

West Berkshire Local Plan Review 2022 - 2039

Duty to Cooperate Statement

March 2023

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1. Introduction to the Duty to Cooperate

1.1 Section 110 of the Localism Act

<http://www.legislation.gov.uk/ukpga/2011/20/section/110> (which amended the Planning and Compulsory Purchase Act 2004, the relevant Duty to Co-operate bodies are as defined under Section 33A of the Act and the Town & Country Planning (Local Planning) (England) Regulations 2012

1.2 <http://www.legislation.gov.uk/ukpga/2011/20/section/110/enacted> places a legal duty on local planning authorities and other prescribed bodies to cooperate with each other when preparing development plan documents in order to address strategic planning issues relevant to their areas. This duty to co-operate:

- relates to development or use of land that would have a significant impact on at least two local planning areas;
- requires that councils set out planning policies to address such issues;
- requires that councils and other bodies 'engage constructively, actively and on an ongoing basis' to develop strategic policies; and
- requires councils to consider joint approaches to plan making.

1.3 The preparation of development plans are governed by the Town & Country Planning (Local Planning) (England) Regulations 2012 (as amended) <http://www.legislation.gov.uk/uksi/2012/767/contents/made>. This sets out the list of prescribed bodies to which the duty also applies.

1.4 Relevant planning policy issues to be considered under the Duty to Cooperate are explained in the NPPF July 2021 (paras 24 to 27) <https://www.gov.uk/government/publications/national-planning-policy-framework--2>. (24) Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries.

(25). Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans. They should also engage with their local communities and relevant bodies including Local Enterprise Partnerships, Local Nature Partnerships, the Marine Management Organisation, county councils, infrastructure providers, elected Mayors and combined authorities (in cases where Mayors or combined authorities do not have plan-making powers).

(26). Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether

development needs that cannot be met wholly within a particular plan area could be met elsewhere.

(27). In order to demonstrate effective and on-going joint working, strategic policymaking authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning guidance, and be made publicly available throughout the plan-making process to provide transparency.

1.5 Paragraph 20 of the NPPF sets out the strategic issues where co-operation might be appropriate and this includes:

- The housing (including affordable housing) and jobs needed in the area;
- The provision of retail, leisure and other commercial development;
- The provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and the provision of minerals and energy (including heat);
- The provision of health, security, community and cultural infrastructure and other local facilities; and
- Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

1.6 The Duty to Cooperate is tested at examination whenever an Authority prepares or reviews its Local Plan. The National Planning Policy Guidance (NPPG) <https://www.gov.uk/guidance/plan-making#maintaining-effective-cooperation> makes clear that in demonstrating compliance with the duty an Authority needs to submit robust evidence of the efforts they have made to cooperate on strategic cross boundary issues. A plan will be found unsound if the Duty has not been complied with. There are two elements to this test:

- The legal requirement under Section 33A of the Planning and Compulsory Purchase Act 2004 (the Duty cannot be retrofitted)
- The NPPF soundness assessment of how effective the cooperation has been

1.7 Cooperation needs to have resulted in a positively prepared plan with an effective outcome. The Council will also need to show how it has considered joint plan-making arrangements, what decisions were reached and why.

2. Our Strategic Context

2.1 West Berkshire (see Appendix 1a) is a unitary authority of 704 square kilometres, located in the south east of England. Forming half of the former county of Berkshire, the District covers towns such as Newbury and Thatcham and the urban areas of Tilehurst, Purley on Thames and Calcot in the east of the District, close to Reading. At the same time, about 90% of the District is rural in character. The North Wessex Downs Area of Outstanding Natural Beauty (AONB) is a nationally important and legally protected landscape, designated for the quality of its scenic beauty and covers 74% of the District. The District benefits from a high degree of strategic accessibility afforded by the M4 motorway and A34 and in addition, the proximity of Heathrow airport provides enhanced national and international connectivity. These locational factors, combined with high quality urban and rural areas, contribute towards making the area a popular place to live and work.

2.2 Outside of the main urban areas about 44% of the total population are located in the rural area, dispersed across a large number, of towns, villages and smaller settlements each of which has its own identity, as well as its own specific needs and concerns. This rural dimension is very important in shaping the character of West Berkshire, its communities, economy and environment. It also creates synergies with our neighbouring authorities to the north, south and west with cross border working taking place with authorities in Oxfordshire, Hampshire and Wiltshire through the North Wessex Downs Area of Outstanding Natural Beauty (AONB) Council of Partners (see Appendix 1b).

2.3 Economic influences are particularly significant at a strategic level. West Berkshire is part of the Thames Valley Berkshire sub region which is recognised as the most dynamic and competitive sub-regional economy in the UK. This economic domination means that the most significant economic influences lie to the east, notably Reading, with economic linkages to the north, south and west of the District much less strong. Our strategic partnership working reflects this situation and we are a key player in the Thames Valley Berkshire Local Economic Partnership (TVB LEP). In partnership with other unitary authorities across Berkshire and authorities outside West Berkshire within one hours drive as well as the LEP. Recent joint working has focused on meeting unmet employment needs and working with 13 authorities and other strategic organisations within a one hour drive of West Berkshire. Previous work has been on wider economic and housing needs as well as leisure, retail and other commercial needs.

2.4 West Berkshire is strategically well connected in transport terms. At the centre of the District is an important road interchange where the east-west M4 motorway intersects with the north-south A34. There are also road connections to larger centres such as Reading, Oxford, Swindon, Basingstoke and London. In

addition, mainline railway services to London and the south west of England run through the south of the District.

2.5 Geography plays an important role in shaping cross border movements. Some of the western and northern parts of West Berkshire look towards Swindon and Oxford. Some of the southern communities gravitate towards Basingstoke, highlighting the complex nature of cross border arrangements that inevitably have to exist. A cross-border working group exists between West Berkshire Council, Hampshire County Council, and Basingstoke and Deane Borough Council on areas of common concern – including the exploration of sustainable solutions to the growth of traffic on the A339.

2.6 The Council works in partnership on various transport related joint activities given some of the eastern communities of West Berkshire have a boundary co-terminus with the urban area of Reading. This work is particularly related to the need to deliver sustainable transport solutions to reduce and manage the growth of congestion around the A4 and the M4 and surrounding transport corridors.

2.7 The settlements in the Eastern Area – Purley on Thames, Tilehurst, Calcot and Theale have a close functional relationship with Reading. Whilst many residents in this area use facilities and services in Reading, there is a significant movement the other way in terms of school children, with West Berkshire schools educating a significant number of Reading pupils.

2.8 Kennet Valley Meadows in Calcot are an important part of West Berkshire and Reading's green infrastructure, so joint working is important to conserve and enhance the management of this area, particularly as this forms part of a Biodiversity Opportunity Area. As a member of the Berkshire Local Nature Partnership the Council works at the landscape scale in order to make positive changes for biodiversity.

2.9 Additional cross border working takes place with Basingstoke and Deane, Wokingham, and Reading relating to the monitoring of housing completions within the consultation zones of AWE in Aldermaston and AWE in Burghfield.

2.10 Assessing the future need for Gypsy, Traveller and Travelling Showpeople site provision within the District also benefits from joint working arrangements. A shared methodology has been used amongst all Berkshire authorities to inform the quantity and types of site allocated in this Plan.

2.11 There are no Special Protection Areas (SPA) within West Berkshire, although there is a very small part of the District around Beech Hill within 5km of the Thames Basin Heaths SPA. Development in this area will need to be regulated in accordance with the Thames Basin Heaths Delivery Framework. Since the level of development expected to come forward in this area of the District is extremely low, the Council will explore opportunities for cross boundary working with Wokingham Borough Council in this regard.

2.12 The strategic context of West Berkshire means that there continues to be pressure on house prices, the need for affordable housing, the job market, transport and the environment. The area is therefore seen as one that will continue to seek to accommodate growth within sensitive environmental and policy constraints.

3. Preparation of the West Berkshire Local Plan Review to 2039

3.1 The Core Strategy (2012 – 2026) aimed to build upon the existing settlement pattern across West Berkshire and direct most development to Newbury, Thatcham and the settlements in the east of the District close to Reading. The existing urban areas regarded as the most suitable locations for future development by virtue of their existing access to services and facilities, thereby providing the opportunity to reduce out-commuting and the need to travel. The adopted Housing Site Allocations Development Plan Document (DPD) supports the delivery of housing as set out in the Council's adopted Core Strategy by allocating non-strategic housing sites across the District in accordance with the spatial strategy set out in the Core Strategy. This means that the sites allocated are in the areas that the Core Strategy sets out, based on evidence, as suitable for some level of future growth and that the proposals will conform to the policy details set out in the Core Strategy. Sites for Gypsies, Travellers and Travelling Showpeople were also proposed for allocation.

3.2 The West Berkshire Local Plan Review to 2039 (LPR) is intended as a comprehensive review of local planning for West Berkshire, but incorporating some of the allocations and policies of the two previous adopted DPDs (Core Strategy and Housing Allocations) and updating them where necessary. Additional sites and policies have been added based on new evidence and changed or updated guidance. A climate emergency was declared by West Berkshire in 2019 and the LPR has tackling climate change and related themes as a priority running through the document.

4. Identifying our strategic planning issues

4.1 West Berkshire Council started reviewing its Local Plan to cover the period up to 2036 in February 2018. The review of the Local Plan was intended to cover the future levels of need for new homes (including market, affordable and specialist housing and Gypsy and Traveller accommodation) and employment land and other land uses up to 2036 (now 2039) and to provide an appropriate basis for housing, employment land and infrastructure provision over that period. The Review is wide ranging and in summary, involved: a review of the existing Core Strategy strategic objectives; a review of the existing spatial strategy for the District; a review of all of the existing Core Strategy and Housing Site Allocations DPD policies to ensure their continued consistency with national policy. The introduction of additional development management policies in response to the

review of the saved development management policies not replaced by the Core Strategy or the Housing Site Allocations DPD. There have also been new policies in response to recent changes in national planning policy and guidance.

4.2 In November 2018 the Council produced a paper which set out how we would deal with the review of the Local Plan covering a wide range of key topics including the vision for the LPR and the strategic objectives. There was a review of the spatial strategy which including suggested work and approaches to the local plan, including the scale of development across the district, the housing requirement, Local Housing Need, housing land supply, employment land requirement, reviewing the spatial distribution of development and the spatial areas. The settlement hierarchy along with settlement boundaries were reviewed and the approach to identifying potential housing and employment land allocations was also set out using the Housing and Economic Land Availability Assessment. The council were at the time also working jointly with Reading and Wokingham on a potential garden village type development to deliver a sustainable community with housing, employment and social and community facilities called Grazeley with draft master planning being undertaken.

4.3 The outcome of this process was to agree the following strategic issues for the LPR at that time (this has since evolved slightly over time) -

Tackling climate change

- To mitigate and adapt to the effects of climate change and minimise demand for energy and other resources.

Sustainable and Quality Development

- To ensure provision of sustainable developments of high quality design, construction and efficiency (including land use) which contribute to an attractive, safe and accessible environment for all.

Housing Needs

- Work together with the other Berkshire authorities within the Western Berkshire Housing Market Area, to ensure that the assessed need for market and affordable housing up to 2036 will be met across the District.
- The approach to meeting needs for Gypsy and Traveller accommodation.
- Providing the right type of accommodation for the changing demographic structure of the population including the challenges presented by an aging population and smaller household size.

Economy

- To facilitate and support a strong, diverse and sustainable economic base across the District, including the provision of employment land which provides for a range of local job opportunities.
- To enhance the vitality and viability of town, district and local centres in West Berkshire as places for shopping, leisure and community activities.

AONB

- Together with partners, to continue to conserve and enhance the North Wessex Downs AONB, with landscape led development delivering wider environmental, economic and social benefits.

Green Infrastructure and Healthy Living

- To ensure that West Berkshire contains a strong network of multi-functional green infrastructure which provides health and environmental benefits and enhances the overall quality of life of sustainable communities.

Transport

- To make provision for transport networks that support sustainable growth West Berkshire and to promote low emission transport choices.

Infrastructure requirements

- To ensure that infrastructure needs (physical and social) arising from the growth in West Berkshire are provided to support and keep pace with development in accordance with the detail set out in the Infrastructure Delivery Plan.
- Ensuring development proposals do not adversely impact the water and wastewater network.

4.4 It is acknowledged that some of these issues are very broad and all encompassing, whereas others are narrower and more focused in their nature. In taking them all forward under the Duty it soon became clear that some were more critical for the preparation of the LPR than others and therefore required more attention and this has varied over time. Work on some of the more site specific issues, such as Grazeley and the need to change the strategic and cross boundary approach once it was determined it could not go forward.

4.5 At the same time, when the strategic issues were drawn up it was acknowledged that they may evolve as work progressed and that further cross boundary working could also be identified. Our approach to strategic planning is being prioritised and undertaken on the following basis as part of the Local Plan Review.

5. Strategic Matters for Co-operation

5.1 This section summarises the strategic matters for West Berkshire which have required co-operation, the key bodies involved, and the work that has been undertaken to date. Appendix 3 sets out the bodies that the Council has engaged with.

Housing

5.2 West of Berkshire Spatial Planning Framework, Expression of Interest in Garden Village and subsequent work.

5.3 Work on the Berkshire Strategic Housing Market Assessment identified two housing market areas (HMAs), and identified a high level of need for new housing within each HMA. It was therefore clear that the authorities in the Western Berkshire HMA needed to work together to consider how this level of growth may be accommodated. This led to two key pieces of work – an overall spatial planning framework to examine options for growth, and an expression of interest in a Garden Village at Grazeley.

