

From: [REDACTED]
To: [REDACTED]
Subject: Representations to the Local Plan Main Modifications / Policies Map Modifications
Date: 30 January 2025 12:37:11
Attachments: [REDACTED]

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

Dear Sir / Madam

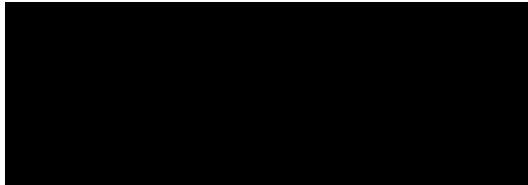
On behalf of our client, Pangbourne Beaver Investments Ltd., please find attached representations to the Main Modifications to the Local Plan and Policies Map.

I would be grateful if you could kindly confirm receipt.

Kind regards

Adam

Adam Ross



LONDON | BIRMINGHAM | BRISTOL | MANCHESTER | READING

nexusplanning.co.uk



IMPORTANT - this e-mail and the information that it contains may be confidential, legally privileged and protected by law. Access by the intended recipient only is authorised. Any liability (in negligence or otherwise) arising from any third party acting, or refraining from acting, on any information contained in this e-mail is hereby excluded. If you are not the intended recipient, please notify the sender immediately and do not disclose the contents to any other person, use it for any purpose, or store or copy the information in any medium. Copyright in this e-mail and attachments created by us belongs to Nexus Planning Limited: the author also asserts the right to be identified as such and object to any misuse. Should you communicate with anyone at Nexus Planning Limited by e-mail, you consent to us monitoring and reading any such correspondence. Nexus Planning Limited Tel. +44 (0) 20 8938 3177 E-Mail: info@nexusplanning.co.uk

Adam Ross
Executive Director



**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		Mr
First Name*		Adam
Last Name*		Ross
Job title <i>(where relevant)</i>		[REDACTED]
Organisation <i>(where relevant)</i>	Pangbourne Beaver Investments c/o Agent	Nexus Planning
Address* <i>Please include postcode</i>		Suite 2 Apex Plaza 3 Forbury Road Reading RG1 1AX
Email address*		[REDACTED]
Telephone number		[REDACTED]
Consultee ID <i>(if known)</i>		

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):	Nexus Planning / Pangbourne Beaver Investments Ltd
--	--

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 / Proposed Changes to Policies Map
Modification/Change reference number (MM / PMC)	MM3 (Policy SP1 - Spatial Strategy) & PMC3

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	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.

See attached pages / document.

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	
Paragraph number	
Comments:	

--

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)

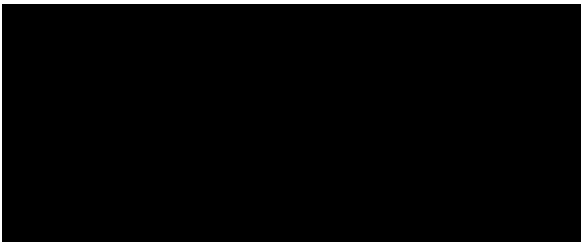
Page number	
Paragraph number	
Comments:	

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>	X
<i>The adoption of the Local Plan Review</i>	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.

Signature		Date	30th January 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>.

MM3 – Policy SP1 (Spatial Strategy)

Introduction

Policy SP1 establishes the overarching spatial strategy for West Berkshire and was discussed at length during the examination hearing sessions.

MM3 proposes to make some relatively limited amendments to the policy wording and, on the whole, we take no issue with these changes. Indeed, we support the Council's confirmation that the references in Policy SP1 to how the development of land within and outside the identified settlement boundaries will be treated in policy terms, will have regard to the amended settlement boundaries now proposed as a consequence of these Modifications. These Proposals Map Changes include, by way of example, a change to the settlement boundary at Pangbourne to reflect the allocation of Land North of Pangbourne Hill (MM57 and illustrated on the Proposed Changes to the Policies Map [PMC3]).

