

From: [REDACTED]
To: [REDACTED]
Subject: Local Plan reps 1 from Henry Venners
Date: 31 January 2025 22:14:12
Attachments: [REDACTED]

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

Form and plan attached

Kind regards

Henry Venners

[REDACTED]



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

Representation Form


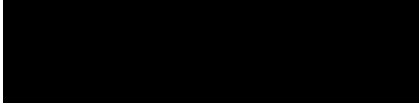
Ref:
 (For official use only)

Please complete and return this form:	By email: 
	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"> • 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cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published. 		
	1. Your details	2. Agent’s details (if applicable)
Title		
First Name*	H	
Last Name*	Venners	
Job title <i>(where relevant)</i>		
Organisation <i>(where relevant)</i>		
Address* <i>Please include postcode</i>	c/o Bagley Croft, Hinksey Hill Oxford, OX1 5BD	
Email address*		
Telephone number		
Consultee ID		

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):	H Venners
--	-----------

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)	MM44

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.

Please note that I am sending two comments on different aspects of this policy

The site at HSA11- 72 Purley Rise has contrary to the SEA dated November 2024 been largely built out. All consented homes have been built although not all are occupied.

This results from the construction of 30 new dwellings within the bounds of the site allocation. The policy however indicated that there should be 35 dwellings provided. For design/services reasons the area of the allocation was unable to include the additional five dwellings hoped for. Thus there is some shortfall on numbers.

As the site has been built it is however clear that the layout approved and now build will suit the provision of further dwellings. Specifically there is ample space for the construction of 3-5 dwellings to the north east area of the land. Attached to this submission is a drawing showing the approved layout of the new scheme and a place where very easily 3-5 new dwellings can be adding utilising infrastructure provided for the built out development. This would assist in getting to the right numbers.

WestBerks has already consented development on this land (a new build stable) confirming its acceptability for development (it is not in a flood zone, safety zone nor AONB). However the placement of these suggested additional homes would lie outside the defined boundaries of the previous allocation for HSA11.

Via the simple expedient of extending the boundary for the allocation to the north additional homes can be provided, and provided quickly given that the infrastructure is in place following the recent works nearby.

The policy requires adaption to show that the 30 homes are delivered, but only 30.

The policy should be adapted for reasons of soundness and to help deliver housing in an agreeably sustainable location by altering the boundaries of the site to assist with delivery of the intended 35 homes.

By the same token the settlement boundary for Purley on Thames should also be shifted so as to align and allow for the provision of the additional dwellings.

See attached plan showing where the site allocation boundary should be altered to include for additional homes

OS mapping is now more up to date although it has not fully captured all new buildings. The plan in the LPR needs review as it is plainly now out of date: this plan:

Local Plan Review 2022-2039 Proposed Submission

72 Purley Rise, Purley on Thames



Is out of date- the site looks like this now:



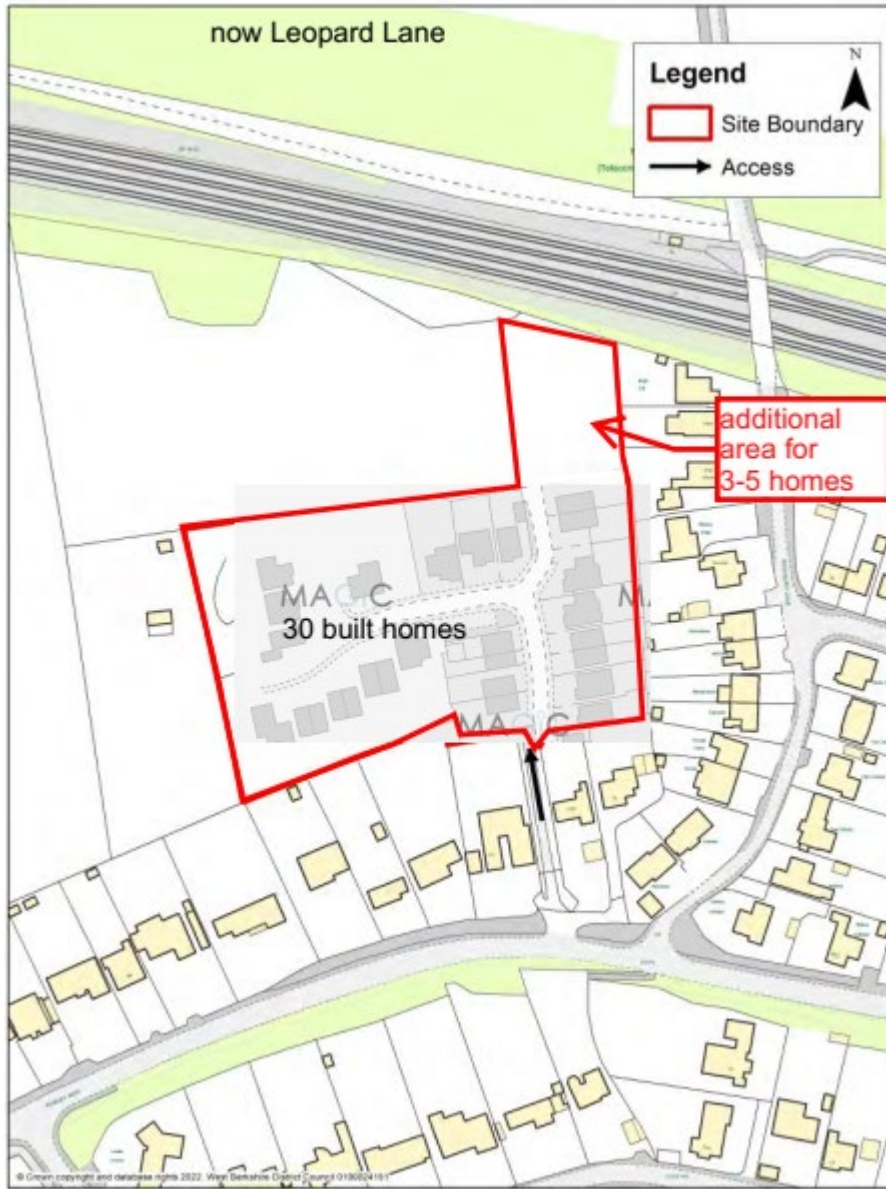
OS reproduced under licence OS100005960

It is suggested that that site boundary be amended so as to provide for additional; dwellings

Adding dwellings here has advantages over development in the AONB, by being outwith the AONB- the boundary to which is shown in red above, and contiguous with built form on three sides ((railway to north Westbury Lane to east and Leopard Lane to South.:

Suggested revised outline of allocation:

72 Purley Rise, Purley on Thames



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	72
Paragraph number	HSA11
Comments:	
<p>The report on progress despite dated November 2024 is outdated all the 30 homes consented are built (some are awaiting decoration and new inhabitants) but by and large the approved scheme can be considered delivered, but of course only for 30 homes. A suggestion is made to make small and reasonable adjustment to allow the policy aims of 35 dwellings to be provided.</p> <p>That site has been delivered as ‘Leopard Lane’</p>	

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>	<i>x</i>
<i>The adoption of the Local Plan Review</i>	<i>x</i>

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	H Venners	Date	04/01/2025
------------------	------------------	-------------	-------------------

Your completed representations must be received by the Council by 11:59pm on Friday 31 January 2025.

Please note – Personal/Contact Details

All submitted representations will be made publicly available, including on the Council's website, with the person/organisation making the representation being identified. A copy of all submitted representations will also be made available to the Planning Inspectorate and the person appointed by the Secretary of State to conduct the examination.

To ensure an effective and fair examination, it is important that the Inspector and all other participants in the examination process are able to know who has made representations on the LPR. The Council therefore cannot accept anonymous representations – you must provide us with your name and contact details. Address details will not be made publicly available. 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>.

The Council will also need to make sure that the names and full addresses of those making representations can be made available and taken into account by the Inspector. By submitting a representation, you confirm that you agree to this and accept responsibility for your comments. The Planning Inspectorate's privacy statement for local plan examinations is available at <https://www.gov.uk/guidance/local-plans#plans-privacy-statement>.