5.4 The DCLG and Homes and Communities Agency invited expressions of interest in 2016 for providing new garden villages, with a deadline of 31st July. With the SHMA having been published in February 2016 and it having shown a high level of need for new homes, there was a clear opportunity for the local authorities in the area to explore the potential for a new garden village to help to accommodate growth accompanied by new infrastructure investment.

5.5 The site at Grazeley, which was already being discussed through the Spatial Planning Framework, was identified as having good potential for a successful bid. The site straddled the boundary between Wokingham and West Berkshire just outside the Reading boundary, so a bid on behalf of the three authorities was made. The Expression of Interest noted the potential for up to 15,000 new homes, supported by economic development uses and strong transport and infrastructure provision. Unfortunately the bid was not successful. The Detailed Emergency Planning Zone (DEPZ) for Burghfield now covers the area for the proposed Grazeley. This change resulted in objections from the Defence Nuclear Organisation (part of the Ministry of Defence) and the Office for Nuclear Regulation. No strategic allocation has been made in this area.

Readings Unmet Housing Need

5.6 The local authorities which make up the Western Berkshire Housing Market Area (HMA) have agreed a Statement of Common Ground (Appendix 2) for the purposes of Local Plan-making. This continues to recognise Reading's unmet need set out in the Reading Local Plan and the principle that the need should be met within the West of Berkshire area. This agreement relates only to Reading's need as calculated by the Berkshire SHMA, not by any alternative calculations of need.

5.7 Reading set out in their Regulation 18 representation on the emerging draft LPR that a five yearly review is required by 2024 and that will need to consider how to deal with the housing needs generated by the standard methodology or any subsequent methodology. The shortfall of 230 dwellings was anticipated by Reading Borough Council to arise at the later part of their current plan period. Though the principle of meeting any unmet need within the HMA is accepted, the distribution of that unmet need within the HMA has not been agreed and will be subject to further review, through the plan – making process, before the need arises. Additional text has been included in the supporting text section of policy SP12 Approach to Housing Delivery in recognition of Reading's unmet housing need. Reading in their Regulation 19 response have confirmed that this approach is acceptable (see the relevant appendix). Bracknell Forest have also warned (in their Regulation 19 response) that this additional text may need to be altered as their Inspector found their similar wording unsound and required it to be amended, to make the local plan sound.

Gypsies and Travellers

5.8 West Berkshire Council (WBC) continues to work on meeting it's identified Gypsy and Traveller housing need, based on a joint methodology agreed with the Western Berkshire Councils, this has also involved discussing cross boundary issues with neighbouring authorities. WBC has an up to date Gypsy and Traveller needs assessment.

Economy

5.9 The six Berkshire authorities and the Thames Valley LEP worked together to define appropriate Functional Economic Market Areas (FEMAs) across Berkshire. This work then formed the basis for carrying out the Economic Development Needs Assessment (EDNA) for each of the FEMAs to identify the future quantity of land/floorspace required for economic development uses. The recent Employment Land Reviews (ELRs) 2020 and 2022 have since superseded the EDNA.

5.10 Unfortunately due to a variety of constraints which will be identified in other council evidence such as the Housing and Economic Land Availability Assessment (HELAA), West Berkshire Council cannot meet its own identified

employment needs. Since the 2020 Employment Land Review further work has been undertaken to update the Employment Land Review, which has suggested new need figures for different employment uses. There is now a potential deficit for office, B2 and B8 warehousing/logistics uses over the plan period. The figures for the deficits are: Office 51,000 sq m and 33,000 sq m for B2 and B8 warehousing/logistics uses, this is partly due to the expected changes in the economy during and since the Covid pandemic, although it is difficult to be certain.

5.11 Given this shortfall the council has been meeting local planning authorities within one hours drive of Newbury to discuss if they could contribute to meeting this unmet need; they are; Test Valley, Reading, Wiltshire and Swindon, South Oxfordshire, Vale of the White Horse, Wokingham, Basingstoke and Deane, Hart, Buckinghamshire, Oxford City, Rushmoor, Royal Borough of Windsor and Maidenhead and Bracknell Forest (who were mid examination of their Local Plan). Many of the councils were at an early stage in reviewing their local plans and updating, refreshing or re-assessing their evidence, including on employment needs and land requirements to meet those needs. Many felt that they could not meet the identified need that their latest evidence suggested would be appropriate. The meetings were initially at officer level, although relevant leading members at the different authorities were informed of WBC's employment land needs and that the meetings were needed. One authority at officer level has indicated that there may be a possibility of a statement of common ground covering offices possibly to meet some of our unmet need, but further work is still required on this.

5.12 In January 2023 a formal request was made to the authorities within one hour's drive of Newbury as well as the Thames Valley Berkshire Local Enterprise Partnership and the formal responses we have received are attached as appendices. In general they confirm the above statement but also suggest that further joint work will need to be on going. This duty to cooperate work is ongoing.

Housing and Employment Land Availability Assessment (HELAA)

5.13 A joint HELAA methodology was developed and agreed with four other Berkshire unitary authorities – Reading Borough Council, the Royal Borough of Windsor and Maidenhead, Slough Borough Council, and Wokingham Borough Council. Of the Berkshire authorities, only Bracknell Forest Borough Council (BFBC) did not sign up to the methodology because work was already underway on their own methodology. Nonetheless, BFBC contributed to discussions around the methodology, and it is considered that the two approaches are largely compatible.

5.14 The preparation of a joint methodology with the other Berkshire authorities, particularly those within the same Housing Market Area (Bracknell Forest, Reading, West Berkshire, and Wokingham are all within the Western Berkshire

Housing Market Area) enables HELAAs to be brought together to form a consistent evidence base regarding development potential in the area. Whilst a single study covering the Housing Market Area would have been the most appropriate approach for consistency, this has not been practical due to there being four different plan-making timetables. The approach of the joint methodology contributes towards ensuring that the Duty to Cooperate is met.

5.15 As part of the preparation of the HELAA, the suitability of sites was assessed. Input from stakeholders was sought to inform the assessment of suitability, and paras 3.25 to 3.27 of the main HELAA document cover this. The suitability assessments (which incorporate the comments from stakeholders) are included within Appendix 4 of the HELAA.

Western Berkshire Retail and Commercial Leisure Assessment

5.16 The four authorities in the Western Berkshire HMA (West Berkshire District Council, Reading Borough Council, Wokingham Borough Council and Bracknell Forest Borough Council (BFBC)) commissioned a joint retail and commercial leisure assessment, with BFBC being the lead authority. GVA were appointed to carry out the assessment in January 2016. The purpose was to establish the level of need for new retail and commercial leisure provision across the area up to 2036.

North Wessex Downs Area of Natural Beauty (AONB)

5.17 The Council of Partners includes member representatives (with officer support) of the nine local authorities which have the administrative responsibilities for the area covered by the North Wessex Downs. It also includes representatives of Natural England, community and parish councils, farming and rural businesses, nature conservation, historic environment, rural recreation and tourism. All have signed a Charter which sets out how we work together for the long term benefit of the AONB and all who live and work in it. The Council of Partners has no independent executive powers. Its work is carried out with the prior approval of its constituent local authorities and DEFRA (the funding partners).

5.18 The Partnership is underpinned by a small AONB delivery team. Preparation of a Management Plan for the North Wessex Downs AONB (NWD AONB) is a statutory requirement placed upon the constituent local authorities by the Countryside and Rights of Way (CROW) Act 2000. The review, production and publication of the Management Plan, together with the coordination of its delivery, has been delegated by the Council to the Council of Partners. The delivery of the AONB Management Plan is monitored by the Partnership through an annual review of the delivery of the AONB Business Plan, and achievements are reported through the AONB's Annual Report.

5.19 For potential site allocations in or near the AONB the delivery team have been consulted and asked for comment as an integral part of the process.

Transport

5.20 Our principal contact with National Highways is Patrick Blake He provided their Regulation 18 response in February 2021. Members of the Transport Policy Team and the Environment Delivery Manager subsequently met with Patrick and a colleague to go through the response, which is supportive and did not reveal any contentious issues. We are currently arranging a mutually convenient time for a subsequent meeting now that the picture has changed slightly, and we are more advanced in our modelling work than last time we spoke with them.

5.21 In addition, the Transport Policy Team Leader, has regular contact through the Berkshire Strategic Transport Forum (BSTF) with National Highways representatives, Greg Stone and Beverley Spellman.

5.22 West Berkshire Council is working towards a statement of common ground between the Council and National Highways, in preparation for the Examination stage of the LPR. We will continue our collaboration with National Highways and our transport modelling consultants WSP as the Local Plan gets finalised. The ideal situation is that at examination we have an agreed statement of common ground confirming there are no issues flowing from our proposals from National Highways' point of view; and, they are content with our approach and methodology of assessment / modelling.

Health

5.23 Tackling health and wellbeing requires a multi-agency approach. The West Berkshire Health and Wellbeing Strategy 2017-2020, developed by the Health and Wellbeing Board, seeks to align the broader strategic priorities of the Council, Newbury and District Clinical Commissioning Group (CCG) and North and West Reading CCG as well NHS England and Public Health England. It is underpinned by the need to 'build communities together' by enabling communities to be stronger and resilient, solving problems for themselves, working together with partner agencies and the voluntary sector to meet their health and wellbeing needs. It also aims to tackle inequalities in health by addressing the wider determinants of health such as housing, unemployment, homelessness, education, social isolation, transport and community safety. Ensuring those who have the most need in our district are as healthy as everyone.

5.24 The Council recognises that the Local Plan has a crucial role to play in ensuring that opportunities exist for people to be able to make healthier lifestyle choices and address health inequalities. Health and environment are inextricably linked and the creation of attractive, safe and accessible places to live, improves the quality of life and wellbeing of both individuals and communities as a whole.

5.25 The Local Plan Review Policy DM3 Health and Wellbeing, sets out that development should be designed to encourage healthier lifestyles through the promotion of physical activity, the enhancement of social connections and the strengthening of mental health.

5.26 There have been regular officer and NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board (ICB) meetings. From 09/10/2020 to winter 2022 every second Friday of the month 10.30 to 11.30, where the implications of the proposed local plan were discussed, in terms of health care impact and possible future requirements. This changed to the first Wednesday of the month from 04/01/2023. Meetings have also taken place with the NHS and the three surgeries who cover the North East Thatcham proposed strategic development (Burwood, Chapel Row and Thatcham Healthcare) in September 2021 and December 2022. In addition two senior officers from West Berkshire attended briefings of Thatcham Town Council (10/01/2023) and Newbury Town Council (19/01/2023).

Infrastructure

5.27 Infrastructure requires working with a wide range of organisations to deliver the infrastructure need to deliver the local plan, some of them are strategic and others more local. The details of how this is to work are set out in the Infrastructure Delivery Plan (IDP), part of the background evidence for the Local Plan Review. The parties involved in delivering the infrastructure are also set in the IDP.

5.28 The IDP has extensive references to strategic transport infrastructure, including working with National Highways, Transport for the South East, strategic cycle routes, working with the Thames Valley Berkshire LEP to gain support for certain strategic projects such as the A339 Corridor Study, the Basingstoke to Reading Multimodal Transport Corridor study, public transport bus and rail, as well as other transport projects which may have strategic impacts.

5.29 In addition to transport, Energy is part of the IDP and seeking to achieve net zero carbon emissions from the district by 2030 and implications for network planning is considered including with strategic partners. Gas, electricity and renewable energy challenges are also discussed which have strategic implications.

5.30 Water and drainage are considered across the district at a strategic level and the close work with Thames Water is highlighted who supply both the water and collect and treat waste water across the district. Thames Water has worked extensively and closely with our consultants JBA to evaluate the impacts of different development proposals on the effluent and treatment systems, also contributing to the water cycle studies. This work will continue as the Local Plan is progressed and proposals for development are firmed up with more certainty.

Nutrient Neutrality

5.31 Since March 2022 the river Lambourn (Special Area of Conservation) was found to have significant levels of phosphate pollution and classified as being in a "poor state". West Berkshire Council has been working with Natural England and other councils to find a long term solution to this challenge for certain development proposals.

Flooding

5.32 The Environment Agency reviewed the draft Level 1 Strategic Flood Risk Assessment and commented on the council's approach to delivering housing and other allocations. Their focus has been flood risk issues and managing climate change but also included advice on maintaining waterbodies quality saying there are some sites that would require further investigation and analysis in a Phase 2 Water Cycle Study (WCS).

Habitats Regulations Assessment

5.33 The approach to Habitats Regulations Assessment (HRA) has been developed in conjunction with Natural England and they agreed with our initial screening opinion and the final HRA document has been developed following that screening. We have requested entering to a statement of common ground with Natural England and will continue to work with them on this topic.

Atomic Weapons Establishments Aldermaston and Burghfield

5.34 Council officers have had regular discussions with the Office for Nuclear Regulation about the Detailed Emergency Planning Zone (DEPZ) and the impact on new allocations. They have also had a key input into the updated policy relating to the DEPZ.

Thatcham Masterplanning

5.35 The Housing and Economic Land Availability Assessment (HELAA) submissions made in response to WBDC's Call for Sites highlighted a number of sites which are being promoted at Thatcham. WBDC reviewed those sites and published the results; those of a strategic nature warranted more detailed testing to better understand their suitability, capacity and viability. At Thatcham, WBDC's view is that this could be achieved through a three-stage process, with an emphasis on planning for the future of the settlement as a whole: looking at the towns past, present and future.

5.36 A series of three documents were produced by David Lock Associates and Stantec covering the three stages set out above. For the final stage the consultants engaged with the local community and key strategic stakeholders to consider how the area north east of Thatcham could be developed. This led to a framework for NE Thatcham: the principles for growth, concept masterplan and

development frameworks which could deliver strategic growth on the site in NE Thatcham. An examination of necessary infrastructure to deliver strategic growth in Thatcham, and a high-level viability analysis of different scenarios. The consultants also produced an analysis and recommendations for potential strategic growth options in Thatcham.

