



**West Berkshire Local Plan Review 2022-2039**  
**Proposed Submission Representation Form**

**Ref:**

*(For official use only)*

<b>Please complete online or return this form to:</b>	<b>Online:</b> <a href="http://consult.westberks.gov.uk/kse">http://consult.westberks.gov.uk/kse</a>
	<b>By email:</b> <a href="mailto:planningpolicy@westberks.gov.uk">planningpolicy@westberks.gov.uk</a>
	<b>By post:</b> Planning Policy, Development and Regulation, Council Offices, Market Street, Newbury, RG14 5LD
<b>Return by:</b>	<b>4:30pm on Friday 3 March 2023</b>

This form has two parts:

- Part A - Your details: need only be completed once
- Part B - Your representation(s): please fill in a separate sheet for each representation you wish to make

**PART A: Your Details**

*Please note the following:*

- *We cannot register your representation without your details.*
- *Representations cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.*
- *All information will be sent for examination by an independent inspector*
- *All personal data will be handled in line with the Council's Privacy Policy on the Development Plan. You can view the Council's privacy notices at <http://info.westberks.gov.uk/privacynotices>*

	<b>Your details</b>	<b>Agent's details (if applicable)</b>
Title:	Mr	Ms
First Name:*	H	Patricia
Last Name:*	Scutt	Terceiro
Job title <i>(where relevant):</i>		Senior Planner
Organisation <i>(where relevant):</i>	The Sulham Estate	Barton Willmore, now Stantec
Address* <i>Please include postcode:</i>	C/O Agent	████████████████████ ██████████
Email address:*	C/O Agent	██
Telephone number:		██████████

\*Mandatory field

## Part B – Your Representation

### **Please use a separate sheet for each representation**

The accompanying guidance note available at: <https://www.westberks.gov.uk/lpr-proposed-submission-consultation> will assist you in making representations.

*Your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change(s) as there will **not normally** be a subsequent opportunity to make further representations, **further submissions will ONLY be at the request of the Inspector, based on the matters and issues they identify for examination.***

Your name or organisation (and client if you are an agent):	Agent: Ms Patricia Terceiro, Barton Willmore, now Stantec Client: Mr H Scutt, The Sulham Estate
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**Please indicate which part of the Local Plan Review this representation relates to:**

Section/paragraph:	Shaping West Berkshire: Vision and Objectives / paragraphs 3.1-3.4
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:*

N/A

### 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
<b>Positively Prepared:</b> 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	<b>x</b>	
<b>Justified:</b> the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence	<b>x</b>	
<b>Effective:</b> 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	<b>x</b>	
<b>Consistent with national policy:</b> the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF	<b>x</b>	

Please give reasons for your answer:

On the scope of the Regulation 18 Consultation we noted the key themes within Council's Vision and, in particular, the focus on community cohesion, health and wellbeing. The energy efficiency, landscape, heritage and biodiversity elements of the vision are also noted. These key themes continue to be a part of the Council's Vision on the Draft Local Plan currently being consulted on, and this is welcomed.

In relation to the key themes of the vision, we consider that our Client's site, Land at Hall Place Farm, is highly consistent and offers the opportunity to realise the separate strands of the vision on a medium sized site which can be delivered in the short to medium term.

Land at Hall Place Farm Tilehurst, provides the opportunity to accommodate in the region of 80 new homes, a farm shop, small workshop units (to support small and medium sized enterprises), allotments and new public open space within a sustainable location adjoining the Eastern Urban Area. The majority of the homes are intended to be delivered as private rental which would be retained and managed by the landowner. The landowner has a track-record of providing quality accommodation to very longstanding tenants and believes that the private rented sector can offer a genuine, long-term alternative to homeownership. Please refer to the Vision Document which accompanies these representations and other supporting reports for further information as to the details of the proposal.

Land at Hall Place Farm Tilehurst is not currently proposed to be allocated within the Regulation 19 Draft Local Plan. Nevertheless, we consider that the site should be identified as an additional allocation in the Local Plan, on the basis that the development proposal offers the opportunity for an exemplar scheme to reflect the Council's Vision for the district.