Additional land to add to already developed site at Land north of Purley Rise Purley-on-Thames, RG8 8DH
4 January 2025 hv
Plan XX+3/5/L25b
to WBC planning policy
suggested new site allocation

Site submission for housing development consideration

Other land in same ownership edged in blue

POS

Leopard Lane Housing development site formerly No72 Purley Rise

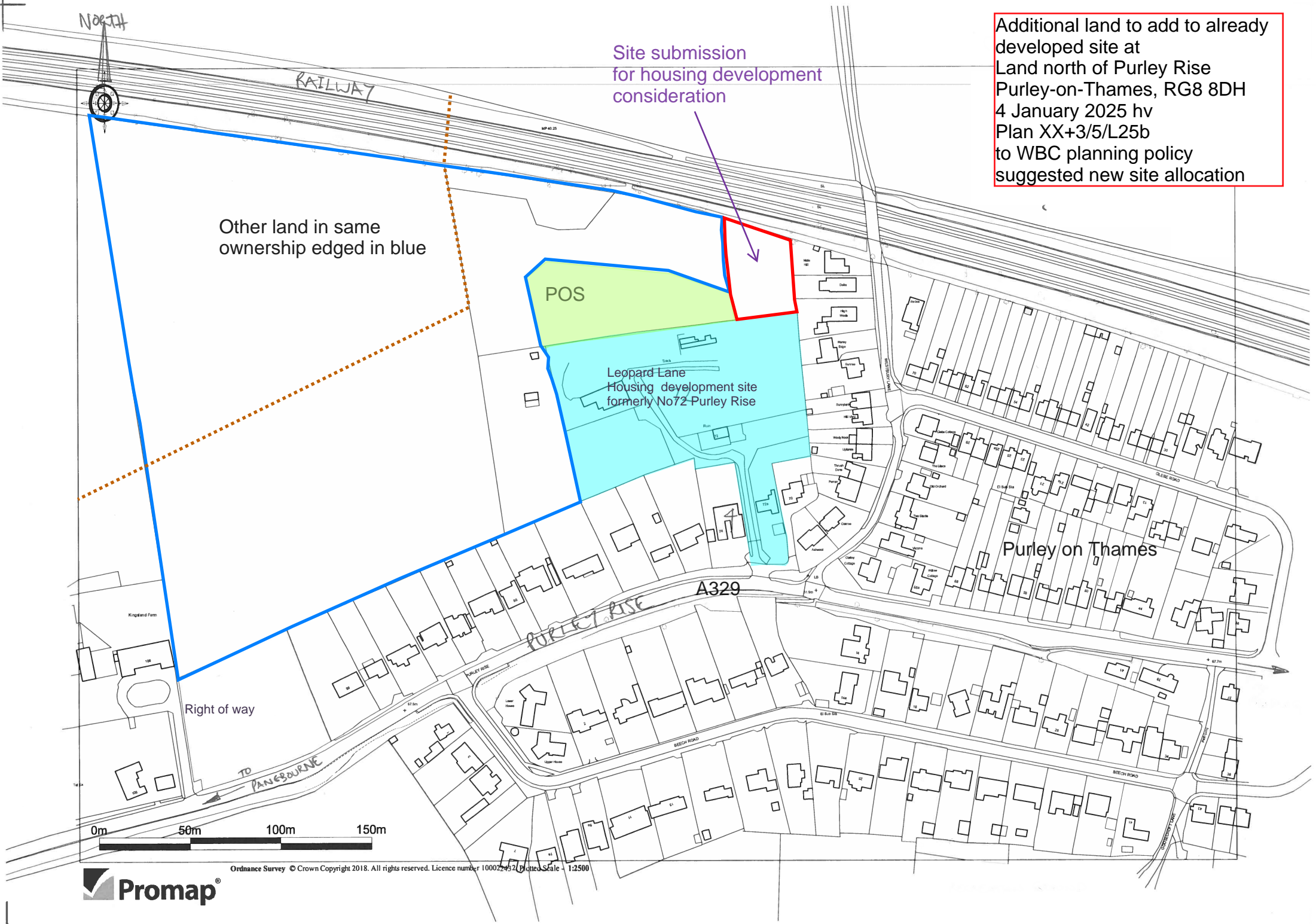
Purley on Thames

A329

PURLEY RISE

Right of way

TO PANESBORNE



From: [REDACTED]
To: [REDACTED]
Subject: Local Plan reps 2 from Henry Venners
Date: 31 January 2025 22:14:38
Attachments: [REDACTED]

