

From: [REDACTED]
To: [REDACTED]
Subject: Objection to Proposed Development at Long Copse Farm
Date: 27 January 2025 09:35:06
Attachments: [REDACTED]

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

Dear Planning Policy Team,

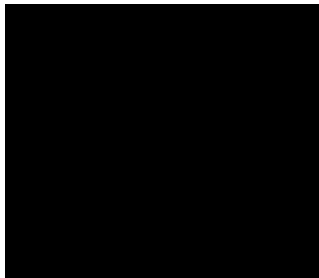
Please find attached my representation form and formal letter of objection regarding the proposed allocation of 24 Travelling Showpersons' plots at Long Copse Farm, Enborne, as part of the Local Plan Review.

I have outlined my concerns about the lack of evidenced need, reliance on a pending planning application, and inconsistencies in the site's use and allocation. I trust the Council will give due consideration to these points to ensure the soundness of the Local Plan.

Thank you for your time and attention to this matter.

Kind regards,

Anthony Johnson





**West Berkshire Local Plan Review 2022-2039 (LPR)
 Consultation on Proposed Main Modifications
 (6 December 2024 – 31 January 2025)**

Representation Form

Ref:
 (For official use only)

Please complete and return this form:	By email: [Redacted]
	By post: Planning Policy, Development and Housing, Council Offices, Market Street, Newbury, RG14 5LD
Return by:	11:59pm on Friday 31 January 2025

Please read the **Guidance Note**, available on the Council’s website <https://www.westberks.gov.uk/lpr-proposed-main-modifications>, before making your representations.

This form has two parts:
 PART A – Your details
 PART B – Your representation(s)

Please complete a new form for each representation you wish to make.

<u>PART A: Your details</u>		
<i>Please note the following:</i>		
<ul style="list-style-type: none"> <i>We cannot register your representation without your details.</i> <i>Representations cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.</i> 		
	1. Your details	2. Agent’s details (if applicable)
Title	Mr	
First Name*	Anthony	
Last Name*	Johnson	
Job title <i>(where relevant)</i>		
Organisation <i>(where relevant)</i>		
Address* <i>Please include postcode</i>	[Redacted]	
Email address*	[Redacted]	
Telephone number	[Redacted]	
Consultee ID <i>(if known)</i>		

*Mandatory Field

PART B – Your representation(s)

All comments made at previous stages of the LPR have been taken into account by the Inspector and there is no need to resubmit these. Publication of the proposed Main Modifications is a regulatory stage and any representations made should relate specifically to the legal compliance and soundness of the proposed Main Modifications and should not relate to parts of the Plan that are not proposed to be modified.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change.

Your name or organisation (and client if you are an agent):	Anthony Johnson
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Proposed Main Modifications and Proposed Changes to the Policies Map

1. Please indicate whether your representation relates to the Schedule of Proposed Main Modifications or the Schedule of Proposed Changes to the Policies Map and provide the modification/change number you are commenting on below:

Document name	Schedule of Proposed Main Modifications (MM) - November 2024
Modification/Change reference number (MM / PMC)	IN27

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

- a) **Legally compliant** Yes No
- b) **Sound** Yes No

Please refer to the guidance notes for a full explanation of 'legally compliant' and 'soundness'

If you consider the Proposed Main Modification or Proposed Policy Map Change not to be sound, please identify which test of soundness your representation relates to:
(please tick/mark 'X' all that apply)

Positively Prepared: The LPR should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements.	X
Justified: the LPR should be the most appropriate strategy, when considered against the reasonable alternatives	
Effective: the LPR should be deliverable	
Consistent with national policy: the LPR should enable the delivery of sustainable development in accordance with the policies of the NPPF	

3. If you have answered ‘No’ to question 2a or 2b above, please provide details of why you consider the Proposed Main Modification or Proposed Policy Map Change is not legally compliant or is unsound, including any changes you consider necessary to make the Plan legally compliant or sound.

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

Please see attached letter for full details.

1. Failure to Adequately Address AP59 and AP60

The Inspector’s IN27 explicitly outlined modifications required to ensure the soundness of the Local Plan, including the following action points:

- **AP59:** Justify the need for 24 Travelling Showpersons’ plots by modifying the reasoned justification in Policy DM20 to delete Table 8 and explain why these plots are needed at the existing yard, with cross-references to Policy RSA25.
- **AP60:** Clarify the relationship between the proposed 24 plots and the existing authorised use of Long Copse Farm, including the extent of agricultural land proposed for development.

Despite these clear instructions, the Schedule of Proposed Main Modifications fails to meet these requirements. The proposed justification for the 24 plots is limited to a vague statement that they are allocated “for use by Travelling Showpeople” with no substantive evidence to support this allocation. Additionally, the lack of clarity regarding the site’s existing use and its relationship to the proposed development remains unresolved.

2. Lack of Evidenced Need under Policy DM20

Policy DM20 requires the Council to justify the allocation of Travelling Showpersons’ plots, yet no current or credible evidence supports the proposed 24 plots at Long Copse Farm. The removal of references to the 2019 Gypsy, Traveller, and Travelling Showpeople Accommodation Assessment (GTAA) in the Local Plan Review suggests an acknowledgment of its insufficiency. However, no alternative evidence has been provided to substantiate the need.

The GTAA itself concluded there was no additional need for Travelling Showpersons’ plots within the district. Earlier assessments, such as the 2015 GTAA, referenced a temporary need for relocation of families from outside the district, which does not constitute a current or local need. Without updated data, the allocation fails to satisfy the Inspector’s requirement in AP59 for an explanation of the need for these plots.