Whilst we agree with these changes in principle, and support the allocation of Land North of Pangbourne Hill, we consider that:

- the wording of Policy SP1 (as modified) relevant to density is contrary to the Council's own over-arching objective in this regard (although it is easily rectified); and
- the revised settlement boundaries as referenced in MM3, and specifically that proposed at Pangbourne to reflect the allocation of Land North of Pangbourne Hill as shown at PMC3), is not effective or justified and should be amended (albeit that this is again very easily rectified).

We expand upon these two issues below.

Density

MM3 proposed to amend the sixth paragraph of Policy SP1 to clarify further the general policy approach to residential density. This amended sixth paragraph starts by establishing that the Council's overarching objective in relation to density is to make '*optimum use of land*' and to achieve '*high quality design*'. We agree that these are important objectives.

In the context of this overarching objective in relation to density, Policy SP1 subsequently identifies minimum net residential densities within the settlements of Newbury, Thatcham, Purley on Thames and Calcot. It similarly identifies minimum net densities in the centres of Hungerford, Pangbourne and Theale. On the edge of settlements, Policy SP1 (as amended by MM3) states that densities should be 30 dwellings per hectare ("dph") outside the AONB / National Landscape, and 20 dph within it.

Given the specific overarching objective identified in Policy SP1 / MM3 i.e. to make optimum use of land and achieve high quality design, and to ensure internal consistency within the policy itself (noting that in all other cases the densities referenced are, rightly in our view, expressed as minima), we consider that the references to 30dph and 20dph on the edge of defined settlements, as referenced in the third bullet point of the policy, should (like the references in bullet points 1 and 2) be expressed as minimum net densities.

Amended Pangbourne Settlement Boundary

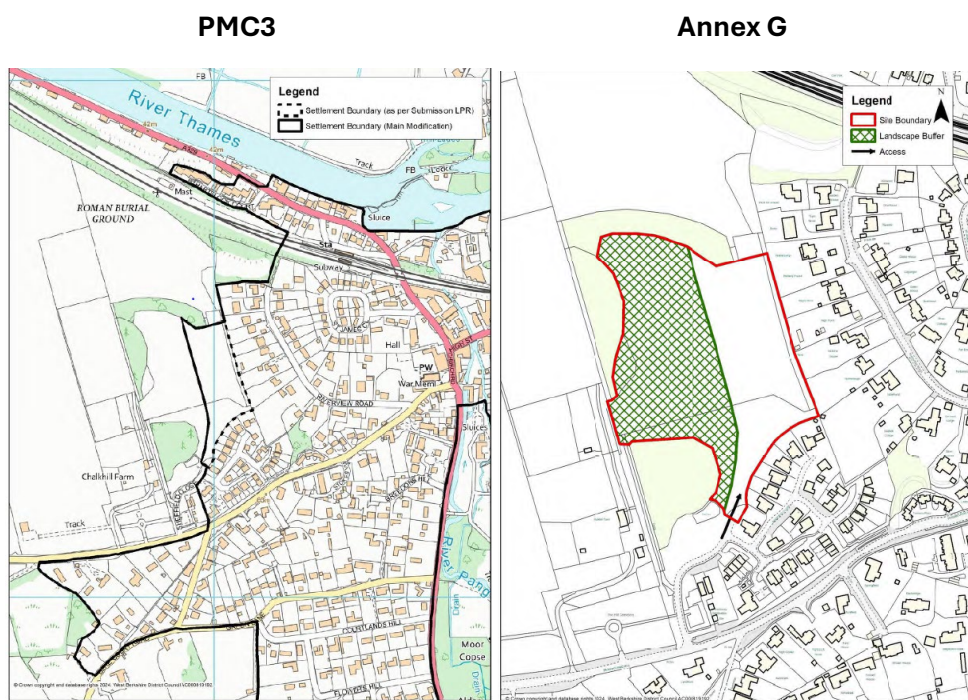
To reflect the proposed allocation of Land North of Pangbourne Hill for approximately 25 homes (MM57), the Council proposes to do two things: to identify that allocation on the Proposals Map (see PMC15), and to make a consequent change to the settlement boundary at Pangbourne (see PMC3).

