



WOKINGHAM BOROUGH COUNCIL

A Meeting of an **INDIVIDUAL EXECUTIVE MEMBER DECISION** will be held in LGF7 - Civic Offices, Shute End, Wokingham RG40 1BN on **WEDNESDAY 22 FEBRUARY 2023 AT 2.00 PM**

A handwritten signature in black ink, appearing to read 'Susan Parsonage', written in a cursive style.

Susan Parsonage
Chief Executive
Published on 14 February 2023

Note: Non-Committee Members and members of the public are welcome to attend the meeting or participate in the meeting virtually, in line with the Council's Constitution. If you wish to participate either in person or virtually via Microsoft Teams please contact Democratic Services. The meeting can also be watched live using the following link:
https://youtube.com/live/lrAY_qFIUE?feature=share

Please note that other people may film, record, tweet or blog from this meeting. The use of these images or recordings is not under the Council's control.



WOKINGHAM BOROUGH COUNCIL

Our Vision

A great place to live, learn, work and grow and a great place to do business

Enriching Lives

- Champion outstanding education and enable our children and young people to achieve their full potential, regardless of their background.
- Support our residents to lead happy, healthy lives and provide access to good leisure facilities to complement an active lifestyle.
- Engage and involve our communities through arts and culture and create a sense of identity which people feel part of.
- Support growth in our local economy and help to build business.

Safe, Strong, Communities

- Protect and safeguard our children, young and vulnerable people.
- Offer quality care and support, at the right time, to prevent the need for long term care.
- Nurture communities and help them to thrive.
- Ensure our borough and communities remain safe for all.

A Clean and Green Borough

- Do all we can to become carbon neutral and sustainable for the future.
- Protect our borough, keep it clean and enhance our green areas.
- Reduce our waste, improve biodiversity and increase recycling.
- Connect our parks and open spaces with green cycleways.

Right Homes, Right Places

- Offer quality, affordable, sustainable homes fit for the future.
- Build our fair share of housing with the right infrastructure to support and enable our borough to grow.
- Protect our unique places and preserve our natural environment.
- Help with your housing needs and support people to live independently in their own homes.

Keeping the Borough Moving

- Maintain and improve our roads, footpaths and cycleways.
- Tackle traffic congestion, minimise delays and disruptions.
- Enable safe and sustainable travel around the borough with good transport infrastructure.
- Promote healthy alternative travel options and support our partners to offer affordable, accessible public transport with good network links.

Changing the Way We Work for You

- Be relentlessly customer focussed.
- Work with our partners to provide efficient, effective, joined up services which are focussed around you.
- Communicate better with you, owning issues, updating on progress and responding appropriately as well as promoting what is happening in our Borough.
- Drive innovative digital ways of working that will connect our communities, businesses and customers to our services in a way that suits their needs.

For consideration by

Lindsay Ferris, Executive Member for Planning and Local Plan

Officers Present

Ian Bellinger, Service Manager for Growth and Delivery

James McCabe, Senior Planning Officer, Growth and Delivery

Callum Wernham, Democratic & Electoral Services Specialist

IMD NO.	WARD	SUBJECT	
IMD 2023/04	None Specific	WOKINGHAM BOROUGH COUNCIL RESPONSE TO THE WEST BERKSHIRE PRE-SUBMISSION LOCAL PLAN	5 - 38

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Agenda Item IMD4

INDIVIDUAL EXECUTIVE MEMBER DECISION

REFERENCE IMD: IMD 2023/04

TITLE	Wokingham Borough Council Response to the West Berkshire Pre-submission Local Plan
DECISION TO BE MADE BY	Executive Member for Planning and Local Plan - Lindsay Ferris
DATE, MEETING ROOM and TIME	22 February 2023 LGF7 at 14:00
WARD	None Specific;
DIRECTOR / KEY OFFICER	Director, Place and Growth - Simon Dale

PURPOSE OF REPORT (Inc Strategic Outcomes)

To ensure that West Berkshire District Council's review of its planning policies leads to a strategy which has minimal negative impacts upon Wokingham Borough and that any positive benefits are maximised.

RECOMMENDATION

That the Executive Member for Planning and Local Plan agrees that Wokingham Borough Council:

- 1) Supports West Berkshire District Council's approach to meeting their Local Housing Need in full;
- 2) Requests West Berkshire District Council acknowledge that the Plan contains flexibility to assist with meeting the existing unmet housing need from Reading Borough;
- 3) Expresses concern over whether the Plan will meet Gypsy and Traveller needs in full, but welcomes the commitment to addressing this through a separate Development Plan Document;
- 4) Confirms that Wokingham Borough Council is currently unable to assist with meeting any unmet employment need arising from the Plan;
- 5) Expects that West Berkshire District Council will work closely with Wokingham Borough Council to ensure appropriate infrastructure is delivered to mitigate the impact of any development which would have cross boundary implications.

SUMMARY OF REPORT

West Berkshire District Council (WBDC) is progressing a review of its planning policies, known as the Local Plan Review which will cover the period 2022 – 2039. The Pre-submission plan (the Plan) has been published for consultation until 3 March 2023. It details a full suite of development management policies and a spatial strategy for the borough for the plan period. WBDC expect to submit the plan to the Secretary of State in March 2023. This report sets out a recommended response to the consultation.

The Plan proposes major new residential growth on land south of Newbury, and north east of Thatcham, alongside a number of smaller sites. Development is also proposed in

existing urban centres, by maximising the use of brownfield land, and optimising development densities. By virtue of their location, it is not considered that the proposed allocations will have material adverse cross-boundary effects for Wokingham Borough.

In total, the plan provides a supply of 9,137 dwellings against a ranged housing requirement of 8,721 to 9,146 dwellings, the lower end being Local Housing Need as calculated using central government's standard method. It therefore sets out a strategy which is capable of exceeding housing needs in accordance with national policy.

