

**From:** [Redacted]  
**To:** [Redacted]  
**Cc:** [Redacted]  
**Subject:** Consultation on the proposed modifications to the West Berkshire Local Plan Review 2022-2039  
**Date:** 30 January 2025 17:27:47  
**Attachments:** [Redacted]

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

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Good Afternoon

Please find attached representations to the Proposed Modifications consultation to the West Berkshire Local Plan Review on behalf of Gleesson Land.

I trust you will be able to confirm safe receipt of this submission

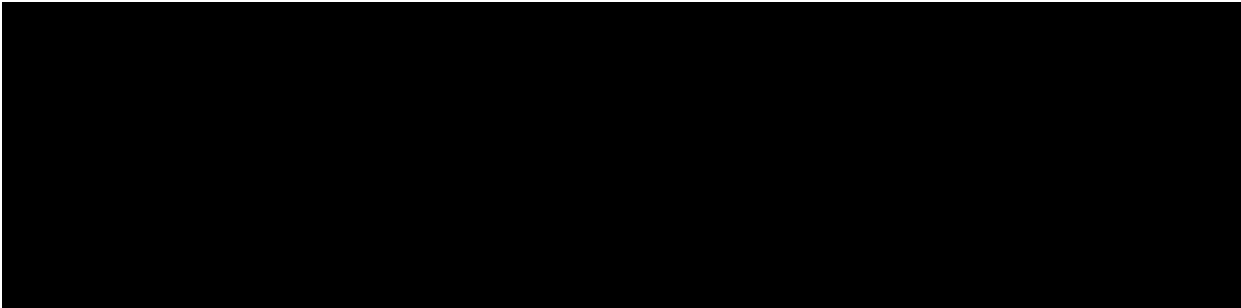
Kind regards

**Robert Phillips**  
Planning Director

Gleeson Land



**gleeson** 





**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cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.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*	Harry	
Last Name*	Plotnek	
Job title <i>(where relevant)</i>	[Redacted]	
Organisation <i>(where relevant)</i>	Gleeson Land	
Address* <i>Please include postcode</i>	Sentinel House Harvest Crescent Fleet Hampshire GU51 2UZ	
Email address*	[Redacted]	
Telephone number	[Redacted]	
Consultee ID <i>(if known)</i>	N/A	

\*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):	Gleeson Land
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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</b>
Modification/Change reference number (MM / PMC)	<b>MM18 and MM19</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>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	

**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.*

*Please refer to supporting representations.*

**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.

<b>Signature</b>	<b>H Plotnek</b>	<b>Date</b>	<b>17/01/2025</b>
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**Your completed representations must be received by the Council by 11:59pm on Friday 31 January 2025.**

# Examination of West Berkshire Local Plan 2022-2039

Representations to Main Modifications

January 2025

**gleeson**land

## Introduction

This statement responds to the consultation on the Proposed Main Modifications to the submitted West Berkshire Local Plan Review, and specifically to Main Modifications MM18 (Policy SP12 Approach to Housing Delivery) and MM19 (Supporting Text to Policy SP12).

It follows Gleeson Land's previous matter statements submitted in February 2024 under reference WS1/7, WS/8, WS3/11, WS7/4 and WS8/4, and matter statements to the further hearings in September 2024.

Gleeson Land has an interest at Land adjoining Man's Hill, Burghfield Common (HELAA 2023 Ref: BUR9) and is actively promoting the land for housing through the Local Plan Review.

## MM18: Policy SP12 Approach to Housing Delivery

Main Modification MM18 proposes an extension of the plan period from 2039 to 2041 and, as a result of this extension, the overall housing requirement is proposed to be increased from 8,721 units to 9,270 units over the plan period.

With reference to the Housing Trajectory 2023/24–2040/41, there is not a reasonable prospect that 9,493 dwellings will be built within the plan period between 2023 and 2041.

This is largely in part due to the over-reliance on only two retained allocations and one proposed new allocation, along with a broad location of growth at Newbury, which is only identified to deliver towards the end of the period, all of which amounts to over 38% of the total supply. This over-reliance is particularly acute from Year 8 (2033/34) onwards where not a single other source of supply is identified to contribute towards delivery.

The risk therefore remains that should any of these sites under-deliver or stall throughout the course of delivery, then meeting the housing requirement would be at risk.

Moreover, the identified supply incorporates a buffer of only 223 units (2.4%) to the housing requirement which is comparatively poor and represents only 0.43 years-worth of supply. Therefore the risk of a deficient five-year housing land supply beyond Year 5 remains significant. The inclusion of a substantial buffer or "headroom" within the supply trajectory represents good practice, therefore the reduction of this buffer throughout the course of the examination now presents significant risk to housing delivery across the plan period. Consequently, additional sites should be allocated for housing to address an increased supply buffer.

Whilst it is positive to have several large-scale strategic allocations contributing to the supply over the plan period, the NPPF remains clear that:

- *"...it is important that a sufficient amount and variety of land can come forward where it is needed..."* (paragraph 60)
- *"Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly."* (paragraph 70)

It is therefore critical to have a variety of sites to absorb any fluctuations to under-delivery and ultimately to address the possible under-delivery of these large-scale allocations.