We fully support the allocation of this site for development as set out in MM57 and PMC15.

We also support the consequential need to amend the settlement boundary at Pangbourne (noting that Policy SP1 confirms the fundamentally different policy basis upon which development within settlement boundaries should be assessed relative to that outside settlement boundaries).

However, the revised settlement boundary at Pangbourne (PM3) creates an unnecessary conflict with both the terms of the allocation of Land North of Pangbourne Hill (see MM57) and the site allocation as proposed to be identified (PMC3), and this could undermine the effectiveness of the site allocation policy. It should additionally be noted that an indicative plan showing the site allocation is proposed to be included within the Local Plan itself (Annex G of the Proposed Modifications document).

For ease of reference, and to identify our concern more clearly we set out below the Pangbourne settlement boundary as proposed to be amended (PMC3) and the indicative site allocation plan included at Annex G of the Modifications document. As can be seen, the indicative site allocation plan (Annex G) shows the boundary of the allocation in red, a significant landscape buffer hatched in green, and the indicative area for residential development as white land within the allocation. MM57 is clear that the site allocation map at Annex G is 'indicative' i.e. it (rightly and consistently with other proposed allocations) allows for a degree of flexibility at the planning application stage.



However, in defining the new settlement boundary at Pangbourne in PMC3, rather than following the 'Site Boundary' of the allocation as shown at Annex G, the Council instead proposes to follow the indicative eastern boundary for the landscape buffer.

Basing what would be a definitive settlement boundary for Pangbourne on an indicative boundary between a landscape buffer and residential development, creates an inherent and unnecessary potential conflict that undermines the effectiveness (and therefore soundness) of the allocation policy.

To illustrate the concern, an application proposal for 25 homes i.e. in accordance with the approximate quantum identified in MM57), and that met all of the other policy criteria, could, depending on the approach to design / housing mix / open space provision etc..., have a small element of that development (part of a house, part of road or driveway, or a play area, for example) that extends slightly further west than shown on the map at Annex G of the Modifications document. In doing so, however, it would still accord with Annex G given that this diagram is indicative.

However, if the settlement boundary is drawn as proposed in PMC3, such an approach would result in a small amount of that development being located outside the settlement boundary. Given the policy of development restraint outside of settlement boundaries, this policy conflict would then need to be wrestled with by Officers / Members at the development management stage.

This lack of clarity is, however, wholly avoidable with a very simple change to the Policies Map (PMC3). If the revised settlement boundary is drawn in a way that is consistent with the red line 'Site Boundary' as shown at Annex G (and on the plan at PMC15), clarity and consistency would be achieved whilst, importantly, not undermining the Council's clear intentions for the site, noting that the site allocation policy (MM57) is clear that:

- housing numbers must be limited to approximately 25 homes; and
- development must take place in a form that is consistent with the indicative plan at Annex G of the Modifications document i.e. with built development on the eastern lower parts of the site and a significant landscape buffer to the west. MM57 criterion f) is also clear that housing must be limited to the lower slopes on the eastern side of the site with a landscape buffer to the west.

This simply but important amendment would avoid an unnecessary complication / delay at the development management stage, thereby ensuring that the Plan is effective, whilst in no way 'watering down' the restrictive elements of the policy as set out in detail in MM57. Such a change is necessary to ensure compliance with paragraph 16d) of the Framework that requires that Local Plans should be "*...clearly written and unambiguous, so it is evident how a decision maker should react to development*".

Changes Proposed

Policy SP1 should be updated to:

- Amend the sixth bullet point of paragraph 6 (as modified by MM3) to state that:

“Developments on the edge of defined settlements are generally expected to secure a net density of **at least** 30 dwellings per hectare outside of the AONB, and **at least** 20 dwellings per hectare within the AONB.”

The Proposals Map (PMC3) should consequently be amended to:

- establish the revised settlement boundary for Pangbourne in a way that is consistent with the ‘Site Boundary’ for Land North of Pangbourne Hill as shown on the plan at Annex G of the Modifications document (and PMC15).



