

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cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.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

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.