

From: [REDACTED]
To: [PlanningPolicy](#)
Subject: West Berkshire Local Plan Review 2022-2039 (LPR) Consultation - strong objection
Date: 12 January 2025 16:56:06
Attachments: [Representation_Form.docx](#)

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

Hello

Please find the attached form and my grave concerns. I have actually emailed government regarding this whole process

Kind regards

Fiona



**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: planningpolicy@westberks.gov.uk
	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cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.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	Miss	
First Name*	Fiona	
Last Name*	Lawrie	
Job title <i>(where relevant)</i>		
Organisation <i>(where relevant)</i>	Admin Pincents Hill Against Development	
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):	Fiona Lawrie
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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	Proposed Main Modifications to the Submission version of the West Berkshire Local Plan Review 2022-2039 (LPR)
Modification/Change reference number (MM / PMC)	MM44 and MM45

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 **No**
- b) **Sound** Yes No **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.	No
Justified: the LPR should be the most appropriate strategy, when considered against the reasonable alternatives	No
Effective: the LPR should be deliverable	No
Consistent with national policy: the LPR should enable the delivery of sustainable development in accordance with the policies of the NPPF	No

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 documents clearly state that The soundness of the LPR should be assessed against the following criteria from paragraph 35 of the National Planning Policy Framework specifically "Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence" – During a public meeting 10th Sept 2024 organised by West Berkshire Council, it transpired that Pincent's Hill would not be their first choice but they "ran out of time" <https://bit.ly/4fToPI2>

At 7.39 minutes in " we tried to withdraw the plan as we were not happy with site allocation" WBC were told "absolutely not" and they would be "charged" – furthermore "we are stuck with this plan and the site allocations"

At 17.50 – you the government were blamed and a threat of a higher housing number communicated

Pincent's Hill has never been in the Local Plan and every planning application for development has not succeeded and has had an unprecedented level of opposition to development. You will see from the meeting (although all comments have been hidden that were raised including a vote of no confidence) that people who attended the meeting believed this was a consultation not a presentation of a done deal

Jeff Brooks joined and stated that the Local District plan is likely to be imposed on your District Council" He then stated "we don't believe it's a great plan" – timing 1.18.16 and then "we think the sites could be better", "the sites we do not believe are suitable" 1.19.08

How is this justified? The Council was asked to go back to the government and request additional time and everyone was told that could not happen due to potential penalties

The councils representatives were also asked for all the evidence which they used to put forward and decide on Pincent's Hill – they said they would get that across to me personally (I had a team on standby to assist with this) – nothing was ever received

I respectfully request that as this would not be the councils first choice and it is not what residents want (as demonstrated by the previous planning application objections) that this LPR has not been "Positively Prepared", nor is it "Justified" (as above) and it will not be "Effective" (have you seen how much money the proposed developers have on Companies House etc? I wouldn't be convinced they could deliver a basic House Extension) and if being "Consistent

with national policy” means not being a first choice but we ran out of time (which I am sure National Policy does not rely on this then it is in breach of that too).

During the meeting a vote of no confidence with the council was also brought up due to the above

Councillors need to adhere to their “Code of Conduct” – they have failed – please note a meeting held ONE DAY after our meeting <https://bit.ly/42c7ruK>

22/01295/FULD meeting ONE DAY after

Main issues – principle of development and impact on the area

Avoiding approval isolated dwellings – “harm to the character of the area” – “it would not be sensitive to the defining characteristics of the local area”

During the meeting it was revealed that the inspector stated that this proposal being similar to previous proposals almost identical in principal and design, planning case law has established a principal of consistency in decision taking – the decision taker ought to have, when considering a materially similar proposal to have regard to the principal of consistency regard to the principal of consistency – failure to have due regard to a material consideration is a ground to have a decision be made unsound

The statement made was there have been no changes to National and Planning policy (strategic gap was mentioned twice during this part of the meeting and it was their role to protect open countryside 1.43.16 into meeting), How is this different to Pincents Hill with numerous refused planning applications and with sound reasoning?

National Planning Policy Framework 2012 (NPPF) The NPPF sets out central government’s planning policies for England. The NPPF states in paragraph 113 that “Local planning authorities should set criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged. Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks.” Paragraph 118 states “When determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles: if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused”.

Alternative sites and options can be found – as expressed the leader of the council stated that Pincents Hill would not be their first choice – they simply ran out of time – this is not an acceptable reason and is unsound, not positively prepared, justified, effective or consistent with Local Planning Policy

I urge you to remove Pincents Hill from the plan and at least wait to see the impact on traffic of the care home modifications. Evidence and documentation were not received as promised, alternatives suggested were not considered – consultations suggested were declined (evidence in the meeting <https://bit.ly/4fToPI2>) and it is clearly stated in that meeting 31.58 there were no consultations (along with really strong agreement to this in the chat which has not been provided online)

At 34.19 – they are doing what they have been told by the inspector – they cannot challenge/amend/put forward new proposals and then it was the Secretary of State which “directed them (sic) to progress”

38.09 – Angela Raynor allegedly made threats to the council

At 50.56 – advised questions in the chat would be dealt with by email – I did not receive any email – again the Council failed to fulfil any promise

I hope I have demonstrated how unsound all of the above is and that this process can be done more effectively and the more suitable sites looked at as Jeff Brooks stated “we do not believe it is a great plan” please give us an opportunity to actually consult and the council to find more suitable proposals and create a “great plan”

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	As above – all unsound
Paragraph number	
Comments:	
As all the above states – even Jeff Brooks states “this is not a great plan” Allow us the time to get this right without destroying sites that would not be first choice	



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>.