

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: WEST BERKSHIRE LOCAL PLAN REVIEW CONSULTATION ON PROPOSED MAIN MODIFICATIONS ON BEHALF OF COPAS BROTHERS (FARMS) LTD
Date: 30 January 2025 14:51:13
Attachments: [REDACTED]
Importance: High

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Dear Sir / Madam,

On behalf of Copas Brothers (Farms) Ltd, please see a representation to the West Berkshire Local Plan Review Consultation on Proposed Main Modifications.

Please confirm that these representations have been received and that they have been registered as having been 'duly made'.

If you would like any further clarification, or to discuss this further, please do get in touch.

Kind regards,

Connor

Connor Sheffield [REDACTED]

[REDACTED]
[REDACTED]
Stantec
The Blade, Abbey Square
Reading RG1 3BE



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Connor Sheffield & Dave Valler (2023) 'Dealing' with Governance and Planning? The Limits of Urban Intrapreneurialism, Planning Theory & Practice, DOI: [10.1080/14649357.2023.2262442](https://doi.org/10.1080/14649357.2023.2262442)

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**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cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.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*		Connor
Last Name*		Sheffield
Job title <i>(where relevant)</i>		[REDACTED]
Organisation <i>(where relevant)</i>	Copas Brothers (Farms) Ltd	Stantec
Address* <i>Please include postcode</i>		The Blade, Abbey Square, Reading, RG1 3BE
Email address*		[REDACTED]
Telephone number		
Consultee ID <i>(if known)</i>		[REDACTED]

*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):	Connor Sheffield – Stantec – on behalf of Copas Brothers (Farms) Ltd
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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
Modification/Change reference number (MM / PMC)	MM30, MM31, and MM67

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	X
Effective: the LPR should be deliverable	X
Consistent with national policy: the LPR should enable the delivery of sustainable development in accordance with the policies of the NPPF	X

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

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

We are aware that Main Modification (MM) 30 reflects the Inspectors Action Point (AP5) of including reference in the emerging Policy SP20 to the minimum floorspace requirements for office and industrial / warehouse uses for the plan period of 2023 to 2041.

Our client supports this MM which states “*For the plan period of 2023 – 2041 there is a requirement across the District for a minimum of 57,531sqm (NIA) of office space and a minimum of 98,196sqm (GIA) (24.5ha) of industrial space*”. However, for the reasons set out below our client continues to be concerned that emerging Policy SP20, and therefore the Local Plan Review is not sound. Our previous representations and hearing statements commented upon the justification of not meeting the identified needs in the context of paragraph 11 (b) of the NPPF (‘NAT1’) and are therefore not duplicated here however we would like to take the opportunity to make the following three further points.

1) Meeting the identified needs / requirement:

The first sentence of emerging Policy SP20 set out within MM30 states “*Through the LPR the Council will seek to facilitate the growth and forecasted change of business development over the plan period through site allocations and by promoting the supply of office and industrial space across the Districts **to meet the identified needs***” (our emphasis).

However, the LPR does not meet the identified needs. This is accepted by the Council in paragraph 7.7 and 7.9 of the supporting text regarding both office and industrial / warehouse supply “***Given the identified shortfall in supply the Council will commit to seek to address this matter again at the first five-year review of the Local Plan***” (our emphasis).

As set out previously, and considering the change in the plan-period since submission of the LPR, the identified shortfall is 57,531sqm (NIA) for office i.e., the full identified need, and 39,796sqm (GIA) for industrial / warehouse i.e., c.40% of the identified need.

In this context, PMM MM30, and by extension MM31 and MM67, do not go far enough to address soundness issues and are therefore not effective because it will not deliver enough development to meet the identified employment need over the plan-period.