The Plan sets out the need for Gypsy and Traveller pitches. The Plan does not contain allocations to meet this need in full, but does include a policy which supports Gypsy and Traveller development where criteria are met. This policy would ensure suitable pitches are approved which contribute to need, though this may not meet long term needs in full. However, WBDC has committed to preparing a separate Development Plan Document for this purpose which is expected to be adopted by 2027.

The Plan sets out WBDC's need for office and industrial floorspace. Following a range of actions being undertaken, insufficient options to meet this need have been identified. Therefore, a significant unmet need for both office and industrial floorspace exists. Consequently, WBDC has written to Duty to Co-operate partners requesting assistance to meet these needs. WBC does not consider it has the ability to assist with unmet employment needs at this time.

Overall, it is recommended that WBC supports the plan which would have limited cross boundary impacts on Wokingham Borough. Recommended response forms for each key issue have been drafted and enclosed with this report.

Background

West Berkshire District Council (WBDC) is progressing a review of its adopted planning policies.

WBDC has now published its Pre-submission Draft Local Plan (the Plan) with a consultation running between 20 January and 3 March 2023. This is a Regulation 19 consultation under the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), which forms the final formal stage before submitting the Plan to the Secretary of State for independent examination in public. The Plan sets out the vision and development strategy up until 2039 and includes proposed site allocations in line with the strategy and proposed development management policies.

Prior to this stage, WBDC have undertaken three consultation exercises:

- In February to March 2018: Scope and content of the local Plan
- In November to December 2018: A proposed vision for the local Plan, and revisions to the emerging evidence base.
- In December 2020 to February 2021: Draft Plan consultation

The Plan is supported by a number of documents, including an Infrastructure Delivery Plan, Sustainability Appraisal/Strategic Environmental Assessment Environmental Report, Transport Assessment Report, Duty to Co-operate Statement, Habitats Regulations Assessment, and various topic specific background papers.

The consultation material indicated that WBDC are aiming to submit the Plan to the Secretary of State in March 2023. A Planning Inspector will be then appointed to undertake the examination.

Business Case (including Analysis of Issues)

This report focusses on those areas considered to be the key cross boundary matters from scoping the plan and previous engagement between the authorities. The majority of planned development is not located near to Wokingham borough. The key issues with potential for cross boundary implications are considered to be: spatial strategy; housing need and supply; Gypsy and Traveller need and supply; and employment land need and supply.

Spatial Strategy

The spatial strategy broadly consists of directing development to areas of lower environmental value, optimising the use of previously developed land (PDL), and optimising development densities. Higher development densities (at least 70 dwellings per hectare (dph)) are expected in town centres as part of flatted development, and a district wide minimum of 30 dph applies unless this would harm prevailing character. It is recommended that WBC supports WBDC's intention to promote higher density housing at more sustainable settlements.

The Plan takes a place-based approach to future growth, by identifying 3 distinct spatial areas: Newbury and Thatcham; North Wessex Downs AONB; and Eastern Area. Further detail is provided below under the 'Site Allocations' section. Within each of the areas, settlements are defined and placed within the settlement hierarchy based on their function and sustainability. Development sites and decisions within each spatial area are expected to reflect the different characteristics of the district.

Housing need and supply

At the time of preparing the Plan, the Local Housing Need (LHN) for West Berkshire District was calculated by the standard method as 513 dwellings per annum (dpa) at 1 April 2022. This equates to a minimum housing need of 8,721 additional homes in the period 2022 – 2039.

Policy SP 12 – 'Approach to Housing Delivery' states that:

'Provision will be made for 8,721 to 9,146 net additional homes in West Berkshire for the period 1 April 2022 to 31 March 2039; 513 to 538 dwellings per annum. The target figure of 538 dwellings per annum does not constitute a ceiling or cap to development...'

The housing requirement is expressed as a range, the lower end being the LHN figure and the upper end comprising LHN plus approximately 5% uplift.

Existing housing commitments, allocations in the adopted plan, and anticipated windfall developments account for 7,337 dwellings. Further land to supply a further 1,809 dwellings is required to meet the higher 9,146 figure (538 dwellings per annum).

Housing/mixed use allocations are set out in Policies SP13 – 15. The Plan sets out new allocations to provide 1,720 homes within the plan period. It additionally identifies a requirement for Neighbourhood Plans to deliver 80 dwellings (55 in Hungerford and 25 in Lambourn), which are both being prepared. Together, this equates to a new supply of 1,800 homes.

Overall, the housing supply in the Plan is 9,137 dwellings (1,800 from new allocations plus 7,337 from existing commitments and windfall). This exceeds the minimum LHN of 8,721. It falls modestly short of the higher figure (9,146) by 9 dwellings.

The Plan takes a cautious approach to windfall development by excluding an allowance from medium and large sites despite past trend data. This cautious approach is considered reasonable. If a less cautious approach was taken to windfalls, the upper end of the housing requirement range would be capable of being met and exceeded. In any event, the plan includes allocations which are capable of exceeding LHN in accordance with national policy and it is recommended that WBC supports this approach.

Unmet housing need from Reading Borough

WBDC forms part of the Western Berkshire Housing Market Area, alongside WBC, Reading Borough Council (RBC) and Bracknell Forest Council (BFC). This grouping forms the basis for joint working on strategic planning matters. The Memorandum of Understanding (MoU) (October 2017) sets out the agreed position across the authorities that the housing need arising from the Western Berkshire HMA should be met within the Housing Market Area.

The RBC Local Plan was adopted in November 2019, and plans for at least 689 homes per annum. Reading's local plan was submitted in March 2018 when housing need was based on the Berkshire Strategic Housing Market Assessment (SHMA) figure of 699 dwellings per annum between 2013 and 2036. This leaves 10 homes per annum, or a total of 230 homes over the plan period, as unmet need. This shortfall is expected late in Reading's plan period (to 2036).

