


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cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.*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

*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 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 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) 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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Your completed representations must be received by the Council by 4:30pm on Friday 3 March 2023.