

	<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cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.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.