

**READING BOROUGH LOCAL PLAN
DUTY TO CO-OPERATE STATEMENT**

March 2018

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1. INTRODUCTION AND BACKGROUND

1.1 The duty to co-operate

1.1.1 There is a legal duty on local planning authorities, county councils and some other bodies to co-operate on planning for sustainable development, which is contained in Section 33A of the Planning and Compulsory Purchase Act 2004, as amended by the Localism Act 2011. This is widely known as the 'duty-to-cooperate' and has quickly become one of the most important considerations in plan-making, and the main vehicle for considering matters of greater than local significance since the demise of regional planning.

1.1.2 The duty requires local authorities to engage constructively, actively and on an ongoing basis in the preparation of development plans so far as they relate to 'strategic matters'. Strategic matters are defined as:

"(a) sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have significant impact on at least two planning areas;

And (b) sustainable development or use of land in a two-tier area if the development or use-

(i) Is a county matter, or

(ii) Has or would have a significant impact on a county matter."

These matters can be far reaching. The geographical extent of co-operation will vary depending on the issue. For example, whilst Reading has strong links with neighbouring authorities within Berkshire, the degree of linkage with some of the other consultation bodies is lower. Therefore, each approach to co-operation has been tailored depending on the nature of the matter.

1.1.3 In addition to local planning authorities, the following organisations are also subject to the duty to co-operate:

- the Environment Agency;
- Historic England;
- Natural England;
- the Mayor of London;
- the Civil Aviation Authority;
- the Homes and Communities Agency;
- clinical commissioning groups;
- the National Health Service Commissioning Board;
- the Office of Rail Regulation
- Transport for London;
- Integrated Transport Authorities;
- highways authorities; and
- the Marine Management Organisation

1.1.4 In addition, Local Enterprise Partnerships and Local Nature Partnerships are not subject to the duty themselves, but local planning authorities must co-operate with those organisations when drawing up local plans.

- 1.1.5 Whether the local planning authority has complied with the duty is the first issue an Inspector will consider in examining a development plan, and where the duty has not been complied with, plans will not be successful at examination. The duty to co-operate does not require agreement with other partners, rather the local authority must demonstrate it has made every effort to engage constructively on strategic matters. Duty to co-operate is an ongoing process and will not cease once the Local Plan is adopted.
- 1.1.6 The National Planning Policy Framework provides more detail on how the duty is to be exercised and particularly notes the following strategic priorities that will be matters to which the duty must be applied where they have cross-boundary implications:
- “the homes 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 coastal change management, 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.” (paragraph 156)
- 1.1.7 Co-operation as set out in the duty is much more than simply consulting the other specified bodies, rather it involves extensive, ongoing co-operation throughout the plan-making process on strategic matters.
- 1.1.8 More information on the duty to co-operate and how it should be applied in practice is contained in National Planning Practice Guidance¹.
- 1.1.9 The duty to co-operate is not a duty to agree, rather the local authority must demonstrate that it has made every effort to work closely with identified partners. The duty to co-operate is ongoing and does not end with the adoption of the Local Plan.
- 1.2 Purpose of this statement**
- 1.2.1 The purpose of this statement is to identify and describe duty to co-operate actions that have occurred during the preparation of the Local Plan and demonstrate that the duty has been complied with. This statement identifies any cross boundary or strategic issues and describes their consideration with adjoining authorities, specified bodies and other organisations. This forms part of the evidence base for the local plan.
- 1.2.2 Section 2 describes the most significant measures that have taken place under the duty to co-operate, and demonstrates how the duty has been complied with. The appendices contain evidence of co-operation, including a more detailed chronological list of all duty to co-operate actions that have taken place (Appendix 2).

¹ <http://planningguidance.planningportal.gov.uk/blog/guidance/duty-to-cooperate/>

1.2.3 This statement will be kept up to date as the process of preparing the Local Plan continues, and, when the Local Plan is submitted, it will be submitted along with other important evidence to support the plan at examination. There is also a requirement to make information on how the Council has complied with the duty available on a regular basis, and the Annual Monitoring Report, published in December each year, summarises the duty to co-operate measures undertaken during each monitoring year.

1.3 Local Context

1.3.1 Reading Borough cannot be viewed in isolation from its wider context. Reading forms the core of an urban area that includes areas that are effectively suburbs of Reading within Wokingham Borough and West Berkshire District, and extends to the towns of Wokingham (in Wokingham Borough) and Bracknell (within Bracknell Forest Borough). South Oxfordshire District to the north is more rural in nature and the Reading Borough boundary forms an edge to the urban area.

1.3.2 The Berkshire local authorities have a long history of working together. After Berkshire County Council was abolished in 1998, and unitary status was conferred upon the six Berkshire authorities (West Berkshire District Council, Reading Borough Council, Wokingham Borough Council, Bracknell Forest Borough Council, Royal Borough of Windsor and Maidenhead and Slough Borough Council), a Joint Strategic Planning Committee was set up, supported by a Joint Strategic Planning Unit. This had responsibility for the production of the joint Berkshire Structure Plan (adopted in 2005) as well as other strategic matters such as minerals and waste planning policy. The six authorities met in various forms to discuss these matters under these arrangements, and many of these arrangements have continued after the Joint Committee and Joint Unit were abolished in 2010. This included regular scheduled meetings of Council Leaders, Chief Executives, Heads of Planning and Planning Policy leads.

1.3.3 Reading Borough Council is at a reasonably advanced stage in production of a post-NPPF local plan compared to many of its neighbours. The Royal Borough of Windsor and Maidenhead finished consultation on a proposed Submission Local Plan in September 2017, and South Oxfordshire District Council consulted on its Final Publication Local Plan during October and November 2017, but most other authorities in close proximity to Reading are at earlier stages. This affects the operation of the duty to co-operate, for instance due to the fact that not all authorities have fully assessed the capacity to accommodate development at this point.

2. DESCRIPTION OF MAIN DUTY TO CO-OPERATE MEASURES

2.0.1 The following section sets out the most important projects or vehicles that demonstrate how the duty to co-operate has been complied with during the period of preparing the Local Plan.

2.0.2 Undertaking the duty to co-operate did not take place in a vacuum, and much of the work developed out of existing arrangements or working relationships, some of which date back many years. However, there needs to be some kind of starting point for these purposes, and it makes sense that this would be the point at which it was formally decided to replace the existing Local Development Documents with a single comprehensive Local Plan. This decision was made by the adoption of a new Local Development Scheme setting out this intention in November 2013.

2.1 Memorandum of Understanding on Strategic Planning

2.1.1 As noted elsewhere, there is a long history of the six Berkshire unitary authorities working jointly, and there are many existing working arrangements in place. For this reason, the first task that was undertaken before work on Local Plans across the area began in earnest was the drawing up of a Memorandum of Understanding to provide a framework for strategic planning and the duty to co-operate. This was signed by all six authorities in 2014, and is included as Appendix 3.

2.1.2 The Memorandum of Understanding is a high-level document that agrees in principle to co-operate on key matters such as establishment of a baseline position on strategic issues, joint evidence and potentially joint strategies. It formed the context for the substantial amount of subsequent joint work that was undertaken between the six authorities.

Relevant strategic matters	All matters
Relevant duty to co-operate partners	Bracknell Forest Borough Council Royal Borough of Windsor and Maidenhead Slough Borough Council West Berkshire District Council Wokingham Borough Council

2.2 Duty to Co-Operate Scoping Strategy

2.2.1 The Council sought to establish a baseline for undertaking the duty to co-operate by producing a brief Duty to Co-operate Scoping Strategy. The main purpose of this document was to identify the strategic matters relevant to Reading that are covered by the duty to co-operate, and to identify the partners with whom it will be necessary to co-operate.

2.2.2 A draft version of the strategy was prepared in September 2015. It identified a number of strategic matters likely to need to be subject to the duty to co-operate, and a range of partners with which co-operation would be required. Broadly, this included all local authorities covered by the Berkshire (with South Bucks) SHMA, together with all local authorities bordering the emerging Western Housing Market Area. This document was sent out for consultation to not only those bodies identified as a partner, but also all other local authorities within a 40km radius of Reading, to ensure that no authority identified a strategic relationship that had been overlooked.

- 2.2.3 Responses were received from 24 organisations, and as a result some amendments were made to the strategy. A revised version was produced and circulated in December 2015, which includes a summary of the comments made on the draft. The document is available to view on the Council's website².
- 2.2.4 In summary, the document identified 18 strategic matters that would potentially need to be subject to the duty to co-operate, as follows:
- Housing needs and provision
 - Needs and provision for gypsies and travellers
 - Needs and provision for economic development and town centres
 - Strategic transport infrastructure needs and provision
 - Strategic education infrastructure needs and provision
 - Strategic healthcare infrastructure needs and provision
 - Utilities infrastructure needs and provision
 - Strategic landscape considerations
 - Strategic biodiversity considerations
 - Open space and recreation provision
 - Strategic flooding considerations
 - Climate change and mitigation
 - Historic environment
 - Tall buildings and strategic views
 - Approach to planning within the consultation zones of the Atomic Weapons Establishment
 - University of Reading
 - Planning for minerals
 - Planning for waste
- 2.2.5 The strategy then identified which of the duty to co-operate partners were relevant for each strategic matter. This matrix is available in Appendix 1.

2.3 Strategic Housing Market Assessment

- 2.3.1 The most significant piece of evidence, which paved the way for many further strands of joint working, was the Berkshire (with South Bucks) Strategic Housing Market Assessment. This was prepared by GL Hearn on behalf of Bracknell Forest Borough Council, Reading Borough Council, Royal Borough of Windsor and Maidenhead, Slough Borough Council, West Berkshire District Council, Wokingham Borough Council and the Thames Valley Berkshire Local Enterprise Partnership. West Berkshire District Council was the lead authority.
- 2.3.2 The potential for a joint SHMA was first discussed in summer 2013, before Reading Borough Council had officially commenced work on a Local Plan. However, these discussions took some time, and it was not until November 2014 that there was final agreement from all authorities and the LEP to undertake the work jointly.
- 2.3.3 The work that had already been undertaken in surrounding areas had a significant influence over the area to be covered by the assessment. SHMAs had already been undertaken for areas including Oxfordshire and Wiltshire, which identified that a best fit area extended up to, but not beyond, the Berkshire boundaries. However, work by ORS/Atkins for authorities in Buckinghamshire found that whilst most of

² http://www.reading.gov.uk/media/4412/Duty-to-cooperate-scoping-strategy/pdf/RBC_Duty_to_Cooperate_Scoping_Strategy_1215.pdf

the authorities formed a single HMA, a significant proportion of South Bucks District had a stronger relationship with authorities within Berkshire, which meant that on a best-fit basis, the authority was not within the Central Bucks HMA. For that reason, it was considered appropriate for the SHMA to cover South Bucks District Council, and an invitation was extended to SBDC to participate in the steering group. Although initially interested, SBDC later decided to decline that invitation.

- 2.3.4 The SHMA was commissioned from GL Hearn in January 2015, and the initial work was in identifying the extent of the Housing Market Areas. A Western HMA comprising West Berkshire, Reading, Wokingham and Bracknell Forest was identified, as was an Eastern HMA comprising Windsor and Maidenhead, Slough and South Bucks. These initial conclusions were presented at a stakeholder event in May 2015, to which a number of duty to co-operate partners, including all adjoining authorities, were invited, and the draft conclusions were subject to a period of stakeholder consultation. More detail on this is set out in the SHMA, available on the Council's website³.
- 2.3.5 South Bucks District Council was kept informed as an interested party in the project, for instance being provided with the opportunity to make comments on draft versions as they emerged. However, SBDC has made clear that it fundamentally disagrees with the extent of the Housing Market Areas identified by the SHMA. SBDC's position is that the Berkshire authorities sit within a single HMA, and its reasons for this are based on the ORS/Atkins work. SBDC have consistently maintained this position ever since. The Buckinghamshire authorities subsequently commissioned further work that argued that, as SBDC had decided to proceed with a joint local plan with Chiltern District Council, the whole area fell within Central Buckinghamshire HMA on a best-fit basis.
- 2.3.6 After identification of HMAs, work then began on assessing the level of housing need for each of the HMAs, and for their constituent authorities. Draft results were subject to a further stakeholder event in October 2015, followed by a period of stakeholder consultation. Again, many duty to co-operate partners were involved at this stage.
- 2.3.7 The SHMA was published in February 2016, with all of the Berkshire unitary authorities and the LEP in agreement that it represented a robust assessment of the housing needs of the area. This was recently reaffirmed in a Memorandum of Understanding between the six authorities⁴, signed by Reading on 5th June 2017 (see Appendix 4). The publication of the SHMA did not mean the end of joint working between the six authorities, and lead councillors from the six authorities have continued to meet on a regular basis under the banner of the Member Reference Group to discuss issues around the housing needs and other strategic planning matters.

Relevant strategic matters	Housing needs and provision
Relevant duty to co-operate partners	Bracknell Forest Borough Council Royal Borough of Windsor and Maidenhead Slough Borough Council West Berkshire District Council Wokingham Borough Council

³ http://www.reading.gov.uk/media/2959/Housing-Market-Assessment/pdf/Berkshire_Strategic_Housing_Market_Assessment_Feb_2016.pdf

⁴ The Royal Borough of Windsor and Maidenhead and Wokingham Borough Council did not sign this MoU, although they were involved in its drafting.

	Thames Valley Berkshire LEP South Bucks District Council <i>Plus other partners as stakeholders</i>
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2.4 Functional Economic Market Area Assessment

- 2.4.1 The six Berkshire unitary authorities once again worked jointly with the Local Enterprise Partnership to examine employment issues across the area. The first stage, as for housing, was to identify the relevant functional area or areas within which needs should be assessed. The LEP led the commissioning process, and NLP were appointed to carry out the Functional Economic Market Area (FEMA) Assessment in October 2015.
- 2.4.2 Initial results from the FEMA Assessment, as well as a draft methodology for the Economic Development Needs Assessment expected to follow, were subject to a stakeholder consultation, including authorities adjoining Berkshire, at the end of November and beginning of December 2015. The final report was produced in February 2016.
- 2.4.3 The Assessment came to the conclusion that there are three FEMAs covering Berkshire; a West Berkshire FEMA covering West Berkshire District only; a Central Berkshire FEMA comprising Reading, Wokingham, Bracknell Forest and Windsor and Maidenhead; and an East Berkshire FEMA consisting of Slough, South Bucks and Windsor and Maidenhead. The position of Windsor and Maidenhead was unusual, in that it fell within two FEMAs. It should be noted that, as for the HMAs, South Bucks District Council does not agree with the FEMA definitions, and considers that a single FEMA covers Berkshire.
- 2.4.4 It should also be noted that, whilst there is a separation between West Berkshire and Reading on a best-fit basis, the FEMA Assessment does highlight important economic linkages, not least from the fact that the urban area of Reading crosses the boundary, and one of the main business parks of the Reading market, Arlington Business Park, is within West Berkshire. Therefore, there is clearly a need for ongoing co-operation between Reading and West Berkshire on economic matters despite falling within different FEMAs.

Relevant strategic matters	Needs and provision for economic development and town centres
Relevant duty to co-operate partners	Bracknell Forest Borough Council Royal Borough of Windsor and Maidenhead Slough Borough Council West Berkshire District Council Wokingham Borough Council Thames Valley Berkshire LEP South Bucks District Council <i>Plus other partners as stakeholders</i>

2.5 Central Berkshire Economic Development Needs Assessment

- 2.5.1 Following from the FEMA Assessment, NLP also undertook the work on three separate Economic Development Needs Assessments, one for each of the resulting FEMAs. The Council therefore worked jointly with Wokingham Borough Council, Bracknell Forest Borough Council, the Royal Borough of Windsor and Maidenhead

and Thames Valley Berkshire Local Enterprise Partnership on the Central Berkshire Economic Development Needs Assessment (EDNA).

- 2.5.2 As set out in paragraph 2.4.2 above, the methodology had already been subject to stakeholder consultation involving a number of duty to co-operate partners at an earlier stage. There was a further two-week stakeholder consultation stage starting in June 2016 on the emerging results of the EDNA, and three comments from duty to co-operate partners were received.
- 2.5.3 The final version of the study was published in November 2016. It identified high levels of need for office and industrial and warehouse space across the area, including in Reading. It was based on the same methodology as the West Berkshire and East Berkshire EDNAs that were prepared and published at the same time, to ensure consistency across Berkshire. All three EDNAs were based on the same employment projections as had been used in the SHMA, to ensure that the same basic information underpinned the strategy for the area.

Relevant strategic matters	Needs and provision for economic development and town centres
Relevant duty to co-operate partners	Bracknell Forest Borough Council Royal Borough of Windsor and Maidenhead Wokingham Borough Council Thames Valley Berkshire LEP <i>Plus other partners as stakeholders</i>

2.6 Western Berkshire Retail and Commercial Leisure Assessment

- 2.6.1 The four authorities in the Western Berkshire HMA (West Berkshire District Council, Reading Borough Council, Wokingham Borough Council and Bracknell Forest Borough Council) 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.
- 2.6.2 The assessment was published in April 2017, and it set out levels of need for new provision in each authority. In Reading, it found a need for 54,400 sq m of comparison goods floorspace, an overprovision of 19,500 sq m of convenience floorspace, and leisure needs including additional cinema facilities and an entertainment venue. Working jointly meant that the assessment was able to take account of changes within the area such as the opening of the Lexicon development in Bracknell, and adjust accordingly.

Relevant strategic matters	Needs and provision for economic development and town centres
Relevant duty to co-operate partners	Bracknell Forest Borough Council West Berkshire District Council Wokingham Borough Council

2.7 West of Berkshire Spatial Planning Framework

- 2.7.1 Work on the Berkshire SHMA identified two housing market areas, 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 (see next section).

2.7.2 The four Western HMA authorities decided against joint plan-making for a variety of reasons. One of the main reasons is that, having had experience of past joint plan making through the Berkshire Structure Plan and the withdrawn Joint Minerals and Waste Core Strategy, the governance arrangements can cause considerable complications and delay within the timescales, particularly when there are a number of different political sign-off processes involved. Authorities were also at different stages at the time, with some authorities such as Reading beginning work on a new Local Plan, whilst West Berkshire was still focused on the examination into housing allocations related to the existing Core Strategy.

2.7.3 For these reasons, it was decided that a non-statutory framework was required that would provide a vehicle for examining options for meeting needs within the area, as well as considering strategic infrastructure requirements. This led to the production of the West of Berkshire Spatial Planning Framework (WoBSPF), which was the product of various meetings and dialogue during 2016, and was published in December 2016.

2.7.4 The WoBSPF had a number of important elements which are particularly relevant to the duty to co-operate:

- It confirmed the principle that the authorities would seek to meet the area’s objectively assessed need within the HMA;
- It identified areas of potential for accommodating the objectively assessed needs. These included central and south Reading, which is carried over into the Local Plan strategy, but also potential locations close to but outside Reading, including an opportunity for up to 15,000 homes at Grazeley, and an area of search to the south west of Reading close to the M4 motorway.
- It set out some strategic, cross-boundary infrastructure requirements, which help to inform Reading’s Infrastructure Delivery Plan.

Relevant strategic matters	Housing needs and provision Needs and provision for economic development and town centres Strategic transport infrastructure needs and provision Strategic education infrastructure needs and provision Strategic healthcare infrastructure needs and provision
Relevant duty to co-operate partners	Bracknell Forest Borough Council West Berkshire District Council Wokingham Borough Council

2.8 Expression of Interest in Garden Village and subsequent work

2.8.1 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.

- 2.8.2 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 straddles the boundary between Wokingham and West Berkshire, but is also directly outside the Reading boundary, so a bid on behalf of the three authorities was made. Bracknell Forest Borough Council was not part of this project, but was aware of the ongoing work. 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.
- 2.8.3 It should be noted that Grazeley is not the only opportunity for growth in the area, and there had been no full planning assessment at this stage. The deadline for expressions of interest meant that there was an opportunity to secure funding, and Grazeley was the most obvious candidate, where there was already a substantial amount of information available to support a bid.
- 2.8.4 The Eol was submitted in July 2016. It was not successful in securing funding under this programme, primarily as it exceeded the 10,000 home limit, but dialogue with DCLG and the Homes and Communities Agency has continued. In the meantime, Wokingham Borough Council recently commissioned more detailed work on this area, along with other larger sites, to examine the opportunity and challenges for delivering new homes.

Relevant strategic matters	Housing needs and provision Needs and provision for economic development and town centres Strategic transport infrastructure needs and provision Strategic education infrastructure needs and provision Strategic healthcare infrastructure needs and provision
Relevant duty to co-operate partners	West Berkshire District Council Wokingham Borough Council

2.9 Skeleton Draft Local Plan

- 2.9.1 As work on a Draft Local Plan progressed, it was decided to prepare a 'skeleton draft' version of the emerging Local Plan for the duty to co-operate bodies. This constituted an outline version of the plan itself, summarising the emerging strategy, the topics to be covered by policies, and the expected broad content of those policies. The purpose was to give duty to co-operate partners an early sight of the areas of policy coverage and expected levels of development, to inform continued discussions under the duty. In particular, the Council asked for:
- Any concerns around the overall strategy;
 - Whether the plan will cover all key matters; and
 - Which of the policy areas need ongoing co-operation with the Council prior to publication of the Draft.
- 2.9.2 The Skeleton Draft was sent out to all duty to co-operate partners identified in the Duty to Co-Operate Scoping Statement on 15th December 2016 on a confidential basis, with a deadline for responses of 27th January 2017. A copy of the Skeleton Draft is included at Appendix 6.

2.9.3 Responses were received from 11 organisations, and these responses, together with a summary of the Council’s response or action, are set out at Appendix 7. The responses to the Skeleton Draft helped to steer the content of much of the Draft Local Plan, and formed a context for other duty to co-operate discussions held throughout the process.

Relevant strategic matters	All matters
Relevant duty to co-operate partners	All partners

2.10 Central and Eastern Berkshire Minerals and Waste Local Plan

2.10.1 Reading Borough Council is currently working with three neighbouring authorities - Wokingham Borough Council, Bracknell Forest Borough Council and the Royal Borough of Windsor and Maidenhead - on a Joint Minerals and Waste Local Plan to cover the area. Whilst compliance with the duty to co-operate will need to be separately assessed in the examination for that plan, and it does not therefore formally represent a duty to co-operate measure for the Reading Local Plan, it is nevertheless important context, as it demonstrates that Reading’s decision not to cover minerals and waste issues within its own Local Plan was taken in view of that co-operation.

2.10.2 Briefly, the formal decision for the four authorities to enter into a Joint Working Agreement with Hampshire County Council to undertake the function of provision of a minerals and waste plan was taken in September 2016. The plan will cover the area of the four Berkshire authorities and it will guide minerals and waste decision-making in the Plan area up to 2036. Consultation on Issues and Options for the Minerals and Waste Local Plan took place during June and July 2017. A consultation on Preferred Options is due to take place in early 2018. Further information is available on the dedicated website for the Minerals and Waste Local Plan⁵.

2.10.3 It is important to clarify that Hampshire County Council are involved in a consultancy role, and carrying out the duty to co-operate with HCC as one of a number of partners is a separate issue that is being undertaken through the plan-making process.

Relevant strategic matters	Planning for minerals Planning for waste
Relevant duty to co-operate partners	Bracknell Forest Borough Council Royal Borough of Windsor and Maidenhead Wokingham Borough Council <i>Plus other partners as stakeholders</i>

2.11 Housing and Economic Land Availability Assessment Methodology

2.11.1 It was agreed that, with the main housing and economic development needs having been assessed on a joint basis within Berkshire, that it would be beneficial to establish a joint methodology for assessing the availability of land to accommodate those needs. It was not felt to be appropriate to undertake the assessments themselves jointly, given the different Local Plan timescales across the area, but a joint methodology would ensure that there was a consistent basis.

⁵ <https://www.hants.gov.uk/landplanningandenvironment/berksconsult>

- 2.11.2 The joint methodology was therefore undertaken by five of the six Berkshire unitary authorities (Reading Borough Council, Royal Borough of Windsor and Maidenhead, Slough Borough Council, West Berkshire District Council and Wokingham Borough Council). Bracknell Forest Borough Council was invited to participate, but had already prepared and consulted on its own HELAA methodology, so did wish to hold their own work up. However, BFBC were involved in discussions around the methodology as it was developed.
- 2.11.3 The joint methodology was subject to a period of stakeholder engagement, which included a number of the duty to co-operate bodies, including local authorities adjoining the five Berkshire unitary authorities, and key bodies such as the Environment Agency, Natural England, Historic England and Highways England. A number of comments were received, and the HELAA methodology itself sets out how these were taken into account.
- 2.11.4 The final methodology was published in November 2016, and was used as the basis for undertaking Reading Borough Council’s own HELAA.

