

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cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.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

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.