### 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:

N/A

#### 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.*

*Please see above.*

**Please indicate which part of the Local Plan Review this representation relates to:**

Section/paragraph:	The Spatial Strategy
Policy:	SP2 (North Wessex Downs AONB)
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:*

N/A

**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
<b>Positively Prepared:</b> 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	<b>x</b>	
<b>Justified:</b> the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		<b>x</b>
<b>Effective:</b> 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	<b>x</b>	
<b>Consistent with national policy:</b> the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		<b>x</b>

Please give reasons for your answer:

## Policy SP2

On the scope of the Regulation 18 Consultation we commented that Policy SP2 represents an unnecessary duplication of paragraphs 176-177 of the National Planning Policy Framework (NPPF). We note that the wording of this Policy remains broadly the same as in the previous version of the Draft Local Plan. This is inconsistent with the Planning Practice Guidance, which states that all plans need to be as focused, concise, and accessible as possible [Paragraph: 002 Reference ID: 61-002-20190315].

As such, we consider that the policy should be revised to remove duplication and refer to the relevant sections of the national policy instead.

## Paragraphs 4.29 and 4.30

We note that the supporting text to Policy SP2 (paras 4.29 and 4.30) sets out what constitutes 'Major Development' in the context of the AONB.

Footnote 60 of the NPPF states that:

**"for the purposes of paragraphs 176 and 177, whether a proposal is 'major development' is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined".**

National Policy is therefore clear that whether a development is 'Major' is a matter for the decision maker and, as such, is subjective and dependent on site-specific circumstances. In our view, the Draft Local Plan seeks to incorporate a prescriptive approach which contradicts the deliberate flexibility afforded by Footnote 60 (above). We fundamentally consider that this approach is inappropriate and unsound on the basis that it is inconsistent with National Policy.

In addition to our 'in principle' objection, we also raise particular objection to the specific wording of items i), ii) and iv) under para 4.29 within the Draft Local Plan Review and make additional comments below.

Points i) and ii) under para 4.29 advise that the starting point of assessment will be the definitions of 'Major' and 'Minor' development set under the Town and County Planning (Development Management Procedure) (England) Order 2015 (DMPO). Reference to the DMPO is erroneous and conflates two entirely separate definitions of 'Major'.

Footnote 60 does not make any reference to the definitions of major and minor development set out in the DMPO, but rather states that, for the purposes of this definition in the context of the AONB, the development's nature, scale and setting are to be taken into account. If the DMPO was relevant to the decision maker's judgement, national policy would state this. The fact it does not is a clear indication that the definitions are unrelated and should not be conflated.

Point iv) under para 4.29 states that *the 'determination as to whether a development is 'Major' will consider whether it has the potential to have a significant adverse impact alone or in combination with other development'*. We consider that this requirement is unsound and is inconsistent with National Policy. There is no reference in national policy to assessments of development within the AONB being undertaken considering an 'in combination' impact. Paras 176-177 and Footnote 60 are clear in reference to 'the development' as a singular. There is no reference to consideration in combination with other development. As such, we consider that this point is not consistent with national policy.

Our position is supported by a relevant Legal Opinion (available here: [Guidelines-on-Significance-for-SDNP-Planning-Applications—NPPF-Complaint-July-2014.pdf](#) (southdowns.gov.uk)), where the Solicitor undertakes a review of caselaw, guidance and appeal decisions aiming to understand the reasoning for a development to be considered ‘Major’ in the context of the AONB.

The Legal Opinion concludes that ‘the overarching principle is that the determination of whether a proposal amounts to ‘major development’ for the purposes of paragraph 116 of the NPPF (now paras 176-177) is a matter of planning judgment to be decided by the decision maker in light of all the circumstances of the application and the context of the application site’ (para 24).

Furthermore, the Legal Opinion states that it would be wrong in law to apply the definition of ‘major development’, as well as any set or rigid criteria to defining major development (para 25). As a matter of planning judgement, the decision maker must consider the application in its local context (para 27).

Although we do not object to the points vi) to xii) under para 4.30, we query whether these are an unnecessary duplication of national policy.