Relevant strategic matters	Housing needs and provision
Relevant duty to co-operate partners	Royal Borough of Windsor and Maidenhead Slough Borough Council West Berkshire District Council Wokingham Borough Council <i>Plus other partners as stakeholders</i>

2.12 Reading’s Unmet Housing Needs

- 2.12.1 It became clear early in Reading’s Local Plan process that meeting the objectively assessed housing needs were likely to be challenging. The SHMA, published in February 2016, identified a need for 699 homes per annum in Reading. As set out in the Issues and Options for the Local Plan (paragraph 3.11), meeting such a need would be likely to require use of significant amounts of undeveloped land and/or employment areas. Subsequently, the scale of economic development needs identified in the EDNA made it to option of reallocation of employment land would only shift the issue to a failure to meet employment needs.
- 2.12.2 Through 2016, Reading Borough Council was already being open with its partners within the housing market area that there was likely to be unmet need arising. This discussion was picked up within the production of the West of Berkshire Spatial Planning Framework, which states that:

“This will help meet needs across the Western Berkshire HMA, helping to deliver housing for areas which can’t meet all of their needs within their own boundaries. In particular it is already clear that Reading with its tight urban boundaries will find it difficult to accommodate its Objectively Assessed Need (OAN) for housing identified in the SHMAA.”

- 2.12.3 This conclusion was given more substance as Reading undertook initial work on its HELAA. Anticipating that there would be a requirement for a formal duty to co-operate request to accept unmet housing needs, a meeting was held in December 2016 for Reading officers to take Wokingham and West Berkshire officers through the HELAA methodology and initial conclusions. The full draft HELAA was

subsequently provided to all authorities within the Western HMA immediately following the meeting.

- 2.12.4 On 24th January 2017, the Council made a formal request to Wokingham Borough Council and West Berkshire District Council to consider accommodating a portion of Reading's unmet need for housing, with the total scale of the shortfall identified as being around 1,000 homes, requesting a reply by 27th February 2017. The requests are included at Appendix 8 and 10.
- 2.12.5 The Council believes, and continues to believe, that Wokingham and West Berkshire are the most appropriate locations to meet any unmet housing need. If housing provision is to genuinely meet needs, it should be located as close as possible to where it arises, which means that it should ideally be in an adjoining authority, particularly where the functional urban area already extends beyond those boundaries. In the case of South Oxfordshire, the Council considers that the existing congested bridges across the Thames form a considerable constraint to access to the town centre and rest of the Borough, including most of Reading's employment opportunities, and it is therefore far from an ideal location to meet Reading's needs (in addition to the issue of it being in a different Housing Market Area on a best-fit basis).
- 2.12.6 Replies were received from both authorities in February 2017. The reply from West Berkshire argued the authority was at too early a stage in its own plan-making to confirm whether it could accommodate unmet need, and also that Reading should reconsider its HELAA to identify any further potential. The West Berkshire response is included at Appendix 9.
- 2.12.7 The reply from Wokingham was concerned that the issue should be addressed as a grouping of the four Western HMA authorities, and that it should therefore be discussed at a meeting of the Members Reference Group. The Wokingham response is included at Appendix 11.
- 2.12.8 The issue was then discussed at the Members Reference Group meeting on 26th April 2017. At this meeting it became clear that there were technical matters around Reading's HELAA that would need to be discussed in more detail. A separate officer-level meeting was convened with all four authorities on 16th June 2017 to discuss these matters, and it was agreed that Reading would prepare a note examining these technical matters in more detail. This note was circulated on 18th July, and the note confirmed that there were some matters where assumptions could be changed that would reduce the shortfall by just over 200 dwellings, but would not eliminate it.
- 2.12.9 During this period, the Council has not sought to request that authorities outside the Western HMA consider accepting some of Reading's unmet need. As far as the Council is concerned, the understanding within the HMA is that the housing need should be met within the area, and this is confirmed in the West of Berkshire Spatial Planning Framework (paragraph 18, see below), and the West Berkshire and Wokingham responses had not contradicted that.

“With the prospect of Brexit the need to plan and work together with common objectives to stimulate economic activity in collaborative way will come to the fore. This will be partly through preparing Local Plans which provide certainty and enable stable growth conditions for the areas via complementary but distinct and locally focussed policy and proposals. The

four authorities aim to meet their individual and collective Objectively Assessed Needs (OAN) for housing through this dialogue.”

2.12.10 During summer/autumn 2017 it became clear that an agreement to accept a specific figure of Reading’s unmet needs was unlikely to be reached, in particular because West Berkshire and Wokingham were at an earlier stage of plan-making and had not carried out the necessary capacity work. To establish a formal agreement across the HMA, the Council therefore drafted a Memorandum of Understanding around Reading’s needs to confirm that:

- There was recognition that Reading could not meet its full needs;
- Needs arising within the HMA should be met within the HMA, and that there was therefore no need for the Council to seek to export its needs beyond the HMA boundaries; and
- The Western Berkshire HMA authorities would work together to keep the issue under review in plan-making.

2.12.11 This MoU was discussed at the SHMA Member Reference Group on 29th September 2017, and subject to some amendments, was agreed. It was fully signed on 16th October 2017. It is included at Appendix 5.

Relevant strategic matters	Housing needs and provision
Relevant duty to co-operate partners	Bracknell Forest Borough Council West Berkshire District Council Wokingham Borough Council

2.13 Unmet needs from other authorities

2.13.1 Reading Borough Council has received formal duty to co-operate requests from two authorities to consider meeting a portion of their unmet needs.

2.13.2 In 2017, Bracknell Forest Borough Council formally requested that Reading Borough Council, together with other authorities within the Central Berkshire FEMA, consider whether there was scope to meet some of Bracknell Forests anticipated unmet needs for employment development. The needs for employment development arose in the Central Berkshire EDNA, although BFBC did not fully quantify the likely level of unmet need. Reading has made clear that it expects to deliver office floorspace above the level of identified need, due mainly to existing permissions. As stated in the Local Plan, the surplus over identified need can therefore be considered a contribution towards the wider needs of the Central Berkshire FEMA, although there will need to be clarity on Wokingham’s position before it can be determined whether this specifically meets Bracknell Forest’s needs.

2.13.3 Slough Borough Council made a formal request to all five remaining Berkshire authorities, highlighting that it was highly unlikely to be able to meet its needs for housing and employment development, and enquiring whether there would be capacity to assist in meeting these needs within the rest of Berkshire. The four Western Berkshire HMA authorities jointly drafted a response in 2018, replying that there was not considered to be potential to meet those needs within the area. In Reading’s case, the reply pointed out that Reading was not expected to meet its own needs for housing and therefore had no spare capacity. It also stated that, although there was a potential oversupply of offices, the priority would be for this to contribute to meeting any unmet needs within the Central Berkshire FEMA.

2.13.4 Since few of Reading’s close neighbours have yet reached advanced stages in Local Plan preparation, detailed capacity work is not always available to calculate whether needs will be accommodated, and therefore there have not been many associated duty to co-operate requests. Within close proximity to Reading, it is only South Oxfordshire District Council and the Royal Borough of Windsor and Maidenhead that have reached Regulation 19 Draft stage, and both authorities anticipate meeting their own needs within their boundaries.

Relevant strategic matters	Housing needs and provision Needs and provision for economic development and town centres
Relevant duty to co-operate partners	All local authorities

2.14 Gypsy and Traveller Pitch Needs

2.14.1 Reading Borough Council commissioned a Gypsy and Traveller, Travelling Showpeople and Houseboat Dweller Accommodation Assessment, which was undertaken during 2017 and reported in September 2017. Stakeholders contacted for their views as part of this process included the five other Berkshire authorities, South Oxfordshire District Council and the two clinical commissioning groups. Once prepared, the draft assessment was also circulated to the other five Berkshire authorities and South Oxfordshire in June 2017, and, although views were not specifically sought, comments were received from Wokingham, South Oxfordshire and Bracknell Forest.

2.14.2 The Assessment identified needs for new provision, notably for 10-17 permanent pitches for gypsies and travellers, and 5 transit pitches. Once the Assessment was received, the Council undertook an assessment of its potential to meet the need within its boundaries. It identified a potential site at Cow Lane to meet transit needs, but could not identify any potential sites to meet permanent needs. This is not surprising in a historic context, as Reading has no current permanent or transit sites for gypsies and travellers, and virtually no history of applications for such uses. In the past there have been agreements with Wokingham on meeting needs within their area, although it should be made clear that no such arrangements are in place now, or have been in recent years.

2.14.3 As a result, prior to finalising the Pre-Submission Local Plan, the Council decided to consult on the Cow Lane site and on the site identification process that it had undertaken. This consultation took place in September and October 2017, and was sent to all planning policy consultees, including all duty to co-operate partners. Responses were received from Wokingham, South Oxfordshire, Wycombe, Environment Agency, Highways England, Historic England and Natural England. Wokingham, South Oxfordshire and the Environment Agency in particular wanted to see additional information.

2.14.4 As the Council remained convinced it could not meet the identified needs for permanent provision, it made a formal duty to co-operate request to consider the scope to meet these needs on 21st February 2018. This was sent to all local authorities within a 10km radius, as it was considered that the identified HMAs had limited relevance for gypsy and traveller needs. A deadline of 16th March was given. Of the eight authorities to whom the request had been sent, six responded to state either that there was no scope to meet these needs, or that they was not

at a stage where they could assess this. The six responses received are set out at Appendix 13.

- 2.14.5 The Council will continue to work with duty to co-operate partners to try to ensure that these needs can be met as close to where they arise as possible. A criteria-based policy in the Local Plan (H13) will enable the assessment of sites for gypsies and travellers, should any be proposed in Reading.

Relevant strategic matters	Needs and provision for gypsies and travellers
Relevant duty to co-operate partners	Basingstoke and Deane Borough Council Bracknell Forest Borough Council Hart District Council Royal Borough of Windsor and Maidenhead Slough Borough Council South Oxfordshire District Council West Berkshire District Council Wokingham Borough Council Wycombe District Council

2.15 Draft Memorandum of Understanding with South Oxfordshire

- 2.15.1 Over the latter part of 2017 and early 2018, work has been underway on drafting a Memorandum of Understanding between South Oxfordshire District Council and Reading Borough Council, which deals with a range of cross-boundary matters, but most notably meeting housing and employment needs, and strategic infrastructure provision including crossing of the Thames and park and ride. The Memorandum has been finalised at officer level. Reading Borough Council signed it on 19th March 2018. South Oxfordshire District Council has not yet signed it at the time of this statement (29th March 2018), but is expected to soon. A copy of the MoU signed by Reading is included at Appendix 12.

Relevant strategic matters	Housing needs and provision Needs and provision for gypsies and travellers Needs and provision for economic development and town centres Strategic transport infrastructure needs and provision
Relevant duty to co-operate partners	South Oxfordshire District Council

2.16 Western Berkshire OAN Sensitivity Report

- 2.16.1 The three other Western Berkshire HMA authorities have recently commissioned an update to the SHMA from GL Hearn that tests the conclusions of the SHMA against updated figures for matters such as population projections and employment projections. Its main purpose is to provide backing to the authorities' position in appeals, and it is a sensitivity test rather than a set of new objectively assessed needs. Reading was not a commissioning authority for this, partly because it is working on the basis of the 2016 SHMA figure and does not consider it appropriate to hold up plan production, but also because it does not face the same pressures in terms of appeals that the other authorities do. However, Reading has liaised closely with its neighbours on this piece of work, including attending meetings and providing comments on drafts. The work reported in March 2018.

2.16.2 The results of this sensitivity analysis shows that, using more up-to-date or alternative assumptions, the figures would change as follows:

	2016 SHMA	2018 Sensitivity	Change
Bracknell Forest	635	630	-5
Reading	699	759	+60
West Berkshire	665	600	-65
Wokingham	856	801	-55
HMA Total	2,855	2,790	-65

2.16.3 None of the four authorities within the Western Berkshire HMA currently regard the figures generated by the update to the SHMA as being a new set of objectively assessed needs that supersede the 2016 SHMA. The OAN that the authorities are currently working to are the figures from the 2016 SHMA, albeit that in the case of Wokingham there have been revisions to these figures as a result of appeals. The authorities also anticipate that the new NPPF will be published in summer 2018 and from then onwards, the government's new standard methodology will replace these OAN figures.

Relevant strategic matters	Housing needs and provision
Relevant duty to co-operate partners	Bracknell Forest Borough Council West Berkshire District Council Wokingham Borough Council

2.17 Other Measures

2.17.1 There are a range of other measures that have helped to fulfil the duty to co-operate during plan preparation. The chronological list in Appendix 2 sets out all significant actions that have been taken during the period. In many cases, there were specific meetings organised to deal with specific or general duty to co-operate matters.

2.17.2 There are also a number of existing working arrangements across the six Berkshire unitary authorities, dating back many years before the Localism Act established the Duty. There is a strong tradition of joint working across the area, with the six authorities having jointly prepared a Berkshire Structure Plan (adopted in 2005), and having also worked jointly in attempting to progress joint minerals and waste plans. The regular meetings that are part of these arrangements include Berkshire Leaders, Berkshire Chief Executives, Berkshire Heads of Planning and Development Plans Group (DPG, comprising the lead planning policy officers from each authority plus on occasion a representative from the Local Enterprise Partnership). Whilst these meetings are not duty to co-operate meetings as such, in practice these meetings, particularly Development Plans Group, provide a vehicle to discuss duty to co-operate issues and to identify matters where joint working and in particular joint evidence is required. As an example, it was through DPG that the SHMA was set up and commissioned, and it was DPG members, along with a LEP representative, that comprised the steering group for that project.

2.17.3 All measures under the duty to co-operate are listed chronologically in Appendix 2.

Relevant strategic matters	All matters
Relevant duty to co-operate partners	All partners

3. PRE-SUBMISSION REPRESENTATIONS UNDER THE DUTY TO CO-OPERATE

3.0.1 The Council received 18 representations during the Pre-Submission Local Plan consultation (November 2017 to January 2018) that considered that the duty to co-operate had not been fulfilled. Responses to representations are set out in full in the Statement of Consultation on the Pre-Submission Draft Local Plan, but it is worth specifically exploring the duty to co-operate issues raised here to explain the Council's position. Please note that the below sections deal only with the duty to co-operate, and do not consider the merits of the representations in any other sense.

3.1 Housing Market Areas and Functional Economic Market Areas

3.1.1 Chiltern and South Bucks District Councils submitted a response that considered that there had been substantial and wide-ranging duty to co-operate failures, affecting a number of matters but most significantly relating to the Housing Market Area and Functional Economic Market Area boundaries upon which Reading's housing and economic needs are based.

3.1.2 The response from Chiltern District Council and South Bucks District Council is joint, as the two authorities are preparing a joint Local Plan. However, as most of the history around this issue relates to South Bucks rather than Chiltern, SBDC are generally referred to below.

3.1.3 In general terms, RBC's response to Chiltern and South Bucks' position can be summed up by the statement in Planning Practice Guidance that "The duty to cooperate is not a duty to agree." There has been substantial co-operation over a number of years. However, Reading Borough Council, together with the other five Berkshire unitary authorities have reached a point with SBDC where there is a fundamental disagreement about definition of the HMAs and FEMAs. This disagreement has not arisen from a lack of co-operation.

3.1.4 As background to this issue, work undertaken by ORS and Atkins for the Buckinghamshire authorities (Housing Market Areas and Functional Economic Market Areas in Buckinghamshire and Surrounding Areas, March 2015) found that South Bucks fell outside a Central Buckinghamshire HMA on a best-fit basis, and sat more comfortably with the Berkshire authorities. For this reason, when the Berkshire authorities decided to undertake a joint SHMA in late 2014, it was decided that it should also cover South Bucks, and SBDC were invited to be part of the commission. Although initially showing interest, SBDC declined this invitation, but asked to be kept in the loop about the progress of the study. As well as being involved through the formal stakeholder consultation, SBDC also received more informal updates of progress and draft versions of parts of the study. As the SHMA started to settle on a definition of an Eastern and Western HMA, it became immediately clear that SBDC did not accept this.

3.1.5 However, SBDC's belief that the ORS/Atkins work demonstrates that there is a single Berkshire HMA is flawed. The ORS/Atkins work is necessarily, and quite rightly, focused on the Buckinghamshire area. It does undertake some analysis for the Berkshire area, but this is largely based around commuting patterns rather than significant analysis of house prices and migration data, which is prominent in the Berkshire SHMA. Most importantly, the study itself recognises its own limitations outside its primary area. Paragraph 3.1 of the ORS/Atkins work states that:

“...the study can only identify the full extent of those HMAs and FEMAs for Buckinghamshire - neighbouring areas will only be identified as far as is necessary to establish the most appropriate boundary between them and the areas being identified in Buckinghamshire.”

3.1.6 Paragraph 3.26 of the ORS/Atkins work further states that:

“...the boundaries outside the county should be treated with caution given the geographic area that was included within the modelling analysis.”

3.1.7 Therefore, whilst a useful input into the Berkshire SHMA work, which has important conclusions about the degree to which South Bucks relates to Slough and Maidenhead in particular, the ORS/Atkins study cannot trump a full consideration of the HMA(s) covering Berkshire which considers the range of factors specified in Planning Practice Guidance. In our view, the Berkshire (including South Bucks) SHMA presented a much more comprehensive analysis of the HMAs within which the Berkshire authorities sit, using migration and house price data alongside travel to work patterns, and it is entirely correct that the six Berkshire unitary authorities continue to rely on it.

3.1.7 Updated work by ORS and Atkins after the Berkshire (including South Bucks) SHMA reported (Housing Market Areas and Functional Economic Market Areas in Buckinghamshire: June 2016 Update) placed South Bucks with the Central Buckinghamshire authorities on a best-fit basis. Although there were no fundamental changes to the functioning of the area, this decision was based on the intention of Chiltern and South Bucks to prepare a joint plan, and therefore on the belief that a ‘best-fit’ should be applied to plan-making boundaries rather than local authority boundaries. RBC has no issue with the production of a joint plan, but the Council’s belief, which is broadly shared by the other Berkshire authorities, is that local authority boundaries should be used for HMA definition. The approach of best-fit boundaries, advocated by paragraph 5.21 of the PAS Technical Advice Note 13⁶, is due mainly to the difficulty of data collection at lower than local authority level, and this is unaffected by a decision to produce a joint plan.

3.1.8 CDC and SBDCs response deals with a number of potential duty to co-operate issues, and need addressing in turn. Appendix 14 therefore includes a table with specific responses to each issue raised.

3.1.9 In short, Chiltern and South Bucks District Councils continue to maintain a position that there is a single Berkshire HMA, which RBC and the other Berkshire authorities do not agree is supported by the evidence. CDC/SBDC place substantial weight on work undertaken for Buckinghamshire, which never set out to fully identify the HMAs within Berkshire, whilst ignoring the much fuller assessment of HMA definition within the Berkshire (including South Bucks) SHMA. This is despite, not due to a lack of, substantial co-operation, and no amount of co-operation seems likely to dissuade CDC/SBDC from this position. All six Berkshire unitary authorities continue to stand by the HMA and FEMA definitions.

3.1.10 It is also worth noting, to give some perspective to this discussion, that the one matter on which SBDC and RBC do agree is that the two authorities are not in the same HMA, nor in the same FEMA. CDC/SBDC do not appear to want any substantive changes to the Local Plan itself, and it is difficult to escape the

⁶ <https://www.local.gov.uk/sites/default/files/documents/objectively-assessed-need-9fb.pdf>

conclusion that the objection to the Local Plan is less about Reading's strategy for its own area and more about seizing one of the first opportunities to test the basis for plan-making across the whole of Berkshire.

3.2 Shortfall in Accommodating Objectively Assessed Housing Need

- 3.2.2 Two responses consider that Reading has failed the duty to co-operate in respect of its approach to its unmet housing needs. The focus of the responses by the BBC (in the context of its aspirations for Caversham Park) and the Home Builders' Federation is that the Memorandum of Understanding signed by the four Western Berkshire HMA authorities and included as Appendix 5 is insufficient, and that more specific information should be included about where the shortfall of 644 dwellings should be accommodated.
- 3.2.3 The process that RBC has gone through in seeking agreement on accommodating unmet needs is set out in section 2.12 and it will not be repeated here. Reading has sought insofar as is possible to reach agreement on where housing should be located. However, given their earlier stages in the plan-making process, none of the other Western Berkshire HMA authorities were in a position to know to what extent some or all of Reading's unmet needs can be accommodated. Short of delaying the plan-making process (certainly not an option against the background of the Government's exhortations to make good progress on local plans) or RBC undertaking detailed capacity work on those authorities' behalf (which, as well as being impossible to achieve with resources available, might in itself have led to a duty to co-operate failure), it is difficult to see what other position RBC could take.
- 3.2.4 There are examples of other authorities that have found themselves in a similar position. In particular, the Birmingham Development Plan (BDP) faced an issue in terms of a substantial level of unmet housing need of approximately 38,000 homes, without having identified how much of that unmet need would be accommodated in which local authorities in the Greater Birmingham HMA. The BDP was found sound, subject to main modifications, on 11th March 2016, and in terms of the duty to co-operate, the Inspector confirmed his opinion in the Interim Findings that the duty had been fulfilled. In those Interim Findings⁷, the Inspector stated the following:

"72. Given that a large proportion of Birmingham's housing needs cannot be met within the BCC area, the most important outcome that needs to be achieved through the duty to co-operate is a mechanism for that housing shortfall to be met through the provision of sites elsewhere in the Greater Birmingham HMA.

73. However, it is not within my remit, as the inspector examining the Birmingham Development Plan, to specify how much land should be allocated for development in each other local authority area. That would require separate examinations of Local Plans or plan reviews for each LPA. Nor would it be consistent with the NPPF's emphasis on the need to have up-to-date plans in place, to delay the adoption of the BDP until every other relevant council in the HMA had reviewed their Local Plan to provide for the Birmingham shortfall - a process that could take

⁷ https://www.birmingham.gov.uk/downloads/file/2624/bdp_inspectors_report_annexpdf

several years and would delay necessary housing development coming forward within the city itself.

74. *For these reasons I do not regard it as practical for me to recommend that the BDP should include a policy listing other local authorities in the HMA and setting out what specific share of the Birmingham housing shortfall each is required to accommodate. On the other hand, I would not be justified in recommending the BDP for adoption without being satisfied that Birmingham's full housing needs are capable of being met over the Plan period. The question is therefore whether or not adequate arrangements have been put in place, including through the duty to co-operate, to enable this to happen."*

3.2.5 In this case, a number of nearby authorities had included a commitment to review their Local Plans if it became clear that there was a need to accommodate unmet need from Birmingham, and the Inspector gave particular weight to this. However, in the case of Reading, there is no need to do so, as the other three authorities in the Western Berkshire HMA are beginning the process of preparing Local Plans in any case. For this reason, the signed MoU represents a reasonable equivalent position, because it provides formal recognition of the expectation of an unmet need to accommodate. It is also worth noting that the scale of the unmet need between Reading and Birmingham is totally different, and Reading's modest unmet need is likely to prove substantially more straightforward to accommodate. The modifications recommended by the Inspector to reflect the position with regard to unmet needs were used by RBC to inform the drawing up of policy H1 and paragraphs 11.1.4 and 11.1.5 of the Monitoring Framework.

3.3 Planning for Education

3.3.1 The representation by Gillott's School considers that the duty to co-operate with Oxfordshire County Council has not been fulfilled in relation to planning for secondary school places, due to a lack of information on pupil place planning. Gillott's School is located in Oxfordshire, on the edge of Henley-on-Thames, and is one of three schools within Oxfordshire (along with Chiltern Edge and Langtree) that a number of Reading children attend. Essentially, the concern is that there is a lack of information to show that a new secondary school as referred to in policy OU1 and the Infrastructure Delivery Plan would not render one or more of these schools unviable, particularly if it is located north of the Thames. Oxfordshire County Council has raised similar comments, but has not contented that this represents a failure of the duty to co-operate.

3.3.2 It is recognised that the information that has led to the need for the Local Plan to include a secondary school has come relatively late in the process, in the Pre-Submission draft. However, there has been discussion of cross-boundary secondary issues between Reading and Oxfordshire, including a specific meeting on 24th April 2017. Much of this discussion has taken place against a background of Oxfordshire County Council's proposal during 2017 to close Chiltern Edge, the secondary school that takes the largest number of Reading-based pupils.

3.3.3 The provision of a new secondary school is to meet new needs arising in Reading and address existing shortfalls, particularly close to the town centre. Therefore, there is no likelihood that its provision will render schools in Oxfordshire unviable. A letter to the Regional Schools Commissioner was jointly agreed between Oxfordshire and Reading in January 2018 that confirmed that Chiltern Edge would

remain viable without any consideration of housing impact, and that factoring in housing impact north of the river and in South Oxfordshire, it would in fact be able to grow. This letter is set out at Appendix 15. These concerns should not therefore prevent Reading from seeking to accommodate secondary education needs arising within its own boundaries, in particular as a result of new development.