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

Form with text attached

Kind regards


Henry Venners

[REDACTED]



**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)

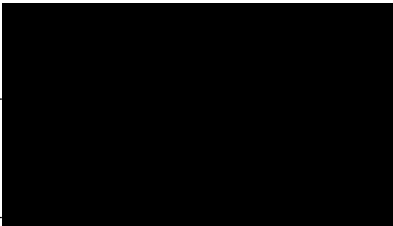
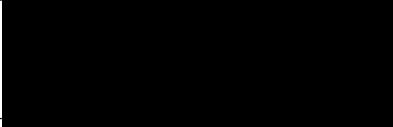
Please complete and return this form:	By email: 
	By post: Planning Policy, Development and Housing, Council Offices, Market Street, Newbury, RG14 5LD
Return by:	11:59pm on Friday 31 January 2025

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.

PART A: Your details		
<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		
First Name*	H	
Last Name*	Venners	
Job title (where relevant)		
Organisation (where relevant)		
Address*	c/o Bagley Croft, Hinksey Hill Oxford, OX1 5BD	
Email address*		
Telephone number		
Consultee ID (if known)		

*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):	H Venners
--	-----------

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)	MM57/Policy RSAX

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	

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.

The general theme of the Local Plan is to seek to provide development in the right place and to provide protection for National Landscapes which deserve the highest level of protection.

It is very surprising therefore to see that an additional allocation for RSAX for 25 dwellings has been made when this will cause harm to the AONB/NL. LURA provides a protected landscapes duty that has not obviously been followed with this site introduction.

We do not consider that the plan has duly considered other alternatives. At the point when it was clear that the plan was short on numbers it would then have been appropriate for the Council to seek to recheck the most suitability of sites and indeed to invite people to put forward sites to meet that additional need that had been identified. The best solution come from engagement but there was no engagement. Indeed WBC tried to push through the additional homes without any consultation.

This exercise has shown that other sites should be given fair consideration, not least when the Government has increased housing numbers to 1,057pa rather than the current lower housing figure.

this alone should have justified a wider consideration of where to build.

The plan fails on the soundness test as there was no proper consideration for alternatives.

In seeking to allocate RSAX the council has not given due consideration to other sites that could have met the need with less identifiable harm to an area specified as needing protection due to its national status.

The ANONB Board (Rebecca Davies) was concerned at impacts of development in the AONB and suggested reducing housing numbers therein. Increasing the numbers goes against the direction

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	101
Paragraph number	RSAX
Comments:	
<p>Insufficient consideration has been given to the ability to not build the 25 homes allocated to RSAX elsewhere, especially to have given consideration to sites outside the National Landscape.</p> <p>In addition given the concern of the Highways Authority about capacity on the A430 and Pangbourne Hill junction meant that fairer consideration to alternative should have been given.</p> <p>There is no analysis that the LPA sought to find another site that would not have either of these problems.</p> <p>On another form I have suggested a better site. In reasonable proximity, helping to meet housing needs in the same geographic area but not with those failings as it would be outwith the national landscape.</p>	

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>	<i>x</i>
<i>The adoption of the Local Plan Review</i>	<i>x</i>

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	H Venners	Date	05/01/2025
------------------	------------------	-------------	-------------------

Your completed representations must be received by the Council by 11:59pm on Friday 31 January 2025.

From: [REDACTED]
To: [REDACTED]
Subject: Local Plan reps 3 from Henry Venners
Date: 31 January 2025 22:16:11
Attachments: [REDACTED]

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

Form and plan attached

Showing a suggested alternative site allocation- Westfield Purley Rise

Kind regards

Henry Venners

[REDACTED]



**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		
First Name*	H	
Last Name*	Venners	
Job title <i>(where relevant)</i>		
Organisation <i>(where relevant)</i>		
Address* <i>Please include postcode</i>	c/o Bagley Croft, Hinksey Hill Oxford, OX1 5BD	
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):	H Venners
--	-----------

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)	MM57/Policy RSAX

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	
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.