### 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:*

N/A

### 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.*

In light of the above discussions, we recommend that para 4.29 of the Draft Local Plan is fully deleted to ensure consistency with National Policy.

Furthermore, we consider that Policy SP2 should be revised to remove an unnecessary duplication of paragraphs 170-173 of the NPPF and refer to the relevant sections of the national policy instead.

**Please indicate which part of the Local Plan Review this representation relates to:**

Section/paragraph:	The Spatial Strategy
Policy:	SP9 (Historic Environment)
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:*

N/A

**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
<b>Positively Prepared:</b> 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	<b>x</b>	
<b>Justified:</b> the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		<b>x</b>
<b>Effective:</b> 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	<b>x</b>	
<b>Consistent with national policy:</b> the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		<b>x</b>



Please give reasons for your answer:

Our comments to the Regulation 18 Consultation on the Local Plan Review 2020 – 2037: Emerging Draft (December 2020) raised that Policy SP9 did not accord with para 203 of the NPPF. Although we note that part of this Policy was revised, we remain of the view that this policy does not meet the test of soundness because it is not consistent with national policy.

Policy SP9 lists the heritage assets to which it should be applied. We note that points f) and g) relate to Local Heritage Assets and, on this basis, Policy SP9 is interpreted as affording the same level of protection to designated and non designated heritage assets. In particular, we note that Policy SP9 states that 'development that has an impact upon a heritage asset, whether designated or non-designated, will be expected to maximise opportunities to preserve, enhance, or better reveal the asset's significance and/or setting, and make a positive contribution to local character and distinctiveness through high standards of design in accordance with Policy SP7'.

This does not accord with paragraph 203 of the NPPF which, for applications which directly or indirectly affects non-designated heritage assets requires a 'balanced judgement [...] having regard to the scale of any harm or loss and the significance of the heritage asset'. We note that there is no requirement within the NPPF for development that has an impact upon a non-designated heritage asset to maximise opportunities to preserve or enhance it.

As such, the Draft Local Plan sets a higher standard than the NPPF on development that affects non-designated heritage assets, which could inhibit the delivery of sustainable development.

### 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:

N/A

### 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.

Based on our comments above, we request that Policy SP9 is revised as detailed below (additions shown underlined deletions shown with a ~~strike through~~). For ease of review we have only included the paragraphs that, in our view, should be subject to change so that Policy SP9 is in line with the NPPF.

[...] These heritage assets include:

- a. Listed Buildings;
- b. Scheduled Monuments and archaeological sites of national importance;
- c. Registered Parks and Gardens;
- d. Registered Battlefields;
- e. Conservation Areas;
- f. ~~Buildings, monuments, sites, places, areas and landscapes that have been added to the West Berkshire Local List of Heritage Assets; and~~
- g. ~~Other places, spaces, structures and features which may not be formally designated but are recognised as significant elements of West Berkshire's heritage and are positively identified on the West Berkshire Historic Environment Record, or through the development management or other planning processes.~~

Development that has an impact upon a designated heritage asset, ~~whether designated or non-designated~~, will be expected to maximise opportunities to preserve, enhance, or better reveal the asset's significance and/or setting, and make a positive contribution to local character and distinctiveness through high standards of design in accordance with Policy SP7.

[...]

Weight will be given to the conservation of the District's designated heritage assets in a manner according to their importance. Any harm to the significance of a designated ~~or non-designated~~ heritage asset must be justified. Proposals will be weighed against the public benefits of the proposal: whether it has been demonstrated that all reasonable efforts have been made to sustain the existing use, find new uses, or mitigate the extent of the harm to the significance of the asset; and whether the works proposed are the minimum required to secure the long term use of the asset.

[...]