3.4 Student Accommodation

3.4.1 The representation by Studios Construction Ltd considers that the Council has failed the duty to co-operate because there is no evidence that there has been co-operation with Wokingham Borough Council (WBC) on the issue of student accommodation. Of particular relevance is that the Borough boundary runs through the University's Whiteknights Campus.

3.4.2 RBC disagrees that it has failed the duty to co-operate on this issue. Reading's position on student accommodation stems from the conclusions of the Berkshire (including South Bucks) SHMA that there was no clearly identifiable need for additional student accommodation over the plan period. WBC and RBC were commissioning authorities for this document and signed off on its conclusions

3.4.3 RBC first flagged up its likely policy position on student accommodation in the Skeleton Draft Local Plan (see Appendix 6), which was sent to duty to co-operate partners including Wokingham Borough Council on 15th December 2016. This stated the following:

"H11: Student accommodation

This policy will deal with student accommodation in the Borough. The Berkshire SHMA did not identify any particular need for additional student accommodation in Reading. Nevertheless, there have been a number of recent proposals, particularly for private student accommodation in and around the town centre. A new policy would be based on a preference for new student accommodation to be close to the university and ideally on the campus itself."

WBC did not respond to this document. The Draft Local Plan (May 2017) followed this up with policy H11 (which became H12), which was broadly unchanged in the Pre-Submission and Submission versions. WBC expressed no concerns about this position.

3.4.4 The issue was further raised in a duty to co-operate meeting between Wokingham and Reading on 12th September 2017. The draft minutes⁸ of this meeting state that:

"RBC is losing potential housing sites within the town centre to speculative, commercial student accommodation. The SHMA has not identified a need for additional student housing. The New Local Plan includes a policy to direct student accommodation to existing university campuses and student sites, which will have implications for university land in both Reading and Wokingham."

3.4.5 In general terms, RBC and WBC have always worked closely on policy for the university campus. The existing policies in Reading's Sites and Detailed Policies

⁸ The minutes were never formally signed off

Document and Wokingham's Managing Development Delivery document are almost identical. Both authorities generally support the principle of on-campus student accommodation. WBC supported policy ER2, which articulates the principle of on-campus accommodation, in its Pre-Submission response, and has not argued that RBC has failed the duty to co-operate.

3.5 Cumulative Impact of Housing Development in Tilehurst

- 3.5.1 Two respondents have referred to a potential duty to co-operate failure in terms of the cumulative impact of housing development in the Tilehurst area, which spans the boundary between Reading and West Berkshire, on infrastructure provision. This was raised in relation to WR2: Park Lane Primary School, The Laurels and Downing Road (Ellis, Liz) and WR3t: Land at Armour Hill (Hicks, Steve, including petition). West Berkshire has a Housing Site Allocations DPD which identifies a number of sites in and around Tilehurst for residential development, whilst further sites are in RBC's Local Plan.
- 3.5.2 Reading and West Berkshire have worked closely together on a whole range of planning issues, including establishing the scale of development needs across the plan periods as part of joint commissions including the SHMA. Likely infrastructure issues have been discussed at meetings between the authorities, and the Council has kept WBDC updated on the likely scale of development in different parts of Reading throughout the whole process, including the Skeleton Draft, sent to duty to co-operate partners in December 2016, and the draft West Reading and Tilehurst chapter, sent to West Berkshire in February 2017 before finalisation of the Draft Local Plan.
- 3.5.3 Whilst infrastructure needs will continue to arise across Reading, Tilehurst will not be the main location for new development. The Local Plan expects that 15% of new dwellings will be in West Reading and Tilehurst, which is comparatively low given that this represents the largest of the five areas within Reading.

3.6 Site CA1b: Reading Golf Club

- 3.6.1 Six representations on site CA1b (part of Reading Golf Club, Kidmore End Road) considered that the Council had failed to fulfil the duty to co-operate in identifying the site for development. Four of these (Bee, Kevin; Grashoff, Andrea; Morley, David; and Smith, William) did not substantiate this any further. However, the indications in the other two representations (Grashoff, Gregory and Williams, Christine) are that the Council has failed to adequately co-operate with South Oxfordshire District Council on the prospects of the acquisition of land for additional holes for the Golf Club and on the cumulative effects of residential development on both sides of the boundary.
- 3.6.2 The Council can confirm that the issue of Reading Golf Club has been raised several times with South Oxfordshire District Council. The site, along with the issues around sites on both sides of the boundary more generally, was discussed in duty to co-operate meetings with SODC on 26th May 2016, 2nd November 2016 and 4th October 2017. In particular in the May 2016 meeting, the issue of the identification of land within South Oxfordshire for additional holes was discussed, and it was confirmed that, although the acceptability of any proposal would have to be considered on its merits and would depend on the specific site, there was no in-principle reason why it would not be achievable. The agreed minutes from the 4th October meeting state that:

“Reading Golf Club - site partly in RBC and SODC. RBC Local Plan identifies part of the site for residential and new clubhouse, which would require land for additional holes to be found in SODC. SODC have no in-principle issue, but it would need to be assessed on its merits.”

3.6.3 The draft Section 8, containing the allocation CA1b, was sent to South Oxfordshire on 27th February 2017, prior to the final drafting of the Draft Local Plan, and no concern about the inclusion of this site has been raised. The Reading Golf Club site has also featured in all three Local Plan consultations, and SODC has never raised any concerns through these more formal processes.

3.6.4 It is worth noting that neither SODC nor Oxfordshire County Council has indicated that the Council has failed to comply with the duty to co-operate.

3.7 Other Issues

3.7.1 The following responses considered that there was a failure of the duty to co-operate, but did not provide any information to substantiate how the Council had failed the duty, and with whom there should have been co-operation. It is therefore not possible to consider these issues in more detail.

- Arthur Hill - Save Our Swimming CIC (policy ER1h)
- Climate Change Centre Reading (General)
- Holland, John (policy EN7)
- Ropemaker Properties (policy H4)
- Ropemaker Properties (policy CR10)

APPENDICES

APPENDIX 1: SUMMARY OF STRATEGIC ISSUES AND RELEVANT DUTY TO CO-OPERATE BODIES

From Duty to Co-operate Scoping Strategy, December 2015

	Housing needs and provision	Needs and provision for gypsies and travellers	Needs and provision for economic development and town centres	Strategic transport infrastructure needs and provision	Strategic education infrastructure needs and provision	Strategic healthcare infrastructure needs and provision	Strategic landscape considerations	Strategic biodiversity considerations	Strategic flooding considerations	Climate change and mitigation	Open space and recreation provision	Historic environment	Tall buildings and strategic views	Utilities infrastructure needs and provision	University of Reading	Planning within the consultation zones of AWE	Planning for minerals	Planning for waste
Basingstoke and Deane Borough Council	✓		✓	✓						✓						✓		
Berkshire Local Nature Partnership								✓		✓								
Bracknell Forest Borough Council	✓	✓	✓	✓		✓				✓							✓	✓
Buckinghamshire County Council	✓		✓	✓						✓							✓	
Civil Aviation Authority				✓									✓					
Environment Agency								✓	✓	✓							✓	✓
Greater London Authority ⁹	✓		✓	✓														

⁹ Because the identified strategic relationship with London is with London as a single entity, rather than individual Boroughs, the GLA has been identified as a relevant body, but not any of the specific London Boroughs.

Hampshire County Council	✓		✓	✓						✓							✓	
Hart District Council	✓		✓	✓						✓								
Highways England				✓														
Historic England												✓	✓					
Homes and Communities Agency	✓	✓																
Marine Management Organisation																	✓	
Natural England							✓	✓	✓									
NHS England						✓												
NHS North and West Reading Clinical Commissioning Group						✓												
NHS South Reading Clinical Commissioning Group						✓												
Office of Rail Regulation				✓														
Oxfordshire County Council	✓		✓	✓						✓							✓	✓
Royal Borough of Windsor and Maidenhead	✓	✓	✓	✓						✓							✓	✓
Rushmoor Borough Council	✓		✓	✓						✓								

Slough Borough Council	✓	✓	✓	✓						✓							✓	✓
South Bucks District Council ¹⁰	✓		✓	✓						✓								
South Oxfordshire District Council	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓				
Surrey County Council	✓		✓	✓						✓							✓	
Surrey Heath Borough Council	✓		✓	✓						✓								
Swindon Borough Council	✓		✓	✓						✓								
Test Valley Borough Council	✓		✓	✓						✓								
Thames Valley Berkshire Local Enterprise Partnership	✓		✓	✓	✓	✓				✓								
Vale of White Horse District Council	✓		✓	✓						✓								
West Berkshire Council	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓	✓
Wiltshire Council	✓	✓	✓	✓						✓								
Wokingham Borough Council	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓
Wycombe District Council	✓		✓	✓						✓								

Notes:

¹⁰ South Bucks District Council intends to produce a joint Local Plan with Chiltern District Council. This may mean that co-operation with South Bucks may also entail co-operation with Chiltern, or may give rise to duty to co-operate issues between Reading and Chiltern.

1. The above listed bodies are those with whom the Council has a duty to co-operate under the Localism Act 2011. There will be many other groups and organisations which the Council will need to consult and liaise with in drawing up its local policies (for instance, the University of Reading will be a key stakeholder in the University issue), and the absence of an organisation from the above list does not mean that the Council will not involve that organisation.
2. The Council will need to look in more detail at minerals and waste planning matters at a later stage. Part of the evidence-gathering process will involve identifying those authorities that have significant movements of waste to or from Reading, or which import aggregates to Reading. There may therefore be other local authorities to whom the duty to co-operate will also apply that will be added at a later date.

APPENDIX 2: CHRONOLOGY OF EVENTS RELEVANT TO THE DUTY TO CO-OPERATE

24/07/2013	DPG meeting which first discusses the prospect of a Berkshire-wide Strategic Housing Market Assessment
11/10/2013	First draft specification for the Berkshire Strategic Housing Market Assessment circulated
December 2013	Memorandum of Understanding between Bracknell Forest Borough Council, Reading Borough Council, Royal Borough of Windsor and Maidenhead, Slough Borough Council, West Berkshire District Council and Wokingham District Council on strategic planning and the duty to co-operate signed by first authority - other authorities signed during rest of 2013 and 2014.
14/01/2014	DPG meeting
17/02/2014	Meeting with RBWM at RBC offices -housing need; Berks SHMA in operation -housing delivery: GB bound to be needed in RBWM, need will exceed present Reading unlikely to make up RBWM shortfall -afford housing; Reading concerned about RBWM pos'n -employ and retail; more AAP proposed.
27/02/2014	DPG meeting, Newbury
18/03/2014	Meeting between Berkshire and Oxfordshire authorities in Newbury to discuss Strategic Housing Market Assessment project. Matters discussed include Oxon SHMA consultation and relationship with surrounding SHMAs
20/03/2014	Discussion of Strategic Housing Market Assessment Brief
22/04/2014	DPG meeting, Slough
13/05/2014	Berkshire minerals and waste officers meeting, Newbury
10/06/2014	DPG, Maidenhead
14/08/2014	DPG/Berkshire Heads of Planning, Bracknell
02/09/2014	Duty to co-operate meeting with South Oxfordshire and Vale of White Horse, SODC (inc WBDC, WDC, RBC, BFBC, RBWM)
05/09/2014	Minerals and Waste meeting, Bracknell
22/09/2014	Berkshire Leaders - General agreement to proceed with a joint Strategic Housing Market Assessment . RBWM reluctant initially, but would await Wokingham decision.
08/10/2014	Oxfordshire Minerals and Waste Local Plan Duty to Co-operate meeting, Reading
10/10/2014	DPG, Wokingham
17/10/2014	Meeting with West Berkshire re Minerals and Waste Plan
Oct/Nov 2014	Full agreement from all six Berkshire authorities and Thames Valley Berkshire Local Enterprise Partnership to take part in a joint Strategic Housing Market Assessment
17/11/2014	Berkshire Leaders meeting
03/12/2014	DPG, Reading
10/12/2014	Minerals and Waste meeting, Reading
18/12/2014	Strategic Housing Market Assessment tender discussion, Newbury
08/01/2015	Minerals and Waste meeting, Bracknell
09/01/2015	Strategic Housing Market Assessment contract awarded to GL Hearn
21/01/2015	DPG, Newbury
26/01/2015	Strategic Housing Market Assessment Inception Meeting, Newbury
10/02/2015	Minerals and Waste meeting, Bracknell
04/03/2015	E-mail to Environment Agency re scope of the Strategic Flood Risk Assessment
17/03/2015	DPG, Slough; Strategic Housing Market Assessment meeting (discussion of SHMA chapters)
26/03/2015	Response from Environment Agency re scope of the Strategic Flood Risk Assessment
30/04/2015	DPG, Maidenhead
05/05/2015	Strategic Housing Market Assessment and Minerals and Waste meeting, Bracknell
15/05/2015	Strategic Housing Market Assessment meeting, Newbury (discussion of SHMA chapters)
19/05/2015	Strategic Housing Market Assessment Stakeholder Event, Easthampstead Park, Bracknell All duty to co-operate partners invited. Attended by the six UAs and Thames Valley

	Berkshire LEP plus organisations including Basingstoke and Deane Borough Council, Homes and Communities Agency, South Bucks District Council, Surrey Heath Borough Council, Wycombe District Council
16/06/2015	DPG, Bracknell
18/06/2015	Strategic Housing Market Assessment Steering Group Meeting , Wokingham (discussion of SHMA chapters)
24/06/2015	Oxfordshire Minerals and Waste Local Plan meeting , Wokingham
01/07/2015	Housing Market Area working meeting , Reading - Initial Set-up
17/07/2015	Duty to Cooperate meeting with West Berkshire , Reading - relating to West Berkshire Housing Sites DPD, but also indicating plans for Reading Local Plan.
28/07/2015	Strategic Housing Market Assessment meeting
13/08/2015	Meeting with PAS to discuss potential assistance with joint working arrangements (including WBC, WBDC, BFBC)
24/08/2015	Strategic Housing Market Assessment meeting , Reading
10/09/2015	DPG, Reading (including discussion of SHMA chapters)
10/09/2015	Meeting with Wokingham Borough Council to discuss sharing evidence base
15/09/2015	Members Reference Group , Bracknell
25/09/2015	Draft Reading Duty to Co-operate Scoping Strategy sent out for consultation to all Duty to Co-Operate partners plus Winchester City Council, East Hampshire District Council, Waverley Borough Council, Guildford Borough Council, Woking Borough Council, Elmbridge Borough Council, Runnymede Borough Council, Spelthorne Borough Council, London Borough of Richmond-upon-Thames, London Borough of Ealing, London Borough of Hounslow, London Borough of Hillingdon, the Mayor of London, Three Rivers District Council, Hertfordshire County Council, Dacorum Borough Council, Chiltern District Council, Cherwell District Council, Oxford City Council, West Oxfordshire District Council
28/09/2015	Minerals and Waste meeting, Bracknell
12/10/2015	Members Reference Group meeting , Bracknell
13/10/2015	Functional Economic Market Area Assessment Inception Meeting , Bracknell (BFBC, RBC, RBWM, SBC, WBC, WBDC, TVBLEP)
16/10/2015	DPG, Bracknell
20/10/2015	Strategic Housing Market Assessment Stakeholder Event , Easthampstead Park, Bracknell All duty to co-operate partners invited. Attended by the six Berkshire UAs and the Thames Valley Berkshire LEP plus organisations including Homes and Communities Agency, Rushmoor Borough Council, South Bucks District Council, Vale of White Horse District Council and Wycombe District Council
21/10/2015	Stakeholder consultation on Functional Economic Market Area Assessment methodology sent to all authorities adjoining Berkshire
23/10/2015	Duty to Co-Operate Scoping Strategy consultation ends. Responses received from Bracknell Forest Borough Council, Elmbridge Borough Council, Environment Agency, Guildford Borough Council, Hart, Rushmoor and Surrey Heath Councils, Highways England, Historic England, London Borough of Hounslow, Mayor of London, Natural England, Office of Rail Regulation, Oxford City Council, Oxfordshire County Council, Royal Borough of Windsor and Maidenhead, Runnymede Borough Council, South Bucks District Council, Spelthorne Borough Council, Swindon Borough Council, Waverley Borough Council, Wiltshire Council, Wokingham Borough Council, Wycombe District Council
28/10/2015	Stakeholder consultation on Functional Economic Market Area Assessment methodology ends - responses from Hart District Council and Rushmoor Borough Council
30/11/2015	Stakeholder consultation on Functional Economic Market Area Assessment emerging findings begins, sent to all authorities adjoining Berkshire
02/11/2015	Functional Economic Market Area Assessment meeting , Slough (BFBC, RBC, RBWM, SBC, WBC, WBDC, TVBLEP)
11/12/2015	Stakeholder consultation on the Functional Economic Market Area Assessment emerging findings ends. Responses received from Rushmoor Borough Council, South Bucks and Chiltern District Councils, Swindon Borough Council, Wiltshire Council, Surrey Heath Borough Council, Hart District Council
23/11/2015	DPG, Wokingham
23/11/2015	Functional Economic Market Area Assessment discussion , Wokingham (BFBC, RBC, RBWM, SBC, WBC, WBDC, TVBLEP)

24/11/2015	Presentation by Historic England to Reading's Strategic Environment, Planning and Transport Committee
14/12/2015	Functional Economic Market Area Assessment final meeting, Newbury
16/12/2015	Reading Duty to Co-Operate Scoping Strategy published on website, and e-mail to DtC partners
22/12/2015	RBWM Duty to Co-operate Summit , Maidenhead
21/01/2016	DPG, Slough
22/01/2016	Consultation on Issues and Options for the Local Plan begins, including sending to all Duty to Co-operate partners
27/01/2016	Retail and Commercial Leisure Study Interviews/Appointment, Bracknell
01/02/2016	Minerals and Waste Meeting, Bracknell
10/02/2016	Retail and Commercial Leisure Study Inception meeting
17/02/2016	Western HMA meeting , Reading. RBC indicates that it will be unlikely to meet its housing needs in full.
24/02/2016	Publication of the Berkshire (with South Bucks) Strategic Housing Market Assessment
03/03/2016	DPG, Bracknell - attended by Historic England. Discussion of Local Plan requirements for heritage.
07/03/2016	Consultation on Issues and Options for the Local Plan ends. Responses received from Basingstoke and Deane Borough Council, Environment Agency, Hampshire County Council, Highways England, Historic England, Mayor of London, Natural England, Oxfordshire County Council, South Oxfordshire District Council/Vale of White Horse District Council, Surrey County Council, West Berkshire District Council, Wiltshire Council, Wokingham Borough Council, Wycombe District Council
17/03/2016	Berkshire Heads of Planning, Reading
17/03/2016	Central Berkshire Economic Development Needs Assessment meeting, Reading
11/04/2016	DPG, Wokingham
09/05/2016	Berkshire Housing & Economic Land Availability Assessment methodology - consultation on methodology begins. Sent out to all adjoining authorities, EA, NE, HisE, HigE etc.
25/05/2016	DPG, Marlow
26/05/2016	Duty to Co-Operate meeting with South Oxfordshire , Milton Park Duty to co-operate discussion taking in plan progress, housing need, sites on the boundary, transport and infrastructure requirements etc.
06/06/2016	Berkshire Housing and Economic Land Availability Assessment methodology - consultation on methodology ends. Responses received from Buckinghamshire County Council, Chiltern and South Bucks District Councils, Environment Agency, Highways England, Historic England, Natural England, Surrey County Council
??/06/2016	Stakeholder consultation on emerging findings for the Central Berkshire Economic Development Needs Assessment begins, sent to all authorities adjoining Berkshire.
29/06/2016	RBWM Duty to Co-operate Summit , Maidenhead
05/07/2016	Stakeholder consultation on emerging findings for the Central Berkshire Economic Development Needs Assessment ends - responses received from Basingstoke and Deane Borough Council, Buckinghamshire County Council and Surrey County Council.
13/07/2016	DPG, Reading
14/07/2016	RBWM Duty to Co-operate Summit , Maidenhead
18/07/2016	Joint letter from Western HMA authorities to RBWM raising DtC concerns
20/07/2016	Retail and Commercial Leisure Study meeting, Bracknell
28/07/2016	Draft headline historic environment policies sent by e-mail to Historic England for comments
July 2016	Expression of Interest in a garden village at Grazeley submitted to government by Wokingham Borough Council, West Berkshire District Council and Reading Borough Council, with the support of the Thames Valley Berkshire Local Enterprise Partnership.
11/08/2016	Feedback received from Historic England on draft headline historic environment policies
14/09/2016	DPG, Newbury
02/11/2016	Duty to Co-Operate meeting with South Oxfordshire , Milton Park
11/11/2016	Final Central Berkshire Economic Development Needs Assessment report published

14/11/2016	Joint Berkshire Housing and Economic Land Availability Assessment Methodology published by Reading Borough Council, Royal Borough of Windsor and Maidenhead, Slough Borough Council, West Berkshire District Council and Wokingham Borough Council
16/11/2016	DPG, Maidenhead
02/12/2016	Reading HELAA Meeting (Reading, West Berks, Wokingham), Reading
05/12/2017	Reading provides initial draft of HELAA to Bracknell Forest, West Berkshire, Wokingham as background for an anticipated formal request to Wokingham and West Berkshire to consider accommodating Reading's unmet housing needs.
13/12/2016	West of Berkshire Spatial Planning Framework Launch , Wokingham, and online publication
15/12/2016	Initial Skeleton Draft of Draft Reading Borough Local Plan sent out to all Duty to Co-Operate partners.
06/01/2017	Draft Strategic Flood Risk Assessment sent to Environment Agency for comments
19/01/2017	Infrastructure Planning Meeting , Wokingham
20/01/2017	DPG, Bracknell
25/01/2017	Stakeholder consultation on Gypsy and Traveller, Travelling Showpeople and Houseboat Dweller Accommodation Assessment sent out - Wokingham, West Berkshire, South Oxfordshire, Bracknell Forest, RBWM, Slough, Wiltshire, North/West Reading CCG, South Reading CCG
24/01/2017	Councillor Tony Page writes to West Berkshire and Wokingham to make a formal request to accommodate Reading's unmet needs
27/01/2017	Consultation on initial Skeleton Draft of the Reading Borough Local Plan ends - responses from Basingstoke and Deane Borough Council, Bracknell Forest Borough Council, Environment Agency, Highways England, Historic England, Natural England, Oxfordshire County Council, Rushmoor Borough Council, South Oxfordshire District Council, Surrey County Council, Wycombe District Council
27/01/2017	Duty to co-operate meeting with Natural England , Reading
17/02/2017	Stakeholder consultation on GTAA ends - responses were received from neighbouring local authorities, but the consultation was undertaken on the basis that responses were not attributed to specific consultees.
06/02/2017	Initial comments on the draft Strategic Flood Risk Assessment received from the Environment Agency
23/02/2017	Meeting with Royal Berkshire NHS Foundation Trust re Royal Berkshire Hospital
24/02/2017	West Berkshire District Council initial response to Reading's request re unmet needs - needs wider discussion and WBDC not at a stage where it can commit to a figure.
27/02/2017	Wokingham Borough Council initial response to Reading's request re unmet needs - needs wider discussion
27/02/2017	Draft Local Plan Caversham and Emmer Green chapter sent to South Oxfordshire on a confidential basis
27/02/2017	Draft Local Plan South Reading and West Reading and Tilehurst chapters sent to West Berkshire on a confidential basis
27/02/2017	Draft Local Plan South and East Reading chapters sent to Wokingham on a confidential basis
28/02/2017	Minerals and Waste meeting, Reading
08/03/2017	DPG, Wokingham
14/03/2017	Meeting with Clinical Commissioning Groups , Reading
End March 2017	Further comments from Environment Agency on Strategic Flood Risk Assessment , incorporated into Draft
20/04/2017	DPG, Reading
24/04/2017	Meeting with Oxfordshire County Council re cross-boundary education issues, Oxford
26/04/2017	Member Reference Group meeting, Bracknell
28/04/2017	Western Berkshire Retail and Commercial Leisure Assessment published
03/05/2017	Consultation on Draft Local Plan begins. Consultation documentation sent to all Duty to Co-Operate partners.
19/05/2017	Berkshire Heads of Planning, Slough
05/06/2017	Reading signs Memorandum of Understanding with other Berkshire authorities on level of objectively assessed need. Wokingham and RBWM involved in drafting MoU but did not sign.
14/06/2017	DPG, Newbury