**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		Mr
First Name*		Adam
Last Name*		Ross
Job title <i>(where relevant)</i>		[Redacted]
Organisation <i>(where relevant)</i>	Pangbourne Beaver Investments c/o Agent	Nexus Planning
Address* <i>Please include postcode</i>		Suite 2 Apex Plaza 3 Forbury Road Reading RG1 1AX
Email address*		[Redacted]
Telephone number		[Redacted]
Consultee ID <i>(if known)</i>		

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):	Nexus Planning / Pangbourne Beaver Investments Ltd
--	--

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)	MM5 – Supporting Text to Policy SP2 (North Wessex Downs AONB)

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.	<input type="checkbox"/>
Justified: the LPR should be the most appropriate strategy, when considered against the reasonable alternatives	<input type="checkbox"/>
Effective: the LPR should be deliverable	<input type="checkbox"/>
Consistent with national policy: the LPR should enable the delivery of sustainable development in accordance with the policies of the NPPF	<input type="checkbox"/>

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 pages / document.

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	
Paragraph number	
Comments:	

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:	

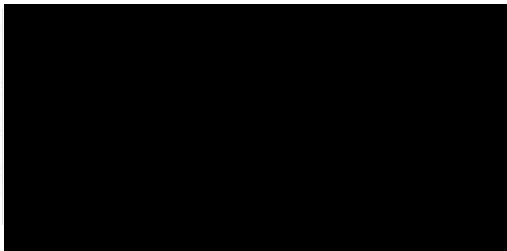
Notification of Progress of the Local Plan Review

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>	X
<i>The adoption of the Local Plan Review</i>	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.

Signature		Date	30th January 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>.

MM5 – Supporting Text to Policy SP2 (North Wessex Downs AONB)

We support the amendments in MM5 that, further to discussions during the examination hearing sessions, insert additional wording into the supporting text to Policy SP2 to make it clear that:

- the Local Plan Review process confirms that the Council has demonstrated that exceptional circumstances exist in the context of West Berkshire to justify the allocation of sites for housing within the AONB; and
- accordingly, proposals that meet the requirements of the relevant site allocation policies (and any other relevant policies) are deemed to accord with the development plan and national policy.

MM5 makes it clear, in a way that is consistent with national guidance (paragraph 16 (d) of the Framework 2024) that requires policies to be clearly written and unambiguous so it is evident how a decision maker should react to development proposals, that the necessary exceptional circumstances have been demonstrated as part of the Local Plan Review process to justify the allocation of sites in the AONB area for housing and, accordingly, that this is not a test that needs to be applied again at the development management stage.



**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		Mr
First Name*		Adam
Last Name*		Ross
Job title <i>(where relevant)</i>		[REDACTED]
Organisation <i>(where relevant)</i>	Pangbourne Beaver Investments c/o Agent	Nexus Planning
Address* <i>Please include postcode</i>		Suite 2 Apex Plaza 3 Forbury Road Reading RG1 1AX
Email address*		[REDACTED]
Telephone number		[REDACTED]
Consultee ID <i>(if known)</i>		

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):	Nexus Planning / Pangbourne Beaver Investments Ltd
--	--

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)	MM18 – Policy SP12 (Approach to Housing Delivery)

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	

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 pages / document.

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	
Paragraph number	
Comments:	

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>	X
<i>The adoption of the Local Plan Review</i>	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.

Signature		Date	30th January 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>.

MM18 – Policy SP12 (Approach to Housing Delivery)

Having regard to the requirements of national policy and the subsequent discussions at the examination hearing sessions, we support the changes to Policy SP12 that propose to revise the minimum level of housing to be provided in the Local Plan Review, and extend the Plan period.

As confirmed in MM18, meeting this amended housing requirement requires and relies upon housing delivery from a variety of sources including, most fundamentally, those sites allocated in the Local Plan Review (as modified) which boost supply both in the Plan period as a whole but also, importantly, in the first 5 years after the adoption of the Plan.