5.37 As the proposal for NE Thatcham is evolving further work with local and strategic stakeholders will be required.

6 Western Berkshire Councils Statement of Common Ground

6.1 As the Western Berkshire authorities continued to work together on moving forward local plans and policy development a joint Statement of Common Ground was agreed and produced for the authority areas (Appendix 2). The document covers a wide range of topics including: Housing and employment need and supply, Gypsy and Traveller and Showpeople accommodation needs and supply, retail leisure and town centres, strategic transport infrastructure, utilities provision, landscape and the atomic weapons establishments.

6.2 In the statement of common ground there is general agreement that each authority will seek to meet their own employment needs, or initially did not see issues preventing them meeting those needs. Unfortunately in West Berkshire this has not proven to be the case and further duty to co-operate work has been undertaken which is still ongoing and set out above.

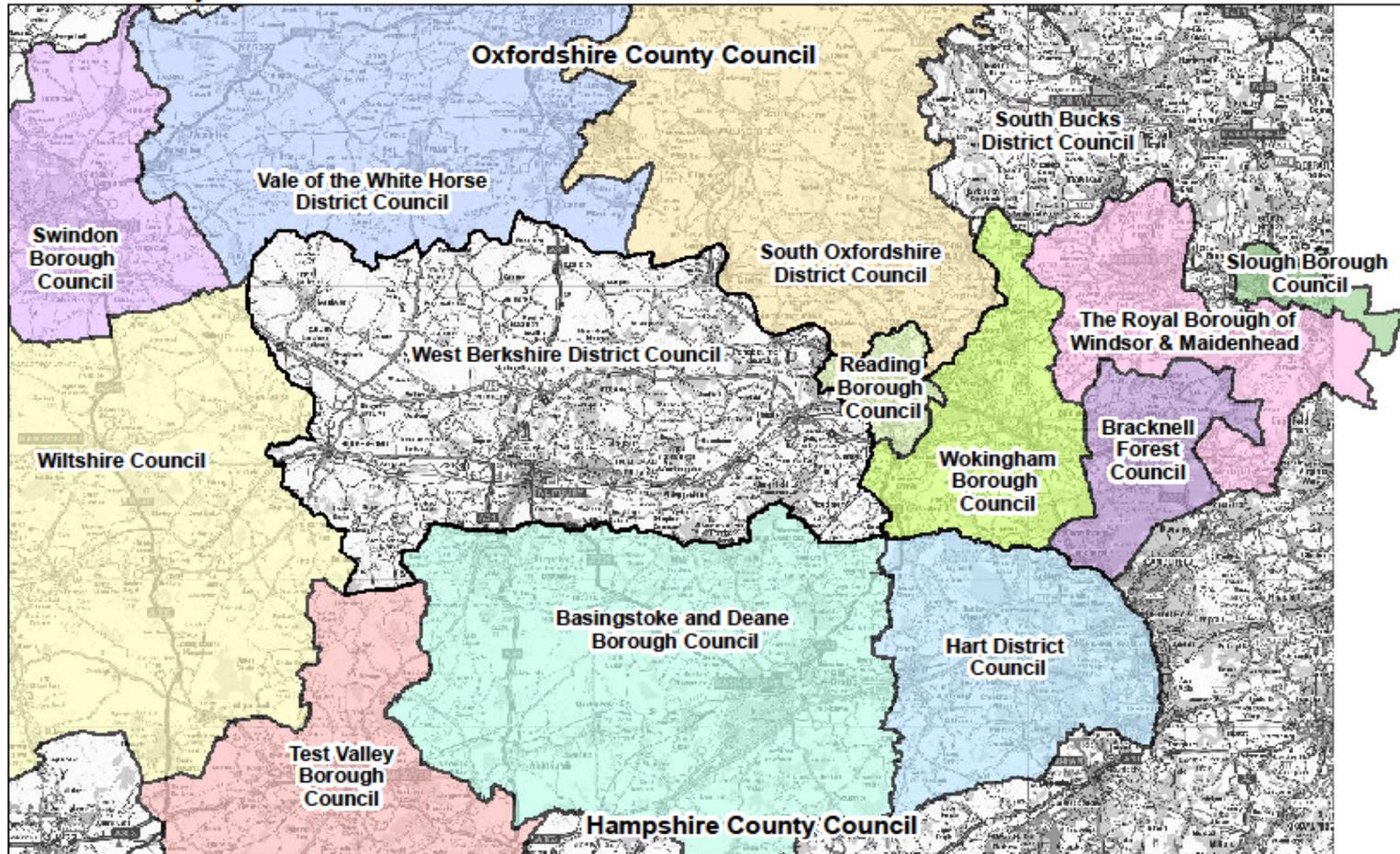
7 Conclusions

7.1 In producing the West Berkshire Local Plan Review to 2039 the council has engaged with a wide range of duty to co-operate partners and the process is still ongoing in many areas. It is considered that the work with many duty to co-operate partners over the production of the West Berkshire Local Plan Review to 2039 has met the requirements for maintaining effective co-operation set out in paragraphs 24 to 27 of the National Planning Policy Framework 2021.

7.2 The council have collaborated to identify the relevant strategic matters which they need to address in their plans. They have undertaken and maintained effective and on-going joint working between strategic policy-making authorities and relevant bodies has been integral to the production of a positively prepared and justified strategy. In particular, joint working has helped to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.

APPENDIX 1a: Map of strategic planning area

**Strategic Planning Area
Local Authority Partners**



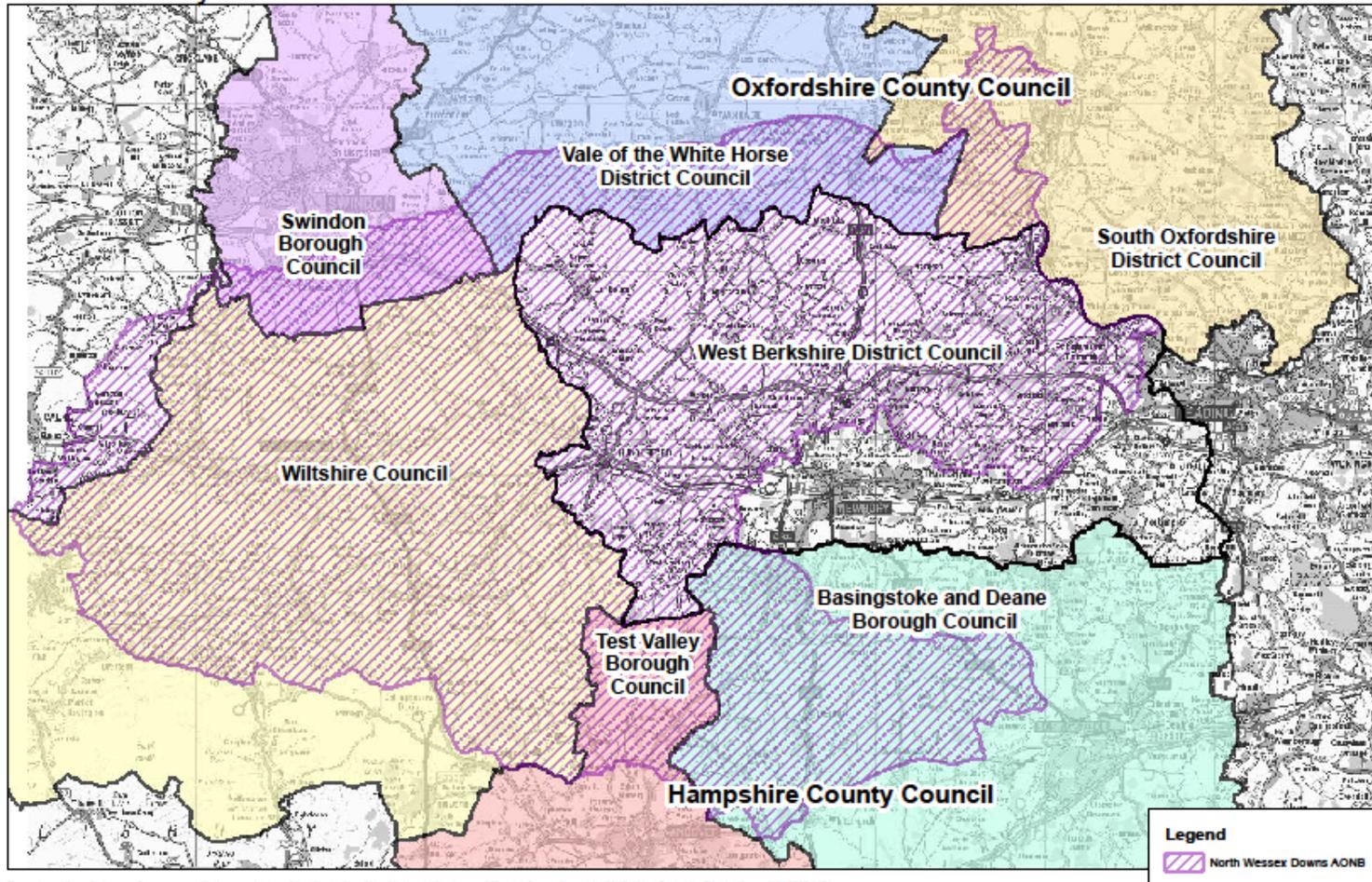
Reproduced from Ordnance Survey map with the permission of the Controller of Her Majesty's Stationery Office (c) Crown Copyright 2015. West Berkshire District Council 0100024151.

APPENDIX 1b: Map of Strategic Planning Partners for the North Wessex Downs AONB

Strategic Planning Area - North Wessex Downs AONB Local Authority Partners

14/10/2015

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APPENDIX 2: Statement of Common Ground for Western Berkshire Councils

WEST OF BERKSHIRE AREA STATEMENT OF COMMON GROUND

FOR LOCAL PLAN-MAKING

August 2021



APPENDIX 3

Glossary of bodies engaged

There are a number of organisations who have played a particularly key role in helping to identify and develop the strategic issues and priorities to be considered as part of the Local Plan Review and will also be key in helping in their monitoring and delivery. These include:

Basingstoke and Deane Borough Council

We primarily work with the Borough Council at both an officer and member level on dealing with specific issues, such as any cross boundary concerns relating to transport and traffic on the A339 or regarding AWE Aldermaston and AWE Burghfield. We coordinate the officer level off site planning group for AWE Aldermaston and AWE Burghfield. We also work together at both an officer and member level as constituent members of the North Wessex Downs AONB Council of Partners (CoP). They have recently been engaged on duty to co-operate meeting associated with the unmet employment land requirements.

Berkshire Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT)

We are committed at both an officer and member level to our partnership working with BBOWT. In January 2014 we entered into an innovative partnership with the organisation, which now manages our commons, country parks and nature reserves. The overarching partnership agreement is for 50 years and in return for ongoing funding BBOWT delivers countryside management at the sites according to an agreed business plan and annual management plan. A Steering Group has been established as part of the governance arrangements which comprises senior officers and Council members/trustees. Part of our partnership working covers the Living Landscape Project.

Berkshire Local Nature Partnership (BLNP) -

Please go to <http://berkshirelnp.org/index.php/homepage/the-partners> for further details. We have been fully engaged with the BLNP at both a member and officer level. The Council's Executive Portfolio Holder for Countryside sits on the BLNP Executive Board and the Council's Principal Ecologist sits on the BLNP Steering Group. The Partnership includes representatives from Natural England, Thames Water, Environment Agency, BBOWT and the AONB.

Berkshire Local Transport Body (BLTB)

The Berkshire Local Transport Body (BLTB) is a partnership of the six Berkshire authorities and Thames Valley Berkshire Local Enterprise Partnership which has been established to prioritise funding for local major transport schemes devolved from the Department for Transport. Slough Borough Council is the Accountable Body for the BLTB. The Council's Executive Portfolio Holder for Transport sits on the Body. For full details of membership, agendas and meeting minutes please go to <http://www.slough.gov.uk/moderngov/mgCommitteeDetails.aspx?ID=601>

Berkshire Strategic Transport Forum (BSTF)

The Berkshire Strategic Transport Forum (BSTF) brings together the six Berkshire authorities and Thames Valley Berkshire Local Enterprise Partnership, the Department for Transport (DfT), Network Rail, Highways England, Heathrow Airport Limited, and

some train and bus operating companies to discuss and consult on matters of mutual interest relating to strategic transport issues in Thames Valley Berkshire. It operates at two levels – one with elected members and business representatives, and the other with senior transport officers. The Berkshire Chief Executives' Group has recognised the importance of these arrangements by nominating one of its members to chair the officers' meeting and liaise with the LEP and the members. The membership of the BLTB and of the Berkshire Strategic Transport (Members') Forum is identical, and the two bodies operate in tandem with each other.

Bracknell Forest Borough Council

We use the Memorandum of Understanding on Strategic Planning (MoU) signed by all the Berkshire unitary authorities as a starting point to guide our approach to cooperation. The MoU provides a framework for joint working between the Berkshire authorities and it allows refined Agreements to be agreed between individual authorities on specific areas where they consider it appropriate. In accordance with the MoU, which was formally adopted by West Berkshire Council on 19th December 2013, we use existing partnerships and working groups to take issues forward as appropriate. At an officer level these include the Berkshire Development Plans Group (DPG) which provides a co-ordinating role for planning policy officers across Berkshire to discuss matters of mutual interest on a bi monthly basis. This reports to the Berkshire Heads of Planning (BHoP) which provides a strategic planning policy overview for chief planning officers across Berkshire to discuss matters of mutual interest. BHoP periodically keeps Lead Councillors informed on how mechanisms for fulfilling the duty to co-operate are progressing and being taken forward. At a member level there are regular meetings of Berkshire Leaders (and occasional meeting of portfolio holders for specific issues). In addition, a Member Reference Group has been set up to move the outcomes of the SHMA forward into capacity work across the Housing Market Areas and beyond.

