in the supporting text in paras 10.1.33-10.1.37.

Para 10.1.33 recognises the unique quality of ancient woodland

Para 10.1.34 sets out a precautionary approach to determining the buffers required for ancient woodland

Para 10.1.35 draws on Woodland Trust expert guidance to advise on the makeup of buffer zones

Para 10.1.36 requires a detailed Ancient Woodland Nitrogen Impact Assessment for ammonia-emitting facilities

Para 10.1.37 specifies that historic ancient wood pastures and historic parkland should be treated as ancient woodland, in line with the NPPF.

Together, these represent a best practice approach to meeting the legal requirements for ancient woodland protection that the Woodland Trust strongly welcomes and endorses.

2. Soundness

Please see the guidance notes for an explanation of what ‘soundness’ means.

Do you consider the Local Plan Review is sound?

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF)

Please tick all that apply:

NPPF criteria	Yes	No
Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area’s objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development	X	
Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence	X	
Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground	X	
Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF	X	

Please give reasons for your answer:

Draft policy DM15 supports national policy on the protection of ancient woodland in the NPPF and the promotion of woodland cover as part of the Nature Recovery Network.

The Woodland Trust strongly welcomes the policy and the supporting text in paras 10.125 to 10.138 of the Local Plan review which combine to make the plan effective in support for national policy.

We support the policy wording “use native species wherever appropriate” and the supporting text in para 10.126 “For new planting the use of UK and Ireland sourced and grown tree stock is encouraged.” This is important for tree health & biosecurity, in line with Government policy in the England Trees Action Plan and the GB Plant Biosecurity Strategy.

As noted above, we support the policy to protect ancient woodland, strengthened by the robust guidance in the supporting text, paras 10.1.33-10.1.37.

We support para 10.138 which commits to set an evidence-based tree canopy cover target for West Berkshire. This is an effective way to ensure that the Local Plan contributes to supporting national policy for Local Nature Recovery Strategies and the delivery of Biodiversity Net Gain.

3. Complies with the Duty to Co-operate

Please see the guidance note for an explanation of what ‘Duty to Cooperate’ means.

Do you consider the Local Plan Review complies with the Duty to Co-operate?

Yes

No

Please give reasons for your answer:

n/a

4. Proposed Changes

Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

n/a

5. Independent Examination

If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?

Yes

No

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

n/a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Part B – Your Representation

Please use a separate sheet for each representation

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Your name or organisation (and client if you are an agent):	Woodland Trust (Ms Bridget Fox)
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Please indicate which part of the Local Plan Review this representation relates to:

Section/paragraph:	
Policy:	SP11 (Biodiversity & geodiversity)
Appendix:	
Policies Map:	
Other:	

1. Legally Compliant

Please see the guidance notes for an explanation of what 'legally compliant' means.

Do you consider the Local Plan Review is legally compliant?

Yes

No

Please give reasons for your answer:

The draft policy complies with the NPPF requirement to protect irreplaceable habitats, including ancient woodland, except in exceptional circumstances and with compensation commensurate to the loss or deterioration of the irreplaceable habitat to be considered on a site by site basis, including long term management and maintenance.

2. Soundness

Please see the guidance notes for an explanation of what 'soundness' means.

Do you consider the Local Plan Review is sound?

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF)

Please tick all that apply:

NPPF criteria	Yes	No
Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development	x	
Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence	x	
Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground	x	
Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF	x	

Please give reasons for your answer:

As noted above, the draft policy is consistent with NPPF policy on protection of irreplaceable habitats.

This is made more effective by the wording in the supporting text in para 5.80 which clarifies that compensation measures for irreplaceable habitats will not be considered acceptable where the replacement habitat provided results in a neutral impact, that compensation will be based on the nature or extent of damage or loss, and will be assessed on a site by site basis in consultation with the relevant conservation body.

The Woodland Trust supports this approach.

3. Complies with the Duty to Co-operate

Please see the guidance note for an explanation of what 'Duty to Cooperate' means.

Do you consider the Local Plan Review complies with the Duty to Co-operate?

Yes

No

Please give reasons for your answer:

n/a

4. Proposed Changes

Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

n/a

5. Independent Examination

If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?

Yes

No

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

n/a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Part B – Your Representation

Please use a separate sheet for each representation

The accompanying guidance note available at: <https://www.westberks.gov.uk/lpr-proposed-submission-consultation> will assist you in making representations.

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Your name or organisation (and client if you are an agent):	Woodland Trust (Ms B Fox)
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Please indicate which part of the Local Plan Review this representation relates to:

Section/paragraph:	
Policy:	SP16 Sandleford Strategic Site Allocation
Appendix:	
Policies Map:	
Other:	

1. Legally Compliant

Please see the guidance notes for an explanation of what 'legally compliant' means.