14/06/2017	Consultation on Draft Local Plan ends. Comments received from West Berkshire District Council, Wokingham Borough Council, Bracknell Forest Borough Council, Slough Borough Council, South Oxfordshire District Council, Chiltern/South Bucks District Councils, Oxfordshire County Council, Greater London Authority, Surrey County Council, Surrey Heath Borough Council, Rushmoor Borough Council, Basingstoke & Deane Borough Council, Hampshire County Council, Buckinghamshire County Council, Environment Agency, Highways England, Network Rail, Marine Management Organisation, Royal Berkshire NHS Foundation Trust, Thames Valley Berkshire LEP, Historic England, Natural England
16/06/2017	Reading HELAA meeting (with BFBC, WBDC, WBC) to set out assumptions and findings
27/06/2017	Draft Gypsy and Traveller, Travelling Showpeople and Houseboat Dweller Accommodation Assessment circulated to officers from BFBC, RBWM, SBC, SODC, WBDC, WBC
28/06/2017	Member Reference Group , Bracknell
18/07/2017	Technical Note on HELAA Assumptions , showing a potential reduction in unmet needs, following on from meeting on 16/6/17 sent to BFBC, WBDC, WDC
01/08/2017	Draft Sequential and Exception Test Document sent to Environment Agency for comments
08/08/2017	Written confirmation from West Berkshire District Council that the HELAA with amended assumptions from the Technical Note on the HELAA Assumptions represents a robust basis for further Duty to Co-operate discussions
08/09/2017	Inception meeting for Strategic Housing Market Assessment update based on most recent data. Reading BC not a commissioning body, but is co-operating with the project.
12/09/2017	Duty to co-operate meeting with Wokingham Borough Council Matters discussed - Local plan update, housing needs and provision/Grazeley, gypsies and travellers, employment needs and provision, retail and town centres, transport infrastructure, education and health infrastructure, natural environment, University of Reading.
19/09/2017	DPG, Slough
21/09/2017	Comments on Draft Sequential and Exception Test Document received from EA
22/09/2017	Draft Memorandum of Understanding on Reading's Unmet Needs sent to WBDC, WBC, BFBC
25/09/2017	Duty to co-operate meeting with West Berkshire Council Matters discussed - Local plan update, housing needs and provision/Grazeley, gypsies and travellers, employment needs and provision, retail and town centres, transport infrastructure, education and health infrastructure, built and natural environment.
26/09/2017	Gypsy and Traveller Provision Consultation Document sent to all duty to co-operate partners and all other consultees. Accompanied by publication of Gypsy and Traveller Provision Background Document on the website.
29/09/2017	Member Reference Group, Bracknell Agreement reached between Western Berkshire HMA authorities on Memorandum of Understanding on Reading's unmet needs. Agreement to seek joint discussion with Housing and Planning Minister re growth issues. Agreement to undertake work on Statement of Common Ground across Berkshire and HMAs. (BFBC, RBC, RBWM, SBC, WBDC, WBC, TVBLEP)
04/10/2017	Duty to co-operate meeting with South Oxfordshire District Council Matters discussed - Local plan update, housing needs and provision including affordable housing, sites on the boundary of SODC/RBC, gypsies and travellers, economic development needs and provision, transport infrastructure (Thames crossing, park and ride, other modes), education and health infrastructure, built and natural environment.
06/10 - 16/10/2017	Memorandum of Understanding on Reading's Unmet Need signed by four Western Berkshire HMA authorities <ul style="list-style-type: none"> • West Berkshire District Council - 06/10/2017 • Bracknell Forest Borough Council - 10/10/2017 • Wokingham Borough Council - 10/10/2017 • Reading Borough Council - 16/10/2017
26/09/2017	Consultation on Gypsy and Traveller Provision Consultation Document closes. Comments received from South Oxfordshire District Council, Wokingham Borough Council, Wycombe District Council, Environment Agency, Highways England, Historic England, Natural England
27/10/2017	Draft Transport Assessment circulated to relevant duty to co-operate partners - HigE, WBC, WBDC, BFBC, BDBC, SODC, OCC.
November 2017	Responses to Draft Transport Assessment received from HigE, BFBC, BDBC, SODC, OCC

21/11/2017	Draft Memorandum of Understanding between SODC and RBC received from SODC.
28/11/2017	DPG, Maidenhead
30/11/2017	Consultation on Pre-Submission Draft Local Plan begins. Consultation documentation sent to all Duty to Co-Operate partners.
08/12/2017	Member Reference Group, Bracknell Discussed a lobbying note to the Housing and Planning Minister. Discussion around a new version of the MoU on objectively assessed need which every authority could sign. (BFBC, RBC, RBWM, SBC, WBDC, WBC, TVBLEP)
08/01/2018	E-mail from South Bucks DC/Chiltern DC expressing concern about not being involved in MoU on objectively assessed needs
15/01/2018	Response to e-mail from South Bucks DC/Chiltern DC sent, clarifying role of the MoU on objectively assessed needs.
26/01/2018	Consultation on Pre-Submission Draft Local Plan ends. Comments received from West Berkshire District Council, Wokingham Borough Council, South Oxfordshire District Council, Oxfordshire County Council, Bracknell Forest Borough Council, Royal Borough of Windsor and Maidenhead, Slough Borough Council, Wycombe District Council, Chiltern and South Bucks District Councils, Greater London Authority, Surrey County Council, Environment Agency, Highways England, Historic England, Natural England Of these representations, whilst some objections were made, only one duty to co-operate partner (Chiltern and South Bucks District Councils) explicitly stated that they considered there had been a duty to co-operate failure. There were 17 other representations that argued there had been a duty to co-operate failure, from other individuals or organisations. See section 3 for full details of these representations.
09/02/2018	Member Reference Group, Bracknell Chiltern/ South Bucks DC also in attendance. Continued discussion around a new version of the MoU on objectively assessed need. Discussed London Plan. Highlighted forthcoming request re unmet needs for gypsy and traveller provision. (BFBC, RBC, RBWM, SBC, WBDC, WBC, CDC/SBDC, TVBLEP)
21/02/2018	Formal request to West Berkshire District Council, Wokingham Borough Council, South Oxfordshire District Council, Bracknell Forest Borough Council, Basingstoke and Deane Borough Council, Hart District Council, Royal Borough of Windsor and Maidenhead and Wycombe District Council re Reading's unmet need for permanent gypsy and traveller pitches.
01/03/2018	Telephone call with Highways England to discuss representations to RB Local Plan. Principal issue is whether RBC's modelling adequately takes account of M4 Smart Motorway. HE provided with finalised version of the modelling. Potential for Statement of Common Ground prior to examination if modelling can incorporate Smart Motorway.
06/03 - 16/03/2018	Responses from Wokingham Borough Council, South Oxfordshire District Council, Basingstoke and Deane Borough Council, Hart District Council, Royal Borough of Windsor and Maidenhead and Wycombe District Council to request regarding unmet need for permanent traveller pitches. No response from West Berkshire District Council or Bracknell Forest Borough Council.
09/03/2018	Reading Borough Council signs Memorandum of Understanding with South Oxfordshire District Council. SODC yet to sign.

NB: where the above refers to 'all Duty to Co-Operate partners', that means all of the following organisations: Basingstoke and Deane Borough Council (BDBC); Berkshire Local Nature Partnership (BLNP), Bracknell Forest Borough Council (BFBC), Buckinghamshire County Council (BCC), Civil Aviation Authority (CAA), Environment Agency (EA), Hampshire County Council (HCC), Hart District Council (BDC), Highways England (HigE), Historic England (HisE), Homes and Communities Agency (HCA), Marine Management Organisation (MMO), Mayor of London (MoL), Natural England (NE), NHS England (NHS), NHS North and West Reading Clinical Commissioning Group (NWRCCG), NHS South Reading Clinical Commissioning Group (SRCCG), Office of Rail Regulation (ORR), Oxfordshire County Council (OCC), Royal Borough of Windsor and Maidenhead (RBWM), Rushmoor Borough Council (RuBC), Slough Borough Council (SBC), South Bucks District Council (SBDC), South Oxfordshire District Council (SODC), Surrey County Council (SCC), Surrey Heath Borough Council (SHBC), Swindon Borough Council (SwBC), Test Valley District Council (TVDC), Thames Valley Berkshire Local Enterprise Partnership (TVBLEP), Vale of White Horse District Council (VoWHDC), West Berkshire District Council (WBDC), Wiltshire Council (WC), Wokingham Borough Council (WBC), Wycombe District Council (WDC)

**APPENDIX 3: MEMORANDUM OF UNDERSTANDING BETWEEN THE SIX BERKSHIRE
UNITARY AUTHORITIES ON STRATEGIC PLANNING**

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 4: MEMORANDUM OF UNDERSTANDING ON OBJECTIVELY ASSESSED HOUSING NEEDS

**Objectively Assessed Need for
Additional Housing –
Memorandum of Understanding
between the Berkshire local authorities
in the Western Berkshire and Eastern
Berks & South Bucks Housing Market
Areas**

May 2017

1.0 Introduction

- 1.1 The National Planning Policy Framework (NPPF) requires local planning authorities to have a clear understanding of housing needs in their area. To achieve this, they should prepare a Strategic Housing Market Assessment (SHMA) to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries.

2.0 The Western Berkshire Housing Market Area

- 2.1 The Western Berkshire Housing Market Area (HMA) includes the boroughs of Bracknell Forest, Wokingham and Reading in addition to the district of West Berkshire.

3.0 The Eastern Berks and South Bucks Housing Market Area

- 3.1 The Eastern Berks and South Bucks HMA includes Slough Borough, the Royal Borough of Windsor and Maidenhead and South Bucks District.

4.0 The Berkshire (including South Bucks) Strategic Housing Market Assessment

- 4.1 The six Berkshire authorities have constructively collaborated over several years to meet the requirements of the NPPF.
- 4.2 This collaboration has resulted in the "*Berkshire (including South Bucks) SHMA*", published in February 2016, which identifies the scale and mix of housing needed across the area by 2036.
- 4.3 The outcome of this work is that:
- an additional 2,855 dwellings per annum are forecast to be needed across the Western Berkshire HMA between 2013 and 2036; and
 - an additional 2,015 dwellings per annum are forecast to be needed across the Eastern Berks and South Bucks HMA between 2013 and 2036

5 Demonstrating the Duty to Cooperate

- 5.1 The six Berkshire authorities have agreed to work together to ensure that this full objectively assessed need for housing in the Western Berkshire HMA and the Eastern Berks & South Bucks HMA will be met in the authorities' forthcoming Local Plan reviews, as far as is consistent with the policies set out in the NPPF.

Classification: OFFICIAL

Signed:

Cllr
On behalf of Bracknell Forest Council



Cllr
On behalf of Reading Borough Council

Cllr
On behalf of Slough Borough Council

Cllr
On behalf of West Berkshire Council

Cllr
On behalf of the Royal Borough of Windsor and Maidenhead

Cllr
On behalf of Wokingham Borough Council

Classification: OFFICIAL

APPENDIX 5: MEMORANDUM OF UNDERSTANDING ON READING'S UNMET NEEDS

NB: There are two documents in this Appendix as Bracknell Forest Borough Council signed a different copy.

Meeting the Objectively Assessed Housing Need for Reading
Memorandum of Understanding between the authorities in the
Western Berkshire Housing Market Area

October 2017

1. Background

- 1.1 The six Berkshire unitary authorities of Bracknell Forest Borough Council, Reading Borough Council, Royal Borough of Windsor and Maidenhead, Slough Borough Council, West Berkshire District Council and Wokingham Borough Council, together with the Thames Valley Berkshire Local Enterprise Partnership, co-operated on the production of a Berkshire (with South Bucks) Strategic Housing Market Assessment (SHMA), which was published in February 2016.
- 1.2 The SHMA identified two Housing Market Areas covering Berkshire, including a Western Berkshire Housing Market Area, covering the local authorities of West Berkshire, Reading, Wokingham and Bracknell Forest.
- 1.3 The SHMA assessed the need for additional housing within the two Housing Market Areas. In the Western Berkshire Housing Market Area, a need for 2,855 homes per annum between 2013 and 2036 was identified. Reading's share of this need was identified as being 699 homes per annum between 2013 and 2036, a total of 16,077 homes. It is important to note that this Memorandum of Understanding describes the situation in relation to the objectively assessed need from the 2016 SHMA, and not future agreed levels of need that may be calculated later in the plan period.
- 1.4 Reading Borough Council published a Draft Local Plan for consultation in May 2017. This Draft Local Plan comes to the conclusion that Reading cannot meet this level of housing need within its boundaries, and therefore plans for 658 homes per annum, based on the results of a Housing and Economic Land Availability Assessment (HELAA, May 2017). This leaves 41 homes per annum, or a total of 943 homes over the plan period, as unmet need. Alterations to assumptions made in the HELAA would have the effect of reducing the total unmet need to 732 dwellings, although the HELAA will need to be revised periodically and the exact figure is therefore subject to change. This unmet need is likely to affect the planned level of housing provision in the latter part of the plan period, from 2026. It will not therefore need to be accommodated in the short term.
- 1.5 This Memorandum of Understanding sets out the agreed position across the Western Berkshire Housing Market Area relating to this unmet need.

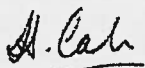
2. Reading's Unmet Need

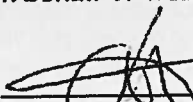
- 2.1 Bracknell Forest Borough Council, Reading Borough Council, West Berkshire District Council and Wokingham Borough Council agree the following:

- A. That Reading Borough Council's Housing and Economic Land Availability Assessment (May 2017) currently demonstrates that Reading Borough cannot accommodate the entire objectively assessed housing need for Reading between 2013 and 2036. The scale of the shortfall is a matter of detail which depends on assumptions made and subject to future assessments, but it is within the range of 500-1,000 dwellings in total between 2013 and 2036, and arises in the second half of the plan period;
- B. That the full objectively assessed housing need for the Western Berkshire Housing Market Area should be met within the Housing Market Area as defined in the Strategic Housing Market Assessment;
- C. That, given point B above, there is no requirement for Reading Borough Council to seek alternative locations outside the Western Berkshire Housing Market Area to accommodate its identified unmet need;
- D. That the four Western Berkshire HMA authorities will continue to work together to ensure that Local Plans in the area set out policies and proposals that collectively provide for the full housing needs of the area, including unmet need from Reading.

Signed: _____ Date: _____
 (Councillor Chris Turrell)
 On behalf of Bracknell Forest Borough Council

Signed:  _____ Date: _____
 (Councillor Tony Page)
 On behalf of Reading Borough Council

Signed:  _____ Date: 06.10.17
 (Councillor Hilary Cole)
 Portfolio Holder: Deputy Leader, Planning, Housing and Leisure
 On behalf of West Berkshire District Council

Signed:  _____ Date: 10/10/2017
 (Councillor David Lee)
 On behalf of Wokingham Borough Council

Meeting the Objectively Assessed Housing Need for Reading

Memorandum of Understanding between the authorities in the Western Berkshire Housing Market Area

October 2017


1. Background

- 1.1 The six Berkshire unitary authorities of Bracknell Forest Borough Council, Reading Borough Council, Royal Borough of Windsor and Maidenhead, Slough Borough Council, West Berkshire District Council and Wokingham Borough Council, together with the Thames Valley Berkshire Local Enterprise Partnership, co-operated on the production of a Berkshire (with South Bucks) Strategic Housing Market Assessment (SHMA), which was published in February 2016.
- 1.2 The SHMA identified two Housing Market Areas covering Berkshire, including a Western Berkshire Housing Market Area, covering the local authorities of West Berkshire, Reading, Wokingham and Bracknell Forest.
- 1.3 The SHMA assessed the need for additional housing within the two Housing Market Areas. In the Western Berkshire Housing Market Area, a need for 2,855 homes per annum between 2013 and 2036 was identified. Reading's share of this need was identified as being 699 homes per annum between 2013 and 2036, a total of 16,077 homes. It is important to note that this Memorandum of Understanding describes the situation in relation to the objectively assessed need from the 2016 SHMA, and not future agreed levels of need that may be calculated later in the plan period.
- 1.4 Reading Borough Council published a Draft Local Plan for consultation in May 2017. This Draft Local Plan comes to the conclusion that Reading cannot meet this level of housing need within its boundaries, and therefore plans for 658 homes per annum, based on the results of a Housing and Economic Land Availability Assessment (HELAA, May 2017). This leaves 41 homes per annum, or a total of 943 homes over the plan period, as unmet need. Alterations to assumptions made in the HELAA would have the effect of reducing the total unmet need to 732 dwellings, although the HELAA will need to be revised periodically and the exact figure is therefore subject to change. This unmet need is likely to affect the planned level of housing provision in the latter part of the plan period, from 2026. It will not therefore need to be accommodated in the short term.
- 1.5 This Memorandum of Understanding sets out the agreed position across the Western Berkshire Housing Market Area relating to this unmet need.

2. Reading's Unmet Need

- 2.1 Bracknell Forest Borough Council, Reading Borough Council, West Berkshire District Council and Wokingham Borough Council agree the following:

- A. That Reading Borough Council's Housing and Economic Land Availability Assessment (May 2017) currently demonstrates that Reading Borough cannot accommodate the entire objectively assessed housing need for Reading between 2013 and 2036. The scale of the shortfall is a matter of detail which depends on assumptions made and subject to future assessments, but it is within the range of 500-1,000 dwellings in total between 2013 and 2036, and arises in the second half of the plan period;
- B. That the full objectively assessed housing need for the Western Berkshire Housing Market Area should be met within the Housing Market Area as defined in the Strategic Housing Market Assessment;
- C. That, given point B above, there is no requirement for Reading Borough Council to seek alternative locations outside the Western Berkshire Housing Market Area to accommodate its identified unmet need;
- D. That the four Western Berkshire HMA authorities will continue to work together to ensure that Local Plans in the area set out policies and proposals that collectively provide for the full housing needs of the area, including unmet need from Reading; and

Signed:  _____ Date: 10.10.17
(Councillor Chris Turrell)
On behalf of Bracknell Forest Borough Council

Signed: _____ Date: _____
(Councillor Tony Page)
On behalf of Reading Borough Council

Signed: _____ Date: _____
(Councillor Hilary Cole)
On behalf of West Berkshire District Council

Signed: _____ Date: _____
(Councillor David Lee)
On behalf of Wokingham Borough Council

APPENDIX 6: SKELETON DRAFT LOCAL PLAN

BACKGROUND

- i. Reading Borough Council expects to publish a draft local plan¹ for consultation in April 2017. This document is a skeleton version of the plan, showing what that proposed draft will cover, highlighting the proposed areas for policies and giving a sense of the policy direction.
- ii. This document has been produced for duty to co-operate partners only, as identified in the Council's Duty to Co-operate Scoping Strategy². Its purpose is to give those partners an early sight of the areas of policy coverage and expected levels of development, which can inform continued discussions under the duty. Nothing is set in stone at this stage. We would like to hear from you, as a duty to co-operate partner, about:
 - Any concerns around the overall strategy;
 - Whether the plan will cover all key matters; and
 - Which of the policy areas need ongoing co-operation between yourselves and the Council prior to publication of the draft.
- iii. The document, in a number of places, makes reference to how policies might be similar to or differ from the policies in our existing adopted development plans. Many of the policies are likely to be carried forward. If you wish to see these policies, the documents are on our website here:
 - Core Strategy (adopted 2008, amended 2015) can be viewed [here](#)
 - Reading Central Area Action Plan (RCAAP) (adopted 2009) can be viewed [here](#)
 - Sites and Detailed Policies Document (SDPD) (adopted 2012, amended 2015) can be viewed [here](#)
- iv. This document also sets out the expected broad level of development, with Reading set to provide for the following up to 2036:
 - Around 15,000 homes, compared to an 'objectively assessed need' of just over 16,000 homes
 - At least 200,000 sq m of employment floorspace, the full identified need.
- v. The proposed level of development would result in an unmet need of around 1,000 homes, which the Borough would not be able to accommodate. Reading Borough Council is working closely with the other three authorities in the Western Berkshire Housing Market Area, namely Wokingham Borough Council, West Berkshire Council and Bracknell Forest Borough Council to consider opportunities for accommodating development needs across the area together with essential infrastructure. On Tuesday 13th December, the four authorities launched a West of Berkshire Spatial Planning Framework that considers how co-operation can meet the area's identified needs. This is not a development plan, rather it is a non-statutory document that explores opportunities for growth to meet needs. The document recognises the difficulties in accommodating Reading's full need within its boundaries. There will need to be continued dialogue between the four authorities about the extent of development in each area and any unmet needs, but it is important to note that it is not intended that any of Reading's unmet need be accommodated beyond the Western Berkshire HMA area.

¹ Under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

² http://www.reading.gov.uk/media/4412/Duty-to-cooperate-scoping-strategy/pdf/RBC_Duty_to_Cooperate_Scoping_Strategy_1215.pdf

- vi. Please note that whilst the figures for development levels in the document provide a good guide to what the plan will contain, they will be subject to further refinement between now and publication, and are therefore subject to change.
- vii. We are asking for your views by Friday 27th January 2017. We appreciate that this is a tight timescale, but please bear in mind that this is not a formal public consultation stage, so we do not require formal representations at this point. If you have any queries, please contact the Planning Policy team on planningpolicy@reading.gov.uk or 0118 9373337.

CONFIDENTIAL

SKELETON VERSION OF PROPOSED SUBMISSION DRAFT READING BOROUGH LOCAL PLAN (To 2036)

1. INTRODUCTION

The general introduction and background text will cover the role of the document, the planning context of Reading, the relationship with other plans and strategies, and the timescales for production.

2. VISION AND OBJECTIVES

2.1 Vision

The vision will be based on the existing vision in the Core Strategy. It is not considered that there is a particular need to significantly change the vision, as its contents remain very much relevant to how the town will develop:

The vision is to maintain and improve the quality of life in Reading, embracing the challenges of a dynamic, inclusive urban community of the 21st century. Everyone will have the opportunity to benefit from all that Reading can offer. Everyone has a part to play in shaping its future.

Reading's communities will be sustainable and have good access to a range of local facilities, services (including healthcare and education), housing and employment. The quality of the environment will continue to improve, and Reading will become a clean, safe and desirable place in which to live, work, study and visit. Reading will continue to develop as a regional centre serving the wider Thames Valley and provide commensurate opportunities for shopping and entertainment.

It will provide headquarters for a number of major national and international companies and will be an environment where new business can start up and flourish. The centre will provide a quality environment and facilities accessible to all members of society, with good access to open space and waterspaces. The conditions to enable a high quality of life for residents in the centre will be sought as part of developments. The centre will also contribute towards maintaining and improving the quality of life for all those who live in, work in and visit Reading.

In the suburbs, appropriate development of housing and services in locations with good links to public transport services will continue. The district and local centres will perform an increasing role of providing services to local populations. Travel from the suburbs to the centre will for many people usually take the form of improved public transport. Green corridors along the Rivers Thames and Kennet will be protected and enhanced as a recreational and ecological resource.

2.2 Objectives

The objectives are also proposed to be by-and-large a continuation of the core objectives set out in the Core Strategy. Taking account of the representations received during Issues and Options consultation, the following objectives are proposed.

1. *Strengthen the role of Reading, including central Reading, as the hub for the Thames Valley, providing an accessible focus for the development of employment, housing, services and facilities, meeting the needs of residents, workers, visitors, those who study in Reading Borough, and the wider area;*
2. *Improve the quality of life for those living, working, studying in and visiting the Borough, creating inclusive, sustainable communities with good access to decent and affordable housing, employment, open space and waterspace, transport, education, services and facilities (such as sustainable water supplies and wastewater treatment, healthcare services, sport and recreation, etc.) to meet identified needs;*

3. *Ensure new development and existing areas are accessible and sustainable, in accordance with the sustainability appraisal objectives, including reducing its effects on, and adapting to, climate change;*
4. *Maintain and enhance the historic, built and natural environment of the Borough through investment and high quality design;*
5. *Improve and develop excellent transport systems to improve accessibility within Reading and for the wider area by sustainable modes of transport, including walking and cycling;*
6. *Offer outstanding cultural opportunities, which are based on multiculturalism, local heritage and high quality, modern arts, leisure and visitor facilities;*
7. *Ensure that Reading is a highly socially-inclusive community where the needs of all its citizens are met by high quality, cost effective services and outstanding levels of community involvement.*

3. SPATIAL STRATEGY

The Spatial Strategy is not expected to fundamentally change. The reality is that the available sites are in Central and South Reading, and it will be in these areas that the bulk (approximately 80-90%) of development will take place. Smaller scale development within district and local centres will also form an important role, and there is still some scope for identification of some of those employment areas not identified as Core Employment Areas for housing. Reference will need to be made to the need to ensure density reflects levels of accessibility and the need to make best use of the limited number of sites within the Borough, taking account of the national emphasis on making the best use of land around transport hubs.

The Spatial Strategy will also need to be set within a wider context, particularly that of the Western Berkshire Housing Market Area. This section will also therefore need to refer to work to consider options for growth within the wider area, and how Reading's local plan can facilitate that growth, including through infrastructure provision.

4. GENERAL POLICIES

4.1 Cross-Cutting Policies

CC1: Presumption in favour of sustainable development

This policy will be largely the same as the existing policy SD1 in the Sites and Detailed Policies Document. It has become a requirement of local plans in line with the NPPF.