2) Promoting Sustainable Development

Considering the role of planning system more broadly, paragraph 7 of the NPPF asserts that the purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 8 of the NPPF captures this in the three overarching objectives; economic, social, and environmental respectively. Moreover, chapter 6 of the NPPF is clear regarding the role of planning policies and decisions in helping to create the condition in which businesses, can invest, expand, and adapt. Paragraph 82 (b) highlights that planning policies should “*set criteria, or identify, strategic sites, for local and inward investment to match the strategy and to meet*

anticipated needs over the plan period". The Council acknowledge this as part of the Vision and Strategic Objectives for the LPR, yet the proposed strategy to achieve this falls short.

As part of the LPR Examination, the Council have identified additional housing supply following the Inspectors Post Hearing Letter (IN30) as summarised in examination documents EXAM50 and EXAM 53.1. This resulted in the proposed housing supply in the plan period increasing from 8,893 to 10,143 based on information contained within IN30 and EXAM 53.1. In addition to this, a broad location for growth to the north of Newbury potentially accommodating a further 650 – 800 dwellings towards the end of the plan-period subject to the committed early-review.

In our view, whilst not commenting on the specifics of the above PMM's, the increase in housing supply within the plan-period further emphasises the importance of also meeting identified employment needs. Paragraph 105 of the NPPF sets out that "*the planning system should actively manage patterns of growth in support of these objectives [see NPPF paragraph 104]. Significant development should be focused on locations which are or can be made sustainable, through **limiting the need to travel and offering a genuine choice of transport modes***" (our emphasis). Paragraph 106a expands further stating that planning policies should "*support an appropriate mix of uses across an area, and within larger scale sites, to **minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities***" (our emphasis).

In this context, not meeting the identified employment needs, which for industrial has seen a consistently strong provision of floorspace and growth and for the office sector, the LPR evidence expects a return to growth, alongside the Council accepting that there is an overriding need for additional employment for industrial uses¹, will result in either/or;

- i) An increase in travel required to employment within West Berkshire;
- ii) An increase in out-commuting as a necessity to access employment; and/or
- iii) Economic growth and/or productivity being constrained in contradiction to national policy.

Whilst we acknowledge the Government's expectations relating to the conduct of examination detailed in the Minister for Housing's letter to the Chief Executive of the Planning Inspectorate², delaying addressing the shortfall in employment supply to the first review is not, in our clients view, a sound approach to achieving sustainable development.

3) National Government – Plan for Change

As noted by the Inspector in IN38, the LPR was submitted for examination in March 2023. In this context, the LPR has been examined against the 2021 version of the NPPF in accordance with the relevant transitional arrangements. That being said, the Inspector in IN38 also references the Government's recent reiteration of their position on getting up-to-date plans in place (see footnote 2). Additional Government policy statements and documents have also been published reemphasising the significant importance behind supporting the economy.

On the 14th October 2024, Jonathan Reynolds, the Secretary of State for Business and Trade, made a statement on the Invest 2035: The UK's Modern Industrial Strategy³. This statement asserts that "*Growth is the number one mission for this Government*". It goes on to state that "*We must create a strong pro-business environment that supports businesses to thrive and grow*".

¹ Section 5.4.2 of the SA/SEA Environmental Report November 2022.

² Local Plan examinations: letter to the Chief Executive of the Planning Inspectorate (July 2024)

³ Written statements - Written questions, answers and statements - UK Parliament

On the 5th December 2024, Sir Kier Starmer, Prime Minister, laid in the House of Commons the Government's Plan for Change⁴⁵. The Plan for Change, again set outs that Economic Growth is the number one mission for the Government.

On the 12th December 2024, Matthew Pennycook, Minister of State for Housing and Planning, made a statement alongside the publication of the updated National Planning Policy Framework⁶. This statement, whilst focusing on building new homes, made reference to changes to the planning system to drive greater commercial development in those sectors which will be the engine of the UK's economy in the future.

