

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** West Berks Local Plan Review Proposed Main Modifications Consultation - Response o.b.o. Englefield Estate  
**Date:** 29 January 2025 16:39:32  
**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 Sir / Madam,

We are instructed by the Englefield Estate to make a response to the West Berkshire Local Plan Review Proposed Main Modifications Consultation. The enclosed response on behalf of the Englefield Estate, confirms that the proposed modifications in respect of Policy DM43 and its supporting text (as agreed within the Statement of Common Ground between West Berkshire, Englefield Estate, Network Rail and Beftonforth), ensure that the Local Plan is clear on what is permitted within the safeguarded area and is clear in identifying the potential for rail-freight growth at Theale. The modifications are therefore considered to be sound.

We would be grateful for your confirmation of receipt of the attached documents (listed below) and confirmation that the submission has been duly made.

- Response Letter, Firstplan (obo Englefield Estate), dated 27 January 2025
- Response Form, Firstplan (obo Englefield Estate), dated 27 January 2025.

Kind Regards,  
Jack

**Jack Clemance**

[REDACTED]  
**FIRSTPLAN**

[REDACTED]  
Firstplan Ltd Registered Office: Broadwall House, 21 Broadwall, London, SE1 9PL  
Registered in England: No. 4882565



**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>We cannot register your representation without your details.</li> <li>Representations cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.</li> </ul>		
	1. Your details	2. Agent’s details (if applicable)
Title	Englefield Estate (C/o Firstplan Ltd)	
First Name*		Vilna
Last Name*		Walsh
Job title <i>(where relevant)</i>		[REDACTED]
Organisation <i>(where relevant)</i>		Firstplan
Address* <i>Please include postcode</i>		Broadwall House, 21 Broadwall, London, SE1 9PL
Email address*		[REDACTED]
Telephone number		[REDACTED]
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.

**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):	Firstplan (on behalf of Englefield Estates)
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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 November 2024</b>
Modification/Change reference number (MM / PMC)	<b>MM103 / MM104</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>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.*

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**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	 Vilna Walsh	Date	27/01/2025
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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>.

Our Ref: 22456/VW/jc/jb  
Your Ref: n/a  
Email: [REDACTED]

Broadwall House 020 3096 7000  
21 Broadwall info@firstplan.co.uk  
London SE1 9PL firstplan.co.uk

27 January 2025

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

**By email only: [planningpolicy@westberks.gov.uk](mailto:planningpolicy@westberks.gov.uk)**

Dear Sir / Madam,

**WEST BERKSHIRE LOCAL PLAN REVIEW 2022-2039 – PROPOSED MAIN MODIFICATIONS CONSULTATION (6 DECEMBER 2024 – 31 JANUARY 2025), RESPONSE ON BEHALF OF ENGLEFIELD ESTATE**

We write on behalf of the Englefield Estate to respond to the Main Modifications Consultation in respect of the West Berkshire Local Plan Review 2022-2039 which runs from 12 December 2024 through to 31 December 2025.

This response follows representations made by Englefield Estate at Regulation 19 stage in respect of the Theale Rail-Road Transfer Site which involved joint working with Network Rail (NR) and Beftonforth (the owner of the last remaining parcel of undeveloped land within the Rail-Road Site). NR, Englefield Estate and Beftonforth have since worked with WBC to address the points of objection raised which ultimately concluded with preparation of a Statement of Common Ground (SoCG).

The SoCG, dated 20 March 2024, included agreed Main Modifications to Policy DM43 and supporting text (Paragraphs 12.100 – 12.103).

The proposed Main Modifications as specifically worded and agreed in the SoCG are required to ensure that the Local Plan is clear on what is permitted within the safeguarded area and is clear in identifying the potential for rail-freight growth at Theale. Provided the Main Modifications as identified in the SoCG are applied for in full, they meet the at minimum requirements identified in the objections and required changes by the Englefield Estate in respect to policy DM43 and supporting text. The MMs as agreed with WBC ensure that:

- The Plan is positively prepared – and responds to identified need and facilitates sustainable development;
- The Plan is justified, in that the evidence points to the need to support the growth of rail freight provision both generally and in regional/local plan terms. The sound approach is to at minimum provide supporting text which confirms and maintains the potential for rail freight growth at Theale; and,
- To ensure consistency with National Policy which the Main Modifications now provide.

The SoCG was considered under Matter 11 as part of the Examination Hearings where no objections were raised.

The West Berkshire Local Plan Review 2022-2039 Schedule of Proposed Main Modifications (MM) November 2024 has been reviewed in relation to the modifications agreed within the SoCG.

**It is confirmed that the modifications as agreed within the SoCG have been carried forward in full as Proposed Main Modifications to the Local Plan Review (Main Modification Ref's MM103 and MM104). Englefield Estate therefore confirm that the Proposed Main Modifications in respect of Policy DM43 and supporting text are**

**considered to be sound for the reasons as detailed above (positively prepared, justified and consistent with National Policy).**

Confirmation of receipt of these representations and that they have been duly made is requested. We would also ask to be kept informed as to the progress of the Local Plan Review.

Yours sincerely



VILNA WALSH

