

## Comment

Consultee	[REDACTED] (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 ([REDACTED] - 1335046)
Comment ID	PS529
Response Date	02/03/23 15:23
Consultation Point	1 Introduction and Background ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.2
Bookmark	Reading Borough Council

### 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	[REDACTED] (1335046)
Email Address	[REDACTED]
[REDACTED] 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 ([REDACTED] 1335046)
Comment ID	PS531
Response Date	02/03/23 15:25
Consultation Point	Policy SP 4 Atomic Weapons Establishment (AWE) Aldermaston and Atomic Weapons Establishment (AWE) Burghfield ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.1
Bookmark	Reading Borough Council

### 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?

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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** . Yes

**is accommodated where practical to do so and is consistent with achieving sustainable development.**

**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 supports the approach of policy SP4. The Detailed Emergency Planning Zone for AWE Burghfield crosses the boundary of West Berkshire and Reading, and RBC commits to continue joint working with WBDC to consider the implications of any development in the area on the off-site emergency 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	[REDACTED] (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 ([REDACTED] [REDACTED] 1335046)
Comment ID	PS532
Response Date	02/03/23 15:26
Consultation Point	Policy SP 5 Responding to Climate Change ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.1
Bookmark	Reading Borough Council

### 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).

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**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 supports this policy. Both WBDC and RBC have declared a Climate Emergency, and application of this policy will be critical in moving towards net zero carbon in the area.

**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	[REDACTED] (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 ([REDACTED] - 1335046)
Comment ID	PS533
Response Date	02/03/23 15:27
Consultation Point	Policy SP 10 Green Infrastructure ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.1
Bookmark	Reading Borough Council

### 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).

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**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.** . No

**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.** . No

**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 generally supports this policy, but it lacks recognition of the need to link into identified green links or corridors within adjoining areas. In particular, much of the boundary with Reading is within the urban area, and the Reading Borough Local Plan has identified Green Links that connect to the boundary. Criterion g of the proposed policy particularly recognises the importance of wildlife connectivity in urban areas, and this could therefore benefit from a reference to connections beyond the boundary.

### **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

### **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 Local Plan Review 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.*

The following change is suggested:

*“Enhance the natural environment and natural processes to improve biodiversity and increase natural capital whilst seeking opportunities to use green infrastructure to extend wildlife corridors and provide habitat connectivity, particularly in urban areas, including where it crosses authority boundaries, and where it contributes to nature recovery networks;”*

### **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	[REDACTED]
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 ([REDACTED] - 1335046)
Comment ID	PS534
Response Date	02/03/23 15:28
Consultation Point	Policy SP 12 Approach to Housing Delivery ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.1
Bookmark	Reading Borough Council

### 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	[REDACTED] (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 ([REDACTED] [REDACTED] 1335046)
Comment ID	PS535
Response Date	02/03/23 15:29
Consultation Point	Policy SP 14 ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.1
Bookmark	Reading Borough Council

### 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.*

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*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 identifies a limited number of sites for development in the Eastern Area, which is the area likely to have the greatest implications for Reading. Of these, only three sites (RSA6, RSA7 and RSA8) are within the Reading urban area itself, and the total development proposed within those sites is 70 dwellings and 65 residential care bedspaces. All of these sites are already allocated within the existing Local Plan. There are no significant cross-boundary implications as a result of this policy which RBC therefore supports.

**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	[REDACTED] (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 ([REDACTED] [REDACTED] 1335046)
Comment ID	PS537
Response Date	02/03/23 15:31
Consultation Point	Policy SP 18 Housing Type and Mix ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.1
Bookmark	Reading Borough Council

### 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. . No

**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.** . No

**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**

This policy seeks a mix of different sizes of homes based on updated Strategic Housing Market Assessment work. It is worth noting in this context that the need for homes in Reading is for approximately 50% 3-bed or larger, but the actual delivery is very significantly below this due to the realities of the types of site that come forward, where much of the delivery is at high density in the town centre. This will mean a need to place further emphasis on delivering family accommodation in adjoining areas, particularly where those areas are within the wider Reading urban area.