Do you consider the Local Plan Review is legally compliant?

Yes

No

Please give reasons for your answer:

The policy requires protection for the ancient woodland, in line with the NPPF.

We welcome the wording requiring:

A network of green infrastructure to be provided which will:

Conserve the areas of ancient woodland and provide appropriate buffers between the development and the ancient woodland;

Mitigate the increased recreational pressure on nearby sensitive wildlife sites, secure strategic biodiversity enhancements

2. Soundness

Please see the guidance notes for an explanation of what 'soundness' means.

Do you consider the Local Plan Review is sound?

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF)

Please tick all that apply:

NPPF criteria	Yes	No
Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development	x	
Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence	x	
Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground	x	
Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF	x	

Please give reasons for your answer:

As noted above, the policy includes wording for protection for ancient woodland, in line with the NPPF.

It is important that this wording is included for the Local Plan to be effective and consistent with national policy.

This is a major site, allocated for residential development of 1500 dwellings. The site contains seven areas of ancient semi-natural woodland:

- *Crooks Copse (SU46936508) ASNW 2.31 Ha*
- *Barn Copse (SU46336474) ASNW 2.45 Ha*
- *High Wood (SU46646473) ASNW 0.27 Ha*
- *High Wood (SU46786472) ASNW 2.68 Ha*
- *High Wood (SU47086462) ASNW 8.92 Ha*
- *Dirty Ground Copse (SU46716448) ASNW 2.55 Ha*
- *Unnamed (SU46716387) ASNW 5.42 Ha*

It also includes the following significant trees which require protection (Ancient Tree Inventory IDs given):

- *Ancient tree (Pedunculate Oak) ID: 150885*
- *Veteran trees (all Pedunculate Oaks) IDs: 159632, 150908, 150907, 150906, 150933, 150936, 150938, 150939, 150896, 150898, 150899, 150900, 150901, 150902, 150903, 150904, 150929, 150940, 150941, 150942, 150943, 150884, 150883, 150882, 150881, 150875, 150879*
- *Notable Trees (all Pedunculate Oaks) IDs: 150937, 150897, 150880.*

3. Complies with the Duty to Co-operate

Please see the guidance note for an explanation of what 'Duty to Cooperate' means.

Do you consider the Local Plan Review complies with the Duty to Co-operate?

Yes

No

Please give reasons for your answer:

n/a

4. Proposed Changes

Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Propose amending the wording

A network of green infrastructure to be provided which will:

Conserve the areas of ancient woodland and provide appropriate buffers between the development and the ancient woodland;

To read

A network of green infrastructure to be provided which will:

Conserve the areas of ancient woodland and provide appropriate buffers between the development and the ancient woodland, and appropriate Root Protection Areas for ancient & veteran trees;

This will make the policy more robust in delivering the same protection for important trees as ancient woodland, as required by the NPPF.

5. Independent Examination

If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?

Yes

No

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

n/a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Part B – Your Representation***Please use a separate sheet for each representation***

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*Your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change(s) as there will **not normally** be a subsequent opportunity to make further representations, **further submissions will ONLY be at the request of the Inspector, based on the matters and issues they identify for examination.***

Your name or organisation (and client if you are an agent):	Woodland Trust (Ms Bridget Fox)
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Please indicate which part of the Local Plan Review this representation relates to:

Section/paragraph:	
Policy:	SP17 North East Thatcham Strategic Site Allocation
Appendix:	
Policies Map:	
Other:	

1. Legally Compliant

Please see the guidance notes for an explanation of what 'legally compliant' means.

Do you consider the Local Plan Review is legally compliant?

Yes

No

Please give reasons for your answer:

The policy as worded does not provide sufficient protection for the adjacent ancient woodland as required by the NPPF.

2. Soundness

Please see the guidance notes for an explanation of what 'soundness' means.

Do you consider the Local Plan Review is sound?

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF)

Please tick all that apply:

NPPF criteria	Yes	No
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Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area’s objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development	x	
Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence	x	
Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground	x	
Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		x

Please give reasons for your answer:

The site is adjacent to the following areas of ancient woodland which require protection in line with the NPPF but there is no specific wording to address this in the policy.

- The plantation (SU52056829) ASNW 2.92 Ha
- Hartshill Copse (SU52706889) ASNW 22.82 Ha
- Unnamed (SU53236822) ASNW 1.08 Ha
- Unnamed (SU53346802) PAWS 2.01 Ha
- Long Grove Copse (SU53646771) ASNW 18.02 Ha
- Blacklands Copse (SU54216798) PAWS 27.63 Ha

We therefore propose amended wording to include requirement for appropriate buffers for adjacent ancient woodland.