Additionally, under the new 2024 NPPF the local housing need increases from 495 to 1,070 dpa, therefore the draft housing requirement (515 dpa) meets only 48% of the new local housing need. Whilst the new NPPF permits the examination to proceed under the previous NPPF, paragraph 236 (2024 NPPF) confirms:

*"...the local planning authority will be expected to begin work on a new plan, under the revised plan-making system provided for under the Levelling Up and Regeneration Act 2023 (as soon as the relevant provisions are brought into force in 2025), in order to address the shortfall in housing need."*

Consequently, it would be prudent for the Council to build-in additional delivery now to avoid a step change scenario in future at the point of the next local plan review.

In light of the above, there is clearly not a realistic prospect that 9,270 dwellings will be delivered between 2023 and 2041 as some of the identified supply will slip beyond 2031. The Council will therefore need to identify additional land to bolster the five-year supply and should therefore allocate the Land adjoining Man's Hill, Burghfield Common (HELAA 2023 Ref: BUR9) for housing.

This site, adjacent to the settlement boundary, represents a logical extension to Burghfield Common, recognised as a sustainable settlement defined as a rural service centre, and could deliver up to 300 homes including a policy compliant affordable provision. By supporting the growth of rural service centres such as Burghfield Common, it would provide the council with a greater choice of sites in terms of their future housing delivery, which must be a more sustainable approach than an over reliance on larger strategic allocations which typically are difficult to bring forward and are very unlikely to deliver housing in the first 5 years of the Plan period.

The allocation of this site for up to 300 homes would support the status of Burghfield Common as a rural service centre, bringing in new homeowners to utilise and sustain the existing shops and services and community facilities such as local schools. This would help support these important local facilities and businesses and in turn the local economy.

Gleeson Land is a well resourced and experienced land promoter with a proven track record of housing delivery over the last 20 years. As such in our experience we would be confident that the allocation of this site would deliver housing within the first 5 years of the Plan

## MM19: Supporting Text to Policy SP12

Main Modification MM19 proposes changes to the windfall allowance and five year housing land supply position.

With reference to the Housing Trajectory 2023/24–2040/41, there is not a realistic prospect that 3,195 dwellings will be delivered in the first five years of the plan between 2026 and 2031 as some of the identified supply will likely slip beyond 2031.

Other than for Site SP17 North East Thatcham, all of the fifteen Proposed New Allocations are forecast to deliver by Year 3 (2028/29) which appears arbitrary and, for some of the allocations, somewhat unrealistic.

This would assume the concurrence of several lead-in factors such as the planning applications being submitted, assessed and determined at similar times, and for the sites to begin delivering at similar times. Clearly this would be highly improbable and therefore the trajectory would appear inaccurate.

To enable first completions by 2028/29, this would require the planning approval, mobilisation and build periods all to occur within four years. Lichfields' *Start to Finish 3* suggests a total lead-in time for validation to first dwelling completion of 3.8 years for site sizes of 50-99 units and 6 years for 100-499 units.

Consequently, a four-year period for the smaller sites would appear realistic, though even then any slippage to these timescales – arising from, for example, the potential need for an appeal, land sale complications, or



construction delays – could significantly affect delivery within the five-years.

Notwithstanding, for the larger sites above 100 units this appears unrealistic and therefore it is likely that some completions will fall beyond the five year period ending in March 2031.

Moreover, Table 3 confirms the five year housing land supply position amounts to 5.7 years. It should be noted that the draft housing requirement (515 dpa) meets only 48% of the new local housing need (1,070 dpa) and therefore from July 2026 a 6-year housing land supply would need to be demonstrated as per new NPPF para 78c. Whilst 5.7 years would therefore comply with the requirements of the previous NPPF, it would be prudent for the Council to build-in additional delivery now to avoid a supply deficit from July 2026.

Furthermore, the trajectory comprises a windfall allowance of 140 dwellings per annum from Year 1 (2026/27). This approach is considered poor practice as most of the sites that come forward in Years 1-3 will likely have permission and therefore already be captured in the trajectory as commitments. Many authorities only apply a windfall allowance from Year 4 onwards, which is considered best practice – this is the case for [Hart](#), [Horsham](#), [East Hampshire](#), and [Welwyn Hatfield](#) to name a few examples.

Indeed, the Council's Housing Land Supply at February 2024 (Doc Ref: EXAM 12) confirms:

*"To ensure against potential double counting with sites that have been granted planning permission, these current permission are deducted from the total allowance for the five year period and the resultant allowance for windfalls applied only in the later years of the five year period."* (3.21)

It is therefore unclear as to why the allowance has been applied for the full five-year period. To avoid double counting, an allowance should not be included in Years 1-3 at the minimum.

In light of the above, there is clearly not a realistic prospect that 3,195 dwellings will be delivered between 2026 and 2031 as some of the identified supply will slip beyond 2031. The Council will therefore need to identify additional land to bolster the five-year supply and should therefore allocate the Land adjoining Man's Hill, Burghfield Common (HELAA 2023 Ref: BUR9) for housing.