Referencing other comments I have made that make the case that the Pangbourne Hill RSAX site should not be included before due consideration would be given to alternative sites, as landowner of a site that would not fall down on either of the main concerns as that site I wish to make the case for a fresh site.

Land is immediately available outside the AONB/NL, adjoining to the Eastern Urban Area and thus highly accessible and sustainable at the site I shall call westfield Purley Rise, west of previous site allocation HSA11 which has been built out. I am the landowner

This site has the capacity to accommodate 25 homes (as at RSAX) and for the site to include self-build housing and housing suitable for older people. Expressly the site can include 25% bungalows which is a form of property that is greatly in need for older people but where there is scant evidence of mainstream larger sites providing. Policy DM19 calls for specialist sites. This site can accommodate a reasonable proportion of such homes interspersed with other market and affordable homes. It would be likely to be for people living in their own homes but potentially with warden support, and the support of neighbours and suitable adjoining community in purpose built homes for older people on a single level. Also using shared amenity spaces for community benefit.

Landscape

Site Westfield Purley Rise is outside AONB- adjoining land in the same ownership can provide buffering and open space for play and nature, there is sufficient buffering land to make a sufficient net gain to not need offsetting

Flood risk

Site is served by on site mains drainage already

Flood zone 1

No flood risk on site

Highways

The site has suitable access to the public highway for pedestrians and vehicles. A new road has been provided with suitable capacity (Leopard Lane)

Heritage

No known possible impacts

Education

Schools at Purley or Tilehurst could be suitable

However intention would be to provide homes more suitable for older people,

Ecology

Only known ecological interest is a small population of slow worm on an adjoining site. However no evidence that they inhabit this site in large numbers if at all. Harm can be avoided by safe working and gardens are very suitable for these creatures- more so than the open farmland it is now

Utilities

These are all on hand including fresh water and mains drains with gravity feed

HV electricity is on site

No gas pipes nearby- no need for gas supply for modern houses.

Thames water confirms (see response PS990 no water supply issues)

The Environment Agency comments at PS1834 which relates to an adjacent site are mistaken waste water flows through this site to the Pangbourne WWTW

Site is available now with no constraint to achievability

We ask that due consideration is given to allocating this site in preference to RSAX which has notable failings, as set out elsewhere:

Key

A

Suggested site allocation of westfield, west of Leopard lane, Purley

B

Site (built out) HSA11- the sites are interconnected)

