

From: [REDACTED]
To: [REDACTED]
Subject: Objection to West Berkshire Local Plan Review 2022-2039 (LPR) Consultation on Proposed Main Modifications (6 December 2024 – 31 January 2025)
Date: 31 January 2025 11:10:58
Attachments: [REDACTED]

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

Dear Sir/Madam,

I am writing to formally object to the Proposed Main Modifications (PMMs) to the West Berkshire Local Plan Review 2022-2039 and to express my strong support for the detailed response provided by Cold Ash Parish Council (CAPC) in their submission.

The modifications proposed by the Council undermine the integrity of the original Local Plan and fail to align with sustainable development principles, local community needs, and national planning policy. The CAPC document highlights a number of significant concerns that I fully endorse, including:

1. Failure to Prioritise Sustainability and Infrastructure Readiness

The PMMs disproportionately shift development towards areas where infrastructure—such as roads, public transport, healthcare, and schools—is already under significant strain. There is insufficient evidence that essential infrastructure improvements will precede or even accompany the proposed growth. This contradicts the National Planning Policy Framework's (NPPF) emphasis on sustainable development, which requires infrastructure to be considered alongside housing expansion.

2. Overreliance on Greenfield Development, Contradicting Environmental and Climate Goals

The proposed modifications weaken the protection of greenfield sites, leading to an excessive reliance on such areas for housing. This contradicts both West Berkshire's own climate commitments and national objectives for biodiversity, carbon reduction, and sustainable land use. The original Local Plan provided a more balanced approach, whereas the modifications appear to disregard environmental considerations in favour of short-term housing targets.

3. Ignoring Local Consultation and Community-Led Planning

The modifications undermine the democratic process by disregarding the feedback and concerns of local communities, including those in Cold Ash and surrounding areas. Neighbourhood Plans, which represent a legally recognised tier of planning, are devalued by these changes, diminishing local decision-making and public trust in the planning system.

4. Flawed Housing Allocation Strategy and Questionable Evidence Base

The methodology used to justify the revised housing allocations lacks transparency and appears to be driven more by arbitrary targets than by genuine housing needs and land suitability. The CAPC response provides a compelling critique of the data and assumptions underpinning the PMMs, which should be addressed before any further modifications are considered.

5. Unbalanced Development Distribution

The modifications place disproportionate pressure on certain settlements while failing to explore alternative strategies, such as maximising brownfield regeneration in more sustainable locations. The original Plan had a more considered spatial distribution strategy, which has been significantly weakened by the proposed changes.

Conclusion

For the reasons outlined above—and as thoroughly detailed in the Cold Ash Parish Council response—I urge the Council to reconsider these modifications. The original Local Plan was the product of extensive

consultation and careful planning; these changes erode its integrity and fail to deliver sustainable, community-led development.

I strongly encourage the Council to reject the PMMs and instead work collaboratively with local communities to ensure that West Berkshire's development is truly sustainable, well-supported by infrastructure, and aligned with the long-term needs of both residents and the environment.

Many Thanks
Jonathan Hendry



**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		
First Name*	Jonathan	
Last Name*	Hendry	
Job title <i>(where relevant)</i>		
Organisation <i>(where relevant)</i>		
Address* <i>Please include postcode</i>	[REDACTED]	
Email address*	[REDACTED]	
Telephone number		
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):	Jonathan Hendry
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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	Proposed Main Modifications to the West Berkshire Local Plan Review 2022-2039
Modification/Change reference number (MM / PMC)	- MM03 (SP1) – Spatial Strategy - MM04 (SP2) – Settlement Hierarchy - MM06 (SP4) – Housing Distribution - MM07 (SP5) – Housing in the Countryside - MM11 (SP7) – Climate Change

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.	X
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	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.

I strongly object to the Proposed Main Modifications (PMMs), as they undermine the integrity of the original Local Plan and fail to align with principles of sustainability, infrastructure planning, environmental protection, and community-led decision-making. Specifically:

1. Failure to Prioritise Sustainability and Infrastructure Readiness

- The modifications shift development to areas where infrastructure (roads, public transport, healthcare, and schools) is already under strain, without a clear strategy for necessary improvements.

2. Overreliance on Greenfield Development, Contradicting Environmental Goals

- The PMMs over-rely on greenfield development, contradicting West Berkshire's climate commitments and national sustainability goals.

3. Ignoring Local Consultation and Community-Led Planning

- The modifications ignore local consultation, including Neighbourhood Plans, undermining democratic decision-making.

4. Flawed Housing Allocation Strategy and Questionable Evidence Base

- The revised housing allocation strategy lacks transparency and appears driven by arbitrary targets rather than genuine housing need.

5. Unbalanced Development Distribution

- The modifications create an unbalanced distribution of development, concentrating growth in areas ill-equipped to handle it while neglecting more sustainable brownfield opportunities.

For these reasons, I fully support the objections raised by Cold Ash Parish Council and urge the Council to reject the Proposed Main Modifications in favour of a balanced, sustainable, and infrastructure-supported approach to development in West Berkshire.

In order to make the proposal legally sound I suggest the following:

- Reject the Proposed Main Modifications (PMMs) and maintain the original Local Plan's balanced development strategy.

- Ensure development is infrastructure-led, with clear commitments to schools, healthcare, and transport improvements before major housing expansions.

- Prioritise brownfield regeneration and sustainable urban development over excessive greenfield site allocation.

- Protect Neighbourhood Plans and local community input to ensure democratic planning decisions are upheld.

- Strengthen climate and environmental policies rather than diluting them, ensuring compliance with national carbon reduction and biodiversity goals.

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	Jonathan Hendry	Date	31 Jan 2025
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