**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		Mr
First Name*		Adam
Last Name*		Ross
Job title <i>(where relevant)</i>		[Redacted]
Organisation <i>(where relevant)</i>	Pangbourne Beaver Investments c/o Agent	Nexus Planning
Address* <i>Please include postcode</i>		Suite 2 Apex Plaza 3 Forbury Road Reading RG1 1AX
Email address*		[Redacted]
Telephone number		[Redacted]
Consultee ID <i>(if known)</i>		

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):	Nexus Planning / Pangbourne Beaver Investments Ltd
--	---

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)	MM54 – new paragraph and table inserted before Policy RSA14 (Land North of Pangbourne Hill)

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	

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 pages / document.

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	
Paragraph number	
Comments:	

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:	

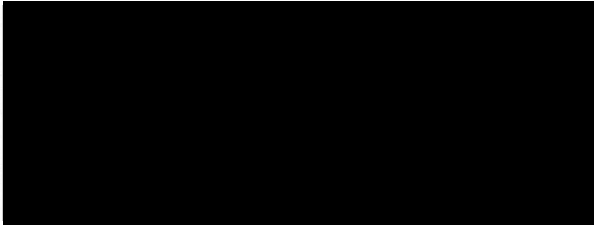
Notification of Progress of the Local Plan Review

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>	X
<i>The adoption of the Local Plan Review</i>	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.

Signature		Date	30th January 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>.

MM54 – new paragraph and table inserted before Policy RSA14 (Land North of Pangbourne Hill)

We support MM54 which identifies clearly the eleven sites within the North Wessex Downs National Landscape (AONB) that are allocated for housing in the Local Plan Review (as modified), noting that the Council has already confirmed that the exceptional circumstances to justify these allocations have already been demonstrated as part of the Local Plan Review process.



**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		Mr
First Name*		Adam
Last Name*		Ross
Job title <i>(where relevant)</i>		[REDACTED]
Organisation <i>(where relevant)</i>	Pangbourne Beaver Investments c/o Agent	Nexus Planning
Address* <i>Please include postcode</i>		Suite 2 Apex Plaza 3 Forbury Road Reading RG1 1AX
Email address*		[REDACTED]
Telephone number		[REDACTED]
Consultee ID <i>(if known)</i>		

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):	Nexus Planning / Pangbourne Beaver Investments Ltd
--	---

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 – New RSA Policy (Land North of Pangbourne Hill)

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	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.

See attached pages / document.

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	Pages 21/22
Paragraph number	
Comments:	
<p>The updated Sustainability Appraisal / Strategic Environmental Assessment Non-Technical Summary (pages 21/22), that accompanies and informs this Main Modifications consultation, confirms that the development of Land North of Pangbourne Hill would have:</p> <ul style="list-style-type: none"> • positive impacts on social sustainability; • positive impacts on environmental sustainability; and • positive economic sustainability benefits from new development in a sustainable location with good access to services and facilities. <p>Overall, the SA / SEA confirms that there would not be any negative sustainability impacts associated with the allocation of this site.</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>	X
<i>The adoption of the Local Plan Review</i>	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.

Signature		Date	30thJanuary 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>.

MM57 – New RSA Policy (Land North of Pangbourne Hill)

We support the proposed allocation of Land North of Pangbourne Hill for the development of approximately 25 homes, as proposed in MM57 and shown on the indicative map at Annex G of the Modifications document.

The Council's evidence base confirms that Pangbourne is a highly sustainable location for development and, based on evidence presented in representations / examination statements, accepted that Land North of Pangbourne Hill specifically was suitable for housing and indeed that the Council would have allocated the site in the submitted Plan had it understood then what it subsequently came to accept during the examination hearings.

The updated Sustainability Appraisal / Strategic Environmental Assessment Non-Technical Summary (pages 21/22) that accompanies and informs this Main Modifications consultation, confirms that the development of Land North of Pangbourne Hill would have:

- positive impacts on social sustainability;
- positive impacts on environmental sustainability; and
- positive economic sustainability benefits from new development in a sustainable location with good access to services and facilities.

Overall, the SA / SEA confirms that there would not be any negative sustainability impacts associated with the allocation of this site.

