

From: [REDACTED]
To: [REDACTED]
Subject: Consultation on the Proposed Main Modifications to the West Berkshire Local Plan Review 2022-2039
Date: 31 January 2025 08:46:47
Attachments: [REDACTED]

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

Good morning

Please see attached representation and covering letter providing comments regarding the above consultation.

I would be grateful if you could please confirm safe receipt.

Many thanks and kind regards

Alan

Alan Divall [REDACTED]
[REDACTED]

Bourne House, Cores End Road, Bourne End, Bucks, SL8 5AR
[REDACTED]



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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"> 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cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published. 		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		Mr
First Name*		Alan
Last Name*		Divall
Job title <i>(where relevant)</i>		[REDACTED]
Organisation <i>(where relevant)</i>	Colthrop Village Consortium	Walsingham Planning
Address* <i>Please include postcode</i>		Bourne House, Cores End Road, Bourne End, Bucks, SL8 5AR
Email address*		[REDACTED]
Telephone number		[REDACTED]
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):	Colthrop Village Consortium
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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)	See attached covering letter

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.	
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	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.

See attached covering letter.

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	N/A
Paragraph number	N/A
Comments:	
N/A	

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	N/A
Paragraph number	N/A
Comments:	
N/A	

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

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	31/01/2025
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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>.

Our Ref: AD/B0031/24

31 January 2025

West Berkshire Council
Planning Policy
Council Offices
Market Street
Newbury
RG14 5LD

Sent by email

Dear Planning Policy

Examination of the West Berkshire Local Plan

Consultation on the Proposed Main Modifications to the West Berkshire Local Plan Review 2022-2039

December 2024 – January 2025

On behalf of my client the Colthrop Village Consortium (Examination Representor Ref: 1138300), please find below my client's comments to the proposed main modifications to the West Berkshire Local Plan Review 2022-2039.

Main Modification 3 (MM3):

The inclusion of the Colthrop Industrial Estate within the Thatcham settlement boundary is supported.

Main Modification 19 (MM19):

This main modification amends, in part, the supporting text to Policy SP12. The text clarifies the Local Housing Need (LHN) figure for West Berkshire of 515 dwellings per annum using a baseline of 2023. This in turn is confirmed as the annual housing requirement in the Plan under Policy SP12. This housing requirement has been prepared and examined, as has the Plan as a whole, under the requirements of the December 2023 National Planning Policy Framework.

On the 14th December 2024 the Government published the latest NPPF. Alongside the publication of the NPPF the Government also confirmed and published the latest LHN figures for each Local Authority in England using the Standard Method. The now adopted Standard Method figure for West Berkshire is 1,070 dwellings per annum.



The December NPPF sets out the transitional arrangements for Local Plan making for all Local Authorities in England.

The West Berkshire Local Plan review meets the transitional requirements of paragraph 234 (b) of the NPPF. However, because of the December 2024 Standard Method figure for West Berkshire, the requirements of paragraph 236 will need to be complied with following the adoption of the Plan.

Paragraph 236 states (with my emphasis and footnotes removed):

Where paragraph 234b applies, if the housing requirement in the plan to be adopted meets less than 80% of local housing need the local planning authority will be expected to begin work on a new plan, under the revised plan-making system provided for under the Levelling Up and Regeneration Act 2023 (as soon as the relevant provisions are brought into force in 2025), in order to address the shortfall in housing need.

Because the Plan currently at Examination will have a housing requirement less than 80% of the now adopted LHN for the District, there will be a requirement to review the emerging Local Plan immediately upon its adoption – as its adoption is likely to be after the plan making provisions in the Levelling Up and Regeneration Act 2023 come into force.

We would request that the supporting text to Policy SPI2 provides a clear reference to the need for this immediate review to deal with the shortfall in housing need in the District. Dealing swiftly and effectively with this shortfall will deliver the objectives of the NPPF in delivering new homes to meet the housing crisis.

Without this further clarification/amendment to the supporting text we consider the Plan does not meet the requirements of the NPPF.

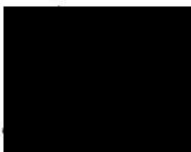
Main Modification 24 (MM24):

The inclusion of additional text (underlined) to the end of paragraph 6.42 ‘..... Newbury, as part of the Newbury and Thatcham urban area, is a sustainable location for development as confirmed in the Strategic Vision 2050’ is supported.

I would be grateful if you could please confirm safe receipt of these representations.

We look forward to discussing my client’s site further with West Berkshire Council.

Yours sincerely



Alan Dival 

