

From: [REDACTED]
To: [PlanningPolicy](#)
Subject: West Berkshire Local Plan Review - comments
Date: 16 January 2025 16:36:47
Attachments: [image003f41.png](#)
[20250116 Representation Form VP24527 AP f.pdf](#)

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FAO Planning Policy Team

Good afternoon,

I hope this finds you well.

I'm contacting you to make a comment/representation on the Schedule of Proposed Changes to the Local Plan Review 2022-2039 Policies Map.

Attached is a completed representation form, submitted by Viable Placemaking on behalf of Young Estates and Land Ltd.

I trust the attached is clear but if you need anything else on this matter please don't hesitate to contact me.

Kind regards,

Adam Place MRTPI MIED FRSA
Director
Viable Placemaking



RTPI
Chartered Town Planner



RICS[®]

e: [REDACTED]

m: [REDACTED]



Viable Placemaking is the trading name of Viable Placemaking Ltd | Registered in England and Wales company No. 14610245 | Registered Office: 16 Queen Street, Worcester, England, WR1 2PL. London Office: International House, 6 South Molton Street, London, W1K 5QF.

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**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"> 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cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published. 		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	Mr
First Name*	Tim	Adam
Last Name*	Young	Place
Job title <i>(where relevant)</i>		
Organisation <i>(where relevant)</i>	Young Estates & Land Ltd	Viable Placemaking
Address* <i>Please include postcode</i>	Youngs Industrial Estate, Paices Hill, Aldermaston, Berkshire, RG7 4PQ	16 Queen Street, Worcester, WR1 2PL
Email address*	[REDACTED]	[REDACTED].co.uk
Telephone number	[REDACTED]	[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):	Adam Place – Viable Placemaking (on behalf of Tim Young – Young Estates and Land Ltd)
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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 Changes to the Policies Map
Modification/Change reference number (MM / PMC)	PMC8

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	X
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.

The National Planning Policy Framework (NPPF) explains that, in examining local plans, plans are ‘sound’ if they are positively prepared, justified, effective, and consistent with national policy. Young Estates and Land Ltd consider that, although the proposed main modifications and proposed changes to the policies map are legally compliant, they are not sound, since it is not ‘justified’.

While we acknowledge that the December 2024 update to the NPPF raised additional factors regarding local plans, the primary factors prevalent with the West Berkshire Local Plan Review 2022-2039 (LPR) which may cause issue in this context relate to housing needs, supply and delivery. Viable Placemaking acknowledge the transitional arrangements for local plans which are set out at Annex 1 of the December 2024 NPPF update shall be reviewed in detail within the examination of the LPR. Notwithstanding, given this representation pertains to an economic/employment allocation, this representation shall not investigate the implications of the NPPF update further.

This representation relates to the proposed changes to the Policies Map – change reference PMC8. PMC8 relates to Policy SP20 and AP65.

As part of the Examination of the LPR, the Planning Inspectorate published IN27: Action Points from week four hearing sessions. AP65 pertained to designated employment areas, stating: “Council to change the extent of Young’s Industrial Estate Designated Employment Area on the Policies Map to ensure it is justified and effective with regard to development within the DEPZ” (Detailed Emergency Planning Zone).

Main Modification reference MM30 also relates to Policy SP20. Viable Placemaking have reviewed the proposed changes to this policy and reasons set out within the Schedule of Proposed Main Modifications to the West Berkshire Local Plan Review 2022-2039 (November 2024) and consider that these changes are legally compliant and sound.

As part of the tests of soundness, the NPPF indicates a plan is ‘justified’ if it is “an appropriate strategy, **taking into account the reasonable alternatives**, and based on proportionate evidence” (our emphasis).

Viable Placemaking have reviewed the updated policies map which reflects the changes of PMC8 and consider that this is not appropriate and has **not** taken into account the reasonable alternatives, namely maintaining the boundary as it was originally proposed.

The Council have removed areas which are already in current employment use from the Youngs Industrial Estate, which plays an integral role in the West Berkshire rural economy, as already confirmed within the West Berkshire District Council Employment Land Review (August 2020) – which is cited as a key piece of evidence within the LPR (paragraph 4.5).

The Council have already approved large employment developments within the wider site and beyond the northern edge of the previous boundary and it would be remised to exclude this from the protected employment area.

The Local Planning Authority already have the ability to control development in the DEPZ through proposed Policy SP4 within the LPR. The Council will have the ability to control and require justification for prospective developments in the DEPZ through the application of this policy in decision making. Therefore, it is not necessary for this control to be repeated elsewhere within the LPR unnecessarily.

Youngs Industrial Estate has remained an integral component of the West Berkshire rural economy and has had no voids for over 3 years. Throughout this 0% vacancy period, the Estate has had continuous interest from existing tenants seeking to expand their business and from new enquiries looking for premises. Accordingly, ensuring the area is maintained in employment/economic use would be a more justified alternative for the LPR policy map boundaries.

One final concern relating to the removal of this land from the allocated employment land within the policies map is prospective development in other uses. The area of land included within the original boundary for the Industrial Estate is already brownfield land which we understand is predominantly in existing employment uses. Therefore, including the original boundary, as opposed to the amended version proposed in PMC8, would allow the LPA to maintain this employment use throughout the plan period.

Viable Placemaking consider that, the original boundary, is a reasonable alternative and, for the Council to ensure the plan is fully justified, this should be included within the final LPR version for examination.

We trust the above is clear but if you require any further information on this representation please don't hesitate to contact Viable Placemaking who would welcome the opportunity to support the Council in their ambitions of preparing a fully justified local 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	
Paragraph number	
Comments:	
N/A	

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:	
N/A	

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	A. Place	Date	16.1.2025
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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>.