**Please indicate which part of the Local Plan Review this representation relates to:**

Section/paragraph:	Delivering Housing
Policy:	SP12 (Approach to Housing Delivery)
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:*

N/A

**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
<b>Positively Prepared:</b> 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	<b>x</b>	
<b>Justified:</b> the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		<b>x</b>
<b>Effective:</b> 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		<b>x</b>
<b>Consistent with national policy:</b> the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		<b>x</b>

*Please give reasons for your answer:*

On the scope of the Regulation 18 Consultation we commented that we do not agree with the proposed policy on the basis that the housing target is insufficient. We note that the Regulation 19 Draft Local Plan has further lowered the housing target. Nevertheless, the housing provision set out under Policy SP12 is consistent with the Council's evidence base, as detailed in the Housing Background Paper (January 2023). This is also consistent with the standard method figure.

Please refer to the Affordable Housing Need Technical Note prepared by Barton Willmore now Stantec, dated March 2023 submitted with these representations for our full response in relation to SP12. A brief summary follows but this should be read in the context of the full Technical note.

The accompanying Technical Note undertakes a review of the affordable housing delivery in West Berkshire against the identified need set out within the emerging evidence base. The pipeline of sites identified as part of Council's five year land supply, all of which have potential to contribute to the supply of affordable housing, is also reviewed. This provides a basis for understanding the extent to which affordable housing supply is likely to keep pace with identified need. The Technical Note concludes that the rate of affordable housing delivery needs to increase from the existing rate and continue into the future to ensure that the needs for West Berkshire are met. When combining the existing and future shortfall in affordable housing, there is a need to provide up to 10,406 affordable dwellings to ensure that the needs of West Berkshire are met.

In light of the above, it is evident that the number of homes delivered in total across West Berkshire should increase, which in turn will increase the number of affordable dwellings delivered within the district.

### 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:*

N/A

### 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.*

To ensure that more affordable homes are delivered, the Council should increase their housing target and allocate further sites for development including our client's site at Our client's site at Hall Place Farm (reference TIL18) within the West Berkshire Housing and Economic Land Availability Assessment ('HELAA') (February 2020).

**Please indicate which part of the Local Plan Review this representation relates to:**

Section/paragraph:	Delivering Housing
Policy:	SP14 (Sites allocated for residential development in the Eastern Area)
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:*

N/A

**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
<b>Positively Prepared:</b> 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	<b>x</b>	
<b>Justified:</b> the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		<b>x</b>
<b>Effective:</b> 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		<b>x</b>
<b>Consistent with national policy:</b> the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		<b>x</b>

*Please give reasons for your answer:*

In response to the scope of the Regulation 18 Consultation we commented that we did not agree with the Council's approach to housing delivery, on the basis that the Local Plan Review did not include any additional site allocations in Tilehurst. The Regulation 19 Draft Local Plan does not include any additional site allocations under this Policy and therefore we maintain our objection to the Council's approach.

The Council recognises the "close functional relationship" between the urban area of Tilehurst and Reading (as stated at paragraph 4.14 of the Draft Local Plan). As such, the development at Hall Place Farm represents a highly appropriate location to provide residential development within the context of the wider housing market area.

The Council should consider the most sustainable areas to ensure that the contribution they can make to housing delivery is fully optimised. Hall Place Farm on the edge of Tilehurst represents an appropriate location for growth on a site which is deliverable within the short term. The site is well-related to existing infrastructure and services including public transport and schools. Please refer to the Vision Document submitted with these representations for further details.

Land at Hall Place Farm (TIL18) was ruled out through the site selection process on the basis that *"development would be inappropriate in the context of the existing settlement form, pattern and character of the landscape"*.

This is an incorrect assessment of the site and relationship to the settlement/wider landscape. As set out in the accompanying Landscape and Visual Appraisal for Land at Hall Place Farm, the Site not only immediately adjoins the existing western settlement boundary of Reading, but is physically and visually separated from the wider open countryside to the north-west and west of the Site. This is by the combination of the existing topography and the containment provided by the substantial woodland and vegetation to the west of the Site, such that the Site is orientated to and well related to the existing settlement of Reading, rather than to that the open or wider countryside.

Furthermore, as a consequence of the above, the Site is physically, visually and functionally related to the existing residential area of Tilehurst on the western edge of the settlement of Reading. Set within the existing residential development to the north and south the Site, provides the opportunity for the continuing rounding off of the settlement edge of Reading.

