

From: [REDACTED]
To: [REDACTED]
Subject: Local Plan Review Consultation
Date: 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)
	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.

PART A: Your details		
Please note the following: <ul style="list-style-type: none"> We cannot register your representation without your details. Representations cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published. 		
	1. Your details	2. Agent's details (if applicable)
Title	Mr.	
First Name*	David	
Last Name*	Tompkins	
Job title (where relevant)		
Organisation (where relevant)		
Address* Please include postcode	[Redacted]	
Email address*	[Redacted]	
Telephone number		
Consultee ID (if known)		

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):	Mr. David Tompkins
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Proposed Main Modifications and Proposed Changes to the Policies Map

1. Please indicate whether your representation relates to the Schedule of Proposed Main Modifications or the Schedule of Proposed Changes to the Policies Map and provide the modification/change number you are commenting on below:

Document name	Schedule of Proposed Main Modifications
Modification/Change reference number (MM / PMC)	MM88

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** No
- b) **Sound** 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 checked="" type="checkbox"/>
Justified: the LPR should be the most appropriate strategy, when considered against the reasonable alternatives	<input checked="" type="checkbox"/>
Effective: the LPR should be deliverable	<input checked="" type="checkbox"/>
Consistent with national policy: the LPR should enable the delivery of sustainable development in accordance with the policies of the NPPF	<input checked="" 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.

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 number	
Paragraph number	
<p>Comments:</p>	

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 (GTAAs) in relation to the accommodation for Travelling Showpeople, and in maintaining reference to these

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

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

Paragraph 34 of the NPPF says:

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	[REDACTED]	Date	30.01.2025
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Your completed representations must be received by the Council by 11:59pm on Friday 31 January 2025.