On the 19th January 2025, Rachel Reeves, Chancellor of the Exchequer, spoke about the importance of economic growth, reiterating that it was the number one mission of the government. The chancellor's speech included a commitment to reintroduce a new approach to planning decisions on land around rail stations, changing the default answer to yes. As stated previously, our client's site is located less than 500m from Aldermaston Rail Station.

Although we are aware that the LPR is being examined against the 2021 version of the NPPF, which no less affirms that significant weight should be placed on the need to support economic growth and productivity, the clear message from Government policy and direction is that the economy is at the forefront. Commitments to the economy demonstrate the utmost importance of supporting the economy. In this context, the LPR's substantial shortfall in employment land supply is evidently inconsistent with national policy.

Summary of soundness issues

Taking into account the above, and comments raised within our Regulation 19 representations, Matter 2 and Matter 11 Hearing Statements, and expressed at the Days 1 and 10 Hearing Sessions, we have concerns regarding the soundness of Policy SP20 and therefore the emerging Local Plan Review.

- **Positively Prepared:** *Emerging Policy SP20 has not been positively prepared as it does not seek to meet the identified employment needs and therefore does not support achieving sustainable development in West Berkshire.*
- **Justified:** *Emerging Policy SP20 does not take an appropriate strategy as it not seeking to identify sufficient sites to meet the identified employment need. The reasons for doing so are not, and have not been justified, when considering the identified employment need and available sites that can contribute to this need, including our client's site.*
- **Effective:** *Emerging Policy SP20 will not deliver enough development to meet the identified employment need over the plan-period and the principle of the proposed approach set out in paragraph 7.7 of the Proposed Submission Version ('CD1') to address the shortfall as part of a five-year review will not support the delivery of sustainable development in West Berkshire for reasons set out previously at regulation 19 stage.*
- **Consistent with National Policy:** *Emerging Policy SP20 is not consistent with setting criteria, or identifying strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period. Nor is emerging Policy SP20 consistent with Government's more recent policy statements prioritising economic growth.*

⁴ Written statements - Written questions, answers and statements - UK Parliament

⁵ Plan for Change – Milestones for mission-led government

⁶ Written statements - Written questions, answers and statements - UK Parliament

Necessary changes:

In consideration of the above, we consider the LPR should identify additional employment land supply to meet the identified employment needs or amend the wording in the first sentence of emerging Policy SP20 to: “to meet **part of the identified needs**”. As set out within our previous representations and hearing statements, we consider that Land adjacent to Beenham Industrial Estate, Beenham (BEEN 11) could support the Council in meeting their employment needs and therefore we consider this site should be included in the table set out at supporting text 8.3 (MM67) and included as its own site allocation ‘Policy ESA7’ in emerging Policy SP20 for 20,000sqm approx. floorspace and uses E/B2/B8. The Policies Map should be updated accordingly.

As previously stated, Land adjacent to Beenham Industrial Estate;

- Will support the delivery of the minimum employment needs identified by the ELRA through the additional provision of approx. 20,000 sqm of Class E, B2, and B8 uses within the plan period.
- The Site is located in a sustainable location adjacent to the existing Beenham Industrial Area which is proposed to be a Designated Employment Area and could therefore form a logical extension to the DEA.
- The Site can be sustainably access off Grange Road and is less than 500m from Aldermaston Rail Station.
- Whilst the Site is located within the AONB (National Landscape), it is considered that sensitive mitigation measures, including the favourable site topography and generous vegetation screening within the Site could be used to limit any perceived landscape and visual impact on the AONB (National Landscape).
- The Site is consistent with paragraph 85 of the NPPF which states that planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements.

Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA)

4. Do you have any comments on the updated Sustainability Appraisal/Strategic Environmental Assessment Report – Proposed Main Modifications (November 2024)?
(Please be as precise as possible)

Page number	
Paragraph number	
Comments:	

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	Connor Sheffield	Date	30/01/2025
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Your completed representations must be received by the Council by 11:59pm on Friday 31 January 2025.