The WBDC Plan recognises (at paragraph 6.6) this unmet need of 230 dwellings and notes the Statement of Common Ground between the Western Berkshire HMA authorities that this need should be met within the Western Berkshire HMA. The Plan's response to this unmet need is to note the requirement for RBC to review its plan by 2024, which will need to consider how to deal with housing needs generated by the standard method.

It is important to note that the future local plan for Reading will consider the starting point for housing through the standard method set out in national planning policy and practice guidance. Following revisions to the standard method in December 2020, Reading Borough is identified as one of the 20 largest urban areas in England, where the 'cities and urban centres uplift' applies a 35% increase to the local housing need calculation.

Notwithstanding, the position is that a shortfall of 230 dwellings exists from RBC against the adopted plan.

The WBDC Plan includes a supply of housing which exceeds LHN by 416 dwellings. Additionally, it is noted that that if a less cautious windfall allowance was assumed in the Plan (as discussed above), developments on large and medium sites would be capable of addressing the unmet need of 230 dwellings in part or full (based on past trends). It is recommended that WBC request the Plan is updated to confirm that it contains a buffer to contribute to Reading's unmet housing need if required. This would be consistent with the approach taken in the Bracknell Forest Local Plan, where the Inspectors have recently published their post hearing letter¹. The letter confirms the plan is legally compliant and capable of being made sound with modifications.

Proposed site allocations

A number of sites identified in the Housing Site Allocations Development Plan Document (2006 – 2026) (HSA) have been carried forward to the current consultation draft as they have not yet been completed. The Plan sets out housing / mixed use allocations at Policies SP13 to SP15. These policies outline all allocations, including those newly proposed in the Plan, those carried forward from the HSA, and those expected to come forward through neighbourhood plans.

As set out above, the Plan takes an area based approach to direct future development. The Newbury and Thatcham urban area continues to be the focus of new housing and employment development. An urban extension south of Newbury is proposed to accommodate 1,500 dwellings (carried forward from the existing development plan and expected to deliver all 1,500 dwellings within the plan period). The Draft Plan (2020) proposal for regeneration and intensification within Newbury town centre for a further 250 dwellings is no longer supported. The expansion of Thatcham to the north east is also proposed, comprising 1,500 dwellings which are likewise expected to all be delivered in the plan period. This is a reduction from 2,500 proposed at the Draft Plan (2020) stage, of which a minimum 1,250 were expected within the plan period at that time.

The Eastern area partly adjoins WBC. AWE Burghfield and AWE Aldermaston are significant constraints within this area, which act to restrict development opportunities within an emergency planning zone. The strategy proposes for the Eastern area is to maintain the individual identities of the separate settlements and to conserve the high quality landscape and environmental assets. No new allocations are proposed within the emergency planning zone around the AWE sites². Beyond this, new development allocations are proposed at Theale and Woolhampton in addition to existing commitments at Theale, Calcot and Burghfield Common ranging from 16 to 100 dwellings in quantum.

The largest area, the North Wessex Downs Area of Outstanding Natural Beauty (AONB), will accommodate appropriate and sustainable growth that conserves and enhances its special landscape qualities. Only modest (between 15 – 55 dwellings) new development allocation sites are proposed, in addition to sites allocated within the existing plan, the largest of which will deliver around 140 dwellings.

Overall, the spatial strategy approach does not seek to allocate significant levels of development in proximity to WBC, with growth focussed on Newbury and Thatcham as

¹ <https://consult.bracknell-forest.gov.uk/file/6134773>

² One retained allocation for 100 dwellings (Land adjoining Pondhouse Farm, Clayhill Road, Burghfield Common) within the DEPZ received reserved matters approval in July 2022.

the largest and most sustainable settlements. Therefore, cross boundary traffic impacts are considered to be limited, with Transport Modelling evidence indicating impacts can be mitigated through network improvements where necessary, and appropriate provision of active / sustainable transport. It is recommended that WBC notes the spatial strategy and requests that when a planning application is submitted WBC is consulted, in order to assess any cross boundary impacts that development close to its boundary may have.

Gypsy and Traveller Provision

WBDC published a 'Gypsy and Traveller and Travelling Showperson Accommodation Assessment' (GTAA) in 2019. A further GTAA Update was published in 2021 (GTAA 2021). The GTAA 2021 study identifies a cultural need for 30 pitches in the period 2021/22 – 2037/38. 20 of these pitches are for households that meet the definition of Gypsies and Travellers within the Planning Policy for Traveller Sites (PPTS). Further needs for a 4 pitch transit site (capable of accommodating 8 caravans) and 24 Travelling Showperson plots are identified.

The Plan proposes to address this need through a combination of site allocation and a criteria based policy (Policy DM20). The criteria based policy supports the development of Gypsy and Traveller pitches and Travelling Showpeople plots where relevant criteria are satisfied. There is no requirement for strategic housing allocations to provide pitches or plots as part of a mix.

Policy RSA24 proposes to allocate an additional 8 permanent pitches at an existing private site at Paices Hill within an area of land currently comprising transit pitches. This allocation is carried forward from the existing plan. The site has now obtained planning permission for a change of use from 8 transit caravan pitches to 8 permanent Gypsy / Traveller pitches³. It is noted that the site is located within the Detailed Emergency Planning Zone (DEPZ) of AWE Aldermaston where new residential developments would not usually be acceptable. However, in this particular instance, it was considered that having permanent pitches on site would be an improvement to the existing transit provision as the former would be expected to provide day rooms with more secure accommodation than touring caravans in the event of an emergency. On this basis it is recommended that WBC supports the allocation which will contribute towards identified need.