Environment Agency

The Environment Agency has responsibility for water quality and resources and we primarily work with it at an officer rather than member level. The Agency have been working with the councils on flood risk environmental matters in their remit, including green and blue infrastructure and responding to Reg 18 consultations on the LPR. The continued use of one to one discussions will be important at the planning application stage and in the delivery of the LPR. Their focus has been flood risk issues and managing climate change but also included advice on maintaining waterbodies quality saying there are some sites that would require further investigation and analysis in a Phase 2 Water Cycle Study (WCS).

Hampshire County Council

We primarily work with Hampshire County Council at both an officer and member level on dealing with transport issues relating to the A339 and the updating of the freight network. We also work together at both an officer and member level as constituent members of the North Wessex Downs AONB Council of Partners (CoP).

Hart District Council

We continue to work with the District Council at an officer level, although a memorandum of understanding was prepared by Hart District Council in 2013 which made clear there were no strategic issues that needed to be considered between us. They have recently been engaged on duty to co-operate meetings associated with the unmet employment

land requirements and nutrient neutrality. We have also taken the opportunity to update each other on local plan and evidence base progress,

National Highways (formerly Highways Agency and Highways England)

As the government agency charged with managing motorways and A roads, we have worked with the Highways England at an officer level to provide comments on potential housing and employment sites in advance of any formal public consultation and the organisation has also been involved at all formal stages of the process to date.. The continued use of one to one discussions will be important at the planning application stage and in the delivery of the LPR.

Natural England

Natural England is the government's adviser on the natural environment, providing practical scientific advice on how to look after England's landscapes and wildlife. We have worked with Natural England at an officer level to provide comments on potential sites in advance of any formal public consultation and it has also been involved at all formal stages of the process to date. They have been involved in considering the impact of proposed allocations on the North Wessex Downs AONB. Consultations on Habitats Regulation matters are undertaken particularly recently in relation to nutrient neutrality, they have responded to WBC's initial screening of the Habitats Regulation Assessment for the LPR. The continued use of one to one discussions will be important at the planning application stage and in the delivery of the LPR. We also work together as constituent members of the North Wessex Downs AONB Council of Partners (CoP).

North Wessex Downs AONB Council of Partners (NWD AONB)

The Council of Partners includes member representatives (with officer support) of the nine local authorities which have the administrative responsibilities for the area covered by the North Wessex Downs. It also includes representatives of Natural England, community and parish councils, farming and rural businesses, nature conservation, historic environment, rural recreation and tourism. All have signed a Charter which sets out how we work together for the long term benefit of the AONB and all who live and work in it. The current list of members can be found here -

<https://www.northwessexdowns.org.uk/about-us/the-council-of-partners/council-of-partners-membership/>

The Council of Partners has no independent executive powers. Its work is carried out with the prior approval of its constituent local authorities and DEFRA (the funding partners). Minutes of its meetings can be found here -

<https://www.northwessexdowns.org.uk/about-us/the-council-of-partners/meetings-minutes/>

The Partnership is underpinned by a small AONB delivery team.

Preparation of a Management Plan for the North Wessex Downs AONB (NWD AONB) is a statutory requirement placed upon the constituent local authorities by the Countryside and Rights of Way (CROW) Act 2000. The review, production and publication of the Management Plan, together with the coordination of its delivery, has been delegated by the Council to the Council of Partners. The delivery of the AONB Management Plan is monitored by the Partnership through an annual review of the delivery of the AONB Business Plan, and achievements are reported through the AONB's Annual Report.

Office for Nuclear Regulation (ONR)

The ONR is responsible for regulation of nuclear safety and security across the UK and is responsible for advising on land use planning (LUP) applications in the vicinity of

licensed nuclear installations. The aim is to ensure that developments around nuclear installations do not result in populations rising to unacceptable levels.

The ONR administers the government's policy on the control of development and provides advice to the Council, who take this into account in considering whether or not to approve planning applications. Please go to - <http://www.onr.org.uk/land-use-planning.htm> for further details.

We have primarily worked with the ONR at an officer level through the off site planning group for AWE Aldermaston and AWE Burghfield which consists of emergency planning officers from West Berkshire, Basingstoke and Deane Borough Council, Reading Borough Council and Wokingham Borough Council. This meets on a quarterly basis, with planning policy officers attending as appropriate.

Oxfordshire County Council

As part of the work on our Local Plan Review we work with the County Council on transport related issues at both an officer and member level. We do this primarily through the Berkshire Strategic Transport Forum (BSTF). We set up individual meetings to discuss specific issues when appropriate such as the updating of the freight network. We also work together at both an officer and member level as constituent members of the North Wessex Downs AONB Council of Partners (CoP).

Reading Borough Council

We use the Memorandum of Understanding on Strategic Planning (MoU) signed by all the Berkshire unitary authorities as a starting point to guide our approach to cooperation. The MoU provides a framework for joint working between the Berkshire authorities and it allows refined Agreements to be agreed between individual authorities on specific areas where they consider it appropriate. In accordance with the MoU, which was formally adopted by West Berkshire Council on 19th December 2013, we use existing partnerships and working groups to take issues forward as appropriate. At an officer level these include the Berkshire Development Plans Group (DPG) which provides a co-ordinating role for planning policy officers across Berkshire to discuss matters of mutual interest on a bi monthly basis. This reports to the Berkshire Heads of Planning (BHoP) which provides a strategic planning policy overview for chief planning officers across Berkshire to discuss matters of mutual interest. BHoP periodically keeps Lead Councillors informed on how mechanisms for fulfilling the duty to co-operate are progressing and being taken forward. At a member level there are regular meetings of Berkshire Leaders (and occasional meeting of portfolio holders for specific issues). Reading has also been a signatory to the statement of common ground in 2021 in relation to strategic planning matters as set out in Appendix 2 They have recently been engaged on duty to co-operate meeting associated with the unmet employment land requirements.

Royal Borough of Windsor and Maidenhead

We use the Memorandum of Understanding on Strategic Planning (MoU) signed by all the Berkshire unitary authorities as a starting point to guide our approach to cooperation. The MoU provides a framework for joint working between the Berkshire authorities and it allows refined Agreements to be agreed between individual authorities on specific areas where they consider it appropriate. In accordance with the MoU, which was formally adopted by West Berkshire Council on 19th December 2013, we use existing partnerships and working groups to take issues forward as appropriate. At an officer level these include the Berkshire Development Plans Group (DPG) which provides a co-ordinating role for planning policy officers across Berkshire to discuss matters of mutual

interest on a bi monthly basis. This reports to the Berkshire Heads of Planning (BHoP) which provides a strategic planning policy overview for chief planning officers across Berkshire to discuss matters of mutual interest. BHoP periodically keeps Lead Councillors informed on how mechanisms for fulfilling the duty to co-operate are progressing and being taken forward. At a member level there are regular meetings of Berkshire Leaders (and occasional meeting of portfolio holders for specific issues). They have recently been engaged on duty to co-operate meeting associated with the unmet employment land requirements.

Slough Borough Council

We use the Memorandum of Understanding on Strategic Planning (MoU) signed by all the Berkshire unitary authorities as a starting point to guide our approach to cooperation. The MoU provides a framework for joint working between the Berkshire authorities and it allows refined Agreements to be agreed between individual authorities on specific areas where they consider it appropriate. In accordance with the MoU, which was formally adopted by West Berkshire Council on 19th December 2013, we use existing partnerships and working groups to take issues forward as appropriate. At an officer level these include the Berkshire Development Plans Group (DPG) which provides a co-ordinating role for planning policy officers across Berkshire to discuss matters of mutual interest on a bi monthly basis. This reports to the Berkshire Heads of Planning (BHoP) which provides a strategic planning policy overview for chief planning officers across Berkshire to discuss matters of mutual interest. BHoP periodically keeps Lead Councillors informed on how mechanisms for fulfilling the duty to co-operate are progressing and being taken forward. At a member level there are regular meetings of Berkshire Leaders (and occasional meeting of portfolio holders for specific issues). They have recently been engaged on duty to co-operate work associated with the unmet employment land requirements.

Swindon Borough Council

We set up individual meetings to discuss specific issues when appropriate such as the updating of the freight network. We also work together at both an officer and member level as constituent members of the North Wessex Downs AONB Council of Partners (CoP). Recently we have been working with them on meeting our unmet employment land provision as well as strategic cross boundary planning matters.

Buckinghamshire Unitary Authority and part predecessor South Buckinghamshire District Council

We have primarily worked with the new unitary council district council at both an officer and member level during the preparation of the Berkshire SHMA once it was identified as part of the area covered. South Bucks later indicated that it did not want to be actively involved in the Berkshire SHMA but was pursuing alternative options which were linked to it taking forward a joint local plan with Chiltern District Council. It also declined to take part in the jointly commissioned work on the Functional Economic Market Area (FEMA). More recently we have been working with them on meeting our unmet employment land provision as well as strategic cross boundary planning matters.

South Oxfordshire District Council

As part of the work on our Local Plan Review we work with the District Council on transport and economic related issues at both an officer and member level. We also set up individual meetings with the District Council to discuss specific issues when appropriate, such as the cross boundary implications of housing growth or employment

matters particularly recently WBC unmet employment land requirements. We also work together at both an officer and member level as constituent members of the North Wessex Downs AONB Council of Partners (CoP).

Test Valley Borough Council

We will set up individual meetings with the Borough Council to discuss specific issues when appropriate and recently have engaged with them on the LPR particularly in relation to unmet employment need requirements and nutrient neutrality , although issues relating to other local plan topics have been discussed. We also work together at both an officer and member level as constituent members of the North Wessex Downs AONB Council of Partners (CoP).

Thames Valley Berkshire Local Economic Partnership (TVB LEP)

<http://thamesvalleyberkshire.co.uk/>

We are engaged at both an officer and member level with the TVB LEP.

Thames Valley Environmental Records Centre (TVERC)

TVERC is a 'not for profit' organisation covering Berkshire and Oxfordshire. It is run by a partnership and is one of a national network of local records centres. Its funding partners include all the local authorities in Oxfordshire & Berkshire plus Natural England and the Environment Agency. It also works closely with the Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust. TVERC provides the following services for the Council –

- Provision of sites, species and habitat data
- Data collection and management
- Data analysis and presentation
- Supporting recorders and volunteers
- Local Wildlife Sites surveys
- Review of Ancient Woodland inventory
- Roadside nature reserves surveys

All this information has informed the SA/SEA work as part of the site selection process. It also forms part of the regular data collected and monitored as part of the Council's Annual Monitoring Report.

Thames Water

As the statutory water and waste water provider we have worked with Thames Water at an officer level to provide comments on potential housing sites in advance of any formal public consultation and the organisation has also been involved at all formal stages of the process to date. The continued use of one to one discussions will be important at the planning application stage and in the delivery of the LPR.

Vale of White Horse District Council

As part of the work on our wider Local Plan we work with the District Council on transport and economic related issues at both an officer and member level. We also set up individual meetings with the Vale of White Horse District Council to discuss specific issues when appropriate, such as the cross boundary implications of housing growth more recently on meeting WBC unmet employment land requirements. We also work together at both an officer and member level as constituent members of the North Wessex Downs AONB Council of Partners (CoP).

Wiltshire Council

As part of the work on our wider Local Plan we work with Wiltshire Council particularly on transport related issues at both an officer and member level. We do this primarily through the Berkshire Strategic Transport Forum (BSTF). We set up individual meetings to discuss specific issues when appropriate such as the updating of the freight network more recently on meeting WBC unmet employment land requirements. We also work together at both an officer and member level as constituent members of the North Wessex Downs AONB Council of Partners (CoP).

Wokingham Borough Council

We use the Memorandum of Understanding on Strategic Planning (MoU) signed by all the Berkshire unitary authorities as a starting point to guide our approach to cooperation. The MoU provides a framework for joint working between the Berkshire authorities and it allows refined Agreements to be agreed between individual authorities on specific areas where they consider it appropriate. In accordance with the MoU, which was formally adopted by West Berkshire Council on 19th December 2013, we use existing partnerships and working groups to take issues forward as appropriate. At an officer level these include the Berkshire Development Plans Group (DPG) which provides a co-ordinating role for planning policy officers across Berkshire to discuss matters of mutual interest on a bi monthly basis. This reports to the Berkshire Heads of Planning (BHoP) which provides a strategic planning policy overview for chief planning officers across Berkshire to discuss matters of mutual interest. To date, together with the Thames Valley Berkshire Local Economic Partnership, the Group has been instrumental in coordinating the work of the Strategic Housing Market Assessment (SHMA) and the identification of a Functional Economic Market Area. BHoP periodically keeps Lead Councillors informed on how mechanisms for fulfilling the duty to co-operate are progressing and being taken forward. At a member level there are regular meetings of Berkshire Leaders (and occasional meeting of portfolio holders for specific issues). In addition, a Member Reference Group has been set up to move the outcomes of the SHMA forward into capacity work across the Housing Market Areas and beyond. They have recently been engaged on duty to co-operate meetings associated with the unmet employment land requirements.