We additionally note that the Council's updated Habitats Regulations Assessment November 2024 ("HRA") confirms at paragraph 2.10 that the limited scale of the proposed allocation at Land North of Pangbourne Hill means that any potential significant impacts are likely to be negligible and that its allocation does not, therefore, affect the conclusions of the 2022 HRA that addresses issues relating to wastewater affecting water quality in the SAC's, recreation access and disturbance, or air pollution (the main considerations for the HRA).

Accordingly, and given that the merits of this site are now clearly established in the Council's evidence base, as well as in the representations and examination statements we submitted on behalf of the landowner (and discussed at the relevant examination hearing sessions), it is evident that the allocation of Land North of Pangbourne Hill is both a necessary and appropriate part of a sound housing strategy for the Local Plan area generally, and the North Wessex Downs AONB are specifically.

Criterion f ii) - Landscape

We support the allocation of this site, and take no issue with the significant majority of the proposed policy wording / requirements, including the requirement for proposals to be informed by a full Landscape and Visual Impact Assessment, to ensure that built development is limited to the lower slopes on the eastern side of the site, and to ensure the provision of a landscape buffer to the west on the more elevated slopes.

We do, however, object to the final sentence of criterion f ii) relevant to landscape matters, which states that the part of the allocated site that is required to be retained as a landscape buffer "*..will remain outside the settlement boundary*". As set out in our representations to MM3, we consider that this approach is neither effective nor justified (albeit that it is very easily rectified).

Proposed Change

Delete the final sentence of criterion fii) for the reasons elaborated upon in our representations to MM3.



**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		Mr
First Name*		Adam
Last Name*		Ross
Job title <i>(where relevant)</i>		[REDACTED]
Organisation <i>(where relevant)</i>	Pangbourne Beaver Investments c/o Agent	Nexus Planning
Address* <i>Please include postcode</i>		Suite 2 Apex Plaza 3 Forbury Road Reading RG1 1AX
Email address*		[REDACTED]
Telephone number		[REDACTED]
Consultee ID <i>(if known)</i>		

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):	Nexus Planning / Pangbourne Beaver Investments Ltd
--	---

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)	MM111 - Annex N (Housing Trajectory)

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	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.

See attached pages / document.

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	
Paragraph number	
Comments:	

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:	

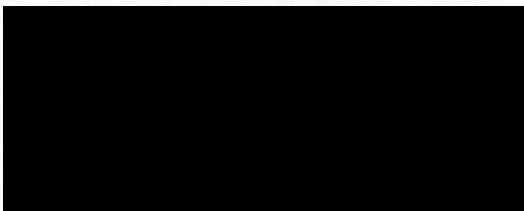
Notification of Progress of the Local Plan Review

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>	X
<i>The adoption of the Local Plan Review</i>	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.

Signature		Date	30th January 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>.

MM111 - Annex N (Housing Trajectory)

As referenced in MM111, we welcome the inclusion of a more detailed housing trajectory within the Local Plan Review as set out on pages 162 to 164 of the Main Modifications document (Annex N). This revised / updated trajectory now includes the allocated site at Land North of Pangbourne Hill, and identifies the delivery of 12 homes in 2028/29 and 13 homes in 2029/30 i.e. a total of 25 homes by 2029/30.

As set out in the deliverability statement submitted to the Council during the examination hearings, and submitted again in December 2024 in response to a separate request from the Council relevant to its annual five year land supply update, the landowner's intention for this site is to submit a planning application in 2025. As such, first completions would realistically take place a year earlier than shown in the trajectory i.e. 12 homes delivered in 2027/28 and 13 homes in 2028/29.

Whilst, in either scenario, the development of Land North of Pangbourne Hill can be completed in the 5-year period post adoption of the Local Plan Review and, therefore, contribute towards short term supply in the district, the accurate, up to date and unchallenged information provided to the Council is that this site can deliver housing a year earlier than shown, and this should be reflected in this trajectory.

Proposed Changes

Amend the housing trajectory to identify that Land North of Pangbourne Hill can realistically deliver 12 homes in 2027/28 and 13 homes in 2028/29.