WBC notes that the Plan does not contain allocations to meet cultural needs in full, and while the criteria based policy will facilitate the delivery of windfall pitches where appropriate, there are no estimates provided on how many pitches this would enable. It is therefore not possible to say with confidence that needs over the plan period will be met in full. However, WBDC has committed via its updated Local Development Scheme (LDS) to produce a Gypsy and Traveller Accommodation Development Plan Document (DPD). The LDS sets out that this will contain policies and allocations to meet the Gypsy and Traveller Accommodation Needs. On this basis, it is therefore recommended that WBC supports the production of the separate DPD to meet needs in full, and no issues of soundness are raised in relation to the Plan.

³ Application reference [22/00120/FUL](#) approved 30 September 2022

As regards Travelling Showperson needs, Policy RSA25 proposes to allocate 24 Travelling Showperson plots. This would meet the identified need in full. WBC has no comments on this proposed allocation.

Provision for employment

WBDC's employment evidence⁴ identifies a need for 50,816sqm of office floorspace and a combined 91,109sqm industrial, storage and distribution floorspace over the plan period. Policy SP20 details the strategic approach to addressing economic development needs, Policy SP21 sets out a number of site allocations for industrial land, and Policy DM32 identifies Designated Employment Areas where businesses uses are to be safeguarded. No allocations are made in the Plan for additional office floorspace.

The Plan supports the redevelopment and regeneration of existing employment sites. It therefore retains, and identifies new, employment sites which can be intensified to meet some of its identified needs. New allocations for industrial use are anticipated to provide 58,400sqm. However, this is insufficient to meet the full identified needs for industrial land, resulting in a shortfall of 32,709sqm industrial floorspace. There are no estimates provided of how much floorspace the wider policy approach might deliver, and no specific land is identified to provide for office use. As a result, the full identified office need of 50,816sqm remains unmet. WBDC has approached WBC and other duty to co-operate partners to seek assistance in meeting these needs.

Like WBDC, WBC has commissioned a new Employment Land Needs Review, to better understand future economic needs, for both office, and industrial/warehousing. The key emerging finding of the report is an increased need for industrial/warehousing floorspace across Wokingham Borough, which reflects changes in both the local and sub-regional economy. The report suggests there is no need for additional office floorspace.

Work is ongoing to assess the availability, suitability and deliverability of land promoted for economic uses within Wokingham Borough, as part of the Housing and Economic Land Availability Assessment (HELAA), which will help to inform whether these economic needs can be met. However, given the scale of the need for new industrial/warehousing floorspace arising in Wokingham Borough and the small number of sites promoted for economic uses, at this stage it is considered highly unlikely any of the unmet office or industrial needs from WBDC will be able to be accommodated. Indeed, WBC cannot guarantee meeting the need arising from Wokingham Borough.

It is recommended that WBC confirm this and requests and that WBC continues to engage with WBDC as part of the duty to cooperate.

Regarding retail, the Plan identifies a hierarchy of centres and designates primary shopping areas. It supports development for town centre uses that contributes to vitality and viability of these centres and provides for changes of use away from retail, only in certain circumstances. The Plan also designates a number of Retail Parks to safeguard retail and leisure uses. It does not identify any specific allocations for retail floorspace.

The Plan sets out a commitment to review retail evidence within the first 5 years of the Plan, owing to significant changes brought about by Brexit and COVID19 making it

⁴ [West Berkshire District Council Employment Land Review \(December 2022\)](#)

impractical to update its evidence in a meaningful way. WBDC's existing evidence from 2016 (The Western Berkshire Retail and Commercial Leisure Assessment jointly prepared with WBC, RBC, and BFBC) identified a need for 25,600sqm comparison retail floorspace in West Berkshire to 2036. This represents a significant need, and it is not clear how far this has been met, or whether the identified needs remain appropriate. WBC has embarked upon an update to retail and commercial leisure evidence as part of its own emerging Local Plan Update. Given the significant need previously identified, it is recommended that WBC stresses the importance of WBDC's evidence being updated as soon as possible and the Plan being reviewed as necessary to address this in the short term.

Other matters

The plan covers a range of matters which, though not considered to have cross-boundary implications, may be of interest to members.

The Plan expects developers to provide 30% affordable housing on previously developed land and 40% on greenfield land on all developments of 10 or more dwellings. For schemes of between 5 and 9 dwellings, the Plan seeks 20% provision.

Regarding biodiversity, Policy SP11 seeks a minimum of 10% net gain to be achieved, which reflects the Environment Act (2021). The policy proposes that developers must use the most up to date accounting metric developed by Natural England and provide details of long-term management.

In terms of sustainable construction, the plan (Policy DM4) requires all new dwellings and non-residential development above 100sqm to achieve net zero operational development. This broadly requires that new buildings match all their operational (regulated and unregulated) energy with renewables on site, or if unfeasible then offset 30 years' worth of carbon. The Plan requires in the first instance that specific Target Emissions Rates are achieved through fabric efficiency and efficient heat systems alone, before adding renewable energy generation measures.

National Planning Policy Framework consultation

Consultation on amendments to the NPPF runs until 2 March 2023. WBDC expects to submit the Plan to the Secretary of State in March 2023 prior to the outcome of the consultation being published by Government, and therefore against the current NPPF (2021).

Conclusion

In summary, it is recommended that WBC supports WBDC's plan in principle having reviewed those matters with the potential for cross boundary implications. WBDC will need to continue to engage with WBC to ensure appropriate infrastructure is delivered to mitigate the impact of any development which would have cross boundary implications.

It is recommended that WBC supports the Plan's spatial strategy which identifies a developable housing land supply which exceeds LHN and is sufficient to accommodate unmet needs arising from Reading. The strategic scale housing allocations proposed in

the Plan are focused on Newbury and Thatcham which are likely to result in minimal impacts on Wokingham Borough.

On the matter of Gypsy and Traveller provision, WBC cannot be confident that the Plan will meet its need in full at present. Notwithstanding, it is recommended that WBC welcomes WBDC’s commitment to producing a separate Gypsy and Traveller DPD to fully address needs in the long term.

