



**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> <a href="mailto:planningpolicy@westberks.gov.uk">planningpolicy@westberks.gov.uk</a>
	<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cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.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	Miss	N/A
First Name*	Emma	N/A
Last Name*	Runesson	N/A
Job title <i>(where relevant)</i>	Planning Manager	N/A
Organisation <i>(where relevant)</i>	Ridgepoint Homes Limited	N/A
Address* <i>Please include postcode</i>	Terriers House, 201 Amersham Road, High Wycombe, Bucks HP13 5AJ	N/A
Email address*	[REDACTED]	N/A
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):	Ridgepoint Homes Limited
--	--------------------------

### **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)	MM28, MM29, MM79 & MM107

**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>Justified:</b> the LPR should be the most appropriate strategy, when considered against the reasonable alternatives	<b>x</b>
<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 the enclosed letter.

**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	N/A
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	N/A
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>Date</b>	09/01/2025
------------------	--	-------------	------------

**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>.

# RIDGEPOINT HOMES

Planning Policy  
Development and Housing  
West Berkshire District Council  
Market Street  
Newbury  
RG14 5LD

9<sup>th</sup> January 2025

Dear Sir/Madam,

## **Re: Proposed Main Modifications to the West Berkshire Local Plan Review 2022-2039 Consultation**

We refer to the above Main Modifications consultation and write to set out our comments upon certain proposed modifications. Accordingly, we have set out the modification and planning policy reference below followed by our comments where applicable. The modifications that we do not wish to comment on are not included. Our comments are accompanied by the Representation Form.

### **Representations**

- **MM28 – Sixth Paragraph of Policy SP19**

In regard to affordable housing tenure split, we can confirm support for the removal of the requirement to deliver 25% First Homes, reflective of the updated NPPF December 2024, encompassing First Homes and Shared Ownership within the overall 30% requirement for affordable ownership tenure.

- **MM29 – Supporting Text to Policy SP19**

We can confirm support for the provision of affordable housing to only apply to sites of 10 or more homes in the parishes listed that are not designated as rural areas, in particular Theale, as stated in amended paragraph 6.75.

- **MM79 – Supporting Text to Policy DM7**

We object to the deletion of paragraph 10.70 with the stated reason for the modification being that Grampian conditions may be imposed where a water company is concerned that a new development may impact upon their service to customers or the environment.

As noted in the reason for the modification, Thames Water is the statutory undertaker responsible for water supply, sewerage, and sewerage disposal. Therefore, the duty for ensuring there is adequate water supply and waste water treatment infrastructure capacity lies with Thames Water.

Accordingly, Grampian conditions should not be imposed with the effect of making development conditional to infrastructure upgrades where required and paragraph 10.70 should be re-inserted into the supporting text to Policy DM7.



Registered Office: Ridgepoint Homes Ltd, Terriers House, 201 Amersham Road,  
High Wycombe, Buckinghamshire, HP13 5AJ  
Registered in England and Wales - 05907559  
Website: [www.ridgepointhomes.co.uk](http://www.ridgepointhomes.co.uk)



# RIDGEPOINT HOMES

- **MM107 – Supporting Text to Policy DM45**

We object to the inclusion of the proposed new paragraph after 12.112 which states that the monitoring period for Travel Plans for large multi-occupancy developments which may be built over an extended period may cover a period encompassing the construction and final occupation of the development and include a period of up to five years beyond final occupation.

This may lead to uncertainty in the Travel Plan monitoring requirements and may in the case of larger sites result in many years of monitoring, at the unnecessary expense of the developer.

We propose that this should be amended to require Travel Plans to be monitored from 5 years from final occupation for large multi occupancy developments to allow sufficient time for travel patterns to be established.

## **Summary**

We trust the above comments are of assistance in preparing the Local Plan Review and we await confirmation of receipt and registration of our representations in due course.

Yours faithfully,



**Emma Runesson MRTPI**  
**Planning Manager**

T - [REDACTED]

M - [REDACTED]

E - [REDACTED]



*Registered Office:* Ridgepoint Homes Ltd, Terriers House, 201 Amersham Road,  
High Wycombe, Buckinghamshire, HP13 5AJ  
Registered in England and Wales - 05907559  
*Website:* [www.ridgepointhomes.co.uk](http://www.ridgepointhomes.co.uk)

