

From: [REDACTED]
To: [REDACTED]
Subject: LPR resonse
Date: 27 January 2025 14:30:35
Attachments: [REDACTED]

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

Please find attach my responses to the revised Plan.

Ian Watson

[REDACTED]



**West Berkshire Local Plan Review 2022-2039 (LPR)
 Consultation on Proposed Main Modifications
 (6 December 2024 – 31 January 2025)**

Representation Form

Ref:
 (For official use only)

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cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.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*	Ian	
Last Name*	Watson	
Job title <i>(where relevant)</i>	n/a	
Organisation <i>(where relevant)</i>	n/a	
Address* <i>Please include postcode</i>	[Redacted]	
Email address*	[Redacted]	
Telephone number	[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):	Ian Watson
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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	
Modification/Change reference number (MM / PMC)	

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	x

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.

EA CAMS 2019 indicates no additional water is available for abstraction for most of the time, except limited abstraction when there are high flow rates. This is not reflected in the West Berks Local Plan Review or the Schedule of Proposed Main Modifications. The plan states *All developments should implement the highest standards of water efficiency and infrastructure in order to place no additional pressure on water scarcity and quality in the river basin catchments of the Kennet and its tributaries and of the Thames and Chilterns South* but does not say how this can be enforced nor who will be responsible for enforcement. DM7 provides for the efficient use of water resources and requires that new developments not exceed water use of 110 l per person per day. If developers fail to meet this standard are there any sanctions which can be applied? What is being done to ensure that Thames Water is able to undertake the necessary investments to be able to supply additional water to the new developments and treat their sewage to an acceptable standard?

New developments potentially raise the risk of higher flood risk, both to the new and to existing properties. It is stated that *In 2018 the Environment Agency identified Newbury and Thatcham as a nationally significant Flood Risk Area. In line with the recommendations of the Cumulative Impacts Assessment (CIA), a Surface Water Drainage Strategy will be required for all developments in Newbury and Thatcham regardless of their size.* How will this be enforced and will the lead be taken by WBC of the EA?

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	46-47
Paragraph number	5.67
Comments:	
<p>SP11 refers. While the importance of the Kennet SSSI is noted on the Local Plan Review and the Schedule of Proposed Main Modifications there is little mention of the compulsory measures required to maintain the SSSI status through protection from pollution, increased nutrient inputs or the impact of construction work. The Plan notes that the 2 Kennet SACs will need protection but the measures indicated are more aspirational than required. This needs strengthening to ensure that developments do not adversely affect the SACs. The site at Lower Way Thatcham requires an Ecological Impact Assessment to be conducted but the Plan does not say who is responsible for carrying this out, nor does it say what powers West Berks council could use to enforce any findings from the EIA and ensure that there is no adverse impact on the Kennet SSSI.</p> <p>DM6 identifies key measures for ecological status under current legislation. Given that other agencies (EA, NE) are responsible for monitoring and driving this legislation the Plan should describe how coordination with external agencies will be carried out.</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:	

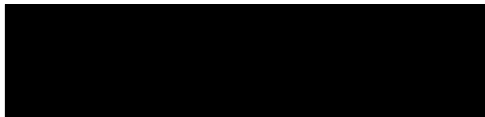
Notification of Progress of the Local Plan Review

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>	<input checked="" type="checkbox"/>
<i>The adoption of the Local Plan Review</i>	<input checked="" type="checkbox"/>

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	27/01/24
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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>.