Regarding employment needs and supply, WBC notes the unmet need for both office and industrial floorspace that the Plan is unable to deliver. It is recommended that WBC continue to engage with WBDC regarding emerging needs and supply of economic floorspace, but currently it is considered unlikely that unmet needs for office or industrial floorspace will be able to be met in Wokingham Borough.

WBC look forward to continuing to work with WBDC as part of the Plan, including on the outstanding matters identified in this response.

Recommended response forms reflecting the analysis in this report have been drafted for each key issue and enclosed with this report.

FINANCIAL IMPLICATIONS OF THE RECOMMENDATION

The Council faces unprecedented financial pressures as a result of; the longer term impact of the COVID-19 crisis, Brexit, the war in Ukraine and the general economic climate of rising prices and the increasing cost of debt. It is therefore imperative that Council resources are optimised and are focused on the vulnerable and on its highest priorities.

	How much will it Cost/ (Save)	Is there sufficient funding – if not quantify the Shortfall	Revenue or Capital?
Current Financial Year (Year 1)	Nil	Yes	n/a
Next Financial Year (Year 2)	Nil	n/a	n/a
Following Financial Year (Year 3)	Nil	n/a	n/a

Other financial information relevant to the Recommendation/Decision

No financial implications arise as a result of submitting representations to this consultation.

Cross-Council Implications

None anticipated.

Public Sector Equality Duty


Due regard has been had to the Public Sector Equality Duty in reviewing and responding to this consultation.

SUMMARY OF CONSULTATION RESPONSES	
Director – Resources and Assets	No comments
Monitoring Officer	No comments
Leader of the Council	No comments received

Reasons for considering the report in Part 2
N/A

List of Background Papers
<p>Enc. 1: Response form – Employment provision Enc. 2: Response form – Gypsy and Traveller Enc. 3: Response form – Housing supply Enc. 4: Response form – Reading unmet need</p> <p>West Berkshire Proposed Submission Plan</p> <p>Further information published by West Berkshire District Council relating to the Proposed submission Local Plan – see: https://www.westberks.gov.uk/local-plan-evidence</p>

Contact James McCabe	Service Place
Telephone No Tel: 0118 908 8333	Email james.mccabe@wokingham.gov.uk

	<p>West Berkshire Local Plan Review 2022-2039</p> <p>Proposed Submission Representation Form</p> <p>Ref:</p> <p><i>(For official use only)</i></p>
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Please complete online or return this form to:	Online: http://consult.westberks.gov.uk/kse
	By email: planningpolicy@westberks.gov.uk
	By post: Planning Policy, Development and Regulation, Council Offices, Market Street, Newbury, RG14 5LD
Return by:	4:30pm on Friday 3 March 2023

This form has two parts:

- Part A - Your details: need only be completed once
- Part B - Your representation(s): please fill in a separate sheet for each representation you wish to make

PART A: Your Details		
<i>Please note the following:</i>		
<ul style="list-style-type: none"> • We cannot register your representation without your details. • Representations cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published. • All information will be sent for examination by an independent inspector • 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 		
	Your details	Agent's details (if applicable)
Title:	Mr	
First Name:*	James	
Last Name:*	McCabe	
Job title <i>(where relevant):</i>	Principal Planning Policy Officer	
Organisation <i>(where relevant):</i>	Wokingham Borough Council	
Address* <i>Please include postcode:</i>	Wokingham Borough Council P.O. Box 157 Shute End Wokingham Berkshire RG40 1WR	
Email address:*	policyandplans@wokingham.gov.uk	
Telephone number:		

**Mandatory field*

Part B – Your Representation

Please use a separate sheet for each representation

The accompanying guidance note available at: <https://www.westberks.gov.uk/lpr-proposed-submission-consultation> will assist you in making representations.

*Your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change(s) as there will **not normally** be a subsequent opportunity to make further representations, **further submissions will ONLY be at the request of the Inspector, based on the matters and issues they identify for examination.***

Your name or organisation (and client if you are an agent):	Wokingham Borough Council
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Please indicate which part of the Local Plan Review this representation relates to:

Section/paragraph:	Paragraphs 7.1 – 7.41
Policy:	SP20, SP21, SP22, DM32 and DM34
Appendix:	
Policies Map:	
Other:	

1. Legally Compliant

Please see the guidance notes for an explanation of what 'legally compliant' means.

Do you consider the Local Plan Review is legally compliant?

Yes

No

Please give reasons for your answer:

No comments.

2. Soundness

Please see the guidance notes for an explanation of what ‘soundness’ means.

Do you consider the Local Plan Review is sound?

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF)

Please tick all that apply:

NPPF criteria	Yes	No
Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area’s objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development		X
Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence	X	
Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground	X	
Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF	X	

Please give reasons for your answer:

Wokingham Borough Council (WBC) notes that West Berkshire District Council’s (WBDC) employment evidence identifies a need for 50,816sqm of office floorspace and a combined 91,109sqm industrial, storage and distribution floorspace over the plan period. Policy SP20 details the strategic approach to addressing economic development needs, Policy SP21 sets out a number of site allocations for industrial land, and Policy DM32 identifies Designated Employment Areas where businesses uses are to be safeguarded. No allocations are made in the Plan for additional office floorspace.

The Plan supports the redevelopment and regeneration of existing employment sites. It therefore retains, and identifies new, employment sites which can be intensified to meet some of its identified needs. New allocations for industrial use are anticipated to provide 58,400sqm. However, this is insufficient to meet the full identified needs for industrial land, resulting in a shortfall of 32,709sqm industrial floorspace. There are no estimates provided of how much floorspace the wider policy approach might deliver, and no specific land is identified to provide for office use. As a result, the full identified office need of 50,816sqm remains unmet. WBDC has approached WBC and other duty to co-operate partners to seek assistance in meeting these needs.