CC2: Sustainable design and construction

The policy will replace CS1 in our Core Strategy, and will set out sustainability requirements in terms of new buildings. The focus will be on non-residential buildings given the withdrawal of the Code for Sustainable Homes. Sustainability standards for new dwellings will now be covered in H4.

CC3: Adaptation to climate change

This policy will deal with how developments will be designed to adapt to the effects of climate change, and generally be similar to DM2 in our

SDPD. Additional text may be added to take account of the changes to the SUDS regime.

CC4: Decentralised energy

This policy is expected to ensure that development makes the most of opportunities for provision of decentralised energy. It will generally be similar to DM3 in our SDPD.

CC5: Waste minimisation

This policy will seek to minimise the generation of waste in the construction, use and life of buildings and promote more sustainable approaches to waste management. It is expected to largely be the same as policy CS2 in our existing Core Strategy.

CC6: Accessibility and the intensity of development

This policy will ensure that the intensity of development takes account of the accessibility of development by means other than the car. Policy CS4 of the Core Strategy did a similar job, but there may need to be some alterations to ensure that Reading can accommodate as much of its own needs as possible, and to take account of national policy of higher densities around public transport hubs.

CC7: Design and the public realm

This will be a general design policy to cover all development in the Borough. Existing policy CS7 from the Core Strategy has proven a robust policy on these matters in recent years, and it is not proposed to significantly change it. More detailed matters on design in the town centre will be covered in the section on Central Reading.

CC8: Safeguarding amenity

This will be a single policy that seeks to ensure no significant adverse effects on existing residents, or on any future residents of a proposed development. It will be broadly the same as DM4 of our SDPD.

CC9: Securing infrastructure

This policy will set out the principle that development will mitigate its impacts on infrastructure. In doing so, it will also set out the priorities for securing infrastructure, which will relate both to the Community Infrastructure Levy regime and to the use of Section 106 agreements. The priorities will include transport, leisure and open space, education and economic development infrastructure, as currently set out in SDPD policy DM3, with some additional areas in individual cases. It will further combine various elements of Core Strategy policies CS9, CS13 and CS32.

4.2 Built and Natural Environment

EN1: Protection and enhancement of the historic environment

A general policy protecting and seeking enhancement of heritage assets, including listed buildings, conservation areas, scheduled ancient monuments, historic parks and gardens, locally listed buildings and their settings. The policy will be based on CS33 of the Core Strategy.

EN2: Areas of archaeological significance

This policy sets out the need for identification and evaluation of archaeological remains, and the preference for preservation of remains in situ.

EN3: Enhancement of conservation areas

This policy identifies some of the key opportunities for enhancement of conservation areas. It draws on the set of Conservation Area Appraisals, which include priorities for enhancement such as reducing visual clutter, improving paving, railings, walls and street furniture, and preserving and enhancing green areas.

EN4: Locally important heritage assets

This policy will cover those assets that have been locally-listed and how effects on locally-listed buildings will be judged.

EN5: Protection of key views and vistas

The scope of this policy will be limited to key views with a heritage element, e.g. views featuring a specific asset. It is intended that this will be a limited number of relatively long range views, as short distance views of assets will be covered in terms of their setting under EN1.

EN6: The historic environment as a tool to shape new development

This policy seeks to harness the cues from the existing historic environment to inform the design of new development, e.g. through its contribution to townscape, local distinctiveness or improving or creating access to assets.

EN7: Local green space

This policy will identify the key areas of local green space that comply with the NPPF criteria. It is not expected that all areas currently protected as public and strategic open space under SA16 of the SDPD fulfil the NPPF criteria and can therefore be designated in this policy, as the criteria are quite demanding.

EN8: Other designated open space

The intention is to include other areas of open space that are worthy of protection within this policy. They will not benefit from NPPF protection, but the policy will still seek their retention.

EN9: Undesignated open space

This policy contains a presumption in favour of retention of open space, but refers to exceptional circumstances where adequate replacement space or sports and recreation facilities can be provided.

EN10: Provision of new open space

This policy will deal with the requirements for new open space as a result of new development. It will be based upon a combination of policy CS29 in the Core Strategy and policy DM16 in the SDPD, which requires new provision on sites of 50 or more dwellings. The amount and quality to be provided will continue to be linked to Reading's 2007 Open Spaces Strategy.

EN11: Access to open space

This policy will ensure that where possible new development improves links to open spaces. It will be generally similar to policy CS30 of the Core Strategy.

EN12: Waterspaces

This policy recognises the importance of the waterways to Reading's environment, and gives guidance on the design of development close to the waterways. In particular, development should enhance the character and distinctiveness of the waterways, enhance the roles and quality of the waterways and ensure public access. It is based on policy CS8 of the Core Strategy.

EN13: Biodiversity and green network

The policy will identify and protect those areas of existing biodiversity value, and also seeks to stitch them together through the establishment, retention and enhancement of a green network. This may incorporate parks, gardens, areas of planting etc, to try to reverse the fragmentation of habitats. As such, this integrates former policies CS36 of the Core Strategy and DM18 of the SDPD.

EN14: Major landscape features

The policy identifies five major landscape features across Reading, and preserves their landscape value. The five areas are not proposed to change from previous plans, and comprise the Thames Valley, Kennet and Holy Brook Meadows, West Reading wooded ridgeline, East Reading wooded ridgeline and the North Reading dry valleys, as well as identifying where the Borough meets the edge of the Chilterns AONB. It is a combination of policies CS37 of the Core Strategy and SA17 of the SDPD.

EN15: Trees, hedges and woodlands

This policy protects individual important trees, hedges and woodlands, and seeks enhancement of tree cover in Reading in line with the published Tree Strategy.

EN16: Air quality

This policy ensures that new development will not cause an unacceptable worsening of air quality, and that development for sensitive uses will not take place where air quality is poor without adequate mitigation. It is not proposed that it be substantially different from policy DM19 of the SDPD.

EN17: Pollution and water resources

This policy ensures that new development will not cause damage through pollution, and that development for sensitive uses will not take place where it may be affected by pollution without adequate mitigation. As air quality is dealt with separately, this refers to other types of pollution, notably noise, light, water and land pollution or contamination. It also ensures that water resources are adequate to support a proposed development. It will be based on CS34 of the Core Strategy.

EN18: Flooding

This policy will resist development in areas at high risk of flooding, where development would reduce the capacity of the flood plain to store floodwater, impede the flow of floodwater or in any way increase the risks

to life and property arising from flooding. It will be based on CS35 of the Core Strategy, but take account of anything specific arising from the ongoing Strategic Flood Risk Assessment.

4.3 Employment

EM1: Provision of employment development

This policy will set out the amount of employment development planned for. The identified levels of need from the Central Berkshire Economic Development Needs Assessment are at least 200,000 sq m of new employment floorspace. The policy plans to meet that level of need. However, it clarifies that employment development over and above those levels will need to either demonstrate that there will be no significant additional housing demand, or will need to mitigate any effects.

EM2: Location of employment development

This policy sets out where major employment development will be located. In the case of offices, the priority will be the town centre and the A33 corridor to the south. In the case of industry and warehousing, the priority will be the identified Core Employment Areas and the A33 corridor. This is the same overall strategy as policy CS10 of the Core Strategy. The Core Employment Areas are proposed to be defined as largely the same as existing policy SA13 of the SDPD.

EM3: Loss of employment land

This policy sets out guidance on the loss of employment land. It will have a presumption in favour of retention of employment land (which may also include non B-class uses that can only reasonably be accommodated in employment areas) in Core Employment Areas. Elsewhere, there will be criteria for considering release, which will be broadly the same as those in CS11 of the Core Strategy.

EM4: Maintaining a variety of premises

The policy seeks to ensure that there is a variety of employment premises available, in particular for start-up and grow-on space. It also seeks to retain storage and distribution space in the south of Basingstoke Road. The policy is expected to largely be the same as CS12 of the Core Strategy.

No site allocations for employment will be in this section. They will be set out in the site policies in sections 5-9.

4.4 Housing

H1: Provision of housing

This policy will set out the amount of housing that is planned to be delivered in Reading.

The Berkshire Strategic Housing Market Assessment identified a need for Reading of 699 dwellings per annum, a total of 16,077 between 2013 and 2036. This policy plans for 658 dwellings per annum, a total of 15,123 between 2013 and 2036, based on work demonstrating that there is not capacity to meet the full need within the Borough boundaries.

This leaves approximately 1,000 dwellings as unmet need. The four authorities within the Western Berkshire Housing Market Area are currently working together to identify options for accommodating growth in the area as a whole.

H2: Density and mix

This policy deals with a number of matters around the type and density of homes that will be provided.

In terms of density, there is a clear need to maximise densities to ensure that Reading meets as much of its needs as possible. Guidelines on density will be set out, and these are likely to be more ambitious than the ranges set out in current policy CS15 of the Core Strategy, albeit still set at a level to avoid significant negative effects on the character of local areas. They will need to take account of the national policy to increase densities around transport hubs.

In terms of dwelling size, the Berkshire SHMA emphasised that around 50% of the housing need in Reading is for homes with three or more bedrooms. There is clearly a difficulty, as a large proportion of possible development sites in Reading are within the town centre, where it will not be possible to achieve many homes of that size. Realistically, it will not be possible to meet a 50% target, but the policy will seek to ensure that at least 50% of dwellings outside the town centre are 3-bed or larger, as current policy DM5 of the SDPD does.

The policy will also cover self-build housing, and the proposal is to require a minimum proportion of plots for self-build on large sites for houses (as opposed to flats).

H3: Affordable housing

This policy will seek to set the proportion of new developments that will be for affordable housing. There is a very significant need for new affordable homes in Reading of 406 per annum. It will not be possible to meet these needs in full, but the policies will maximise the contribution that developments can make subject to viability considerations.

Current policy, based on relatively recent evidence leading to a 2015 amendment to our Core Strategy and SDPD, is for 30% affordable housing on sites of ten or more, 20% on sites of 5-9 and an equivalent contribution to 10% on sites of 1-4. The proposal is to continue this approach, which was subject to a very recent (2015) amendment and therefore based on reasonably up-to-date evidence, but subject to the following caveats:

- Viability assessment will need to be undertaken, which may indicate that the proportion should be lower, or higher.
- The Council will be conscious of decisions on appeals as it seeks to apply its existing policies in the face of the recent Court of Appeal decision on the ministerial statement indicating that authorities should not seek affordable housing contributions for sites of ten or less, bearing in mind that the statement does not necessarily override local policy.
- The Council will also continue to monitor any changes in terms of a requirement for starter homes, which could significantly affect this policy.

H4: Housing standards

This policy will set out the Council's approach to the national standards for new homes for various topics:

- The nationally described space standard
- Higher levels of water efficiency in the Building Regulations
- Emissions standards, following the removal of the Code for Sustainable Homes
- Adaptable and accessible dwellings as set out in the Building Regulations
- Wheelchair adaptable and accessible dwellings as set out in the Building Regulations.

The extent to which new homes comply with these standards is still to be determined, and will be affected by comprehensive viability assessment, but approximate continuation of current policy as a 'business as usual' approach would mean that all new homes are built to comply with higher levels of water efficiency, 50% of major developments achieve a 19% improvement over the 2013 Building Regulations, and that all new housing is adaptable and accessible.

H5: Accommodation for vulnerable people

This policy deals with those for whom there are specialist housing needs due to vulnerability. It sets a requirement of an additional 253 residential care bedspaces for elderly people, as identified in the Berkshire SHMA, but also sets a preference for living as independently as possible. The remainder of the policy sets out development management criteria for accommodation for vulnerable groups, and will be similar to DM7 of the SDPD.

H6: Protecting the existing housing stock

This policy will ensure that existing residential accommodation is not lost, and carries forward policy CS17 of the Core Strategy.

H7: Residential conversions

This policy will set out expectations for conversions to flats and to houses in multiple occupation. It will largely be a combination of policy CS18 of the Core Strategy and DM8 of the SDPD, although it will also draw on experience of operating an Article 4 for small HMOs in parts of Park, Redlands and Katesgrove wards.

H8: House extensions and ancillary accommodation

This will be a criteria-based policy for house extensions and ancillary accommodation such as granny annexes. It is not likely to differ substantially from DM9 of the SDPD.

H9: Private and communal outdoor space

This sets out expectations for how much private and communal outdoor space will be provided for residential development. The expectations are likely to be in line with policy DM10 of the SDPD, which contains no hard and fast minimum areas, but rather expects a functional minimum outdoor area.

H10: Development of private residential gardens

This policy deals with development of garden land for new dwellings, and is expected to be a criteria-based policy along the lines of DM11 of the SDPD. The policy is not worded to be restrictive, and the criteria are important and fairly standard planning considerations, so garden land will continue to be a future source of supply of housing where appropriate.

H11: Student accommodation

This policy will deal with student accommodation in the Borough. The Berkshire SHMA did not identify any particular need for additional student accommodation in Reading. Nevertheless, there have been a number of recent proposals, particularly for private student accommodation in and around the town centre. A new policy would be based on a preference for new student accommodation to be close to the university and ideally on the campus itself.

H12: Provision for gypsies and travellers

A criteria-based policy for proposals for gypsies and travellers will be included. Work on gypsy and traveller accommodation needs is ongoing and will inform the content of this policy. Depending on the outcome of that work, the policy may set out a level of provision that Reading is planning for and/or identify where any unmet needs are to be met. If sites are to be identified, that will be dealt with in the relevant site policies in sections 5-9.

H13: Suburban regeneration and renewal

The ongoing development at Dee Park is regenerating a tired and poorly designed residential estate for new housing with a significant net gain of homes. This kind of suburban regeneration and renewal can contribute to meeting the Borough's housing need. At this stage, it is not considered realistic that other areas can deliver a significant amount of housing, as Dee Park was a fairly unique opportunity. However, the plan potentially has a 20 year life, and should opportunities become available, this policy can help to provide guidelines on how to determine them.

No site allocations for housing will be in this section. They will be set out in the site policies in sections 5-9.

4.5 Transport

TR1: Achieving the transport strategy

This policy will ensure that development helps to fulfil the aims of the most up-to-date transport strategy. It sets an expectation that major schemes will promote sustainable transport measures, and that all developments ensure an adequate level of accessibility and safety in line with any transport assessment. It continues a number of Core Strategy policies, namely CS20, CS22 and CS23.

TR2: Identified transport projects

This identifies the major transport projects, as set out in the Local Transport Plan, which will need to be given priority. These are:

- Mass rapid transit
- Park and ride sites
- Green Park station and interchange
- Crossing of the Thames

- High quality bus services

Where the above schemes require specific land to be identified and safeguarded (e.g. for MRT routes), the Proposals Map will do so.

This will also identify the land that is safeguarded for Crossrail under a Safeguarding Direction.

TR3: Access, traffic and highway-related matters

This is a development management policy to ensure that development does not significantly negatively affect the functioning and safety of the transport network. It is anticipated that it will be broadly the same as DM12 of the SDPD.

TR4: Cycle routes and facilities

This policy will seek to ensure that development enhances facilities for cycling. It also seeks to maintain, enhance and extend the cycle routes shown in the most up-to-date Cycling Strategy, as is currently the case in policy SA14 of the SDPD.

TR5: Car and cycle parking

This policy will link car and cycle parking levels to the accessibility of developments. It is expected that specific standards will continue to be most appropriately set out in the Parking Standards SPD, as is currently the case.

4.6 Retail, leisure and town centres

RL1: Network and hierarchy of centres

This policy will set out the network and hierarchy of centres, which is not proposed to change significantly from that defined in policy CS26 of the Core Strategy and SA16 of the SDPD, although detailed boundaries may need to slightly change.

RL2: Scale and location of retail, leisure and culture development

This policy identifies the level of retail, leisure and culture development proposed. It states that the plan will make provision for 14,000 sq m of retail and 6,000 sq m of leisure/culture floorspace to 2036. This has been informed by a joint Retail and Leisure Study for the Western Housing Market Area. The policy will direct major retail, leisure and culture development to the town centre in the first instance.

RL3: Vitality and viability of smaller centres

This policy will deal with the specific uses appropriate within district and local centres. Policies CS27 of the Core Strategy current provides the overall strategic statement and DM13 of the SDPD deals with the detail. The policy is expected to be a combination of the two policies, but it will need to be slightly amended to take account of changes to permitted development rights.

RL4: Betting shops and pay-day loan companies

Betting shops and pay-day loan companies have been removed from the A2 use class, which enables the local planning authority to have more control over their location. This policy will seek to avoid clustering of these uses.

RL5: Impact of main town centre uses

This policy will require an impact assessment for main town centre uses over 1,000 sq m in an out of centre location, and will be a continuation of policy DM14 of the SDPD.

RL6: Protection of leisure facilities and public houses

This policy will have a presumption in favour of retention of leisure uses and public houses, particularly in small centres, unless there are strong reasons to justify a loss. The overall policy position is likely to remain similar to DM15 of the SDPD, but changes to wording may be necessary to ensure the right balance between retaining important uses and flexibility.

No site allocations for retail, leisure or culture will be in this section. They will be set out in the site policies in sections 5-9.

4.7 Other uses

OU1: New and existing community facilities

This policy will guide the development of new community facilities, and will seek to protect existing facilities where a need for them remains. It will largely be a continuation of Core Strategy policy CS31.

OU2: Hazardous installations

This policy will seek to ensure that development for hazardous installations, or in the vicinity of such installations, does not pose a danger to residents. It will largely be the same as DM20 of the SDPD.

OU3: Telecommunications

This policy will guide development of telecommunications facilities, and will largely be the same as DM21 of the SDPD.

OU4: Shopfronts and cash machines

This policy will guide development of shopfronts and cash machines, and will largely be the same as DM22 of the SDPD.

OU5: Advertisements

This policy will guide proposals for advertisements, and will largely be the same as DM23 of the SDPD.

No site allocations for other uses will be in this section. They will be set out in the site policies in sections 5-9.

5. CENTRAL READING

5.1 Overall strategy for Central Reading

There will be some general principles and a spatial strategy for the centre of Reading. Many of the sites identified in the RCAAP are still to come forward, and it is therefore considered that the overall strategy of the RCAAP, based particularly on strengthening the north-south axis and creating a higher-quality centre with more efficient use of land and with higher quality public realm, is still very much relevant and should be carried forward.

The strategy will specify that Central Reading will provide approximately:

- 7,700 new homes (51% of the housing provision)
- 100,000 sq m of office floorspace (70% of the provision); and
- 15,000 sq m of retail and leisure floorspace (75% of the provision).

5.2 General policies for Central Reading

CR1: Definition of the centre

This policy defines the town centre for various uses, mainly to allow application of the sequential test for main town centre uses. It is not currently proposed that it be substantially different from RCAAP policy RC6.

CR2: Design in the centre

This policy adds some centre-specific design elements to the overall design policy (CC7), such as building on the grid layout. It is proposed that it will be largely the same as RCAAP policy RC5

CR3: Public realm in the centre

This policy will deal with how development should enhance the public realm of the centre, including through provision of new public open spaces. It would include many of the same elements as RCAAP policy RC14, but will not protect specific areas of open space, as this will be covered by the open space policies (EN7 and EN8)

CR4: Leisure, culture and tourism in the centre

This policy will seek diversification of the leisure, culture and tourism offer of the centre, and will seek to maintain and enhance the overall leisure offer. It will also recognise the important recreational value of the Thames and its surrounds. It would generally be a continuation of RCAAP policy RC7.

CR5: Drinking establishments

It is intended that this policy will continue to seek a diverse evening offer in the town centre, and as such will be largely similar to RCAAP policy RC8.

CR6: Living in the centre

This policy will deal with some of the specific issues of residential development within the town centre, such as noise and air quality issues. It will seek to avoid residential in the town centre being dominated by 1-bed units, and will largely carry forward policy RC9 of the RCAAP.

CR7: Ground floor uses and primary frontages in Central Reading

Current policy in RC10 of the RCAAP largely allows changes of use within certain town centre uses at the ground floor without particular restriction, and is therefore more relaxed than policy for smaller centres. However, there is a risk that this could lead to a dilution of diversity of the centre's offer, and there is scope to tighten this up. This policy will also ensure that the key frontages in the centre are enlivened by appropriate town centre uses with display windows.

CR8: Small shop units

This policy will seek to ensure that small shop units continue to play a role in the centre, and that new small units are provided in major new schemes. It will be largely the same as policy RC11 of the RCAAP.

CR9: Terraced housing in the centre

The small areas of terraced housing within the core of the centre which are a key component of Reading's character will be protected by this policy, as is currently the case under policy RC12 of the RCAAP.

CR10: Tall buildings

This policy will set out the locations where tall buildings will be acceptable, and set out guidelines for the design of those buildings, and how those guidelines will differ according to location. Existing policy RC13 currently plays this role, and much of the policy will be likely to be similar, but the need to accommodate development within the Borough boundaries insofar as is possible means that the policy will be re-examined to identify whether there is scope for additional tall buildings to help to meet development needs whilst still retaining the important character and heritage of the centre.

5.3 Site-specific policies for Central Reading

CR11: Development in the Station/River Major Opportunity Area

This policy will look at the major opportunity for development afforded by the areas around Reading station, and seeks to deliver a major mixed use redevelopment of the area. It will carry forward policy RC1 of the RCAAP, but will update it to take account of developments that have been completed or are underway, or any other changing circumstances.

CR12: Development in the West Side Major Opportunity Area

This policy will look at the major opportunity for development afforded by the land around the west side of Central Reading, and seeks to deliver a major redevelopment of the area. It will carry forward policy RC2 of the RCAAP, but will update it to take account of developments that have been completed or are underway, or any other changing circumstances.

CR13: Development in the East Side Major Opportunity Area

This policy will look at the major opportunity for development afforded by the land around the east side of Central Reading, and seeks to deliver a major redevelopment of the area. It will carry forward policy RC3 of the RCAAP, but will update it to take account of developments that have been completed or are underway, or any other changing circumstances.

CR14: Other sites for development in Central Reading

This policy will identify all other development sites in Central Reading, the type and scale of development that they are identified for, and any site-specific considerations.

CR15: Abbey Quarter

This policy will support the project to establish the Reading abbey precinct as a high-quality visitor destination.

6. SOUTH READING

6.1 Overall strategy for South Reading

There will be some general principles set out for development in South Reading. Given the scale of development proposed, there will also need to be an overall spatial strategy showing how areas will be developed and integrated with transport links.

The strategy will specify that South Reading will provide approximately:

- 3,100 new homes (21% of the housing provision)
- 40,000 sq m of office floorspace (30% of the provision);
- 115,000 sq m of industrial and warehouse floorspace (95% of the provision).

6.2 General policies

SR1: General principles for South Reading

This policy will highlight the general principle that development in South Reading will integrate with existing communities and seek to provide facilities from which those existing communities can also benefit. It will also highlight the primacy of the network of centres in South Reading. As such, it will be a continuation of policies SA1 and SA3 of the SDPD.

6.3 Site-specific policies in South Reading

SR2: Land north of Manor Farm Road

This policy will look at the major opportunity afforded by the mixed commercial areas around Gillette Way, north of Manor Farm Road, in terms of a residential-led development. It will carry forward policy SA2c of the RCAAP, but will update it to take account of developments that have been completed or are underway, or any other changing circumstances.

SR3: Green Park

There would be scope to include a policy on the Green Park area, taking account of the fact that what was originally envisaged as a campus-style business park is now evolving as a mixed use location. It would take account of the landowners' Green Park Masterplan.

SR4: Other sites for development in South Reading

This policy will identify all other development sites in South Reading, the type and scale of development that they are identified for, and any site-specific considerations.

7. WEST READING AND TILEHURST

7.1 Overall strategy for West Reading and Tilehurst

There will be some general principles set out for development in West Reading and Tilehurst, linked to an overall strategy map.

The strategy will specify that West Reading and Tilehurst will provide approximately:

- 2,600 new homes (17% of the housing provision)

- 4,000 sq m of industrial and warehouse floorspace (5% of the provision)
- 4,500 sq m of retail and leisure floorspace (20% of the provision).

7.2 Site-specific policies in West Reading and Tilehurst

WR1: Dee Park

This policy will continue to identify area regeneration and renewal of the Dee Park area. Phases 1, 2 and 3a are now complete, but the remainder of phase 3 is still to be undertaken, and will require further applications. This policy is likely to be a straightforward continuation of SA4 of the SDPD.

WR2: Park Lane Primary School, The Laurels and Downing Road

This policy will continue to identify development for a new primary school on a single site, and enable the development of existing fragmented school land for residential. As such it will be largely the same as policy SA5 of the SDPD.

WR3: Other sites for development in West Reading and Tilehurst

This policy will identify all other development sites in West Reading and Tilehurst, the type and scale of development that they are identified for, and any site-specific considerations.

8. CAVERSHAM AND EMMER GREEN

8.1 Overall strategy for Caversham and Emmer Green

There will be some general principles set out for development in Caversham and Emmer Green, linked to an overall strategy map.

