

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** Proposed Main Modifications Consultation - CALA Homes Thames  
**Date:** 31 January 2025 16:39:24  
**Attachments:** [REDACTED]

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

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Dear Policy,

Please find attached five representations on the Proposed Main Modifications on behalf of CALA Homes Thames: MM6, MM7, MM18, MM19 and MM22.

I would be grateful if you would confirm receipt of these comments.

Many thanks,  
James

**James Iles** [REDACTED]  
[REDACTED]

**PRO** VISION

PLANNING | ARCHITECTURE | URBAN DESIGN | ECOLOGY

[REDACTED]

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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)

<b>Please complete and return this form:</b>	<b>By email:</b> [Redacted]
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<b>Return by:</b>	<b>11:59pm on Friday 31 January 2025</b>

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First Name*		James
Last Name*		Iles
Job title <i>(where relevant)</i>		[Redacted]
Organisation <i>(where relevant)</i>		Pro Vision
Address* <i>Please include postcode</i>		The Lodge, Highcroft Road, Winchester, SO22 5GU
Email address*		[Redacted]
Telephone number		
Consultee ID <i>(if known)</i>	[Redacted]	

\*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.

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Your name or organisation (and client if you are an agent):	CALA Homes Thames
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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)	MM6

**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:**  
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<b>Positively Prepared:</b> The LPR should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements.	
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<b>Effective:</b> the LPR should be deliverable	
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We support:

- the amendment to the policy text to clarify that site allocations can come through “the LPR and/or neighbourhood plans” (our emphasis).
- proposed new paragraph that explains that site allocations in neighbourhood plans under this LPR “must be located either within and/or adjoining the settlement boundaries of Urban Areas, Rural Service Centres and Service Villages”. This is consistent with MM18.

**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)*

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<i>The adoption of the Local Plan Review</i>	<i>x</i>

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<b>Signature</b>	James Iles, Pro Vision	<b>Date</b>	31/01/2025
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Document name	Schedule of Proposed Main Modifications
Modification/Change reference number (MM / PMC)	MM7

**2. Do you consider the Proposed Main Modification or Proposed Policy Map Change to be:**  
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Support for new paragraph 4.34, which explains that any residential allocations with neighbourhood plans, where they are within adopted settlement boundaries, will not count towards the housing requirement as they already have a presumption in favour of development.

**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)?**  
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Document name	Schedule of Proposed Main Modifications
Modification/Change reference number (MM / PMC)	MM18

**2. Do you consider the Proposed Main Modification or Proposed Policy Map Change to be:**  
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Support amendment to SP12 to clarify that site allocations within the LPR do not count towards the housing requirement for the neighbourhood area, therefore, there in any neighbourhood plan area there may be strategic sites allocated through the LPR as well as non-strategic sites allocated through the neighbourhood plan.

This is consistent with MM7, which has the effect of discounting from the housing requirement neighbourhood plan allocations within adopted settlement boundaries.

**Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA)**

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Modification/Change reference number (MM / PMC)	MM19

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- a) **Legally compliant**                      Yes                       No
- b) **Sound**                                      Yes                       No

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Support the inclusion of work “approximately” in front of the housing requirement for Hungerford and Lambourn, which is consistent with the policy wording and is further clarification that the housing requirement from the LPR is not a maximum, thereby consistent with national policy to boost the supply of housing.

We support the addition after paragraph 6.8 that Policy SP12 expresses the housing requirement for the LPR as a “minimum” number of dwellings per annum.

However, and as explained at the hearings, CALA continues to consider the LPR is unsound in respect of the housing requirement set for Hungerford, which has not been justified by evidence and appears to have emerged, at least in part, from a confusion about the status of extant housing site HSA18 (now built out and meeting the needs from the previous plan period). This is in addition to our concerns about the overall approach to positive planning for the AONB area, which covers the vast majority of the district, and our shared concern with the present Administration that the plan (submitted under the previous Administration) is failing to support its rural towns and villages to remain prosperous.

Planning Practice Guidance explains that the housing requirement does not need to be retested at the neighbourhood plan level, hence our long held concern that the LPR sets housing requirements for neighbourhood plans that have not been based on clear evidence.

(Please see our previous representations: Hearing Statement/Matter 3 and Regulation 19 submission).

We object to the status and wording of the contingency added to policy SP12 in the event that neighbourhood plans, for whatever reason, do not deliver the housing requirement.

MM19 proposes text as follows:

*“The delivery of these neighbourhood plans will be monitored by the Council to ensure the housing requirement is met. The Council reserves the right to identify opportunities to address any shortfall if the Hungerford and Lambourn neighbourhood plans are not made within two years of the adoption of the LPR”.*



It is not clear what “identify opportunities” means or how the Council can be expected to react in such circumstances. Identifying opportunities alone does not remedy an issue with meeting the housing requirement. More precision is needed so that positive action can be expected if planning for housing, including in the Rural Service Centre of Hungerford, an area with an acute affordability challenge, is not successful (for whatever reason) at the neighbourhood plan level.

We return to the precedent of the South Oxfordshire Local Plan (Policy H4 Housing in Larger Villages), which we cited in our representations at Regulation 19 stage. That adopted policy includes more precision about what the Council will do: it will support planning applications (after 12 months) if allocations have not been advanced. It also includes that contingency within the policy itself, rather than the supporting text, which does not have the same legal status.

***Proposed amendment***

***Move the contingency to the text of Policy SP12 and explain what the Council will do if the neighbourhood plan(s) have not advanced sufficiently i.e. support planning applications that will deliver the housing in a sustainable way.***

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<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>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.*

We continue to support the deletion of policy SP15 (Sites Allocated for Residential & Mixed Use Development in the North Wessex Downs AONB) , with the relevant information now part of policy SP12 (Approach to Housing Delivery).

**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>	<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.

<b>Signature</b>	James Iles, Pro Vision	<b>Date</b>	31/01/2025
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**Your completed representations must be received by the Council by 11:59pm on Friday 31 January 2025.**