Like WBDC, WBC has commissioned a new Employment Land Needs Review, to better understand future economic needs, for both office and industrial/warehousing. The key emerging finding of the report is an increased need for industrial/warehousing floorspace across Wokingham Borough, which reflects changes in both the local and sub-regional economy. The report suggests there is no need for additional office floorspace.

Work is ongoing to assess the availability, suitability and deliverability of land promoted for economic uses within Wokingham Borough, as part of the Housing and Economic Land

Availability Assessment (HELAA), which will help to inform whether these economic needs can be met. However, given the scale of the need for new industrial/warehousing floorspace arising in Wokingham Borough and the small number of sites promoted for economic uses, at this stage WBC confirms that it is considered highly unlikely any of the unmet office or industrial needs from WBDC will be able to be accommodated. Indeed, WBC cannot guarantee meeting the need arising from Wokingham Borough.

WBC recognise and support WBDC's ongoing recognition of the arising employment needs and the attempts to reach agreement with other authorities. WBC requests continued engagement with WBDC on this matter as part of the duty to cooperate.

Regarding retail, the Plan identifies a hierarchy of centres and designates primary shopping areas. It supports development for town centre uses that contributes to vitality and viability of these centres and provides for changes of use away from retail, only in certain circumstances. The Plan also designates a number of Retail Parks to safeguard retail and leisure uses. It does not identify any specific allocations for retail floorspace.

The Plan sets out a commitment to review retail evidence within the first 5 years of the Plan, owing to significant changes brought about by Brexit and COVID19 making it impractical to update its evidence in a meaningful way. WBDC's existing evidence from 2016 (The Western Berkshire Retail and Commercial Leisure Assessment jointly prepared with WBC, RBC, and BFBC) identified a need for 25,600sqm comparison retail floorspace in West Berkshire to 2036. This represents a significant need, and it is not clear how far this has been met, or whether the identified needs remain appropriate. WBC has embarked upon an update to retail and commercial leisure evidence as part of its own emerging Local Plan Update. Given the significant need previously identified, WBC stresses the importance of WBDC's evidence being updated as soon as possible and the Plan being reviewed as necessary to address this in the short term.

3. Complies with the Duty to Co-operate

Please see the guidance note for an explanation of what 'Duty to Cooperate' means.

Do you consider the Local Plan Review complies with the Duty to Co-operate?

Yes

No

Please give reasons for your answer:

WBC notes that separate duty to co-operate discussions are ongoing between the two authorities. WBC welcomes these discussions progressing.

4. Proposed Changes

Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this change will make the LPR 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.

N/A

5. Independent Examination

If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?

Yes

No

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

6. Notification of Progress of the Local Plan Review

Do you wish to be notified of any of the following?

Please tick all that apply:

Tick

The submission of the Local Plan Review for Independent Examination	X
The publication of the report of the Inspector appointed to carry out the examination	X
The adoption of the Local Plan Review	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	J. McCabe	Date	22/02/2023
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Your completed representations must be received by the Council by 4:30pm on Friday 3 March 2023.


West Berkshire Local Plan Review 2022-2039
Proposed Submission Representation Form
Ref:
(For official use only)

Please complete online or return this form to:	Online: http://consult.westberks.gov.uk/kse
	By email: planningpolicy@westberks.gov.uk
	By post: Planning Policy, Development and Regulation, Council Offices, Market Street, Newbury, RG14 5LD
Return by:	4:30pm on Friday 3 March 2023

This form has two parts:

- Part A - Your details: need only be completed once
- Part B - Your representation(s): please fill in a separate sheet for each representation you wish to make

PART A: Your Details

Please note the following:

- *We cannot register your representation without your details.*
- *Representations cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.*
- *All information will be sent for examination by an independent inspector*
- *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>*

	Your details	Agent's details (if applicable)
Title:	Mr	
First Name:*	James	
Last Name:*	McCabe	
Job title (where relevant):	Principal Planning Policy Officer	
Organisation (where relevant):	Wokingham Borough Council	
Address* <i>Please include postcode:</i>	Wokingham Borough Council P.O. Box 157 Shute End Wokingham Berkshire RG40 1WR	
Email address:*	policyandplans@wokingham.gov.uk	
Telephone number:		

**Mandatory field*

Part B – Your Representation

Please use a separate sheet for each representation

The accompanying guidance note available at: <https://www.westberks.gov.uk/lpr-proposed-submission-consultation> will assist you in making representations.

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Your name or organisation (and client if you are an agent):	Wokingham Borough Council
---	---------------------------

Please indicate which part of the Local Plan Review this representation relates to:

Section/paragraph:	Paragraphs 11.27 – 11.35
Policy:	RSA24, DM20
Appendix:	
Policies Map:	
Other:	

1. Legally Compliant

Please see the guidance notes for an explanation of what ‘legally compliant’ means.

Do you consider the Local Plan Review is legally compliant?

Yes No

Please give reasons for your answer:

No comments

2. Soundness

Please see the guidance notes for an explanation of what ‘soundness’ means.

Do you consider the Local Plan Review is sound?

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF)

Please tick all that apply:

NPPF criteria	Yes	No
Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area’s objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development	X	
Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence	X	
Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground	X	
Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF	X	

Please give reasons for your answer:

Wokingham Borough Council (WBC) broadly supports West Berkshire District Council’s (WBDC) approach to the provision of Gypsy and Traveller sites.

WBDC published a ‘Gypsy and Traveller and Travelling Showperson Accommodation Assessment’ (GTAA) in 2019. A further GTAA Update was published in 2021 (GTAA 2021). The GTAA 2021 study identifies a cultural need for 30 pitches in the period 2021/22 – 2037/38. 20 of these pitches are for households that meet the definition of Gypsies and Travellers within the Planning Policy for Traveller Sites (PPTS). Further needs for a 4 pitch transit site (capable of accommodating 8 caravans) and 24 Travelling Showperson plots are identified.