Other bodies

As part of the Duty to Cooperate process the Council has also engaged with a number of other bodies and these include:

- Berkshire Association of Local Councils
- British Aggregates Association
- Cemex (UK)
- Centrica PLC (British Gas)
- Civil Aviation Authority
- Community Council For Berkshire
- Country Land & Business Association
- English Heritage
- Friends, Families and Travellers (FFT)
- Grundon Waste Management Ltd
- Gypsy Council
- Highways Agency

- Home Builders Federation
- Homes and Communities Agency - South and West
- Marine Management Organisation
- Mayor of London
- Mineral Products Association Ltd
- National Farmers Union
- National Grid
- Network Rail
- Newbury and District Clinical Commissioning Group
- NHS England
- North and West Reading Clinical Commissioning Group
- North Wessex Downs AONB
- Office for Nuclear Regulation
- Office of Rail Regulation
- Openreach newSites
- Police and Crime Commissioner
- Renewable UK Association
- Royal Berkshire Ambulance NHS Trust
- Royal Berkshire Fire & Rescue Service
- Scottish and Southern Energy Plc
- Showmen's Guild of Great Britain
- Swindon Borough Council
- Thames Valley Police
- The Coal Authority
- The National Federation of Gypsy Liaison Groups
- Transport for London
- Veolia Environmental Services
- Wales and West Utilities
- West Berkshire Disability Alliance

APPENDIX 4

Memorandum of Understanding between the Berkshire Unitary Authorities on Strategic Planning and the “Duty to Co-operate” on Planning Matters in Berkshire

As single tier authorities, the six Berkshire unitary authorities are both local and strategic planning authorities for their areas. The Localism Act 2011 brings significant changes to strategic planning in England. Strategic planning remains an essential part of the planning system. The Act provides for a bottom up approach to strategic planning in a local area through the “duty to co-operate.”

The Act sets out that a local planning authority has a duty to co-operate by:

“engaging constructively, actively and on an on-going basis in the preparation of development plan and other documents and in activities that can reasonably be considered to prepare the way for the preparation of such documents for strategic matters.”

The requirements of the Localism Act are complemented by the guidance in paragraphs 178-181 of the National Planning Policy Framework (NPPF), although these are additional to those within the Act. The NPPF includes reference to local authorities considering agreements on joint approaches to the undertaking of activities and to considering whether to agree to prepare joint local development documents. The duty involves a continuous process of engagement from initial thinking through to implementation. It should result in meeting development requirements, including unmet requirements from neighbouring authorities, where it is practical to do so. Authorities should also consider producing plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy which is presented as evidence of an agreed position.

The Duty to Co-operate has become the first matter that is tested at a local plan examination. Failure to co-operate will result in delay and increased costs in bringing forward up to date local plans thereby increasing the risks at planning appeals.

In the light of the duty the Berkshire Unitary Authorities have formulated and agreed the following memorandum of understanding:

- A. **Agreeing Strategic/Cross Boundary Issues:** The authorities will endeavour to agree appropriate Berkshire, or part of Berkshire, baseline positions on relevant strategic planning matters as a starting point for the potential development of strategic planning policies for all or part of Berkshire.
- B. **Joint Evidence Base:** The authorities will develop an evidence base that provides potential for sharing across authorities where it is prudent and appropriate to do so relating to strategic planning matters. This might include issues such as demographics, population projections, housing market assessments, gypsy and traveller needs, employment, retail and transport studies, infrastructure plans, minerals and waste (see separate Memorandum of Understanding), strategic environmental and green infrastructure, decentralised energy infrastructure and other issues of cross boundary interest. This could

include the joint commissioning by two or more Berkshire authorities of studies into these matters.

- C. **Other Authorities Plans:** Where it will add weight, the authorities will consider, assess and make joint representations on the strategic aspects of local plans prepared by authorities adjoining Berkshire, especially on minerals and waste matters;
- D. **Joint Strategies:** The authorities will consider opportunities to develop joint strategies and deliver agreed or joint positions or policies in relation to specific topics or development needs where the evidence demonstrates that this is appropriate, (e.g. planning for the SPA or AWE).
- E. **Statements of Common Ground:** The authorities will involve their neighbouring authorities and other partner organisations (e.g. the Berkshire LEP, Environment Agency, Highways Authority, etc.) to which the duty to co-operate applies in the identification of issues and options, in resolving objections and preparing statements of common ground in relation to the preparation of individual local plan documents and other planning policy documents.

The operation of this Memorandum of Understanding will be the responsibility of Berkshire Development Plans Group (DPG), reporting to the Berkshire Heads of Planning (BHoP). In turn, BHoP will periodically (at least once a year) keep Lead Councillors informed on how mechanisms for fulfilling the duty to co-operate are progressing and being taken forward.

This Memorandum of Understanding provides a framework for joint working between the Berkshire authorities and it allows refined Agreements to be agreed between individual authorities on specific areas where they consider it appropriate.

Signed:

Bracknell Forest Council

Reading Borough Council

Royal Borough of Windsor Maidenhead

Slough Council

West Berkshire Council

Wokingham Borough Council

APPENDIX 5

Neighbouring local authorities formal responses -

Basingstoke and Deane Borough Council

Hampshire County Council

Reading Borough Council

South Oxfordshire and Vale of White Horse District Councils

Test Valley Borough Council

Wiltshire County Council

Wokingham Borough Council

APPENDIX 5

Basingstoke and Deane BC Jan 23 Response by email re employment land:

Dear Robert

Thank you for your email of 13 January which set out a formal request from West Berkshire regarding employment needs. You may be aware that Basingstoke and Deane Borough Council is currently in the early stages of updating its Local Plan and that an Economic Needs Assessment was completed by Stantec in December 2021. This looked at further employment needs over the next plan period and can be viewed at <https://www.basingstoke.gov.uk/content/doclib/3417.pdf> The assessment highlighted the following significant amount of floorspace needs:

40,000 sqm - Office
46,000 sqm - Industrial
124,000 sqm - Logistics

The Council is looking to meet this need within the borough and also potentially provide some oversupply in terms of logistics floorspace to contribute toward sub-regional need. Due to the high level of floorspace needs within the borough and the relative lack of available sites, the council will be unable to meet or assist with meeting, some or all of your unmet employment land and space requirements over the plan period.

This position has been discussed and agreed with the Portfolio Holder for Planning and Infrastructure, Cllr Jay Ganesh.

If you would like to discuss this position further, please just let me know.

Kind regards
Joanne Brombley
Planning Policy Manager
Basingstoke and Deane Borough Council
Tel: [REDACTED]

West Berkshire Council
via email

Your ref: Proposed Submission (Reg 19) Plan
Our ref:

1 March 2023

Dear Planning Policy Team,

West Berkshire Council – Local Plan Review 2022-2039 Proposed Submission (Regulation 19)

Thank you for consulting Basingstoke and Deane Borough Council (BDBC) on the Proposed Submission (Reg 19) draft Local Plan.

Basingstoke and Deane Local Plan Update

As you will be aware, Basingstoke and Deane Borough Council (BDBC) has started work on a Local Plan Update to cover the period to at least 2039. The council undertook an Issues and Options consultation in Autumn 2020 and intends to consult on a draft Plan (Regulation 18) in autumn 2023. This would lead to submission in Winter 2024 and adoption in Autumn 2025. Although policy development is at an early stage, at this time the council does not anticipate there being any unmet needs arising from Basingstoke and Deane borough that would need to be met by West Berkshire Council.

Comments on WBC Plan

It is recognised that WBC is progressing with the plan-making process and includes provision for meeting the borough's housing needs and addressing its response to the Climate Change Emergency. However, BDBC wishes to ensure that West Berkshire Council is meeting its needs in full and that the Plan takes account of any potential impacts upon the borough and its residents.

The draft Plan sets out how the council has sought opportunities to meet the office and industrial needs for the district but acknowledges that there is an identified shortfall in supply. WBC commits to addressing this in the first five year review of the Local Plan.

The draft Plan also sets out the council's strategy for meeting gypsy and traveller needs, including through the replacement of transit pitches with permanent pitches at New Stocks Farm on Paices Hill (Policies DM20 and RSA24). Although Policy DM20 states that 'The Council will meet the identified need... by allocating land for plots and/or pitches' it appears that there would still be an overall shortfall in pitches (as explained in para 11.35). It is acknowledged that the council have committed to producing a DPD in respect of longer term pitch requirements and transit sites/short term stopping places. BDBC wishes to ensure that WBC has a robust strategy to meet its gypsy and traveller needs in full to ensure that those needs would not need to be met in Basingstoke and Deane.

In light of the above, BDBC has concerns about the shortfall in provision in terms of both employment, and gypsy and traveller pitch provisions, and is keen to continue to engage in suitable discussions under the Duty to Cooperate in relation to these issues.

It is noted that policy SP4 of the draft Plan sets out planning policy requirements in respect of the Atomic Weapons Establishments at AWE Aldermaston and Burghfield, including details of the DEPZ, OCZ and 12km consultation zone. It is recognised that this policy is in response to the requirements of the Office for Nuclear Regulation. The council has ongoing concerns about how restrictions relating to the AWE are applied to the borough and, most notably, the limitations they place on future sustainable growth at Tadley. The council would like to continue to work proactively with Emergency Planners at West Berkshire to ensure a suitable approach is taken to future growth and change and that all options, including suitable housing allocations, are fully considered.

Should you wish to discuss these matters further, please do not hesitate to contact the Planning Policy team on 01256 844844.

Yours faithfully

Planning Policy Team

CC Service Manager - Emergency Planning

Planning Policy Team,
Planning and Countryside,
West Berkshire District Council,
Market Street,
Newbury, RG14 5LD

Mr Neil Massie

WBDCLPREG19

0370 779 2113

3 March 2023

Dear Sir

Emailed to: planningpolicy@westberks.gov.uk

Dear Sir,

West Berkshire District Council Regulation 19 Local Plan Consultation

Thank you for consulting Hampshire County Council on the West Berkshire District Council Local Plan. The County Council in its capacity as a neighbouring highway authority has focussed this response on the potential implications of the Sandleford Strategic Site (SP16) on the A339 within Hampshire.

It is noted that there are other local infill and strategic sites which may lead to increased flows on the A339, but Sandleford is likely to have the biggest impact by virtue of its location. It is also noted that the site allocation for Sandleford extends down to the Hampshire border, although the development is likely to actually be focused in the north and west of the site.

It is proposed that there will be four all-vehicle accesses to this strategic site, one being from the A339. Whilst the part of the A339 that the site access is likely to be achieved from would be outside of Hampshire's boundary, the impact on the A339 within Hampshire must be considered.

Policy DM2 of Hampshire County Council's emerging Local Transport Plan 4 (LTP4) states '*we will only support requests for NEW accesses onto A roads, the principal road network or traffic sensitive streets where the strategic flow of traffic is prioritised and not compromised and when all other reasonable options (such as taking access from nearby side roads) has been considered.*'

Therefore, for Hampshire County Council to support the proposal for a new access onto the A339 it should be demonstrated that the strategic flow of traffic is prioritised and not compromised, and when all other reasonable options (such as taking access from nearby side roads) has been considered.

It should be noted that the A339 is an ex-trunk route, and it is Hampshire County Council's view that strategic traffic should be routed via the A34, therefore any evidence provided to demonstrate the suitability of a new access onto the A339 should take account of this position and consider wider strategic routes to and from the site.

As further modelling work is done to underpin development in West Berkshire where cross boundary impacts are a possibility, but in particular Sandleford, Hampshire County Council would like to work closely with West Berkshire District Council to discuss modelling parameters and underlying assumptions.

Hampshire County Council is particularly interested in understanding how the cumulative impacts of cross boundary traffic flows have been taken into account, i.e. whether new allocations outside of the West Berkshire boundary have been taken into account, or if the modelling rests on assumptions of background growth.

Hampshire County Council also take this opportunity to point out that the North Manydown site of up to 3,500 homes on the north west side of Basingstoke will have direct access to the A339 and so this may have an impact on background traffic flows. Moreover, under the West Berkshire Local Plan policy SP12 there is a relatively large allowance for windfall sites to help West Berkshire District Council reach its housing supply (1,949 net additional homes out of a total of up to 9,146). Hampshire County Council would like to be involved in discussions where sites are planned adjacent to the common border between Hampshire and West Berkshire.

Of note is the strategic transport study focusing on potential future improvements to the A339 that Hampshire County Council, Basingstoke and Deane Borough Council and West Berkshire District Council have been working together to manage. Hampshire County Council note that if West Berkshire District Council chooses to safeguard land for the measures emerging from the study in the region of the Sandleford development, with a view to taking these forward, Hampshire County Council would want to discuss the impacts on Hampshire's highway network and the redistribution of traffic across the strategic network. From the high level study and modelling work done thus far Hampshire County Council are not currently satisfied that the measures suggested would achieve the aims of reducing through traffic and could serve to bring additional traffic demand to the A339.

Finally, the designation of Greenham business park as a Designated Employment Area is noted. It is recognised that it is already a well-established employment area but given policy DM32 that *'the redevelopment and regeneration of land within DEAs to provide additional business development that meets the needs of the District will be supported'*, Hampshire County Council would like to be involved as a stakeholder in any discussions regarding any potential changes which are likely to

affect traffic flows of heavy vehicles which utilise the A339 in accessing or departing from the site.

If you have any queries concerning the County Council's comments on this consultation, or wish to discuss the comments and issues raised, please do not hesitate to contact my colleague Neil Massie using the details provided at the top of this letter.

Yours faithfully,



Laura McCulloch
Head of Spatial Planning
Hampshire 2050

Comment

Consultee	Mark Worringham (1335046)
Email Address	[REDACTED]
Company / Organisation	Reading Borough Council
Address	X X X
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Comment by	Reading Borough Council (Mark Worringham - 1335046)
Comment ID	PS529
Response Date	02/03/23 15:23
Consultation Point	Local Plan Review 2022-2039 Proposed Submission (View)
Status	Submitted
Submission Type	Web
Version	0.1

1. Do you consider the Local Plan Review is legally compliant?

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

Yes

2. Do you consider the Local Plan Review is sound?

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

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

Please tick all that apply:

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. . Yes

Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. . Yes

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. . Yes

Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. . Yes

Please give reasons for your answer

Reading Borough Council (RBC) works closely with West Berkshire District Council (WBDC) as well as other neighbouring authorities to consider strategic planning issues in the area. WBDC, RBC, Wokingham Borough Council and Bracknell Forest Council have co-operated on a Statement of Common Ground that details the situation regarding strategic matters across the area.

