

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** Representation Form - WBC Local Plan Main Modifications MM25 & MM26  
**Date:** 30 January 2025 23:26:00  
**Attachments:** [REDACTED]

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

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Dear Sir/Madam,

Please find attached my representation regarding the WBC Local Plan Main Modifications MM25 & MM26.

Kind regards,  
Damian Musker  
[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)

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

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.

<b><u>PART A: Your details</u></b>		
<i>Please note the following:</i>		
<ul style="list-style-type: none"> <li><i>We cannot register your representation without your details.</i></li> <li><i>Representations cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.</i></li> </ul>		
	1. Your details	2. Agent’s details (if applicable)
Title	Mr	
First Name*	Damian	
Last Name*	Musker	
Job title <i>(where relevant)</i>		
Organisation <i>(where relevant)</i>		
Address* <i>Please include postcode</i>	[Redacted]	
Email address*	[Redacted]	
Telephone number		
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):	Damian Musker
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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	<b>Schedule of Proposed Main Modifications (MM) - November 2024</b>
Modification/Change reference number (MM / PMC)	<b>MM25</b>

**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)

<b>Positively Prepared:</b> The LPR should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements.	<b>X</b>
<b>Justified:</b> the LPR should be the most appropriate strategy, when considered against the reasonable alternatives	<b>X</b>
<b>Effective:</b> the LPR should be deliverable	<b>X</b>
<b>Consistent with national policy:</b> the LPR should enable the delivery of sustainable development in accordance with the policies of the NPPF	<b>X</b>

**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 increase of the dwellings allocated for the site to 2,500
 
  - *There is no indication of how the increase will be accommodated but we are assuming that it will need to come closer to Upper Bucklebury.*
  - *Significant increase in highways impact when 1,500 was already found to be harmful**
- *Indication in allocation plan of access onto Harts Hill – meaning a potential rat run through UB for access to M4 J12,J13 and the Common.*
- *Significant ambiguity around delivery of community infrastructure in terms of education and health facilities. Potential for these to have to be provided off-site further increasing car journeys.*

**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	Appendix 5 p 62-66
Paragraph number	
Comments:	
<ul style="list-style-type: none"> <li>• Significant concern over potential harm to biodiversity resulting from development of the site. BPC proved that ecology surveys and evidence base were incorrect and outdated to support 1,500 dwellings. No updates have been undertaken to support an increase in dwellings or even for any development.</li> <li>• Significant impact on the setting of the National Landscape (AONB as was) as a result of increase in dwellings.</li> <li>• Lack of update to assessment of impacts in the Sustainability Appraisal as a result of the increase in dwellings.</li> </ul>	

## 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:	
<ul style="list-style-type: none"><li>• Significant concern over potential harm to biodiversity resulting from development of the site. BPC proved that ecology surveys and evidence base were incorrect and outdated to support 1,500 dwellings. No updates have been undertaken to support an increase in dwellings or even for any development.</li><li>• Significant impact on the setting of the National Landscape (AONB as was) as a result of increase in dwellings.</li><li>• Lack of update to assessment of impacts in the Sustainability Appraisal as a result of the increase in dwellings.</li></ul>	

## 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>The adoption of the Local Plan Review</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.

<b>Signature</b>	<b>D.Musker</b>	<b>Date</b>	<b>30/01/25</b>
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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>.