3. Complies with the Duty to Co-operate

Please see the guidance note for an explanation of what ‘Duty to Cooperate’ means.

Do you consider the Local Plan Review complies with the Duty to Co-operate?

Yes

No

Please give reasons for your answer:

n/a

4. Proposed Changes

Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In order to comply with the NPPF requirement to protect ancient woodland and in line with draft LP Policy DM15, we propose the following change.

Amend the wording

An Ecology Strategy which will set out:

a Biodiversity Net Gain Strategy to show how net gain will be achieved including through habitat restoration and linkages;

how priority habitats and ecological features will be protected and enhanced;

the creation of new ecological features; and

a site-wide management plan.

To read

An Ecology Strategy which will set out:

a Biodiversity Net Gain Strategy to show how net gain will be achieved including through habitat restoration and linkages;

how priority habitats and ecological features will be protected and enhanced, including appropriate buffers for the areas of ancient woodland adjacent to the site (in line with policy DM15)

the creation of new ecological features; and

a site-wide management plan.

5. Independent Examination

If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?

Yes

No

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

n/a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Part B – Your Representation***Please use a separate sheet for each representation***

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Your name or organisation (and client if you are an agent):	Woodland Trust (Ms Bridget Fox)
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Please indicate which part of the Local Plan Review this representation relates to:

Section/paragraph:	
Policy:	RSA6 Stoneham's Farm, Long Lane, Tilehurst (Site Ref: HSA 9)
Appendix:	
Policies Map:	
Other:	

1. Legally Compliant

Please see the guidance notes for an explanation of what 'legally compliant' means.

Do you consider the Local Plan Review is legally compliant?

Yes

No

Please give reasons for your answer:

The policy provides protection for ancient woodland in line with the NPPF.

2. Soundness

Please see the guidance notes for an explanation of what 'soundness' means.

Do you consider the Local Plan Review is sound?

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF)

Please tick all that apply:

NPPF criteria	Yes	No
Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area’s objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development	x	
Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence	x	
Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground	x	
Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF	x	

Please give reasons for your answer:

The NPPF requires protection for ancient woodland.

This site is adjacent to ancient woodland Vicarage Copse/Wood (SU65367453) PAWS 19.3 Ha.

We support the policy wording

h. The development design will provide appropriate buffers of at least 15 metres between the development and the ancient woodland. The precise buffer will be determined through detailed assessment and design when proposals are submitted for development.

3. Complies with the Duty to Co-operate

Please see the guidance note for an explanation of what ‘Duty to Cooperate’ means.

Do you consider the Local Plan Review complies with the Duty to Co-operate?

Yes

No

Please give reasons for your answer:

n/a

4. Proposed Changes

Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

n/a

5. Independent Examination

If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?

Yes

No

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

n/a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

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Your name or organisation (and client if you are an agent):	Woodland Trust (Ms Bridget Fox)
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Please indicate which part of the Local Plan Review this representation relates to:

Section/paragraph:	
Policy:	RSA12 Land adjoining Pondhouse Farm, Clayhill Road, Burghfield Common (Site Ref: HSA15)
Appendix:	
Policies Map:	
Other:	

1. Legally Compliant

Please see the guidance notes for an explanation of what 'legally compliant' means.

Do you consider the Local Plan Review is legally compliant?

Yes

No

Please give reasons for your answer:

The policy provides protection for ancient woodland in line with the NPPF.

2. Soundness

Please see the guidance notes for an explanation of what 'soundness' means.

Do you consider the Local Plan Review is sound?

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF)

Please tick all that apply:

NPPF criteria	Yes	No
Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development	x	
Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence	x	
Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground	x	
Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF	x	

Please give reasons for your answer:

The NPPF requires protection for ancient woodland.

We support the policy wording

k. Retain existing woodland on the site and provide an appropriate buffer of at least 15 metres between the development and the areas of ancient woodland. The precise buffer will be determined through detailed assessment and design when proposals are submitted for development;

However, we note that the map on p110 suggests that the ancient woodland is further from the red line site boundary than is recorded on the Ancient Woodland Inventory (Defra Magic Maps) where the ancient woodland is directly adjacent. This should be corrected in the final version of the Local Plan.

3. Complies with the Duty to Co-operate

Please see the guidance note for an explanation of what 'Duty to Cooperate' means.

Do you consider the Local Plan Review complies with the Duty to Co-operate?