The Plan proposes to address this need through a combination of site allocations and a criteria based policy (Policy DM20). WBC notes that the Plan does not set a specific requirement for pitches, rather it simply notes the GTAA evidence. The criteria based policy supports the development of Gypsy and Traveller pitches and Travelling Showpeople plots where relevant criteria are satisfied. There is no requirement for strategic housing allocations to provide pitches or plots as part of a mix.

Policy RSA24 proposes to allocate an additional 8 permanent pitches at an existing private site at Paices Hill within an area of land currently comprising transit pitches. This allocation is carried forward from the existing adopted plan. The site has now obtained planning permission for a change of use from 8 transit caravan pitches to 8 permanent Gypsy / Traveller pitches. It is noted that the site is located within the Detailed Emergency Planning Zone (DEPZ) of AWE Aldermaston where new residential developments would not usually be acceptable. However, in this particular instance, it was considered that having permanent pitches on site would be an improvement to the existing transit provision as the former

would be expected to provide day rooms with more secure accommodation than touring caravans in the event of an emergency. WBC supports the allocation which will make a contribution towards identified need.

WBC notes that the Plan does not contain allocations to meet cultural needs in full, and while the criteria based policy will facilitate the delivery of windfall pitches where appropriate, there are no estimates provided on how many pitches this would enable. It is therefore not possible to say with certainty that needs over the plan period will be met in full. However, WBDC has committed via its updated Local Development Scheme (LDS) to produce a Gypsy and Traveller Accommodation Development Plan Document (DPD). The LDS sets out that this will contain policies and allocations to meet the Gypsy and Traveller Accommodation Needs. On this basis, WBC supports the production of the separate DPD to meet needs in full, and raises no issues of soundness in relation to the Plan.

As regards Travelling Showperson needs, Policy RSA25 proposes to allocate 24 Travelling Showperson plots. This would meet the identified need in full. WBC has no comments on this proposed allocation and supports the commitment to fully addressing Travelling Showperson need, which is considered sound.

3. Complies with the Duty to Co-operate

Please see the guidance note for an explanation of what 'Duty to Cooperate' means.

Do you consider the Local Plan Review complies with the Duty to Co-operate?

Yes

No

Please give reasons for your answer:

No comments

4. Proposed Changes

Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this change will make the LPR 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.

N/A

5. Independent Examination

If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?

Yes

No

X

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

6. Notification of Progress of the Local Plan Review

Do you wish to be notified of any of the following?

Please tick all that apply:


Tick

The submission of the Local Plan Review for Independent Examination	X
The publication of the report of the Inspector appointed to carry out the examination	X
The adoption of the Local Plan Review	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	J. McCabe	Date	22/02/2023
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Your completed representations must be received by the Council by 4:30pm on Friday 3 March 2023.

	<p>West Berkshire Local Plan Review 2022-2039</p> <p>Proposed Submission Representation Form</p> <p>Ref:</p> <p><i>(For official use only)</i></p>
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	Your details	Agent's details (if applicable)
Title:	Mr	
First Name:*	James	
Last Name:*	McCabe	
Job title <i>(where relevant):</i>	Principal Planning Policy Officer	
Organisation <i>(where relevant):</i>	Wokingham Borough Council	
Address* <i>Please include postcode:</i>	Wokingham Borough Council P.O. Box 157 Shute End Wokingham Berkshire RG40 1WR	
Email address:*	policyandplans@wokingham.gov.uk	
Telephone number:		

**Mandatory field*

Part B – Your Representation

Please use a separate sheet for each representation

The accompanying guidance note available at: <https://www.westberks.gov.uk/lpr-proposed-submission-consultation> will assist you in making representations.

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Your name or organisation (and client if you are an agent):	Wokingham Borough Council
---	---------------------------

Please indicate which part of the Local Plan Review this representation relates to:

Section/paragraph:	Paragraphs 6.1 – 6.3, and 6.9 – 6.27
Policy:	SP12
Appendix:	
Policies Map:	
Other:	

1. Legally Compliant

Please see the guidance notes for an explanation of what 'legally compliant' means.

Do you consider the Local Plan Review is legally compliant?

Yes

No

Please give reasons for your answer:

No comments.

2. Soundness

Please see the guidance notes for an explanation of what 'soundness' means.

Do you consider the Local Plan Review is sound?

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF)

Please tick all that apply:

NPPF criteria	Yes	No
Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development	X	
Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence	X	
Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground	X	
Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF	X	

Please give reasons for your answer:

Wokingham Borough Council (WBC) supports the plan approach to the provision of housing.

At the time of preparing the Plan, the Local Housing Need (LHN) for West Berkshire District was calculated by the standard method as 513 dwellings per annum (dpa) at 1 April 2022. This equates to a minimum housing need of 8,721 additional homes in the period 2022 – 2039.

Policy SP12 – 'Approach to Housing Delivery' states that:

'Provision will be made for 8,721 to 9,146 net additional homes in West Berkshire for the period 1 April 2022 to 31 March 2039; 513 to 538 dwellings per annum. The target figure of 538 dwellings per annum does not constitute a ceiling or cap to development...'

The housing requirement is expressed as a range, the lower end being the LHN figure and the upper end comprising LHN plus approximately 5% uplift.

Existing housing commitments, allocations in the adopted plan, and anticipated windfall developments account for 7,337 dwellings. Further land to supply a further 1,809 dwellings is required to meet the higher 9,146 figure (538 dwellings per annum).

Housing/mixed use allocations are set out in Policies SP13 – 15. The Plan sets out new allocations to provide 1,720 homes within the plan period. It additionally identifies a requirement for Neighbourhood Plans to deliver 80 dwellings (55 in Hungerford and 25 in Lambourn), which are both being prepared. Together, this equates to a new supply of 1,800 homes.

Overall, the housing supply in the Plan is 9,137 dwellings (1,800 from new allocations plus 7,337 from existing commitments and windfall). This exceeds the minimum LHN of 8,721. It falls modestly short of the upper end (9,146) by 9 dwellings.