RBC therefore welcomes the publication of the West Berkshire Local Plan Review Proposed Submission and supports the overall approach of the plan.

We have some more detailed comments on some matters of strategic importance.

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

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

Yes

Please give reasons for your answer

WBDC has engaged on the plan throughout its preparation, and we consider that the duty to co-operate as far as RBC is concerned has been fulfilled.

5. Independent Examination

If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? No

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

The submission of the Local Plan Review for Independent Examination . Yes

The publication of the report of the Inspector appointed to carry out the examination . Yes

The adoption of the Local Plan Review . Yes

Comment

Consultee	Mark Worringham (1335046)
Email Address	[REDACTED]
Company / Organisation	Reading Borough Council
Address	X X X
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Comment by	Reading Borough Council (Mark Worringham - 1335046)
Comment ID	PS538
Response Date	02/03/23 15:31
Consultation Point	Policy SP 19 Affordable Housing (View)
Status	Submitted
Submission Type	Web
Version	0.1

1. Do you consider the Local Plan Review is legally compliant?

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

Yes

2. Do you consider the Local Plan Review is sound?

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

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

Please tick all that apply:

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. . Yes

Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. . Yes

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. . Yes

Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. . Yes

Please give reasons for your answer

RBC welcomes the proposal to require significant levels of affordable housing on development sites, and the proportions required are broadly in line with those in the Reading Borough Local Plan. Delivering as much affordable housing within the plan area as possible will avoid placing undue burdens on neighbouring authorities.

RBC particularly supports the proposal to seek affordable housing on sites of below 10 dwellings. As you will be aware, the Reading Borough Local Plan seeks an affordable housing contribution on all sizes of sites due to the exceptional pressures on affordability in the local area, and this will no doubt equally apply to West Berkshire. It is for WBDC to determine where the threshold for affordable housing provision should be based on local evidence, but as a general comment based on our experience, sites of 1-4 dwellings tend to have fewer viability issues in meeting policy requirements than sites of 5-9 dwellings, and WBDC may wish to consider seeking affordable housing contributions from all sizes of site. It is also worth noting that it is often very difficult to secure on-site provision below 10 dwellings due to the difficulties in finding a Registered Provider willing to take these units on, and WBDC may wish to reflect that a financial contribution on smaller sites is likely to be more achievable in most cases.

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

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

Yes

5. Independent Examination

If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? No

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

The submission of the Local Plan Review for Independent Examination . Yes

The publication of the report of the Inspector appointed to carry out the examination . Yes

The adoption of the Local Plan Review . Yes

Comment

Consultee	Mark Worringham (1335046)
Email Address	[REDACTED]
Company / Organisation	Reading Borough Council
Address	X X X
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Comment by	Reading Borough Council (Mark Worringham - 1335046)
Comment ID	PS539
Response Date	02/03/23 15:32
Consultation Point	Policy SP 20 Strategic approach to employment land (View)
Status	Submitted
Submission Type	Web
Version	0.1

1. Do you consider the Local Plan Review is legally compliant?

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

Yes

2. Do you consider the Local Plan Review is sound?

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

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

Please tick all that apply:

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. . Yes

Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. . Yes

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. . Yes

Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. . Yes

Please give reasons for your answer

The supporting text to this policy notes that the plan will not be able to meet the identified employment needs in full, particularly for offices. Whilst West Berkshire is a separate Functional Economic Market Area from Reading, there would nonetheless be cross-boundary implications should a lack of provision in West Berkshire lead to pressures on adjoining areas such as Reading. However, RBC recognises that WBDC had made substantial efforts to try to identify sites for employment provision including repeated call for sites exercises and sufficient appropriate sites have not been forthcoming. RBC also recognises that the Covid-19 pandemic has likely had significant implications for working patterns and the demand for employment floorspace, particularly for offices, which will not have been reflected in the identified need. RBC is therefore satisfied with the approach proposed, which involves a supportive criteria-based policy together with a commitment to address this issue in the first five-year review of the Local Plan.

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

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

Yes

5. Independent Examination

If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? No

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

The submission of the Local Plan Review for Independent Examination . Yes

The publication of the report of the Inspector appointed to carry out the examination . Yes

The adoption of the Local Plan Review . Yes

Comment

Consultee	Mark Worringham (1335046)
Email Address	[REDACTED]
Company / Organisation	Reading Borough Council
Address	x x x
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Comment by	Reading Borough Council (Mark Worringham - 1335046)
Comment ID	PS534
Response Date	02/03/23 15:28
Consultation Point	Policy SP 12 Approach to Housing Delivery (View)
Status	Submitted
Submission Type	Web
Version	0.1

1. Do you consider the Local Plan Review is legally compliant?

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

Yes

2. Do you consider the Local Plan Review is sound?

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

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

Please tick all that apply:

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. . Yes

Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. . Yes

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. . Yes

Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. . Yes

Please give reasons for your answer

The policy proposes meeting the identified local housing need for West Berkshire in full, and expresses a range with local housing need at the lower end of the range. There is therefore flexibility to deliver housing over and above local housing need. RBC therefore supports the policy.

As recognised in the supporting text, the Reading Borough Local Plan includes a small unmet housing need of 230 homes over the plan period to 2036, based on the level of need assessed during the Strategic Housing Market Assessment. This matter is subject to a Memorandum of Understanding between WBDC, RBC, Wokingham Borough Council and Bracknell Forest Council signed in August 2021. This plan does not specifically make any allowance for meeting these unmet needs, but we recognise that the flexibility inherent in the dwelling range expressed, in combination with the plans of other authorities, will enable these unmet needs to be met. This matter will however need to be revisited as part of RBC’s Local Plan Review, due to commence in 2023, given that the standard methodology would significantly increase Reading’s housing need. It should therefore be noted that the matter of unmet housing need will need to be revisited in a future Local Plan review.

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

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

Yes

5. Independent Examination

If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? No

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

The submission of the Local Plan Review for Independent Examination . Yes

The publication of the report of the Inspector appointed to carry out the examination . Yes

The adoption of the Local Plan Review . Yes

Comment

Consultee	Mark Worringham (1335046)
Email Address	[REDACTED]
Company / Organisation	Reading Borough Council
Address	x x x
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Comment by	Reading Borough Council (Mark Worringham - 1335046)
Comment ID	PS543
Response Date	02/03/23 15:37
Consultation Point	Policy DM 20 Gypsies, Travellers and Travelling Showpeople (View)
Status	Submitted
Submission Type	Web
Version	0.1

1. Do you consider the Local Plan Review is legally compliant?

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

Yes

2. Do you consider the Local Plan Review is sound?

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

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

Please tick all that apply:

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. . Yes

Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. . Yes

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. . Yes

Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. . Yes

Please give reasons for your answer

Policy DM20 deals with provision for gypsies, travellers and travelling showpeople. It is noted that the Local Plan does not meet the identified need for permanent gypsy and traveller pitches, and notes that a specific development plan document to deal with longer term need will be prepared.

As set out in the Reading Borough Local Plan, RBC has unmet needs for permanent accommodation for gypsies and travellers. RBC’s Gypsies and Travellers, Travelling Showpeople and Houseboat Dwellers Accommodation Assessment (September 2017) identified a need for 10-17 permanent pitches for gypsies and travellers. After thorough assessment of potential land within Reading, RBC has concluded that this need cannot be met within Reading.

RBC therefore seeks to work with adjoining authorities to understand how these needs can best be met. On 21st February 2018, RBC made a request under the duty to co-operate to a number of authorities, including WBDC, to understand whether there is potential to meet these permanent needs outside Reading’s boundaries. It remains the position that meeting Reading’s permanent needs is likely to require provision outside our Borough, and therefore RBC is keen to work with WBDC on the development plan for gypsy and traveller provision to discuss wider needs within the area, as well as what resources would be required to help in meeting those needs.

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

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

Yes

5. Independent Examination

If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? No

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

The submission of the Local Plan Review for Independent Examination . Yes

The publication of the report of the Inspector appointed to carry out the examination . Yes

The adoption of the Local Plan Review . Yes

LPR DtC Appendix 5

South Oxfordshire and Vale email response 16/03/23

West Berkshire: Duty to Co-operate Employment Land, Formal Request for support in meeting employment land needs

Dear Robert

Thank you for your email and formal request under the Duty to Cooperate.

South Oxfordshire and Vale of White Horse are in the early stages of preparing a joint local plan. We have undertaken a formal Regulation 18 'Issues' consultation in May-June 2022. We will be carrying out a second Regulation 18 consultation in late summer this year on our preferred options. As part of the preparation of the joint local plan we are updating our evidence base, including commissioning a new Employment Land Needs Assessment. This piece of evidence is not underway yet and we do not have outputs at this time. Once we have outputs from this evidence, expected later this year, we will have an up to date position on our employment needs. We are not in a position to agree to assisting with any unmet employment needs at this time.

We have recently published our latest [AMR 2021/2022 for Vale](#). We will also be publishing the latest AMR for South shortly.

This is an officer response.

We will continue to work together on joint strategic issues as both of our local plans progress.

Kind regards

Rona Knott

Senior Planner

South Oxfordshire and Vale of White Horse District Councils

Planning Policy

Abbey House

Abbey Close

Abingdon

OX14 3JE



Robert Paddison
Team Leader Planning Policy
Development and Regulation
West Berkshire Council

Planning Policy and Economic Development Service
Beech Hurst
Weyhill Road
Andover, Hants SP10 3AJ
Telephone 01264 368000
Minicom 01264 368052
Web site www.testvalley.gov.uk

Contact: David Bibby
Telephone: 01264 368000
E-mail: planningpolicy@testvalley.gov.uk
Your ref:
Our ref:
Date: 27 February 2023

Dear Robert,

West Berkshire Local Plan Review 2022-2039 Proposed Submission (Regulation 19)
Consultation and Duty to Co-Operate Employment Land – Formal Request for support in
meeting employment land needs

With regard to your local plan consultation and further to your email request letter of 13 January 2023, which we note was also similarly sent to a number of other neighbouring local planning authorities within the counties of: Berkshire, Buckinghamshire, Hampshire, Oxfordshire and Wiltshire, this letter provides our formal response. We welcome opportunities to engage and collaborate with West Berkshire Council (WBC) on strategic planning matters, policies and cross boundary issues as relevant. We note that West Berkshire has a number of planning constraints which restricts potential site allocation options, particularly that 74% of the district is AONB.

Our adopted Test Valley Borough Local Plan covers the period 2011 to 2029, and we are currently in the process of preparing a new Local Plan that covers the period 2020 to 2040. We undertook public consultation on our Regulation 18 (Stage 1) Draft Local Plan 2040 for Test Valley Borough earlier this year. TVBC will share information with WBC in due course on matters such as the proposed locations for housing and economic development, as we prepare our Regulation 18 (Stage 2) Plan for consultation timetabled for Quarter 3 of 2023, as relevant.

As part of our evidence base we have the Economic, Employment and Commercial Needs (including Logistics) Study 2021, (Stantec), which was commissioned on a sub-regional basis by the Partnership for South Hampshire (PfSH) and extended to provide Borough-wide coverage of Test Valley. As this used a predominantly past trends based methodology to forecast future needs, an additional Test Valley Employment Needs Further Analysis Study 2022 (DLP) was also commissioned by the Council which is currently being finalised. The initial findings are that the economic relationship with West Berkshire is relatively weak and we are not in the same FEMA. A Test Valley Economic Assessment Study 2023 is also currently underway.

We have considered your request regarding employment land needs, taking account of your current draft West Berkshire Local Plan Review 2022-2039 Proposed Submission (Regulation 19) Consultation and its associated evidence base and topic papers etc., as relevant. This has included specifically the content of: *Berkshire Functional Economic Market Study 2016* and the *West Berkshire Employment Land Review 2020 and Addendum 2022*.

Berkshire Functional Economic Market Study 2016

This concludes that that Western Berkshire FEMA comprises West Berkshire district with the key centre of Newbury. This area is characterised by having a relatively self-contained Travel to Work Area (TTWA) and tends to operate within a westward facing commercial property market constituting a key node at the western end of the M4 corridor. Whilst there is some synergy in travel to work and property market terms between Newbury and Reading, these linkages are not considered sufficiently strong to include West Berkshire within a Central Berkshire FEMA.

The Newbury TTWA comprises the majority of West Berkshire, as well as parts of Wiltshire, Basingstoke and Deane and Test Valley. For Test Valley this is the northern most part of the Borough around Linkenholt, Vernhams Dean and Faccombe which is very rural and within the AONB.

There is therefore not a strong commercial property market linkage with Test Valley and the Housing Market Area also suggests very limited overlap with Berkshire.

West Berkshire Employment Land Review 2020 and Addendum 2022.

Based upon the latest figures in the 2022 Addendum we note that there is deficit of 50,816sqm offices and 32,409sqm (9.4ha) industrial. It is not clear however whether these relate to Newbury or the edge of Reading.

The conclusions of the Addendum and considered relevant:

For offices, the overall balance is not a concern in the short term. In the medium to longer term, the gap should be filled by seeking to maximise the potential for new office provision through redevelopment schemes, of existing retail and offices uses within Newbury town centre. It could also be met through mixed use allocations to include an element of housing and employment. The floorspace requirement should be seen in the context of the whole plan period to 2039 and it be demonstrated how it could be accommodated with reasonable prospects of delivery.