Yes

No

Please give reasons for your answer:

n/a

4. Proposed Changes

Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

We request that an accurate map of the adjacent ancient woodland be provided to accompany the policy. A screenshot of the relevant layer of Defra Magic Maps is given below.



5. Independent Examination

If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?

Yes

No

x

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

n/a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Part B – Your Representation

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Your name or organisation (and client if you are an agent):	Woodland Trust (Ms Bridget Fox)
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Please indicate which part of the Local Plan Review this representation relates to:

Section/paragraph:	
Policy:	Policy RSA13 Land north of A4 Bath Road, Woolhampton (Site Ref MID4)
Appendix:	
Policies Map:	
Other:	

1. Legally Compliant

Please see the guidance notes for an explanation of what 'legally compliant' means.

Do you consider the Local Plan Review is legally compliant?

Yes

No

Please give reasons for your answer:

The policy provides protection for ancient woodland in line with the NPPF.

2. Soundness

Please see the guidance notes for an explanation of what 'soundness' means.

Do you consider the Local Plan Review is sound?

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF)

Please tick all that apply:

NPPF criteria	Yes	No
Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area’s objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development	x	
Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence	x	
Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground	x	
Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF	x	

Please give reasons for your answer:

The NPPF requires protection for ancient woodland.

This site is adjacent to ancient woodland Great Mounts Copse (SU57016687) PAWS 0.31 Ha, which in turn is adjacent to a larger area of Ancient Semi-Natural Woodland.

We support the policy wording

h. Provide an appropriate buffer of at least 15 metres between the development and ancient woodland. The precise buffer will be determined through detailed assessment and design when proposals are submitted for development;

3. Complies with the Duty to Co-operate

Please see the guidance note for an explanation of what ‘Duty to Cooperate’ means.

Do you consider the Local Plan Review complies with the Duty to Co-operate?

Yes

x

No

Please give reasons for your answer:

n/a

4. Proposed Changes

Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

n/a

5. Independent Examination

If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?

Yes

No

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

n/a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Part B – Your Representation***Please use a separate sheet for each representation***

The accompanying guidance note available at: <https://www.westberks.gov.uk/lpr-proposed-submission-consultation> will assist you in making representations.

*Your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change(s) as there will **not normally** be a subsequent opportunity to make further representations, **further submissions will ONLY be at the request of the Inspector, based on the matters and issues they identify for examination.***

Your name or organisation (and client if you are an agent):	Woodland Trust (Ms Bridget Fox)
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Please indicate which part of the Local Plan Review this representation relates to:

Section/paragraph:	
Policy:	Policy RSA25 Long Copse Farm, Enborne (Site Ref: TS2)
Appendix:	
Policies Map:	
Other:	

1. Legally Compliant

Please see the guidance notes for an explanation of what 'legally compliant' means.

Do you consider the Local Plan Review is legally compliant?

Yes

x

No

Please give reasons for your answer:

The policy provides protection for ancient woodland in line with the NPPF.

2. Soundness

Please see the guidance notes for an explanation of what 'soundness' means.

Do you consider the Local Plan Review is sound?

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF)

Please tick all that apply:

NPPF criteria	Yes	No
Positively Prepared: The plan provides a strategy which, as a minimum,	x	

seeks to meet the area’s objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development		
Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence	x	
Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground	x	
Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF	x	

Please give reasons for your answer:

The NPPF requires protection for ancient woodland.

This site is adjacent to ancient woodland, Long Copse (SU44036489) ASNW 4.71 Ha.

We support the policy wording

e. Provide an appropriate buffer of at least 15m between the development and the Ancient Woodland at Long Copse Wood., The precise buffer will be determined through detailed assessment and design when proposals are submitted for development. A 10m woodland buffer along the northern and western boundaries of the site to link to Long Copse Wood and tree planting along the southern boundary of the site should also be provided. These must be in place before the occupation of the site;

3. Complies with the Duty to Co-operate

Please see the guidance note for an explanation of what ‘Duty to Cooperate’ means.

Do you consider the Local Plan Review complies with the Duty to Co-operate?

Yes No

Please give reasons for your answer:

n/a

4. Proposed Changes

Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

n/a

5. Independent Examination

If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?

Yes No

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

n/a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

6. Notification of Progress of the Local Plan Review


Do you wish to be notified of any of the following?

Please tick all that apply:

Tick

The submission of the Local Plan Review for Independent Examination	X
The publication of the report of the Inspector appointed to carry out the examination	X
The adoption of the Local Plan Review	X

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

Signature		Date	2 March 2023
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Your completed representations must be received by the Council by 4:30pm on Friday 3 March 2023.



Coords: (465893,167769) Grid Ref:SU65896776

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