C

Potential green buffer area, open space, planting, BNG offset

D

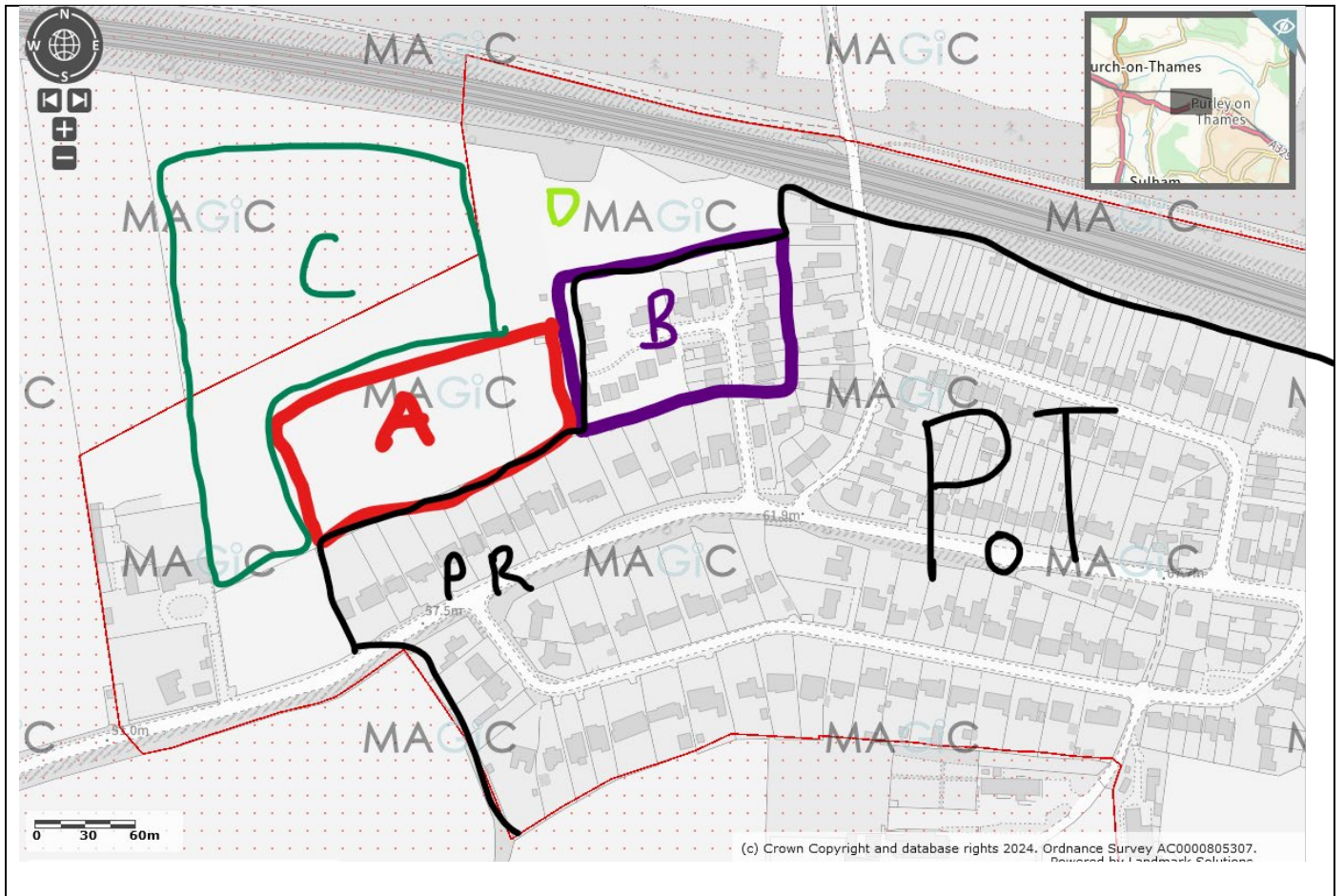
POS to HSA11:

PR

Purley Rise A329

PoT

Purley On Thames- black line showing settlement boundary



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	101
Paragraph number	RSAX
Comments:	
<p>Insufficient consideration has been given to the ability to build the 25 homes allocated to RSAX elsewhere, especially to have given consideration to sites outside the National Landscape, but nearby such as this available site</p> <p>In addition given the concern of the Highways Authority about capacity on the A430 and Pangbourne Hill junction meant that fairer consideration to alternative should have been given. There is no obvious consideration of alternatives making the plan unsound.</p> <p>There is no analysis that the LPA sought to find another site that would not have either of these problems.</p> <p>On this form I have suggested a better site. In reasonable proximity but not with those failings.</p>	

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>	<input checked="" type="checkbox"/>
<i>The adoption of the Local Plan Review</i>	<input checked="" type="checkbox"/>

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	H Venners	Date	06/01/2025
------------------	------------------	-------------	-------------------

Your completed representations must be received by the Council by 11:59pm on Friday 31 January 2025.

North

RAILWAY

'Westfield'
 Land north of Purley Rise
 Purley-on-Thames, RG8 8DH
 5 January 2025 hv
 Plan XXWF/L24a
 to WBC planning policy
 suggested new site allocation

Other land in same ownership edged in blue

POS

Leopard Lane
Housing development site
formerly No72 Purley Rise

Site submission
for housing development
consideration

Purley on Thames

A329

PURLEY RISE

Right of way

TO
PANGBOURNE

0m 50m 100m 150m

Ordnance Survey © Crown Copyright 2018. All rights reserved. Licence number 10002492. Printed Scale 1:2500