For industrial, there is a pressing need to frontload the plan with a readily available pipeline of space. Therefore as much as possible of this overall need should be allocated on easily deliverable sites. There are a number of potential sites in the HELAA, but the majority of these are subject to constraints and policy considerations and none of these are in Newbury, which is an imbalance that should be addressed. If all other options fail to meet demand consideration should be given to providing new industrial floorspace as part of potential large housing allocations, albeit this would only deliver smaller and lighter units, but these are in demand, and viable in the East (Reading market area), although less so elsewhere.

Significantly, it does not recommend seeking to meet any shortfall outside of West Berkshire.

In conclusion, we are unable to assist in meeting your shortfall in employment land and floorspace. However, crucially taking account of the findings and recommendations of your evidence base we consider that in any event, for us to do so would not be an appropriate response or suitable solution in planning terms to meet your unmet employment land needs, given that we are within a different FEMA and there is a low level of economic interaction between West Berkshire and Test Valley, in both commuting/labour market terms and in the operation of the commercial land and property market. Any additional provision in Test Valley would not therefore be an appropriate alternative for your own local arising need which would otherwise have been accommodated within West Berkshire itself.

I confirm that the content of this response has been discussed with, and agreed by our Planning Portfolio Holder, Councillor Phil Bundy.

Notwithstanding this response on the specific issue of your shortfall in meeting employment land needs, we look forward to continuing our engagement on our emerging local plans. This letter should also be considered as our formal response to the West Berkshire Local Plan Review 2022-2039 Proposed Submission (Regulation 19) Consultation. We have no further comments.

Yours sincerely,

David Bibby
Principal Planning Officer (Strategy)
Planning Policy and Economic Development

Wiltshire Council

West Berkshire Local Plan Review 2022-2039 Proposed Submission

Thank you for consulting Wiltshire Council on the above plan.

Wiltshire is located to the west of West Berkshire and shares its eastern boundary. The shared boundary is wholly within the North Wessex Downs Area of Outstanding Natural Beauty (AONB).

As recognised in paragraph 5.14 of your 'Interim Duty to Cooperate Statement' we have been engaging with you, alongside Swindon Borough Council, about a shortfall in employment land. It is noted that your criteria for engagement is local authorities within a one hours drive of Newbury and as such you are engaging with many other local planning authorities to discuss this issue also.

Wiltshire Council is at an advanced stage in preparing its Local Plan Review and we are moving towards our own Regulation 19 consultation later this year. In developing our plan, our focus is on ensuring that Wiltshire's needs can be met taking into consideration the constraints to development that we have in the county and the availability of land being promoted for employment use.

Section 7 of the West Berkshire Local Plan Review relating to economic growth contains two policies - Policies SP20 'Strategic approach to employment land' and SP21 'Sites Allocated for Employment Land'. Paragraphs 7.6 and 7.9 identify shortfalls in sites to meet the local need for office and industrial land, and elsewhere evidence points to the loss of offices to other uses. In such circumstances, it will be critically important to ensure that your planning policies robustly support the retention, intensification, and regeneration of existing sites/areas, as well as encouraging and facilitating windfall sites that could come forward over the plan period. Such a strategy alongside the positive identification of employment allocations will help ensure that employment delivery can be maximised over the plan period; and that people can live and work locally.

It is understood that your employment needs are of a local nature and as such it will be important for them to be provided locally, or in areas with settlements that are spatially well related to Newbury and other urban parts of the District. Such settlements are in the authorities in the South East, rather than to the west of the District in Wiltshire where the character of the area is largely AONB.

For the above reasons, at this stage it is considered that Wiltshire Council is unable to assist West Berkshire Council in meeting its shortfall but will continue to engage with you as appropriate under the Duty to Cooperate.

**Spatial Planning
March 2023**

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
---	---------------------------

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

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

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

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.

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

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.

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.

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

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

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.

APPENDIX 6

Local authorities formal responses who are not immediate neighbours -

Buckinghamshire County Council

Bracknell Forest Borough Council

Royal Borough of Windsor and Maidenhead

Oxford City Council

Rushmoor Borough Council

Slough Borough Council

Swindon borough Council

APPENDIX 6

Buckinghamshire Council

Dear Robert

Here is the Council's response to your request for support with un-met employment needs.

Buckinghamshire Council has commissioned an employment and retail study for its new Local Plan. This is at an early stage. It will not be likely to be completed until July 2023. It is being carried out by Lichfields.

There is a high degree of uncertainty about the level of housing needs which will need to be planned for in Buckinghamshire to 2040. This has a knock-on effect on the associated demand for employment land.

At this point it is not known whether the current employment provision is sufficient to meet Buckinghamshire's future employment needs to 2040. The Local Plan is at an early stage and the evidence base is not complete. The extent of possible employment allocations is not known.

An engagement on the potential strategic approaches to growth in Buckinghamshire is due to take place in autumn 2023. There will also be an engagement on the Vision and Objectives for the Local Plan for Buckinghamshire in Spring 2023.

The West Berkshire Background Paper on Employment refers to the Berkshire Functional Economic Market area (FEMA). There is no connection between this FEMA and Buckinghamshire. No reasoning for a connection has been provided apart from the comment in the Background Paper that Buckinghamshire is within a one-hour drive of West Berkshire (paragraph 59).

Buckinghamshire Council will participate in discussions with West Berkshire Council about the employment land position. However, this does not confirm agreement that this is a strategic issue shared by both authorities.

For the reasons set out above it is not possible to accommodate any of the West Berkshire request for employment land at the present time.

Once published we will share the Buckinghamshire employment and retail study with West Berkshire. We will continue to respond to requests for information, meetings, etc. from our duty to co-operate partners.

This reply has been agreed with the Council's Cabinet Member for Planning and Regeneration, Peter Strachan.

Kind regards

Helen Harding MRTPI
Principal Planner
Planning, Growth and Sustainability
Buckinghamshire Council



Planning Policy
Development & Regulation
West Berkshire Council
Market Street
Newbury
RG14 5LD

By Email to planningpolicy@westberks.gov.uk

22 February 2023

Dear Planning Policy Team,

Regulation 19 Consultation on West Berkshire Local Plan Review

I am writing in response to your initial email dated 25th November 2022 regarding the forthcoming Regulation 19 consultation of the Local Plan Review (LPR), your formal Duty to Cooperate request for support in meeting employment land needs email of 13th January 2023 and formal Regulation 19 consultation email of 20th January 2023, in relation to the LPR consultation which runs from 20th January to 3rd March 2023.

Bracknell Forest's Local Plan (BFLP)

For context, the position with the Bracknell Forest Local Plan (BFLP) is set out below.

The emerging BFLP is at an advanced stage. It covers the period 2020-2037 and was submitted for examination on 20 December 2021. Stage 1 hearing sessions were held between 10th May and 15th June 2022 and Stage 2 hearing sessions were held between 18th and 20th October 2022. The Inspectors' post hearings letter was received on 19th January 2023¹ and outlines a series of Main Modifications that will need to be the subject of public consultation later this year.

The majority of development planned in the BFLP is in Bracknell Town, with some smaller strategic and small site allocations. Parts of the Borough are highly constrained by land ownership (such as Crown Land), ecological constraints (such as the Thames Basin Heath Special Protection Area), policy constraints (such as Green Belt) and other constraints (such as surface water flooding).

¹ Post Hearing Letter available to view: <https://consult.bracknell-forest.gov.uk/file/6134773>

West Berkshire Local Plan Review

Plan Period

It is noted that the plan will cover the period 2022 to 2039.

Housing Need

A Local Housing Need figure of 513 dpa has been used (using a 2022 base date), equating to a minimum need of 8,721 dwellings over the plan period. If a 5% flexibility is added, this would increase the LHN to 538 (or 9,146 dwellings over the plan period). As such, proposed Policy SP12 includes a range of 8,721-9,146 dwellings.

It is assumed that the LPR is meeting in full the general housing need for West Berks, and that there is no unmet need.

Both BFC and West Berks are in the same housing market area (HMA) as Reading Borough, along with Wokingham (forming the Western Berkshire HMA). There is a signed Memorandum of Understanding with these authorities in relation to unmet need from Reading (dated August 2021), which sets out that this need will be met within the HMA. This relates to 230 dwellings in Reading's current Plan. It is noted that this is referred to within the LPR (paras. 6.5-6.7), however it is not stated how West Berks is intending (if at all) to help address this unmet need.

The Inspector's post hearing letter relating to the BFLP, includes the following Main Modification in order to make the Plan sound:

There is an unmet need within Reading Borough's adopted local plan (covering the period 2021 to 2036) of 230 dwellings, which is projected to arise in the second half of the plan period. As agreed by Western Berkshire HMA authorities [insert footnote], this unmet need will be accommodated in the HMA area.

New footnote:

Reading's housing needs:

Memorandum of Understanding between the authorities in the Western Berkshire

The Inspectors note that the BFLP demonstrates a housing supply of 10,780 dwelling, meeting the housing requirement of 10,438, which would include a buffer to contribute to Reading's housing needs if required.

As yet, it is unclear how the unmet need is to be addressed by other authorities within the Western Berkshire HMA. Given that Reading Borough Council wishes the unmet need in its Plan to be met as close as possible to where the need arises (which includes parts of West Berks, being an adjacent authority to Reading, and encompassing part of wider urban area of Reading), it is considered that this matter should be reflected within the current LPR.

Currently it does not appear to do so, and it is therefore considered that the LPR is unsound. This has implications for Duty to Co-operate, and it is therefore requested that further consideration is given to this matter.

Gypsy and Traveller Need

On the basis of the GTAA (2019), as set out in Table 7 of the LPR, the identified need for gypsies is 30 pitches (based on cultural need) and 20 (based on PPTS need) between 2021/22 and 2037/38 (which includes a shortfall between 2021/22 to 2025/26). Table 8 indicates there is a travelling show people requirement of 24 plots, and a need for four transit pitches. However, it is noted from the Plan (para. 11.35) that the longer term need for Gypsy and Traveller pitches and the need for transit sites will be addressed in a separate Development Plan Document, with evidence due to be prepared between 2023-2025, and anticipated adoption in 2027. It is assumed that the GTAA will be updated to reflect a new plan period, and should be seeking to meet cultural needs following the 2022 *'Lisa Smith v SSLUHC [2022] EWHC'* judgement.

In relation to transit provision, the LPR states that collaborative working will be undertaken with neighbouring authorities (para. 11.26). However, BFC is of the view that transit provision is not a duty to co-operate matter. This follows legal advice in respect of the Criminal Justice and Public Order Act 1994. Under the latter, the police are unable to exercise their powers under sections 62A-E concerning the removal of a trespasser to an alternative site, if there is no suitable pitch or site within a Borough. This means that the matter must be addressed within each Council and does not therefore have cross boundary implications.

Prior to submission of the BFLP, BFC undertook Duty to Co-operate discussions with adjoining LPAs in January 2021 (these being the authorities most likely to be able to meet local needs) asking for assistance from adjoining authorities in helping to meet its Gypsy and Traveller pitch needs. No LPA was in a position to assist. The Council proposed to release a site from the Green Belt on Land at Jealott's Hill (as part of a wider allocation in the area) to meet full cultural needs. However, in their post hearings letter the Inspectors conclude that the required exceptional circumstances for the Jealott's Hill allocation has not been evidenced and that a Main Modification is needed to remove the associated policy from the plan. They go on to conclude in paragraph 47 of their letter that because BFC can demonstrate a five-year supply of deliverable Gypsy and Traveller sites, and the BFLP has a windfall policy with a positive approach to development, that no further compensatory allocations are needed. This means that BFC is unable to help West Berks meet its Gypsy and Traveller pitch needs, should it be determined that there is unmet need within West Berks.

Economic Development Needs

It is not clear from the LPR what the quantum of unmet need is over the Plan period, although your email of 13th January 2023 states that it is now 50,816sqm office floor space and 32,709sqm of industrial floor space. The LPR also refers to a lack of suitable sites, and that the District is heavily constrained (paras. 7.7 and 7.9).

BFC is experiencing similar issues to West Berks and at the base date of our Local Plan had an unmet need for industrial and warehousing floorspace (former B1c, B2 and B8 uses). At the base-date of the BFLP the need was for 48,875m² industrial/warehousing, and 19,125m² of office floorspace (the latter of which could be met in full). However, the Inspectors requested an update on changes that had occurred since the base date of the Plan. This found that at 31st March 2022, the remaining need to 2037 for industrial/warehousing had decreased to 21,550m² but that office floorspace needs had increased to 72,365m². The increase in office floorspace need is due to the Borough continuing to experience the demolition or change of use of existing office buildings.

² See BFLP examination document EXAM35: <https://consult.bracknell-forest.gov.uk/file/6066067>

A consequence of the content of the Inspectors' post hearings letter, is that the unmet need for industrial/warehousing increases to 36,550m² (since the suggested Main Modification will mean that the 15,000m² of floorspace that was to contribute to meeting needs will be removed with the deletion of the allocation at Jealott's Hill). Prior to submission of the BFLP, BFC undertook Duty to Co-operate discussions with surrounding LPAs in August 2021 asking for assistance in helping to meet its industrial unmet needs. No LPA was in a position to assist given limited land availability and existing constraints to development.

We advised in an email in September 2022 that BFC was regrettably unable to assist with helping your unmet need. This position has not changed. Therefore in response to your formal Duty to Cooperate request for assistance received on 13th January 2023, Bracknell Forest remains unable to assist with meeting any of West Berkshire's employment land or floorspace requirements. It is noted (para. 7.9) that the Plan includes a commitment to undertake an early review on employment matters.

In relation to retail need, an update of the evidence has not been undertaken due to the challenges which have arisen as a result of Covid and Brexit, and that a commitment has been made to undertake an early review of the Plan on this matter (para. 7.32). Given the recent changes to the use class order (and new Use Class E), a light touch review of retail needs would have been helpful to inform the LPR. (Bracknell Forest commissioned a Retail Advice Note in 2022 as part of evidence base of the BFLP, which took account of the Western Berkshire Retail and Commercial Leisure Assessment from 2016). As it is not known if there is any unmet need for retail, BFC is unable to comment on any implications at this stage.

