From: To:

Subject:Local Plan Review ConsultationDate:30 January 2025 10:24:41

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

Dear Planning Policy

Please find attach my Representation Form



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

is no need to resubmit inese. Publication of the propose stage and any representation Form manufactures and any representations of the proposed Main Modifications and any representation.

Ref:

(For official use only)

Please complete and return this form:	By email:	pporting information necessary
	By post: Planning Policy, Developme Market Street, Newbury, RG14 5LD	ent and Housing, Council Offices,
Return by:	11:59pm on Friday 31 January 202	5 (Image

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

This form has two parts: It asiation and of segment besogned to stuberto and entire another thousands and the second second to students.

PART A – Your details

PART B – Your representation(s)

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

Please note the follo	PART A: Your	<u>details</u>	eference number (MM PMC)
We cannot registRepresentations	ter your representation without y cannot be kept confidential and ontact details will not be publishe	will be available for	
	1. Your details	2. Agent's detail	
Title	Mr.		a) Lecally compliant
First Name*	David		
Last Name*	Tompkins	lance notes for a fu	Please refer to the guid
Job title (where relevant)	ation or Proposed Policy Map	seed Main Modifica	you consides the Propo
Organisation (where relevant)	ness your representation return	1	ound, p <mark>lease identify wi</mark> lease ticklmark 'X' all the
Address*			
Please include postcode	Boames Farm, Enborne, RG20 0JT	sed development a	
Email address*	Andre singley, when consider		he reasonable alternative
Telephone number		elastevilob ed bl	corie 770, Jord reviscoli.
Consultee ID (if known)	hould enable the delivery of sub- of the NPPF		Consistent with national sevelopment in accordan

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	Mr. David Tompkins	eturn this orm:
agent):	11:59pm on Friday 31 January 2025	Return by:

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 Assume of right upon notifications and assume a second modifications.	
Modification/Change	MM88
reference number (MM	PART A: Your details
/ PMC)	Please note the following:

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

a) Legally compliant	No x	
b) Sound	No x	
	Tompkins	

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)

	JC 20100 11 11 15 3 At
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	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	

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.

Positively Prepared: No objective assessment has been cited or referenced for the development and infrastructure requirements of Travelling Showpeople in the plan area. The main modifications propose the removal of reference to the original evidence base (GTAA 2019 & 2021) which contradicts the proposed level of site allocation and no other objective assessment of the development requirements has been cited in advance of the allocation site selection (policy RSA25)

Justified: In the absence of any objectively assessed need for the development, it is impossible to evaluate whether the LPR is the most appropriate strategy, and no other reasonable alternatives for the site allocation have been discussed or proposed.

Effective: It has not been shown that DM20 (and associated site allocation RSA25) is deliverable as it is not clear what legal relationship the land owner has to 'the circus', or that 'the circus' agrees with the proposed allocation.

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

Paragraph 34 of the NPPF says:

'The preparation and review of all policies should be underpinned by relevant and upto-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.'

The main modification renders the LPR non compliant with the NPPF by omitting reference to the evidence base / any other evidence for policy DM20.

Paragraph 62 of the NPPF says:

'To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.'

It is further noted that the Planning Policy for Traveller Sites sets out how travellers' housing needs should be assessed.

By setting aside the accommodation assessments (GTAA's) in relation to the accommodation for Travelling Showpeople, and in maintaining reference to these

assessments for other groups, the accommodation / plot requirements in DM20 can not have been formulated in accordance with the NPPF.

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 nui	revelopment and intrastructure requirements of Traveiling Snowpeople in the Inah radm hain modifications propose the removal of reference to the original evidence hase (GTA
Paragrap number	 x zuz1) which contradicts the proposed level of site allocation and no other objective hisssessment of the development requirements has been cited in advance of the allocation (policy RSA25)
Commer	
	manment in the absence of any objectively assessed reservoir the development, it is mossible to evaluate whether the LPR is the most appropriate strategy, and no other easonable alternatives for the site allocation have been discussed or proposed.
	Effective: It has not been shown that DM20 (and associated site allocation RSA25) is beliverable as it is not clear what legal relationship the land owner has to 'the circus', or the circus' agrees with the proposed allocation.

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It is further noted that the Planning Policy for Traveller Sites sets out how travellers' housing needs should be assessed.

By setting aside the accommodation assessments (GTAA's) in relation to the accommodation for Travelling Showpeople, and in maintaining reference to these

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	secure as effective and fair examination, it is important that the Inspec
Paragraph of the number of the	articipants in the examination process are able to know who has made r ² R. The Council therefore cannot accept anonymous representations — pur name and contact details. Address details will not be made publicly a
	sta will be handled in line with the Council's Privacy Policy on the Develope with Council's privacy notices at http://priv.westberks.gov.uk/privacyn
pector, By submitting a ty for your comments.	The Council will also need to make sure that the names and full addressed presentations can be made available and taken into account by the lines presentation, you confirm that you agree to this and accept responsibilities. Planning inspectorate's privacy statement for local plan examinations to allow dovukfouldance local-plans-folians-privacy-statement.

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)

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.

Signatur e		Dat e	30.01-2025
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Your completed representations must be received by the Council by 11:59pm on Friday 31 January 2025.