It is inappropriate for the Council to discount sites purely on basis of AONB without detailed landscape consideration. West Berkshire is dominated by AONB (74% of the district) which leads to large swathes of urban areas directly abutting the AONB. As a result, some of the most sustainable locations for small and medium scale development, well related to existing services and facilities are within the AONB. This is the case with Tilehurst as this part of the Eastern Urban Area directly abuts the AONB. Consideration of development opportunities in these areas should be based on sound landscape principles.

The Site should be included within the settlement boundary and allocated for development for the following reasons:

- It is visually well contained, and whilst on rising ground is **not** highly visible, nor located on an exposed ridge, landform or open slope.
- It is well contained by boundary vegetation and is developed in part, and is therefore **not** an open undeveloped parcel.
- It is **not** a recreational or amenity open space which extends into the countryside.
- Existing woodland and tree belts on the western edge of the Site would form a natural western boundary to the settlement, and already assist in screening views of the western edge of Reading from the wider countryside.

- It immediately adjoins the western settlement boundary of Reading and is set within the context of existing residential areas to the immediate north, north-east, east, south-east and south, and is therefore not an isolated area of potential development and is **not** physically or visually detached from the settlement of Reading.
- Whilst the Site comprises areas of horse paddocks, these are physically and visually enclosed by the immediately surrounding woodland and vegetation, such that they do **not** visually relate to the open countryside, but more to that of the adjoining settlement edge of Reading.
- It does **not** form an important gap between developed areas in fragmented settlements.

On this basis, the site presents an opportunity for development which is consistent with the existing settlement form and, could be successfully and sympathetically accommodated within the landscape.

### 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:*

N/A

### 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.*

Based on the comments above, we request the following:

- The Council to reconsider the overreliance on larger sites through the allocation of more small / medium sites to ensure a consistent delivery of homes.

The above will ensure that this approach is 'effective', 'justified' and 'consistent with national policy.'

**Please indicate which part of the Local Plan Review this representation relates to:**

Section/paragraph:	Delivering Housing
Policy:	SP13 (Sites allocated for residential development in the Eastern Area)
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:*

N/A

**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
<b>Positively Prepared:</b> 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	<b>x</b>	
<b>Justified:</b> the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		<b>x</b>
<b>Effective:</b> 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		<b>x</b>
<b>Consistent with national policy:</b> the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		<b>x</b>



*Please give reasons for your answer:*

Within our representations to the Regulation 18 Consultation, we commented that we disagree with the Council's approach of relying on larger sites and ruling out sites within smaller settlements and only allocating sites which fall within the service villages, rural service villages or urban areas. The Regulation 19 Draft Local Plan follows suit in its approach to allocating sites for housing development, as evidenced by the allocated sites Sandleford Park (1,500 dwellings) and North-East Thatcham (1,500 dwellings).

Whilst the principles of delivering large sites with accompanying infrastructure is supported by national planning policy, and we do not object to these allocations, we raise concern that the numbers suggested may not be delivered in accordance with the Council's housing trajectory. In particular with the large allocations, substantial infrastructure will need to be delivered prior to any housing delivery. Increased small and medium scale sites would complement these larger sites by ensuring a constant stream of delivery whilst larger sites start to mobilise.

As such, we maintain that the Council should seek to accommodate further growth across the district.

Hall Place Farm, Tilehurst (TIL18) which would deliver approximately 80 dwellings is of a scale and within a location which the Council should be seeking to allocate. Due to the medium scale of development and edge of settlement location, the site can be delivered in the short to medium term utilising existing infrastructure including public transport, schools and local shops.

The need for further small/medium sized sites to compliment the delivery of larger sites is also compounded by the need for an increased housing target and the necessity for further allocations in order to meet this target.

### **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:*

N/A

### **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.*

Based on the comments above, we request the following:

- The Council to allocate additional small / medium sites to ensure a consistent delivery of homes in accordance with the Council's housing trajectory.  
The above will ensure that this approach is 'effective', 'justified' and 'consistent with national policy.'

### 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.*

<b>Signature</b>		<b>Date</b>	03/03/2023
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**Your completed representations must be received by the Council by 4:30pm on Friday 3 March 2023.**