In conclusion, BFC's main concern is about the approach taken to unmet housing need from Reading Borough, which is considered to make the Plan unsound.

If you have any queries regarding this letter, please do not hesitate to contact the Development Plan Team: development.plan@bracknell-forest.gov.uk.

Yours sincerely,

A black rectangular redaction box covering the signature of Max Baker.

Max Baker
Assistant Director: Planning
Place, Planning & Regeneration
Bracknell Forest Council

Ian Motuel
 Planning Policy Manager
 Email address [REDACTED]
 Phone number [REDACTED]



EMPLOYER RECOGNITION SCHEME

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Mr Robert Paddison
 Planning Policy
 West Berkshire Council,
 Market Street
 Newbury
 Berkshire
 RG14 5LD

02 February 2023

Dear Robert

West Berkshire: Duty to Co-operate Employment Land, Formal Request for support in meeting employment land needs

Thank you for your email dated 13th January 2023 with your formal request for the Royal Borough to meet or assist with meeting some or all your unmet employment land and space requirements over the plan period.

As you are aware, the Royal Borough of Windsor and Maidenhead adopted the Borough Local Plan (2013-2033) in February 2022.

In preparing this plan, the Council assessed its growth needs and determined that it has limited capacity to accommodate growth in industrial/warehouse use according to market evidence. Please refer to the [Borough Adopted Local Plan 2013-2033](#) and [Employment Topic Paper \(2019\)](#) evidence base for further information.

In addition, although there are important links with West Berkshire, overall, this borough falls within a different Functional Economic Market Area (FEMA). The [Berkshire FEMA Study 2016](#) shows that West Berkshire District lies within the 'Western Berkshire FEMA' whilst the Royal Borough lies within the 'Eastern Berkshire FEMA', with the 'Central Berkshire FEMA' in between these two areas. The 2016 study states that "[Windsor and Maidenhead] has stronger labour market links with the Buckinghamshire authorities of Wycombe and South Bucks and the London Boroughs of Hillingdon and Hounslow than it does with West Berkshire" (para. 3.33).

Further to our duty to cooperate meeting in May 2022 and email dated 7th October 2022, the Borough's position has not changed. Consequently, the Royal Borough of Windsor and Maidenhead is not able to meet any demonstrated unmet need for office and industrial floorspace arising in West Berkshire Council. We do not have any additional information on the topics we discussed last year.

I look forward to continuing constructive discussions with West Berkshire under the Duty to Cooperate (or its replacement) as your new Local Plan progresses. This response has been approved by Cabinet Member for Planning, Parking, Highways & Transport Councillor Haseler and our Head of Planning, Adrien Waite.

Yours sincerely



Ian Motuel
Planning Policy Manager
Royal Borough Windsor & Maidenhead

Duty to Co-operate, **Oxford City** response April 22

Dear Robert

We are currently undertaking our ELA update to establish our employment need – We certainly won't be able to meet it or our housing need.

I would think you might want to contact the Oxfordshire Plan team and also perhaps South and Vale.

I don't think I need to attend a meeting with you

Kind Regards

Amanda

Mrs Amanda Ford | Team Leader Planning Policy | Oxford City Council | St Aldate's Chambers | St. Aldate's | Oxford | OX1 1DS |

Rushmoor Borough Council response April 22

Dear Robert

Thanks for inviting us to cooperate with you on employment land matters.

My take is that while local authorities nearly always want more employment land, we are not in the same functional economic area as West Berkshire. I am not aware of any strong commuting links between our two local authority areas either. Furthermore, we already have a tight supply of employment land. This is evidenced by an Employment Land Review we commissioned in 2016 with our neighbours and more recent research by our LEP. We are a largely urban authority and much of the remaining parts of the borough are within the Thames Basin Heath SPA which we could not release for any built purpose. Our own employment needs can only be met from existing site allocations and extant permissions.

I therefore conclude that we do not have a duty to cooperate with your authority to provide employment land and I do not consider we have any employment needs that your local authority area should consider in its plan-making activity either given the absence of any strong link between us.

Best wishes

Vincent Maher

Planning Policy Consultant

Planning Policy | Rushmoor Borough Council | Council Offices | Farnborough Road | Farnborough | Hampshire | GU14 7JU
w: www.rushmoor.gov.uk

Slough BC Jan 23 email response:

Hi Robert,

Thank you for your email.

Slough Borough Council is unable to assist with West Berkshire unmet employment needs.

We are reviewing our Local Plan and we will have unmet housing and employment needs.

We will be in touch shortly.

Regards,

Kerry Hobbs
Principal Planning Policy Officer

Date: 01/03/23

Our ref: Local plan rep

Email: Planningpolicy@slough.gov.uk

Planning Policy
Development and Regulation
West Berkshire District Council
Market Street
Newbury
RG14 5LD

By email only to planningpolicy@westberks.gov.uk

Dear Planning Policy,

Response from Slough Borough Council on the West Berkshire Local Plan Review
Proposed Submission Consultation 2023

Thank you for your email on 20th January 2023 inviting Slough Borough Council to respond to the consultation on the West Berkshire Local Plan Review Proposed Submission consultation 2023.

Our response has focused on:

- Housing need
- Employment need

1 Housing need

1.1 We note that the West Berkshire Local Plan Review Proposed Submission consultation proposes to provide for between 8,721 and 9,146 houses within the district (Policy SP12), meeting the identified local housing need of 513 homes per annum (para 6.10). We note that the upper end of the housing range exceeds the local housing need figure and that it is not a maximum figure for development (Policy SP12). We support the proposal for West Berkshire to meet its identified housing requirement in full within the district.

- 1.2 Slough Borough Council is not in the same housing market area as West Berkshire. Slough Borough Council is unable to meet its housing need in full and is cooperating with a neighbouring authority to seek to address the provision of housing to meet Slough's unmet housing need.
- 1.3 Should West Berkshire reduce its housing land provision as the West Berkshire Local Plan progresses, such that it would not be seeking to accommodate its housing need in full within the district. This would potentially increase the unmet needs that will need to be accommodated and could exacerbate development pressures across the sub-region.

2 Employment need

- 2.1 We note that the West Berkshire Local Plan Review Proposed Submission consultation proposes that the Plan is unable to make provision to meet the identified office requirements over the plan period to 2039. We note that the Council has positively sought opportunities to meet the office requirement for the District by undertaking numerous Calls for Sites and pursued opportunities through the Duty to Cooperate.
- 2.2 Further we note that West Berkshire is unable to meet its industrial land requirement due to being constrained and lack of suitable sites.
- 2.3 West Berkshire is not proposing to meet its identified employment needs in full at this time. We support the commitment in the Plan for West Berkshire District Council to review the provision of employment land again at the first five year review of the plan.
- 2.4 Slough Borough Council is not in the same employment market area as West Berkshire. Slough is unable to meet its employment needs in full and therefore is unable to assist with West Berkshire's unmet employment needs. Any unmet employment needs from West Berkshire will potentially increase the unmet needs that will need to be accommodated and could exacerbate development pressures across the sub-region.

Yours faithfully,

Kerry Hobbs

Senior Planning Policy Officer

Planning Policy

Housing and Property

Slough Borough Council

Swindon Borough Council

West Berkshire Local Plan Review Proposed Submission (Regulation 19) Consultation

Matters Relating to Duty to Co-operate

Background

1.0 Swindon Borough Council (SBC) has received a formal request under Duty to Co-operate (Section 110 of the Localism Act) to try and assist with meeting West Berkshire's unmet employment land and space requirements over the plan period. Swindon is one of a number of Local Planning Authorities which have been asked within a 60-minute 'drive time' of Newbury. This drive time area includes a very large geographical catchment and one of the reasons SBC have been asked under DtC to respond to the request.

1.1 West Berkshire describe the shortfall as substantial and consists of:

Office shortfall: 50,816sqm

(requirement – allocations = shortfall

$$50,816 - 0 = 50,816\text{sqm}$$

Industrial shortfall: 32,709sqm

(requirement – allocations = shortfall

$$91,109 - 58,400 = 32,709\text{sqm}$$

$$23\text{ha} - 14.6\text{ha} = 8.4\text{ha}$$

1.2 The Councils of West Berkshire, Swindon Borough and Wiltshire have met on occasions prior to the drafting of the Regulation 19 consultation document and more recently during the Regulation 19 consultation period mainly on matters of evidence and employment need clarification.

1.3 Swindon Town is located approximately 37 minutes from Newbury (28.5 miles) via the M4. SBC does not share an administrative boundary with West Berkshire although the wider Wiltshire area shares an eastern boundary (importantly AONB) with West Berkshire.

Swindon Borough Council and Plan Making

1.4 SBC is currently in the process of developing a new Local Plan to replace the adopted Swindon Borough Local Plan 2026. The Council updated its Local Development Scheme in December 2022 and is in the process of working towards a Regulation 18 Local Plan consultation in Autumn 2023. This work will build upon and update evidence work undertaken as part of an initial Local Plan review process, to include work upon a long-range economic growth vision / strategy, review of the Functional Economic Market Area (FEMA), town centre uses and technical work on employment land needs and supply. The development of this evidence it at an early stage.

1.5 Swindon is recognised as a 'growth town' with strong economic ambitions but the Council needs to be clear on what its updated forecast needs are for its revised plan period and how these can be met effectively and sustainably within the Borough and importantly prior to

accommodating the needs of other authorities, including West Berkshire. The final evidence base for the new Swindon Local Plan will underpin the framework for meeting local economic needs within the Borough and will also analyse strategic growth options and pressures. Fundamentally the Council is keen to maximise opportunities for people to live and work locally and sustainably with access to a diverse and high performing economic base.

West Berkshire Local Plan

1.6 The Council has reviewed the economic technical evidence with the plan including:

- *Berkshire Functional Economic Market Area Study: Lichfield Report – Feb 2016*
- *West Berkshire – Employment Land Review: Addendum: Stantec / Urba – December 2022)*
- Retail Background Paper (December 2022)

A brief review of the Newbury Town Centre Masterplan has also been undertaken.

1.7 Its is noted that while the West Berkshire Travel to Work area is relatively self-contained and based upon historic data there may be some strategic economic connections (flow of goods and labour) along the M4 corridor between larger urban conurbations. West Berkshire settlements such as Newbury are also spatially well related to Reading, Basingstoke and other South East orientated locations by road connections and proximity.

1.8 On the office market generally the evidence would indicate that the West Berkshire office market is driven by demand from smaller occupiers delivering potentially people servicing jobs in the future and this type of market can be very local or location specific. It is clear that Newbury as a major settlement has seen significant office losses driven by a number of factors including changes in permitted development rights. Although the shortfall in office provision in the short term is not considered significant due to current deflated market demand linked to recent macro-economic factors the medium / longer-term needs are potentially more significant.

1.9 It is however encouraging that the Council is taking positive steps with regard to plan policies and the Newbury Town Centre Masterplan to support regeneration and transformation. The town centre masterplan focuses specific attention on becoming a more entrepreneurial town delivering new office space and focuses particularly on delivering smaller, fit-for-purpose, flexible office space for small businesses, start-ups and those looking for occasional workspace closer to home. Meeting local office needs through a proactive policy, regeneration and investment framework is considered as proving West Berkshire with good opportunities to develop local jobs in a sustainable manner.

1.10 With regard to the overall industrial market SBC understands that some of the pressures around space demand are for more ‘footloose’ distribution and logistics businesses particularly within the context of firms being priced out of high value areas. It would be good to more fully understand the extent that distribution / logistic demands are specifically driven by close proximity to Reading and London markets rather than being attracted to site options further afield. Wider industrial demands will also be driven by local business needs.

1.11 SBC is supportive of West Berkshire’s broad plan ambitions but the full application of strategy (including master-planning), flexible Local Plan policies and other tools may yield further positive outcomes to support local economic ambitions and reduce needs shortfalls.

- 1.12 On the basis of this note and the current early stage in the development of the new Swindon Local Plan with an updated evidence base, the Council is unable to assist West Berkshire Council with meeting its office and industrial shortfalls. The Council is of course happy to keep communications open under Duty to Cooperate.

Stephen Hay

Planning Policy Manager (Interim)

Economy and Development
Swindon Borough Council



APPENDIX 7

Thames Valley Berkshire LEP

Dear Robert

Alison has forwarded me your email below regarding Employment Land requirement.

As you will be aware the Berkshire LEP does not have any landholdings itself so in terms of your primary request is unable to assist.

We do however note both your office and industrial shortfall numbers which as a LEP are obviously concerned to hear from an economic prosperity and growth perspective.

I am sure that Stantec have factored in the post Covid hybrid working factor, but would ask that for office requirement, your figures are acid tested against post Covid demand for office space, which we gather from other partners has softened considerably, and is now focussing on energy efficient grade A space. Permanent hybrid working practices are likely to again reduce the demand for traditional M-F office space.

In terms of industrial we again are picking up from partners the demand for most categories of commercial industrial space is outstripping supply, again energy efficiency is becoming a major factor in occupiers selection process. Your local plan research we hope has picked up this continued and increasing demand and will support both the upgrading of existing industrial stock and creation of new stock.

We would suggest a possible engagement with the key commercial agents based with West Berks or who operate in West Berks as a litmus test of your findings below.

We have been supportive of your work to regenerate LRIE and will continue to work with you at a strategic level.

Sorry we could not be of more help with you land requirement.

Simon Matthews

Simon Matthews
Interim Head of Place Programmes (PT Consultant)
Berkshire Local Enterprise Partnership