3. Dependency on Pending Application under Policy RSA25

Policy RSA25 designates Long Copse Farm for these plots, yet the Local Plan Review’s reliance on the pending planning application (23/02596/FULMAJ) is deeply problematic. This creates a risk of predetermination and undermines the independence of the planning process. Furthermore, the Local Plan does not account for the possibility that the application may not be approved, leaving no contingency for meeting the identified housing needs.

Habitats Regulations Assessment

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

(Please be as precise as possible)

Page number	
Paragraph number	
Comments:	


Notification of Progress of the Local Plan Review

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

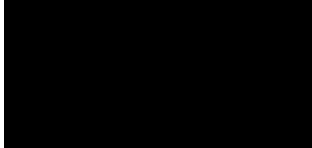

(please tick/mark 'X' all that apply)

<i>The publication of the report of the Inspector appointed to carry out the examination</i>	X
<i>The adoption of the Local Plan Review</i>	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	25 th Jan, 2025
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Your completed representations must be received by the Council by 11:59pm on Friday 31 January 2025.

Planning Policy Team
Development and Housing
West Berkshire District Council
Market Street
Newbury
RG14 5LD

25th January, 2025

Dear Sir/Madam,

Re: Objection to Proposed Allocation under Policies DM20 and RSA25

I am writing to formally object to the proposed allocation of 24 Travelling Showpersons' plots at Long Copse Farm, Enborne, as set out under Policies DM20 and RSA25 of the Local Plan Review. While the need for inclusive planning is clear, this allocation raises substantial concerns regarding its justification, methodology, and compliance with the Inspector's recommendations.

1. Failure to Adequately Address AP59 and AP60

The Inspector's IN27 explicitly outlined modifications required to ensure the soundness of the Local Plan, including the following action points:

- **AP59:** Justify the need for 24 Travelling Showpersons' plots by modifying the reasoned justification in Policy DM20 to delete Table 8 and explain why these plots are needed at the existing yard, with cross-references to Policy RSA25.
- **AP60:** Clarify the relationship between the proposed 24 plots and the existing authorised use of Long Copse Farm, including the extent of agricultural land proposed for development.

Despite these clear instructions, the Schedule of Proposed Main Modifications fails to meet these requirements. The proposed justification for the 24 plots is limited to a vague statement that they are allocated "for use by Travelling Showpeople" with no substantive

evidence to support this allocation. Additionally, the lack of clarity regarding the site's existing use and its relationship to the proposed development remains unresolved.

2. Lack of Evidenced Need under Policy DM20

Policy DM20 requires the Council to justify the allocation of Travelling Showpersons' plots, yet no current or credible evidence supports the proposed 24 plots at Long Copse Farm. The removal of references to the 2019 Gypsy, Traveller, and Travelling Showpeople Accommodation Assessment (GTAA) in the Local Plan Review suggests an acknowledgment of its insufficiency. However, no alternative evidence has been provided to substantiate the need.

The GTAA itself concluded there was no additional need for Travelling Showpersons' plots within the district. Earlier assessments, such as the 2015 GTAA, referenced a temporary need for relocation of families from outside the district, which does not constitute a current or local need. Without updated data, the allocation fails to satisfy the Inspector's requirement in AP59 for an explanation of the need for these plots.

3. Dependency on Pending Application under Policy RSA25

Policy RSA25 designates Long Copse Farm for these plots, yet the Local Plan Review's reliance on the pending planning application (23/02596/FULMAJ) is deeply problematic. This creates a risk of predetermination and undermines the independence of the planning process. Furthermore, the Local Plan does not account for the possibility that the application may not be approved, leaving no contingency for meeting the identified housing needs.

4. Inconsistencies in Site Use and Allocation

AP60 required the Council to clarify the relationship between the proposed 24 plots and the existing authorised use of Long Copse Farm. The Local Plan Review's modifications fail to address this adequately. The eastern portion of the site has historically been used as a Circus headquarters and agricultural holding but lacks formal permission for residential use or the stationing of caravans. Temporary permissions granted in 2018 and 2020 have expired, and the site has primarily been used for storage, further undermining its suitability for this allocation.

The site's piecemeal development history, combined with its current lack of lawful residential use, calls into question the feasibility of relying solely on Long Copse Farm to meet the district's Travelling Showpersons' needs.

Conclusion

In light of the above, I strongly urge the Council to reconsider the proposed allocation at Long Copse Farm under Policies DM20 and RSA25. The Local Plan Review has failed to adequately

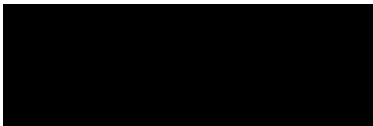
address the Inspector's AP59 and AP60 requirements, lacks a robust evidence base, and depends on an unresolved planning application.

I recommend that this allocation be removed from the Local Plan Review until further evidence can be gathered and the requirements of AP59 and AP60 are fully addressed. A deferred allocation approach, as seen in other local plan reviews (e.g., Brighton and Hove in 2016), would provide a more robust and defensible solution.

Thank you for considering my objection. I trust the Council will take these concerns seriously to ensure the integrity and soundness of the Local Plan Review.

Yours faithfully,

Yours faithfully,

A solid black rectangular box used to redact the signature of Anthony Johnson.

Anthony Johnson