WBC acknowledges that the Plan approach to windfall development is cautious in excluding an allowance from medium and large sites despite past trend data. This cautious approach is considered reasonable. If a less cautious approach was taken to windfalls, the upper end of the housing requirement range would be capable of being met, and exceeded.

In any event, the plan includes supply which is capable of exceeding LHN in accordance with national policy. WBC therefore considers the Plan to be sound regarding meeting its housing need.

3. Complies with the Duty to Co-operate

Please see the guidance note for an explanation of what 'Duty to Cooperate' means.

Do you consider the Local Plan Review complies with the Duty to Co-operate?

Yes

No

Please give reasons for your answer:

The Plan sets out a strategy which is capable of exceeding housing needs in accordance with national policy and which is not considered to give rise to significant cross boundary implications for Wokingham Borough. WBC therefore considers that the Duty to Co-operate has been met in this regard.

4. Proposed Changes

Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this change will make the LPR 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.

N/A

5. Independent Examination

If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?

Yes

No

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

N/A

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

6. Notification of Progress of the Local Plan Review

Do you wish to be notified of any of the following?

Please tick all that apply:


Tick

The submission of the Local Plan Review for Independent Examination	X
The publication of the report of the Inspector appointed to carry out the examination	X
The adoption of the Local Plan Review	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	J. McCabe	Date	22/03/2023
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Title:	Mr	
First Name:*	James	
Last Name:*	McCabe	
Job title <i>(where relevant):</i>	Principal Planning Policy Officer	
Organisation <i>(where relevant):</i>	Wokingham Borough Council	
Address* <i>Please include postcode:</i>	Wokingham Borough Council P.O. Box 157 Shute End Wokingham Berkshire RG40 1WR	
Email address:*	policyandplans@wokingham.gov.uk	
Telephone number:		

**Mandatory field*

Part B – Your Representation

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Your name or organisation (and client if you are an agent):	Wokingham Borough Council
---	---------------------------

Please indicate which part of the Local Plan Review this representation relates to:

Section/paragraph:	Paragraphs 6.4 – 6.8
Policy:	
Appendix:	
Policies Map:	
Other:	

1. Legally Compliant

Please see the guidance notes for an explanation of what ‘legally compliant’ means.

Do you consider the Local Plan Review is legally compliant?

Yes X No

Please give reasons for your answer:

No comments

2. Soundness

Please see the guidance notes for an explanation of what 'soundness' means.

Do you consider the Local Plan Review is sound?

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF)

Please tick all that apply:

NPPF criteria	Yes	No
Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development	X	
Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence	X	
Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground	X	
Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF	X	

Please give reasons for your answer:

West Berkshire District Council (WBDC) forms part of the Western Berkshire Housing Market Area, alongside Wokingham Borough Council (WBC), Reading Borough Council (RBC) and Bracknell Forest Council (BFC). This grouping forms the basis for joint working on strategic planning matters. The Memorandum of Understanding (MoU) (October 2017) sets out the agreed position across the authorities that the housing need arising from the Western Berkshire HMA should be met within the Housing Market Area.

The RBC Local Plan was adopted in November 2019, and plans for at least 689 homes per annum. Reading's local plan was submitted in March 2018 when housing need was based on the Berkshire Strategic Housing Market Assessment (SHMA) figure of 699 dwellings per annum between 2013 and 2036. This leaves 10 homes per annum, or a total of 230 homes over the plan period, as unmet need. This shortfall is expected late in Reading's plan period (to 2036).

The Plan recognises (at paragraph 6.6) this unmet need of 230 dwellings and notes the Statement of Common Ground between the Western Berkshire HMA authorities that this need should be met within the Western Berkshire HMA. The Plan's response to this unmet need is to note the requirement for RBC to review its plan by 2024, which will need to consider how to deal with housing needs generated by the standard method.

It is important to note that the future local plan for Reading will consider the starting point for housing through the standard method set out in national planning policy and practice guidance. Following revisions to the standard method in December 2020, Reading Borough is identified as one of the 20 largest urban areas in England, where the 'cities and urban centres uplift' applies a 35% increase to the local housing need calculation.

Notwithstanding, the position is that a shortfall of 230 dwellings exists from RBC against the adopted plan.

The WBDC Plan includes a supply of housing which exceeds LHN by 416 dwellings. Additionally, it is noted that that if a less cautious windfall allowance was assumed in the Plan, developments on large and medium sites would be capable of addressing the unmet need of 230 dwellings in part or full (based on past trends). WBC request the Plan is updated to confirm that it contains a buffer to contribute to Reading's unmet housing need, if required. This would be consistent with the approach taken in the Bracknell Forest Local Plan, where the Inspectors have recently published their post hearing letter¹. The letter confirms the plan is legally compliant and capable of being made sound with modifications.

3. Complies with the Duty to Co-operate

Please see the guidance note for an explanation of what 'Duty to Cooperate' means.

Do you consider the Local Plan Review complies with the Duty to Co-operate?

Yes

No

Please give reasons for your answer:

4. Proposed Changes

Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this change will make the LPR 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.

Though not considered a soundness issue, WBC request WBDC update the Plan to confirm that it contains a buffer to contribute to Reading's unmet housing need if required, consistent with the approach taken in the Bracknell Forest Local Plan main modifications and the Inspectors' initial recommendations.

5. Independent Examination

If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?

Yes

No

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

¹ <https://consult.bracknell-forest.gov.uk/file/6134773>

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

6. Notification of Progress of the Local Plan Review

Do you wish to be notified of any of the following?

Please tick all that apply:

Tick

The submission of the Local Plan Review for Independent Examination	X
The publication of the report of the Inspector appointed to carry out the examination	X
The adoption of the Local Plan Review	X

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Signature	J. McCabe	Date	22/02/2023
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