The strategy will specify that Caversham and Emmer Green will provide approximately:

- 700 new homes (5% of the housing provision); and
- 1,000 sq m of retail and leisure floorspace (5% of the provision).

8.2 Site-specific policies in Caversham and Emmer Green

CA1: Sites for development in Caversham and Emmer Green

This policy will identify all other development sites in Caversham and Emmer Green, the type and scale of development that they are identified for, and any site-specific considerations.

9. EAST READING

9.1 Overall strategy for East Reading

There will be some general principles set out for development in East Reading linked to an overall strategy map.

The strategy will specify that East Reading will provide approximately:

- 1,000 new homes (6% of the housing provision)

9.2 Site-specific policies in East Reading

ER1: University of Reading, Whiteknights Campus

A policy should be included guiding development on the University of Reading's main campus at Whiteknights. There is an existing policy SA6 of the SDPD, and this will form the basis of the policy. There will need to be consistency with Wokingham Borough, within which much of the campus sits.

ER2: Other sites for development in East Reading

This policy will identify all other development sites in East Reading, the type and scale of development that they are identified for, and any site-specific considerations.

10. IMPLEMENTATION

This section will include general information on how the proposals in the plan will be implemented and by what means. In particular, there will be two major elements:

- A set of timescales for implementation of the main sites identified in the plan; and
- A summary version of the Infrastructure Delivery Plan, setting out the main infrastructure needing to be provided and when and how it will be delivered.

11. MONITORING

This section will include a table with key indicators we will expect to monitor and how often we will collect information on them. It is not proposed that every policy will have a dedicated indicator, but rather that there be indicators related to groups of policies.

12. GLOSSARY

13. APPENDICES

Appendix 1: Housing Trajectory

This will show the expected delivery of housing over the plan period and how it will relate to the housing requirements set out in policy H1.

APPENDIX 7: SUMMARY OF CONSULTATION RESPONSES ON SKELETON DRAFT LOCAL PLAN

Organisation	Comment	Suggested action	Actioned
Basingstoke and Deane Borough Council	We do not have any specific comments on the draft document at this time. However, you will no doubt be aware that whilst Basingstoke and Deane Borough does not immediately adjoin the administrative boundary of Reading Borough Council, there is significant movement between authorities as Reading is both an employment and retail destination for residents of the borough. The impact of growth on the A33 corridor is a key duty to co-operate issue for the Council. Issues of housing need and supply (Objectively assessed housing need) are also of relevance. As such, we would be grateful to continue to be consulted on relevant documents/participate in relevant discussions so that these key issues can be discussed as part of our on-going duty to co-operate requirements.	Continue to consult B&DBC on key documents	Ongoing
		Provide draft transport modelling work when available	27/10/2017
Bracknell Forest Borough Council	Vision should mention the strengthening of its strong inter relationship with its hinterland in terms of economic and housing issues and therefore the further development of strategic transport links and other infrastructure serving these areas.	Amend vision to reflect role of Reading with within wider hinterland	07/02/2017
Bracknell Forest Borough Council	Objectives should be amended to reflect the actions required to cement/strengthen the strong inter relationship of Reading Borough with its hinterland and therefore ensure that the economic and housing needs of the area are addressed in a sustainable manner.	Amend objectives to reflect role of Reading with within wider hinterland	07/02/2017
Bracknell Forest Borough Council	This section also needs to refer to the fact that Reading Borough operates within the Central Berkshire Functional Economic Market Area.	Include reference to Central Berks FEMA within Spatial Strategy	07/02/2017
Bracknell Forest Borough Council	Policy CC5: Waste minimisation There may be a need to insert a cross reference to the Joint Minerals and Waste Local Plan and ensure consistency of approach.	Insert cross reference to Joint M&W Local Plan in supporting text to this policy	07/02/2017
		Cross reference to Joint M&W Local Plan included in introductory text to the Local Plan	2016
Bracknell Forest Borough Council	On the basis of the evidence currently available to this Council, it is unlikely that Bracknell Forest will be able to meet its needs for 'B' Class floorspace as set out in the Central Berkshire	Include text within plan stating that provision is a greater share of the office need for Central Berks than the EDNA sets	01/03/17

Organisation	Comment	Suggested action	Actioned
	Economic Development Needs Assessment. Our Call for Sites has resulted in minimal interest in promoting new sites for employment development. Whilst further consideration needs to be given to the future potential of our defined employment areas, it is considered that there will be a need to discuss the accommodation of some of our unmet needs with other Authorities in the Central Berkshire Functional Economic Market Area, including Reading Borough Council	out, which may have implications for adjoining plans.	
		Carry out further duty to co-operate discussions with BFBC on this issue	Ongoing
Bracknell Forest Borough Council	Policy H2: Density and mix It may be appropriate to acknowledge that due to the nature of sites and character of other Authorities within the Western Housing Market Area, it is likely that there will be a greater emphasis on providing smaller units in Reading Borough and larger units in other parts of the Western Housing Market Area.	Include wording in supporting text to reflect the notion that Reading may provide a share of the HMA's need that is more geared towards smaller accommodation.	07/02/2017
Bracknell Forest Borough Council	Policy H12: Provision for gypsies and travellers Any policy approach to this issue may have consequences for Bracknell Forest. Whilst we are also in the process of commissioning consultants to carry out an up to date assessment of needs, we would wish to be informed of the outcome of your assessment, particularly in respect of any conclusions on the provision of transit sites.	Include BFBC on list of stakeholders for GTAA	Included in stakeholder survey Jan 17
		Consult BFBC on draft study	27/06/2017
Bracknell Forest Borough Council	In response to your request to specify the policy areas in need of ongoing co-operation between this Authority and Reading Borough Council prior to the publication of your draft, our main concerns are employment, housing (including gypsies and travellers), transport and health.	Noted. Ongoing DTC discussions.	Ongoing
Environment Agency	Based on the information provided as part of this consultation, we do not have sufficient information to enable us to make detailed comments about the suitability of the policies. However, we do acknowledge that the policies listed appear to cover everything that we would expect to be in the Local Plan.	Note.	N/A
Environment Agency	We would like to remind you that any site allocations proposed in Flood Zones 2 or 3 must include sufficient evidence that those allocations pass the flood risk Sequential Test and the	Consult Environment Agency on draft SFRA Level 1	Jan 17
		Consult Environment Agency on draft Sequential	Aug/Sep 17

Organisation	Comment	Suggested action	Actioned
	<p>Exception Test where required. Any sites allocated in Flood Zones 2 or 3 must also be subject to detailed assessment in a Level 2 Strategic Flood Risk Assessment (SFRA). If any of this evidence is absent at the submission stage, we will find the Local Plan unsound.</p> <p>You must ensure that your Level 1 SFRA has been updated to reflect changes to national policy and district-specific issues. This, and your Level 2 SFRA, will both need to take account of the revised climate change allowances that were published in February 2016.</p>	<p>Test</p> <p>Undertake Level 2 SFRA for site allocations with input from EA.</p>	Ongoing
Environment Agency	<p>In terms of the wording for your flood risk policy, I have noted an error in our March 2016 response to your issues and options consultation that may need to be addressed in your emerging policy. In that response, we suggested the following line in the policy: <i>"Planning applications on sites greater than 1 hectare or that are in Flood Risk Zones 2 or 3 will need to be supported by..."</i></p> <p>However, this is incorrect because the requirement for an applicant to submit a Flood Risk Assessment (FRA) for 'sites greater than 1 hectare' is no longer in force. Rather, applicants must now submit a surface water FRA for 'major development'. This should be corrected on any flood risk policy going forward.</p>	Incorporate this requirement into supporting text for flooding policy	1/2/17
Environment Agency	<p>We would like to remind you of the importance of maintaining development-free buffer zones adjacent to main rivers and ordinary watercourses in the borough. We would strongly support a requirement for a 10 metre buffer zone adjacent to main rivers, as per Policy DM15 in Wycombe's adopted Local Plan - please see our previous response for more detailed comments on this.</p> <p>Whilst we support the principle of improved access to the riverside for local residents and visitors, this should not be to the detriment of the biodiversity and ecology of the river and corridor.</p> <p>River corridors can form a critical part of the Green/Blue Infrastructure</p>	<p>Reflect the principle of a buffer to waterways in Waterways policy</p> <p>Ensure that this is reflected in the proposals for individual site allocations alongside rivers</p>	<p>1/2/17</p> <p>20/02/17</p>

Organisation	Comment	Suggested action	Actioned
	network across the borough and should be protected and enhanced as such.		
Environment Agency	We are pleased to see an acknowledgement that you will be seeking the tighter water efficiency standard for new dwellings in policy H4. This is critical in such a water-stressed region and we can provide you with evidence to back-up this requirement should you require it.	Noted. Significant evidence already assembled	2016/17
Environment Agency	We would also like to remind you of the need to include sufficient Water Cycle Study evidence to accompany your Local Plan, which should assess - amongst other things - the impacts of your proposed levels of growth on the wastewater treatment works, wastewater network and the availability of drinking water (i.e. water resources). Your policies may need to be amended depending on the outcomes of any such study. If you require any further advice on Water Cycle Study evidence, please contact me directly.	Water Cycle Study is not a compulsory part of the evidence base, and has not yet been produced. Investigate with adjoining authorities the possibility of a joint piece of work.	Ongoing
Highways England	<p>Highways England's role is to operate, maintain and modernise the strategic road network (SRN) in line with the Roads Investment Strategy, reflecting public interest and to provide effective stewardship of the network's long term operation and integrity. In the case of Reading Borough Council this relates to the M4. We would be concerned if any material increase in traffic were to occur on the SRN as a result of planned growth in Reading without careful consideration of mitigation measures. It is important that the Local Plan provides the planning policy framework to ensure development cannot progress without the appropriate infrastructure in place.</p> <p>When considering proposals for growth, any impacts on the SRN will need to be identified and mitigated as far as reasonably possible. We will support proposals that consider sustainable measures which manage down demand and reduces the need to travel. Infrastructure improvements on the SRN should only be considered as a last resort. Proposed new growth will need to be considered in the context of the cumulative impact from already proposed development on the M4. We look forward to discussions to ensure</p>	Share the draft results from the Transport Modelling work with Highways England when available	27/10/2017

Organisation	Comment	Suggested action	Actioned
	the impacts to the SRN from proposals are considered and an identification of an appropriate package of mitigation measures. It is recognised that the proposed Local Plan will play an important role in delivering planned growth.		
Highways England	You will be aware of our proposal to deliver a Smart Motorway Scheme between M4 Junction 3 to 12. There is not a detailed programme of works or detailed design for the M4 Smart Motorway scheme. This is currently being developed and will determine the scale of works that would impact on these sites if they were taken forward.	Reflect the Smart Motorway scheme in the list of major transport projects for the Borough	17/02/17
		Show Smart Motorway on the Proposals Map	17/02/17
Historic England	<p>We made a number of general and detailed comments on the Issues and Options for the Plan in March 2016, setting out the requirements of the National Planning Policy Framework (NPPF) for the consideration of the historic environment in local plans, and how those requirements could be met.</p> <p>We do not reiterate all those comments, but would emphasise that they do remain valid. In particular we will be looking for recognition throughout the Plan of the importance of the historic environment, of the historic environment's role in delivering the Plan's vision and the wider economic, social and environmental objectives for the Plan area, and of the potential impacts of the Plan's policies and proposals on the historic environment, as the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment. We also emphasise the need for an adequate, up-to-date and relevant evidence base to underpin the strategy and policies of the Local Plan.</p>	Note - these have been taken into account in producing the draft so far.	2016
Historic England	We welcome and support, in principle, proposed Policies EN1 - EN6. Policy EN1 should satisfy the requirement of the NPPF for the Local Plan to include a strategic policy to deliver the conservation and enhancement of the historic environment. Policies EN2 and EN3 should provide greater guidance on how planning applications affecting archaeological remains and conservation areas will be assessed in accordance with paragraph 154 of the	Reflected in draft policies	2016

Organisation	Comment	Suggested action	Actioned
	NPPF, which requires only policies that provide a clear indication of how a decision maker should react to a development proposal to be included in a local plan.		
Historic England	We consider that the Local Plan should include a specific policy on listed buildings and, preferably, on historic parks and gardens, in accordance with the principles set out in the Appendix to our letter on the Issues and Options: "Considerations for Development Management policies". We would expect the strategic or development management policies to set out what is required of applicants.	Not clear why a separate policy for each type of heritage asset is required. Plans need to be as concise as possible, and a single policy can still provide the necessary guidance.	N/A
Historic England	Policy EN5 should be underpinned by an assessment of "heritage" views, setting out how the view contributes to the significance of the heritage asset or the appreciation of that significance, and the significance of the viewpoint itself. The Oxford Views Study sets out a methodology for assessing long-range views, and this methodology is refined for closer-range views in a study commissioned, with our support, by Southampton City Council on tall buildings in the city. The latter's approach will also be relevant to proposed Policy CR10.	Assemble evidence in liaison with the Conservation Area Advisory Committee - ongoing.	Ongoing
Historic England	We welcome the Policies EN3 and EN6 as potential examples of the positive measures that we look for in local plans to demonstrate the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment required by the NPPF. We will look for other examples e.g. a programme of completing and reviewing conservation area appraisals, the implementation of Article 4 Directions where the special interest of a conservation area is being lost through permitted development, the completion of a list of locally important heritage assets or a survey of grade II buildings at risk.	Ensure that text reflects the other tools that the Council has to preserve the historic environment. However, the Local Plan needs to be careful to avoid making commitments that cannot be resourced within the plan period.	2/2/17
Historic England	We will also look to the Local Plan to set out the Council's approach to Heritage at Risk, a required component of the required positive strategy for conserving and enjoying the historic environment. We welcome the Council's initiative in seeking to tackle conservation areas at risk but on the Historic England 2016 Heritage at Risk Register there are four significant	Ensure that the text reflects the existence of heritage at risk (and that there will likely be other assets at risk that are not identified).	2/2/17

Organisation	Comment	Suggested action	Actioned
	assets at risk in the Borough: the grade II Sacred Heart Church, the grade II* St David's Hall, the grade I Chazey Farm barn and Reading Abbey, which is a Scheduled Monument. It should be noted that outside London and places of worship the Register does not include grade II listed buildings at risk, and that other heritage assets may become at risk during the life of the Local Plan.		
Historic England	We welcome and support, in principle, proposed Policy EN12 on "Waterspaces" and Policy CR15 "Abbey Quarter". It will be important for the latter to ensure the conservation and enhancement of the historic environment of the Abbey Quarter - indeed the proposed Central Reading policies should all be conscious of the historic environment of the city centre, as part of the required positive and clear strategy.	Policy ensures the conservation and enhancement of the historic environment of the Abbey Quarter.	2016
Historic England	The Council should consider or not it is appropriate to identify land where development would be inappropriate for its historic significance (e.g. Thames Meadows or other green spaces?). It may also be appropriate to consider a policy or policies protecting areas of special townscape character that create a sense of place, but which do not merit conservation area status.	Plan needs to be careful to avoid layering too restrictions where they would duplicate protections. Important areas of historic significance generally have other protections, eg landscape, open space.	N/A
		Main areas to which this may apply are town centre terraces, which are proposed to be protected within a policy	2016
Historic England	We would be pleased to comment informally on any draft historic environment policy or policies or potential site allocations in advance of any formal consultation period and to discuss any historic environment issues or comments we may have.	Send draft policies to Historic England for further comment	Prior to Draft Local Plan
Natural England	NE would like to see words added to the vision for Reading to include "a green healthy environment for people to live in"	Amend vision to accommodate reference to green and healthy.	1/2/17
Natural England	Objective 3 is a good lead in to the addition of green infrastructure and natural capital green space to the plan.	Note	N/A
Natural England	DM1 - no mention of connected habitat for species adaptation to climate change, only about using trees for shading houses etc. The impacts of climate change on animal and plant species need to be addressed as well as those to humans.	Amend policy DM1 (now CC3) to refer to importance of connected habitat.	1/2/17

Organisation	Comment	Suggested action	Actioned
Natural England	CC6 - NE encourages housing without allocation of car parking around transport hubs.	This is covered within existing draft policy on car parking	2016
Natural England	CC7 - emphasis on green design and infrastructure	Ensure that Design policy refers to the importance of green infrastructure.	1/2/17
Natural England	CC9 should refer to securing green infrastructure	Draft policy refers to securing green infrastructure	2016
Natural England	EN3 - add "Development with proposals to green the front gardens will be supported"	Amend policy on Enhancement of Conservation Areas to highlight greening of front gardens where appropriate to the historic interest of the CA.	20/2/17
Natural England	EN7, 8, 9 - These three policies should encourage the placement of green space to help mitigate climate change. Development between areas of green space should have a requirement to provide green infrastructure to connect the green space. There is also the opportunity to provide a strategic plan for greening the city by looking at ways of linking the green spaces.	Draft policy on biodiversity and the green network (and its predecessor) takes precisely this approach.	2016
Natural England	EN10 - "50 dwellings or more require the provision of green space". This is too low; the majority of other plans require it for 15 or more dwellings. Given the age of the Open Spaces Strategy (2007) an update for this is definitely required. To update the strategy provides an opportunity to devise a plan to link green spaces to provide connected habitat to mitigate the impacts of climate change. Even in 2007 the Green Space Strategy found "in other UK towns, most people take less than 5 minutes to get to their local parks, while in Reading only 40% take less than 5 minutes. Indeed, only about 50% of journeys to the park are less than a 10-minute walk". Example Aylesbury Vale LP; "No person should live more than 300m from their area of natural green space of at least 2ha in size."	A basic update for the Open Spaces Strategy is proposed to be undertaken before or during the pre-submission draft consultation.	Ongoing
		Policy EN10 is a reference to provision of on-site public open space. It seems likely that the 15 dwelling threshold elsewhere relates to some green space on site, which may be communal but not publicly accessible. Given the form and density of many developments, it is not achievable that public open space be provided for any development of 15 or more dwellings. Need for some text within plan which summarises our position re any kind of on-site green space.	1/2/17
Natural England	EN13 - This has the potential to be a really good policy. This should include; - All new development must provide a biodiversity 'net gain'	Many of these issues are picked up in existing draft policies. Policies should be amended to refer to achieving biodiversity net	1/2/17

Organisation	Comment	Suggested action	Actioned
	<ul style="list-style-type: none"> - The requirement of green infrastructure in new builds and redevelopment - The support of greening of front gardens in heritage areas - A new mapping product identifying areas of potential green infrastructure locations to link existing green space. Any development located in these identified corridors must contribute to the green infrastructure through either, on-site open space and GI, or contributions through section 106 or CIL to street tree planting or landscaping. 	gain wherever possible.	
Natural England	EN14 - please include the following wording; "There will be no development within the setting of the AONB which would have a detrimental effect on the AONB in terms of scale, design, layout or location. Any development within the setting of the AONB will require a Landscape and Visual Impact Assessment".	Wording to this effect should be included within the Major Landscape Features policy	27/1/17
Natural England	EN16 - make sure you include in this policy a definition of what "poor air quality" actually is so developers can plan accordingly.	Supporting text refers to AQ objective and EU limit levels	2016
Natural England	H2 - Example of other LPA policy. "Where the openness of private areas is part of the overall design it shall be protected against inappropriate enclosure by covenant on the property.	Covenants are not a planning issue, and this precise wording is not appropriate. However, the design policy can be reviewed to ensure that inappropriate enclosure is covered, and it may need to be secured by condition.	1/2/2017
Natural England	NE supports higher density housing if it allows for connected green space	Note	N/A
Natural England	H5 - vulnerable and elderly people are those that benefit most from green spaces in terms of health and wellbeing. All accommodation should provide green infrastructure and green space as part of the design.	Add criteria to Accommodation for Vulnerable People policy to reflect the importance of this.	1/2/17
Natural England	H10 - building in the back gardens can have significant accumulative impacts on biodiversity, especially in Reading where so little green space is available within walking distance. Any development in back gardens must provide evidence of biodiversity net gain.	Add reference to achieving biodiversity net gain in Garden land policy	1/2/17
Natural	H13 - Dee Park redevelopment provides	Dee Park is a	1/2/17

Organisation	Comment	Suggested action	Actioned
England	an excellent opportunity to contribute to local green space. Any development of this site should include green space, green infrastructure and a biodiversity net gain.	development that is underway. The general policy should refer to qualitative improvements in this type of development even if there is an overall loss of undeveloped land.	
Natural England	TR4 & 5 - Natural England don't usually comment on transport issues but we do have a remit to decrease the impact of climate change so we are in favour of non-polluting transport. Bike paths are in a sorry state and need a new coat of paint. More bike parking is needed around green space areas such as Forbury Park. Any new development should include bike parking near their green space.	Draft transport policies emphasise sustainable travel, and also ensure improvements to cycling facilities	2016
Natural England	CR10 - High rise development is the perfect opportunity to include a requirement for green infrastructure as part of their SUDS. Green roofs, roof gardens, green walls all reduce the amount of water run-off from the building. Also the roof garden provides a nice place to work and provides health benefits for employees. Existing policy RC13 states "buildings should be linked to physical regeneration of a wider area". The precedent for GI and linking existing green space has already been established.	Tall buildings policy should refer to the potential for green infrastructure as part of the development, specifically measures such as roof gardens, green walls that are of particular relevance in a dense urban environment.	1/2/2017
		Design in the centre policy should refer to the potential for green infrastructure as part of the development, specifically measures such as roof gardens, green walls that are of particular relevance in a dense urban environment.	1/2/2017
Natural England	5.3 - site specific policies for Central Reading - Every policy under this heading should require that GI and SUDS be part of the development. Biodiversity net gain is expected.	Where there are requirements of all developments, it is more appropriate to include this in general policies rather than repeat in all allocations. This is therefore covered by other points.	N/A
Natural England	Sections 6, 7, 8, 9 All these policies should include reference to: <ul style="list-style-type: none"> - Development must provide a biodiversity net gain - Development must avoid Best Most Versatile (BMV) agricultural land (Grade 1-3a) and seek to use less valuable grades. 	Where there are requirements of all developments, it is more appropriate to include this in general policies rather than repeat in all allocations. This is therefore covered by other points with the exception of BMV	N/A

Organisation	Comment	Suggested action	Actioned
	<ul style="list-style-type: none"> - The provision of proportional on-site green space for any development over eg 15 houses - Green space should be provided strategically to make sure neighbouring developments have connecting green space to mitigate for climate change - Development proposals will be expected to retain and enhance existing green corridors and ensure new links are provided between existing open spaces 	agricultural land, of which there is none in Reading.	
Natural England	Sections 7 & 8 No development within the setting of the AONB which would have a detrimental impact on the AONB in terms of scale, design, location or layout. Any development within the setting of the AONB will require a Landscape and Visual Impact Assessment.	Spatial Strategy for North and West Reading should note the AONB and include a development principle. However, detailed development management considerations are covered in the landscape policy.	07/02/2017
Oxfordshire County Council	Oxfordshire County Council will work with Reading BC and other partners to assess the transport impacts of Reading's growth on the highway network within South Oxfordshire and to identify appropriate mitigating measures.	Provide Oxfordshire with draft results of Transport Modelling before it is finalised.	27/10/2017
Oxfordshire County Council	Crossing of the River Thames Oxfordshire County Council will continue to participate in cross-border working through the Thames Crossing Working Group. The County Council will want to be satisfied that the need and benefits of the scheme are clearly identified and any impacts on the highway network within Oxfordshire are mitigated by the scheme itself.	Reading Borough Council continues to actively engage in cross-border working through the Thames Crossing Working Group as well as supporting Wokingham Borough Council in their scheme leading work. As a result, Reading Borough Council continues to support the identification of the needs and benefits of the scheme as well as mitigation measures for linked impacts on the associated highway network.	Ongoing
Oxfordshire County Council	High quality bus services The role of inter-urban bus services is currently under played. Reading is an employment, retail and administrative centre with a hinterland which expands far beyond the tight Borough boundary. Whilst rail is very important for local travel between Reading and some	Reading Borough Council understands the importance of the promotion of sustainable bus travel and seeks improvements to the existing inter-urban routes. It is furthermore	01/03/17