### **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

### **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 Local Plan Review 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.*

RBC suggests that changes be made to the supporting text to allow this to be considered when planning applications are determined. The suggested changes are set out below:

"To ensure mixed and balanced communities, a mix of dwelling sizes, in line with the table above, will be sought from developments delivering new homes. While developments will be expected to reflect this mix, rigid application of these requirements may not be appropriate in all cases. When considering the appropriate mix, the Council will have regard to:

- . the scale of development;
- . individual site circumstances including location, character of surrounding area, and any physical building constraints, particularly in relation to conversions; and market conditions.
- . viability, subject to the applicant submitting a viability assessment at the application stage and its independent assessment by the Council;
- . the latest position on delivering the size of dwellings required, including in adjoining authorities where it is part of the same urban area; and
- . information within made neighbourhood plans and any associated local housing needs surveys"

### **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	[REDACTED] (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 ([REDACTED] [REDACTED] 1335046)
Comment ID	PS538
Response Date	02/03/23 15:31
Consultation Point	Policy SP 19 Affordable Housing ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.1
Bookmark	Reading Borough Council

### 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?

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*Please tick all that apply:*

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**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	[REDACTED] (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 ([REDACTED] 1335046)
Comment ID	PS539
Response Date	02/03/23 15:32
Consultation Point	Policy SP 20 Strategic approach to employment land ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.1
Bookmark	Reading Borough Council

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

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**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	[REDACTED] (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 ([REDACTED] 1335046)
Comment ID	PS541
Response Date	02/03/23 15:35
Consultation Point	Policy SP 23 Transport ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.1
Bookmark	Reading Borough Council

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

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**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.** . No

**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**

Development close to the boundary between West Berkshire and Reading is likely to have implications for cross-boundary transport networks, and mitigation of these impacts may also need to take place on a cross-boundary basis. This requires some recognition within the policy.

The plan as a whole lacks reference to the provision of new strategic transport infrastructure, in particular park and ride. Policy DM42 does talk about provision of transport infrastructure, but only in the context of securing improvements from development proposals, and is in any case not strategic in nature. The Reading Borough Local Plan identifies the A4 and A329 corridors crossing the boundary to West Berkshire as being a priority for the provision of park and ride. This will realistically require provision of park and ride sites within West Berkshire. No specific sites have been identified, but there should nonetheless be some recognition of the importance of park and ride provision in the Reading area.

### **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

### **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 Local Plan Review 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.*

It is suggested that the policy be amended as follows:

*"Development that generates a transport impact will be required to:*

- . Minimise the impact of all forms of travel on the environment, in accordance with West Berkshire's declared Climate Emergency and Environment Strategy;*
- . Improve and promote opportunities for active travel;*
- . Improve travel choice and facilitate sustainable travel particularly within, between and to main urban areas and rural service centres;*
- . Demonstrate good access to key services and facilities;*
- . Mitigate any adverse impact on local transport networks and the strategic road network, including where those impacts would be cross-boundary; and*
- . Have regard to the West Berkshire Freight Route Network and availability of lorry parking where development will need the support of these facilities."*

An addition should be made to the policy as follows:

“Provision of park and ride on the A4 and A329 corridors linking to central Reading by enhanced public transport including bus priority measures will be supported and the Council will work with Reading Borough Council to identify deliverable proposals.”

## 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	[REDACTED] (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 ([REDACTED] [REDACTED] 1335046)
Comment ID	PS542
Response Date	02/03/23 15:36
Consultation Point	Policy SP 24 Infrastructure Requirements and Delivery ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.1
Bookmark	Reading Borough Council

### 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 this policy, in particular the recognition that *“The Council will collaborate with other strategic policy making authorities to ensure that administrative boundaries do not restrict the delivery of the most appropriate infrastructure response.”*

**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	[REDACTED] (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 ([REDACTED] 1335046)
Comment ID	PS543
Response Date	02/03/23 15:37
Consultation Point	Policy DM 20 Gypsies, Travellers and Travelling Showpeople ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.1
Bookmark	Reading Borough Council

### 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