Organisation	Comment	Suggested action	Actioned
	<p>towns in surrounding districts, the bus serves intermediate markets and communities.</p> <p>Efforts should be made to offer priority on-road measures and provide attractive terminal arrangements for buses on inter-urban routes, which include:</p> <ul style="list-style-type: none"> - (Oxford)-Wallingford-Caversham-Reading - (High Wycombe)-Henley-Caversham-Reading - (High Wycombe)-Henley-Twyford-Reading. <p>These routes (and similar services from the other districts to the east, south and west of Reading) could convey far more people into the Borough than currently, thus reducing the number of cars on Reading's roads. Promotion of inter-urban bus services should be considered before further Park and Ride services. It is more sustainable for people to take the bus from a stop near people's home (for example in Wallingford, Woodcote and Henley) than to promote car travel along congested 'A' roads to Park and Ride sites.</p>	<p>the Council's perspective that the improvement to bus routes and the intended Park and Ride schemes are not mutually exclusive, as these will support the growth in demand for these services and support the financial justification of improving these services.</p> <p>Text noting the potential for inter-urban bus services to be added to Draft Local Plan.</p>	
Oxfordshire County Council	There doesn't seem to be a policy on walking. Walking (as well as cycling) is integral in achieving sustainable Door to Door journeys, e.g. walking to/from a bus stop or train station. If various factors for walking are met, such as legibility or directness, this can play an important role in ensuring local and longer distance trips (such as those made from Reading into Oxon) can be made sustainably and not add to the pressure on the existing network.	As demonstrated in the LP, RBC is committed to encouraging sustainable travel choices and to improve the accessibility to sustainable infrastructure. Although there is no specific walking policy, it is covered in the policies on sustainable travel	N/A
Oxfordshire County Council	How will the plan treat the longer term desire for EW rail services to run south of Oxford to Reading? We expect this to be reflected in the plan.	Reading Borough will seek to reflect its support of the EW rail services in the Local Plan.	01/03/17
Oxfordshire County Council	Given the significant numbers of Reading pupils currently educated in Oxfordshire - - broadly equivalent to one form of entry of primary pupils and over two forms of entry of secondary pupils - Oxfordshire County Council would welcome the opportunity to discuss with the borough council any possible implications for the demand and supply of school places in both authorities relating to the new Local	Seek clarification from Oxfordshire on the precise capacity of Oxfordshire schools	Meeting held 24/04/2017
		Detailed consideration of education provision will need to be made as part of the infrastructure delivery plan. This may lead to further policy development within the	October/ November 2017

Organisation	Comment	Suggested action	Actioned
	<p>Plan.</p> <p>The Reading Local Plan is proposing 15,000 homes, which could potentially generate 20 forms of entry of additional school demand. If the Local Plan does not include sufficient additional school capacity to meet the generated demand, surrounding local authorities, including Oxfordshire, will need to understand the potential impact on their own schools. Conversely, if additional school capacity exceeds population growth, it could undermine the viability of nearby Oxfordshire schools if it results in fewer Reading children attending Oxfordshire schools.</p>	<p>Local Plan, including requirements of specific sites.</p> <p>Further discussions with all neighbouring authorities needed on education provision.</p>	<p>During 2017</p>
Rushmoor Borough Council	The Council does not have any specific comments on the draft document. We would like to state our support for the efforts being made by Reading Borough Council to address potential unmet needs and cooperation taking place within the Western Berkshire HMA. In particular, we support the statement made that it is not intended that any of Reading's unmet need will need to be accommodated beyond the Western Berkshire HMA area.	Note	N/A
Rushmoor Borough Council	In the first instance, national planning policy requires unmet needs to be addressed by adjoining local planning authorities forming part of a housing market or functional economic area. Only once those opportunities have been exhausted through appropriate plan making would the search area extend in terms a wider request to establish opportunities to meet unmet housing or employment needs. At this point in our respective plan making processes, there is not therefore any expectation that Rushmoor and Reading will be required to meet each other's housing or employment needs. This is considered to be a pragmatic approach to the interpretation of national policy on cross boundary working on strategic planning matters, and in this respect, the Council wishes to remain informed of progress on the preparation of the Reading Local Plan.	Note. Continue to consult Rushmoor on Local Plan.	Ongoing
South Oxfordshire District Council	While the Skeleton Plan document provides an overview as to the policies that may be included in the Local Plan, we are keen to work with you to understand further and in more detail	Send list of likely site allocations that may affect SODC to South Oxfordshire prior to consultation on Draft.	27/02/17

Organisation	Comment	Suggested action	Actioned
	the specific locations and justification of any proposed development sites and/or land needed for major transport projects where this could have an impact upon South Oxfordshire. Those that we have identified from the Skeleton Plan document are any development sites in north Caversham and/or Emmer Green, any Park and Ride sites in and/or to the north of Reading and the crossing of the Thames.		
South Oxfordshire District Council	We would be particularly interested to learn more about the transport modelling work that you have undertaken with regards to cross boundary traffic movements.	Provide South Oxfordshire with draft results of Transport Modelling before it is finalised.	27/10/2017
Surrey County Council	We consider the key cross boundary issues of common interest to our authorities to be minerals and waste planning and transport. However, we do not have any comments to make at this stage but look forward to receiving notifications of future consultation events from you.	Note	N/A
Wycombe District Council	We have no immediate strategic issues to raise, however we would appreciate some clarification on precisely how the Council's unmet need of roughly 1,000 dwellings is planning to be met within the West Berkshire Housing Market Area.	Respond to Wycombe clarifying that the unmet need should be provided elsewhere in the Western HMA	E-mail sent 1/2/17

**APPENDIX 8: REQUEST TO WEST BERKSHIRE DISTRICT COUNCIL REGARDING
READING'S UNMET NEEDS FOR HOUSING**

Councillor Mark Ashwell
Executive Member for Planning and
Regeneration
Wokingham Borough Council
By e-mail

Giorgio Framalitto
Head of Planning, Development and
Regulatory Services

Civic Offices, Bridge Street,
Reading, RG1 2LU
☎ 0118 937 3787

Our Ref:
Your Ref:

Direct: ☎ 0118 9373337
e-mail: Mark.Worringham@reading.gov.uk

24th January 2017

Your contact is: Mark Worringham, Planning Section

Dear Councillor Ashwell,

Re. Reading Borough Local Plan - unmet housing need

I am writing to you to make a formal request that Wokingham Borough Council accommodate a portion of Reading Borough's unmet need for housing.

As you will know, our authorities recently co-operated on the production of a Berkshire (with South Bucks) Strategic Housing Market Assessment (SHMA), published in February 2016. This defined a Western Berkshire Housing Market Area, consisting of West Berkshire, Reading, Wokingham and Bracknell Forest, with the starting point being to meet any need arising within the Housing Market Area (HMA) in the first instance. The SHMA identified challenging levels of 'objectively assessed need' (OAN) for housing in the HMA up to 2036 of 2,855 homes per annum. This need was divided between the four authorities, and for Reading, the SHMA identified a need of 699 homes per annum.

As you will again be aware, Reading is a highly constrained authority and faces significant challenges in finding land for new development. The vast majority of the Borough, 74%, is already built-up, and the land which is not already previously developed is generally made up of either undeveloped land in the functional floodplain or of public parks and recreation grounds. The Borough has continued to be able to accommodate a significant amount of development in recent years, mainly through redevelopment of previously developed land, including high density town centre development, but sites to continue this approach are a limited resource. The particular constraints affecting Reading have been recognised by the four authorities within the HMA, with the recently published West of Berkshire Spatial Planning Framework noting that:

"This will help meet needs across the Western Berkshire HMA, helping to deliver housing for areas which can't meet all of their needs within their own boundaries. In particular it is already clear that Reading with its tight urban boundaries will find it difficult to accommodate its Objectively Assessed Need (OAN) for housing identified in the SHMAA."

Reading Borough Council is committed to delivering as much of our need as practicable. This is not simply to comply with national planning policy, but also to boost housing provision to help to tackle the considerable problems that Reading faces in access to affordable housing. As such, we have

undertaken a Housing and Economic Land Availability Assessment (HELAA), in line with a methodology jointly agreed by five of the Berkshire authorities. This looked at all of our potential development land, in terms of suitability, availability and achievability. It included examining all of our employment land and all land outside the urban area, considering opportunities for renewal and regeneration of suburban areas and maximising densities in areas that are highly accessible by public transport, as well as a range of other approaches. A draft HELAA, including all of the information on sites, was provided to officers from your Council in early December 2016. The conclusion of the draft HELAA was that 94% of the OAN for housing can be met within Reading's own boundaries, largely through making the most efficient use of previously developed land. This leaves the remaining 6%, or a total of around 1,000 homes up to 2036, as unmet need which would need to be accommodated elsewhere - considerably less than was anticipated at the beginning of the Local Plan process.

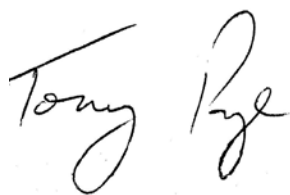
We are therefore formally requesting that Wokingham Borough Council accommodate a portion of our unmet need to 2036. We do not consider it appropriate at this stage to specify what portion would be appropriate to be met in Wokingham, but would welcome further dialogue to come to a figure.

In any contribution to meeting Reading's unmet need, we would wish to see the delivery of affordable homes, and it would be important for Reading to have nomination rights over any affordable housing delivered to meet Reading's need. It would also be essential to be engaged in discussions about developer contributions and Community Infrastructure Levy issues.

For our part, we commit to continuing to work together on considering how to best meet development needs across the HMA, and in particular how to work jointly to ensure that development is adequately supported by infrastructure provision.

I would be grateful if you could respond to our request by Monday 27th February 2017.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Tony Page'. The signature is written in a cursive style with a large initial 'T' and 'P'.

Cllr Tony Page

Deputy Leader, Reading Borough Council and
Lead Councillor for Strategic Environment,
Planning and Transport

**APPENDIX 9: RESPONSE FROM WEST BERKSHIRE DISTRICT COUNCIL REGARDING
READING'S UNMET NEEDS FOR HOUSING**

24th February 2017



Councillor Tony Page
Deputy Leader Reading Borough Council
And Lead Councillor for Strategic Environment
Planning and Transport
Reading Borough Council
Civic Offices
Bridge Street
Reading
RG1 2LU

Planning and Countryside

Council Offices
Market Street Newbury
Berkshire RG14 5LD

Our Ref: 01/02/2017

Please ask for: Bryan Lyttle

Phone: (01635) 519638

e-mail: blyttle@westberks.gov.uk

Dear Councillor Page,

Reading Borough Local Plan – Unmet housing need

Thank you for the formal request to West Berkshire to accommodate a portion of Reading Borough's unmet housing need up to 2036 following your Housing and Economic Land Availability Assessment (HELAA).

I can confirm that as per the West of Berkshire Spatial Planning Framework (December 2016), that West Berkshire agrees the housing needs of Reading, Bracknell Forest, Wokingham and West Berkshire should be met within this spatial area and that it makes sense that Reading should look towards West Berkshire and Wokingham first to help accommodate Reading's unmet housing need.

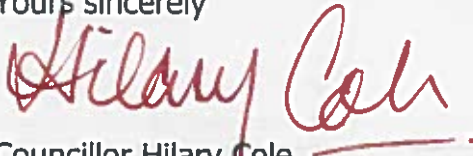
Unfortunately, West Berkshire has yet to undertake its own HELAA, and the council is still conducting the initial call for sites, so at this stage it would be premature for West Berkshire to either agree to an actual number of houses or even a percentage.

The Council is also mindful that the government in the recent white paper "Fixing our broken housing market" is committed to publishing a "standardised approach to assessing housing requirements" and the effect this might have on our jointly produced Objectively Assessed Need (OAN).

Given the aspirations contained within the white paper I would also urge you to consider your HELAA again to see if the Council is maximising the use of suitable land especially around the Green Park area of the Borough, as this will undoubtedly be raised as part of the examination into the Reading Borough Local Plan.

West Berkshire would of course welcome ongoing dialogue between the two authorities over this issue in the coming months and the other points raised in your letter.

Yours sincerely

A handwritten signature in red ink that reads "Hilary Cole". The signature is written in a cursive style with a horizontal line underlining the name.

Councillor Hilary Cole
Executive Member Planning and Countryside,
Acting Deputy Leader

**APPENDIX 10: REQUEST TO WOKINGHAM BOROUGH COUNCIL REGARDING
READING'S UNMET NEEDS FOR HOUSING**

Councillor Mark Ashwell
Executive Member for Planning and
Regeneration
Wokingham Borough Council
By e-mail

Giorgio Framaliccio
Head of Planning, Development and
Regulatory Services

Civic Offices, Bridge Street,
Reading, RG1 2LU
☎ 0118 937 3787

Our Ref:
Your Ref:

Direct: ☎ 0118 9373337
e-mail: Mark.Worringham@reading.gov.uk

24th January 2017

Your contact is: Mark Worringham, Planning Section

Dear Councillor Ashwell,

Re. Reading Borough Local Plan - unmet housing need

I am writing to you to make a formal request that Wokingham Borough Council accommodate a portion of Reading Borough's unmet need for housing.

As you will know, our authorities recently co-operated on the production of a Berkshire (with South Bucks) Strategic Housing Market Assessment (SHMA), published in February 2016. This defined a Western Berkshire Housing Market Area, consisting of West Berkshire, Reading, Wokingham and Bracknell Forest, with the starting point being to meet any need arising within the Housing Market Area (HMA) in the first instance. The SHMA identified challenging levels of 'objectively assessed need' (OAN) for housing in the HMA up to 2036 of 2,855 homes per annum. This need was divided between the four authorities, and for Reading, the SHMA identified a need of 699 homes per annum.

As you will again be aware, Reading is a highly constrained authority and faces significant challenges in finding land for new development. The vast majority of the Borough, 74%, is already built-up, and the land which is not already previously developed is generally made up of either undeveloped land in the functional floodplain or of public parks and recreation grounds. The Borough has continued to be able to accommodate a significant amount of development in recent years, mainly through redevelopment of previously developed land, including high density town centre development, but sites to continue this approach are a limited resource. The particular constraints affecting Reading have been recognised by the four authorities within the HMA, with the recently published West of Berkshire Spatial Planning Framework noting that:

"This will help meet needs across the Western Berkshire HMA, helping to deliver housing for areas which can't meet all of their needs within their own boundaries. In particular it is already clear that Reading with its tight urban boundaries will find it difficult to accommodate its Objectively Assessed Need (OAN) for housing identified in the SHMAA."

Reading Borough Council is committed to delivering as much of our need as practicable. This is not simply to comply with national planning policy, but also to boost housing provision to help to tackle the considerable problems that Reading faces in access to affordable housing. As such, we have

undertaken a Housing and Economic Land Availability Assessment (HELAA), in line with a methodology jointly agreed by five of the Berkshire authorities. This looked at all of our potential development land, in terms of suitability, availability and achievability. It included examining all of our employment land and all land outside the urban area, considering opportunities for renewal and regeneration of suburban areas and maximising densities in areas that are highly accessible by public transport, as well as a range of other approaches. A draft HELAA, including all of the information on sites, was provided to officers from your Council in early December 2016. The conclusion of the draft HELAA was that 94% of the OAN for housing can be met within Reading's own boundaries, largely through making the most efficient use of previously developed land. This leaves the remaining 6%, or a total of around 1,000 homes up to 2036, as unmet need which would need to be accommodated elsewhere - considerably less than was anticipated at the beginning of the Local Plan process.

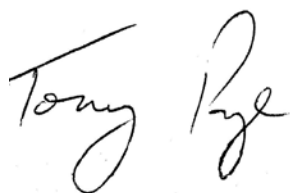
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In any contribution to meeting Reading's unmet need, we would wish to see the delivery of affordable homes, and it would be important for Reading to have nomination rights over any affordable housing delivered to meet Reading's need. It would also be essential to be engaged in discussions about developer contributions and Community Infrastructure Levy issues.

For our part, we commit to continuing to work together on considering how to best meet development needs across the HMA, and in particular how to work jointly to ensure that development is adequately supported by infrastructure provision.

I would be grateful if you could respond to our request by Monday 27th February 2017.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Tony Page'. The signature is fluid and cursive, with the first name 'Tony' and the last name 'Page' clearly distinguishable.

Cllr Tony Page

**Deputy Leader, Reading Borough Council and
Lead Councillor for Strategic Environment,
Planning and Transport**

**APPENDIX 11: RESPONSE FROM WOKINGHAM BOROUGH COUNCIL REGARDING
READING'S UNMET NEEDS FOR HOUSING**

Tel: 0118 974 6455(Direct Line)
Email: John.Spurling@wokingham.gov.uk
Date: 27 February 2017



**WOKINGHAM
BOROUGH COUNCIL**

Cllr Tony Page
Deputy Leader and Lead Cllr for Strategic Environment, Planning
and Transport
Reading Borough Council,
Civic Offices,
Bridge Street,
Reading,
RG1 2LU.

Land Use and Transport Team

P.O. Box 157

Shute End, Wokingham

Berkshire RG40 1WN

Tel: (0118) 974 6000

Fax: (0118) 974 6770

Dear Cllr Page,

RESPONSE TO READING BOROUGH COUNCIL ON UNMET HOUSING NEEDS

Thank you for your letter regarding the possibility of unmet housing need from Reading Borough which I understand has been sent also to the Executive Member at West Berkshire Council.

I have consulted with officers and we welcome the steps you have taken in sharing the early outcomes of your housing and economic capacity work.

As outlined in your letter, joint research has shown our authorities form part of the West Berkshire Housing Market Area along with West Berkshire Council and Bracknell Forest Council. We agree that this grouping is the starting point for considering how the future need for housing will be managed. This approach of working as a functional area is supported by both national policy and guidance.

Accordingly we believe that the issues you raise should be discussed by all local authorities within the West Berkshire Housing Market Area, including Bracknell Forest Council. Given the interactions and relationships between our authorities, we would not recommend the approach of bilateral discussions.

Our recommendation to you is that your housing and economic capacity work and the potential for unmet need are discussed through a sub-meeting of the Berkshire Member Reference Group. This group was established to provide a forum for partnership working, coordination and collaboration on strategic planning issues and has previously been administered by Bracknell Forest Council. Involving all four local authorities is also consistent with the process which underpinned the West of Berkshire Spatial Planning Framework.

Yours sincerely,

Mark Ashwell

Mark Ashwell
Executive Member for Planning and Regeneration

c.c. John Spurling, Service Manager, Land Use and Transport Team, Wokingham Borough Council.
Mark Worryingham, Planning Policy Team Leader, Reading Borough Council.

**APPENDIX 12: DRAFT MEMORANDUM OF UNDERSTANDING WITH SOUTH
OXFORDSHIRE DISTRICT COUNCIL**
(Not yet signed by SODC)

Duty to Cooperate Memorandum of Understanding between South Oxfordshire District Council and Reading Borough Council

March 2018

1. Introduction

- 1.1. This Memorandum of Understanding (MoU) has been prepared by South Oxfordshire District Council (SODC) and Reading Borough Council (RBC) to assist the Inspector during the examination of the South Oxfordshire Local Plan 2033 and Reading Borough Local Plan 2013-2036.
- 1.2. In the light of the Duty to Cooperate, SODC and RBC have agreed this MoU to identify areas and topics of common strategic agreement.
- 1.3. This MoU identifies the current position between the authorities. This MoU will be updated as necessary and updates can be sought at the request of either of the signatory authorities.

2. Housing Market Areas and Functional Economic Market Areas

- 2.1. SODC lies within the Oxfordshire Housing Market Area, as identified in the 2014 Oxfordshire Strategic Housing Market Assessment (SHMA). The SHMA was jointly commissioned and accepted by all Oxfordshire authorities.
- 2.2. RBC lies within the Western Berkshire Housing Market Area, covering the local authorities of Bracknell Forest, Reading, West Berkshire and Wokingham, as identified in the 2016 Berkshire (with South Bucks) Strategic Housing Market Assessment. The SHMA was jointly commissioned and accepted by all Berkshire authorities.
- 2.3. It is agreed that South Oxfordshire District and Reading Borough lie in separate but adjoining Housing Market Areas and Functional Economic Market Areas.

3. Housing and Employment Needs

- 3.1. Policy STRAT2 of the Publication version of the South Oxfordshire Local Plan commits SODC to make provision for at least 17,050 new homes. This equates to 775 homes a year, which is South Oxfordshire's objectively assessed need. In addition Policy STRAT3 of the Publication version of the South Oxfordshire Local Plan commits SODC to meet some of Oxford City Council's unmet housing needs. This will be delivered within the District and SODC is not seeking any neighbouring authorities to accommodate any of its housing requirements.
- 3.2. The Employment Land Review 2015 and Employment Land Review Addendum 2017 assessed that between 33.2 and 35.9 hectares of employment land would be

needed within the Plan period. Policy STRAT 2 of the Publication version of the South Oxfordshire Local Plan commits SODC to make provision for at least 35.9 hectares of employment land. The Publication version of the South Oxfordshire Local Plan identifies locations for a total of 37.2 hectares of employment land to be provided across the district. Some of this will be provided through Neighbourhood Development Plans. SODC does not anticipate that there will be a need to seek to meet needs for employment land outside the District.

- 3.3 Policy H1 of the Reading Borough Pre-Submission Draft Local Plan makes provision for 15,433 homes in Reading between 2013 and 2036, which equates to 671 per annum. Reading's objectively assessed need, identified in the Berkshire (with South Bucks) Strategic Housing Market Assessment (2016) is 699 dwellings a year, a total of 16,077 between 2013 and 2036. The Local Plan therefore identifies a shortfall of 644 dwellings in total. This conclusion is based on a Housing and Economic Land Availability Assessment.
- 3.4. The local authorities that lie within the Western Berkshire Housing Market Area (Bracknell Forest Borough Council, Reading Borough Council, West Berkshire District Council and Wokingham Borough Council) have agreed in a signed Memorandum of Understanding that the full objectively assessed housing need for the Western Berkshire Housing Market Area should be met within the Housing Market Area as defined in the Strategic Housing Market Assessment (2016) and that there is no requirement for RBC to seek alternative locations outside the Western Berkshire Housing Market Area to accommodate its identified unmet need. The authorities will continue to work together to ensure that Local Plans in the area set out policies and proposals that collectively provide for the full housing needs of the area, including unmet need from Reading.
- 3.5. The Economic Development Needs Assessment for Central Berkshire (2016) identified a need for Reading to provide 52,775 sq m of office floorspace and 148,440 sq m of industrial and warehouse floorspace over the plan period. The Pre-Submission Draft Reading Local Plan (November 2017) identifies appropriate locations to address this need.
- 3.6. It is agreed that SODC will not be seeking RBC to meet any of its housing or employment needs within the emerging Local Plan.
- 3.7. It is agreed that RBC will not be seeking SODC to meet any of its housing or employment needs within the emerging Local Plan.
- 3.8. Whilst the two authorities fall within different and separate HMAs, it is recognised that any housing development delivered in South Oxfordshire close to its boundary with RBC will be likely to have cross-boundary infrastructure implications. While neither SODC nor RBC propose that development takes place in this location, SODC and RBC agree to discuss how cross-boundary issues can best be mitigated should such developments be approved and to constructively consider how the approved development meets identified needs. ,

4 Gypsies and Travellers

- 4.1 The South Oxfordshire Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (2017) identifies a need for 10 additional gypsy and traveller pitches and no future need for travelling showpeople plots up to 2033. SODC's Local Plan 2033 identifies locations for this provision.
- 4.2 The Reading Borough Gypsy and Traveller, Travelling Showperson and Houseboat Dweller Accommodation Assessment (2017) identifies a need for 10-17 permanent gypsy and traveller pitches and 5 transit pitches up to 2037. It also identified two additional plots for travelling showpeople up to 2037. RBC has recently consulted on a potential transit site at Cow Lane. However, after a comprehensive assessment of sites, no location(s) to meet permanent needs has been identified.
- 4.3 In their recent response to the Reading Borough Gypsy and Traveller, Travelling Showperson and Houseboat Dweller Accommodation Assessment (2017), SODC asked RBC to clarify that they have explored all options in terms of identifying appropriate sites or including gypsy and traveller provision within employment or mixed use allocations to be proposed in Reading's development plan and/or the development opportunity identified at Grazeley in the West of Berkshire Spatial Planning Framework (2016) and Draft Reading Local Plan (April 2017).
- 4.4 It is agreed that SODC will continue its dialogue with RBC in respect of any cross boundary strategic issues, whilst recognising that South Oxfordshire falls within a separate but adjacent housing market area.

5 Transport Infrastructure

- 5.1 SODC are working with RBC, Wokingham Borough Council, Oxfordshire County Council and the Local Enterprise Partnerships to examine transport modelling and options for a third crossing of the Thames.
- 5.2 The Draft Reading Local Plan (April 2017) identifies three corridors on which opportunities for park and ride will be sought that cross the boundary into South Oxfordshire. There is likely to be a reliance on sites in South Oxfordshire. No specific sites have been identified in the Local Plan. SODC do not object to the principle of park and ride on road corridors into Reading, but this will depend on the specific sites identified. Policy TRANS2 of the Publication version of the South Oxfordshire Local Plan provides general support for park and ride in the district.
- 5.3 Policy TRANS1 of the Publication version of the South Oxfordshire Local Plan commits SODC to work with Oxfordshire County Council and others to plan for transport improvements in the Reading area, including the proposal for a new River Thames crossing which provides demonstrable benefits for South Oxfordshire and

which ensure that there are no adverse traffic and environmental impacts of those measures.

- 5.4 It is agreed that SODC will continue its dialogue with RBC in respect of strategic transport networks which affect both local authorities and to consult on policies and proposals that affect the strategic network or which have cross boundary impacts.

6 Other strategic matters

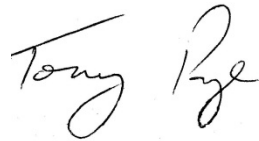
- 6.1 SODC and RBC agree to cooperate on matters concerning any other strategic issues which affect both local authorities and to consult on policies and proposals that have cross boundary impacts.

7 Conclusions

- 7.1 This Memorandum of Understanding provides a framework for joint working between SODC and RBC. It is not a legally binding document but a document through which authorities have agreed an approach to work together on shared planning principles to assist in the preparation of their respective Local Plans.

Signed by the following Council representatives

Signature



Name

Councillor Tony Page

**Deputy Leader and Lead Councillor
for Strategic Environment, Planning
and Transport**

For South Oxfordshire District Council

For Reading Borough Council

Agreement Dated –

2018

**APPENDIX 13: RESPONSE TO DUTY TO CO-OPERATE REQUEST REGARDING GYSPY
AND TRAVELLER ACCOMMODATION NEEDS**

From: Joanne Brombley <Joanne.Brombley@basingstoke.gov.uk>
Sent: 13 March 2018 17:28
To: Worringham, Mark
Subject: Reading's unmet needs for gypsy and traveller provision

This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.

Dear Mark

Many thanks for your email dated 22 February regarding whether there are any sites available in Basingstoke and Deane Borough that could be identified to meet the needs for permanent pitches for gypsies and travellers in the Reading district.

As you may be aware, in 2016 Basingstoke and Deane Borough Council (BDBC) commissioned consultants Opinion Research Services (ORS) to undertake an updated Gypsy and Traveller and Travelling Showpeople Accommodation Assessment (GTAA). This updated the council's previous study in response to the revised Government guidance and definitions set out in Planning Policy for Travellers Sites (PPTS), as amended in 2015. This concluded that there remained a need for pitches in the borough (9 pitches for identified need, which meets the PPTS definition, and a potential further 8 pitches for travellers who may meet the PPTS definition).

BDBC has an adopted strategy for accommodating the needs of Gypsies and Travellers, as set out in its Local Plan (2011-2029), which allocated provision on the Plan's major housing site allocations. However, the council cannot currently meet its need for pitches over the next 5 years (5 pitches) and as such will need to take a proactive approach to delivering pitches on land within its ownership (on allocated sites) to meet this short term need. A call for future development sites was completed in mid-2017 and no sites were put forward as being suitable for gypsy and traveller provision. Similarly, the council has considered its own assets and no suitable sites were identified.

Furthermore, there remains pressure in the borough to provide additional pitches, as evidenced through a number of live planning applications and injunctions currently being considered. In addition, 2 pitches were recently allowed on appeal on an unauthorised site, with the council's lack of available pitches weighing in favour of granting consent.

In light of the on-going pressure within the borough to accommodate the needs of gypsies and travellers, particularly in terms of accommodating short term needs, the lack of available sites and the longer term strategy to accommodate pitches on allocated greenfield sites, there are no suitable opportunities within the borough that could be identified to meet the needs of Travelling Showpeople in the Reading district.

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

Kind regards

Joanne Brombley
Planning Policy Manager
Basingstoke and Deane Borough Council
Tel: 01256 845410
Joanne.Brombley@basingstoke.gov.uk
www.basingstoke.gov.uk
[@BasingstokeGov](#) [@BasingstokeGov](#)

Sign up to receive email updates on council services, news and events at

From: Daniel Hawes <daniel.hawes@hart.gov.uk>
Sent: 08 March 2018 17:10
To: Worringham, Mark
Cc: Planning Policy
Subject: Fw: Reading's unmet needs for gypsy and traveller provision

This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.

Dear Mark

Thank you for your email. Whilst I understand your position and the need to identify how Reading's demand can be met I do not consider this to be a Duty to Co-operate matter between Reading and Hart.

This view is supported by the 'Reading Borough Local Plan Duty to Co-operate Statement November 2017'. You will be aware that Appendix 1 of this statement identifies relevant duty to co-operate bodies for particular issues and that for 'Needs and provision for gypsies and travellers' Hart District is not identified as a Duty to Co-operate body.

Hart does not adjoin Reading Borough, and in my view the fact that part of the District may fall within an arbitrary 10km radius of Reading Borough does not justify a departure from your Duty to Cooperate Statement. We would expect any unmet need to be accommodated within an authority that adjoins Reading Borough.

Daniel Hawes
Planning Policy Manager
Hart District Council

01252 774120

<http://www.hart.gov.uk>

Twitter: [@HartCouncil](https://twitter.com/HartCouncil)

Facebook: [/HartDistrictCouncil](https://www.facebook.com/HartDistrictCouncil)

From: Phillipa Silcock <Phillipa.Silcock@RBWM.gov.uk>
Sent: 16 March 2018 12:09
To: Worringham, Mark
Cc: Helen Murch; Planning Policy
Subject: FW: Reading's unmet needs for gypsy and traveller provision

This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.

Dear Mark,

Thank you for your duty to co-operate letter regarding planned provision of accommodation for Gypsies and Travellers. We agree that the provision of accommodation for travellers as defined by the PPTS 2015 is of strategic concern as the movement of households means that the provision of pitches is necessarily an issue that crosses administrative boundaries.

The Royal Borough of Windsor and Maidenhead (RBWM) is currently having a GTAA prepared for the area by arc4. RBWM currently has lawful pitches on public sites and private sites. It is understood that these pitches are fully occupied and there is currently no spare capacity. The Council is also commencing a housing land availability study to identify any potential land available and suitable for provision of permanent and transit accommodation for Travellers and for travelling show people. This and the GTAA will form the basis for an issues and options consultation in the summer.

At this stage we are not able to confirm the level of need within RBWM or our capacity to meet this need within our boundaries.

RBWM are not therefore regrettably not able at present to offer to meet the unmet need from Reading.

Best wishes

Phillipa Silcock

Phillipa Silcock
Planning Policy Consultant
Royal Borough of Windsor and Maidenhead

Ph: 01628 796434
Phillipa.silcock@RBWM.gov.uk

(Please note that I am unavailable on Tuesdays)

From: Knott, Rona <rona.knott@southandvale.gov.uk>
Sent: 15 March 2018 15:35
To: Worringham, Mark
Subject: RE: Reading's unmet needs for gypsy and traveller provision

This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.

Dear Mark

Thank you for your email dated 21 February regarding gypsy and traveller provision in Reading.

We consider that a site or sites should be identified to address these needs and that the site(s) should be provided in the area where the need arises. We agree with national policy that requires the local authority where the need arises to meet that need, unless there are exceptional reasons why it should not.

To this end, we would again seek assurances that all options have been explored in terms of identifying appropriate sites, including considering a lower site size threshold, or including gypsy and traveller provision within allocations proposed in your emerging Local Plan and/or the development opportunity identified at Grazeley.

We note in the Background document that the site size threshold for assessing sites for permanent provision is 0.34ha and 0.15ha for transit pitches. This is based on a site for five pitches. This approach would not capture any smaller sites capable of delivering fewer than 5 pitches and may therefore miss opportunities for assessing suitable sites.

We also consider that a more robust process could be followed with regard to investigating opportunities to include pitches on allocated sites. We note that letters were sent to landowners, but this had the predictable outcome that no landowners were willing to put their site forward. Further engagement with landowners of suitable sites could be undertaken to negotiate the provision of pitches on part of a site.

Any provision of unmet need outside Reading should be linked to established patterns of movement. We are keen to understand more about any movement between Reading and South Oxfordshire, with information about travelling patterns and details of routes that are used regularly.

South Oxfordshire are currently unable to demonstrate a 5 year supply of deliverable sites for gypsy and traveller provision. We are proposing to address this through allocating pitches on some of our strategic allocations in our emerging local plan. At present, we do not consider (as evidenced during the preparation of evidence in support of our local plan 2033) that we have scope to accommodate any additional unmet needs, but are of course willing to maintain an open dialogue with you and to work together on this issue, and to understand your approach to site selection in more detail.

Regards

Rona Knott
Senior Planner
Planning Policy
South Oxfordshire District Council
Customer service: 01235 422600
Email: rona.knott@southandvale.gov.uk
Visit us at: www.southoxon.gov.uk

Please note: my working days are Tuesday – Friday, I do not work on Mondays

From: James McCabe <James.McCabe@wokingham.gov.uk>
Sent: 06 March 2018 08:52
To: Worringham, Mark
Cc: Ian Bellinger; Ian Church
Subject: RE: Reading's unmet needs for gypsy and traveller provision ~[UNCLASSIFIED]~
Attachments: RBC IEMD G and T provision consultation Final published version.pdf; RBC IEMD Pre-submission Local Plan response v3.pdf

This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.

Hi Mark

Please find Wokingham Borough Council's response below.

Wokingham Borough commissioned arc4 to undertake its own Gypsy and Traveller and Travelling Showperson Accommodation Assessment which was published in September 2017. This study concluded that there is a need over the period (2017/18 – 2035/36) for between 26 – 90 pitches for Gypsy and Travellers. This represents a significant need for pitches which WBC's Local Plan Update will need to consider.

WBC is currently assessing the sites that have been promoted for potential allocation in the LPU. WBC is currently not in a position to determine the likely allocation capacity that these sites may yield. However, it is clear that the scale of need represents a challenge that the LPU will need to work through.

It is noted that WBC responded to both RBC's consultation on Traveller provision in October 2017 and the Proposed Submission Plan consultation in January 2018 (attached for your reference). On both occasions WBC encouraged Reading Borough Council to undertake additional work to identify whether any of its own land assets, some of which were identified as being unavailable at the time of the October consultation but potentially suitable for Gypsy and Traveller use, could be further investigated. Wokingham Borough Council also commented that it was open to Reading Borough Council to consider the purchase of additional land to be allocated to meet its identified need. These points are yet to be addressed to the satisfaction of WBC and WBC's position therefore remains unchanged.

WBC is not able to accommodate any additional pitches as a result of unmet need from Reading.

Kind regards

James

James McCabe
Senior Planning Officer
(Growth and Delivery Specialist)
Strategy & Commissioning (Place)
Wokingham Borough Council
Civic Offices
Shute End
Wokingham RG40 1BN
Tel: (0118) 908 8333
07879608831

Enquiries to: Simon Barlow
Email: newlocalplan@wycombe.gov.uk
Direct line: 01494 421158
Our ref: WDLP/RBC/DTC
Your ref:
Date: 15 March 2018



Mark Worringham
Planning Policy Team Leader
Reading Borough Council
Civic Offices
Bridge Street
Reading
RG1 2LU

Sent by email only

Dear Mark

Reading's unmet need for gypsy and traveller provision

We write further to your email dated 21 February 2018, requesting clarification on whether there is scope within our local authority area to accept some of Reading Borough Council's unmet need for gypsy and traveller (including travelling showpeople) pitch provision.

We understand that you have approach all local authorities within 10km of your own local authority area. With regard to our own local authority area, the parts falling within 10km of your boundary are located within the AONB, where national policy requires that great weight should be given to conserving landscape and scenic beauty. On this basis we would expect options to be explored fully outside of the AONB first.

Furthermore, there are a lack of settlements within the 10km area which could accept a site and satisfy the requirements set out in policy B of the PPTS. We recognise by their nature gypsies and travellers are a mobile population and therefore this 10km radius is not an absolute, but in our view needs should be met as closely as possible to where they originate. Please see also our previous response dated 23 October 2017 in respect of your consultation on your gypsy and traveller provision consultation, where we requested clarity in respect of any unmet needs arising being met within the Western Berkshire Housing Market Area.

On the basis of the points set out above, we would not be able to accept any of Reading Borough Council's unmet gypsy and traveller needs.

Yours sincerely

Simon Barlow
Planning Policy Officer

Planning and Sustainability - Penelope Tollitt, Head of Service

Wycombe District Council, Queen Victoria Road, High Wycombe, Bucks HP11 1BB

Tel: 01494 461000 DX 4411 High Wycombe -1 www.wycombe.gov.uk Twitter: @wycombedc

APPENDIX 14: DETAILED RESPONSE TO CHILTERN AND SOUTH BUCKS DISTRICT COUNCIL DUTY TO CO-OPERATE REPRESENTATIONS

Chiltern and South Bucks District Council representation	Reading Borough Council response
Soundness Representations	
1. The Chiltern and South Bucks Local Plan evidence base (specifically Housing Market Areas and Functional Economic Market Areas in Buckinghamshire and Surrounding Areas [ORS & Atkins, March 2015] and Housing Market Areas and Functional Economic Market Areas in Buckinghamshire: June 2016 Update [ORS & Atkins, June 2016] available from http://www.southbucks.gov.uk/planning/localplan2014-2036/evidence) defines the functional housing market area for the Buckinghamshire authorities and, where relevant, the surrounding areas. This defines South Bucks District as split between two functional housing market areas: partly within a Berkshire-wide Housing Market Area with the six Berkshire authorities and partly within a functional housing market area comprising the rest of Buckinghamshire.	The focus of the ORS and Atkins work from 2015 is on the Buckinghamshire authorities and we do not believe it is in a position to fully define the extent of HMAs across Berkshire. That is recognised within the study itself, at 3.1 and 3.26. Its conclusions on Berkshire are based mainly on commuting patterns, rather than taking account of the full range of issues set out in PPG, also including migration and house prices, and it is not, and does not attempt to be, a final definition of which HMA the Berkshire authorities fall into.
2. The Chiltern and South Bucks evidence base goes on to apply functional housing market areas on a best-fit basis in order to provide a practicable platform for plan-making. This concludes that South Bucks District, on the basis of undertaking a joint local plan with Chiltern District Council, forms part of a best-fit housing market area comprising the four Buckinghamshire districts and that there is a single housing market area comprising the six Berkshire authorities.	The approach that Chiltern and South Bucks have taken in terms of joint plan-making does not alter the functional reality of the housing market areas, and does not undermine the conclusions of the Berkshire SHMA. The SHMA follows the approach of the PAS Technical Advice Note, and is entirely robust. There is no national policy or guidance that states that plan-making boundaries are more appropriate than local authority boundaries.
3. The Reading Draft Local Plan evidence base (specifically, the Berkshire Strategic Housing Market Assessment by GL Hearn, February 2016) does not define functional housing market areas but defines housing market areas on a best-fit basis in order to provide a platform for plan-making. This best-fit approach is on the basis of local authority districts and not on the basis of local plan areas resulting in Eastern and Western Berkshire housing market areas with the Eastern Berkshire Housing Market Area including the whole of South Bucks District.	
4. The best-fit approach of both local plans' evidence bases does not and cannot change the functional housing market areas affecting Buckinghamshire or Berkshire. However, the full functional housing market areas for Eastern Berkshire including South Bucks and for Western Berkshire have not been defined and the evidence provided by G L Hearn demonstrates that there will be a significant degree of functional overlap between them.	There is always some form of functional relationship between neighbouring HMAs. As recognised by the PAS Technical Advice Note 13, data collection at below local authority level is not always easy, and for this reason defining the full functional area down to a fine grain of detail is not always possible. The approach of the Berkshire SHMA is considered robust.
5. Chiltern and South Bucks District Councils do not agree with the Berkshire best-fit approach of using district boundaries to define housing market areas as this is not an appropriate way to provide a practicable platform for plan-making given that there is a joint local plan being prepared for Chiltern and South Bucks. The	We do not agree that it is more appropriate for HMAs to be applied to plan-making areas than to local authority boundaries on a best-fit basis. A best-fit to local authorities was recommended by the PAS Technical Advice Note 13, largely on the basis of difficulties of data collection at sub-local authority level. The decision to

<p>emerging approach to preparation of a joint local plan was shared with G L Hearn and the Berkshire authorities in advance of the formal decision, while the public decision to do so (October 2015) was made some four months before the GL Hearn best-fit approach was finalised and published. The Berkshire best-fit approach to housing market areas is therefore not considered a sound approach by Chiltern and South Bucks Councils.</p>	<p>produce a joint plan does not alter the functional realities of the area, and it is perfectly possible to produce a joint plan covering part of two HMAs.</p>
<p>6. The GL Hearn report is also considered out-of-date as some key base data has changed.</p>	<p>Base data does change over time, and it would be unreasonable to consider that this necessarily renders a document out of date. A sensitivity analysis of more recent data has been undertaken for the Western Berkshire HMA, and this is included in the evidence base. However, it is worth noting that the information that has changed, e.g. population projections, employment forecasts, economic activity rates, are more relevant to the needs assessment part of the SHMA rather than the HMA definition, which is based more on information around migration, commuting and house prices.</p>
<p>7. Chiltern and South Bucks District Councils do not agree with the decision of the Berkshire authorities to define two best-fit housing market areas as this was not recommended to the Berkshire authorities by GL Hearn and is not supported by the Berkshire authorities' own evidence. The decision to progress based on two housing market areas was made at a meeting of the Berkshire authority chief executives before the GL Hearn report was finalised and the final GL Hearn report evidence has sought to be presented in a way to seek to justify the Berkshire chief executives' decision. Chiltern and South Bucks District Councils do not consider that the decision to define two Berkshire Housing Market Areas is a sound basis for planning to meet Berkshire's housing needs in the most sustainable way.</p>	<p>GL Hearn clearly recommend two Housing Market Areas in the SHMA. These recommendations are made in paragraphs 2.255-2.261 of the SHMA. As is often the case with production of evidence, interim conclusions will be discussed throughout the process, and refined with further work. This is entirely normal. In this case, the initial findings of GL Hearn (which SBDC are only aware of precisely <u>because</u> they were kept in the loop through the Duty to Co-operate) were that the evidence could equally point to a single Berkshire HMA or two HMAs, depending on how the data were viewed. However, substantial further work was carried out, in particular on travel to work patterns, and a the SHMA came to a clear conclusion.</p>
<p>8. There are inconsistencies between the housing and economic market geographies in Berkshire. Evidence on the latter (prepared for Berkshire by Nathaniel Lichfield & Partners [2016]) concludes that there are three functional economic areas operating across Berkshire (compared to the two housing market areas) with one of the Districts (the Royal Borough of Windsor & Maidenhead) sitting across two functional economic market areas on a best-fit basis. This supports the case for a single Berkshire-wide functional economic market area.</p>	<p>The NLP work defines three Functional Economic Market Areas. This is the NLP finding, so it is difficult to see how it supports the case for something completely different. It is not the conclusion of the NLP FEMA assessment that there is a single Berkshire FEMA.</p>

Duty to Co-operate Representations	
<p>1. Reading Borough Council has failed to diligently and accurately record a key strategic Duty to Co-operate issue with Chiltern and South Bucks Councils and has failed to indicate why this remains an unresolved matter. The Duty to Co-operate issue is the inappropriate definition of the Berkshire Housing Market Area (HMA) geography and strong functional relationships between local authorities comprising the Eastern and Western Berkshire HMAs. For example:</p> <ul style="list-style-type: none"> • In October 2015 South Bucks District Council commented on Reading Borough Council's Duty to Co-operate Scoping Strategy (September 2015). Those comments drew attention to the conflict between the then emerging HMA commissioned by the Berkshire authorities and the then emerging HMA commissioned by the Buckinghamshire authorities. At that stage the study for Buckinghamshire identified a HMA comprising all six Berkshire authorities plus South Bucks District. The emerging study for Berkshire identified a Western Berkshire HMA (of which Reading forms a part) and an Eastern Berkshire HMA which included South Bucks District. • The October 2015 comments also reiterated that South Bucks District Council was considering undertaking a joint local plan with Chiltern District Council and that Reading Borough Council had been consulted on the implications for HMA definition if a joint plan was prepared. • On the basis of undertaking a joint local plan with Chiltern District Council, evidence commissioned by the Buckinghamshire authorities confirmed that South Bucks District forms part of a best-fit housing market area comprising the four Buckinghamshire districts and that there is a single housing market area comprising the six Berkshire authorities. A draft consultants' report setting out the evidence was sent to Reading Borough Council and other relevant Duty to Co-operate organisations on 8 October 2015 for comment. • As well as failing to comprehensively record the conflicting evidence on housing market geography, the Duty to Co-operate Statement fails to record the fact that South Bucks District Council has never agreed the housing need figures for South Bucks District included in the Eastern Berkshire HMA. Nor does the Statement record the fact that South Bucks District Council has never agreed the functional economic market area (FEMA) geography defined for the six Berkshire authorities and Thames Valley Berkshire LEP. • South Bucks District and Chiltern District Council are not listed as 'Relevant Duty to Co-operate Partners' in the table immediately following paragraph 2.3.6 of the Duty to Co-operate Statement despite 	<p>The Duty to Co-operate Statement has now been updated to fully report on the HMA geography issue and take account of these matters. Whether or not the last version of this Statement fully reflected the outstanding issues, this does not in itself constitute a duty to co-operate failure. The comments on the Duty to Co-operate Scoping Strategy are reported within the Strategy itself.</p>

<p>the fact that South Bucks District is, according to Berkshire's evidence, included in the Eastern Berkshire HMA. Likewise, South Bucks District and Chiltern District Councils are not listed as 'Relevant Duty to Co-operate Partners' in the table immediately following paragraph 2.4.4 of the Duty to Co-operate Statement despite the fact that South Bucks District is included in the East Berkshire FEMA as defined for Berkshire. These are significant omissions, particularly given that Chiltern and South Bucks Districts are identified as 'Relevant Duty to Co-operate Bodies' for the strategic issues of 'Housing needs and provision' and 'Needs and provision for economic development and town centres' in Appendix 1 of the Statement.</p>	
<p>1. Reading Borough Council has to date failed to progress a Memorandum of Understanding (MOU) with Chiltern and South Bucks Councils despite repeated requests to the six Berkshire authorities to do so. The requests date from 2015 when South Bucks District Council was first invited to attend meetings associated with the Berkshire SHMA and FEMA. The requests were never supported by the Berkshire authorities.</p>	<p>The Council's focus has been on progressing Memoranda of Understanding with those authorities closest to us, and with which we have the greatest functional relationship. Given the limited amount of agreement on these matters, it is difficult to see what such a MoU would say and what it would add. Discussions on a MoU to include South Bucks' position are underway, but all that this is currently highlighting is the entrenched nature of the respective positions.</p>
<p>2. The Duty to Co-operate Statement includes as Appendix 4 'Objectively Assessed Need for Additional Housing - Memorandum of Understanding between the Berkshire local authorities in the Western Berkshire and Eastern Berks & South Bucks Housing Market Areas, May 2017'. The MOU includes reference to South Bucks' housing need and delivery and to the Duty to Co-operate. Publication of the Statement in November 2017 is the first time the MOU was shared with Chiltern and South Bucks District Councils. Chiltern and South Bucks Councils were not made aware by the Berkshire authorities that the MOU was being prepared, were not invited to participate, were not informed of its existence, were not invited to participate in the evidence based work coming out of the MOU and were not informed which authorities had/had not signed the MOU until the question was posed following publication of the Statement. The exclusion of Chiltern and South Bucks Councils from the process is a fundamental failing under the Duty to Co-operate. On-going disagreements between Chiltern/South Bucks and Berkshire about the Berkshire SHMA is not acceptable justification for Berkshire - including Reading Borough Council - to have excluded Chiltern and South Bucks from the MOU process.</p>	<p>The purpose of the May 2017 MoU was simply to reaffirm the agreement with the conclusions of the February 2016 SHMA, in terms of the identified HMAs and the methodology and calculation of objectively assessed housing needs. Reading was not the driving force behind this MoU - it was initially requested by other authorities as it would be helpful in defending the SHMA housing numbers at appeal. RBC's view has always been that this MoU is not particularly necessary from a Reading perspective, but that if it helps other authorities we are happy to sign.</p> <p>Since the purpose of the MoU was to reaffirm the authorities' commitment to the conclusions of the SHMA, it made sense to include only those authorities that commissioned and accepted the conclusions of the SHMA in the first place. SBDC's position is well-known, in that they accept neither the HMA geography, nor the calculation of objectively assessed need for South Bucks. The local authorities had no indication that the view was likely to change, and it would not have made a great deal of sense to ask SBDC to re-state agreement with something SBDC had never agreed with at the outset.</p>
<p>3. The MOU also further undermines the Berkshire evidence base on market geography by confirming that the six Berkshire authorities have agreed to work together to meet full objectively assessed need for housing (paragraph 5.1).</p>	<p>CDC and SBDC have misread this MoU. The MoU, which remains unsigned by Wokingham and RBWM, is set out at Appendix 4. There is no intention to indicate that all six Berkshire unitary authorities will work together to meet unmet needs across the whole of Berkshire, and, in fact, the MoU reaffirms the commitment to the two HMAs in paragraphs 2.1 and 3.1.</p>
<p>4. The Duty to Co-operate Statement refers (at Section 2.7) to the West of Berkshire Spatial Planning Framework. Chiltern and South Bucks Councils note that Reading Borough Council is likely to have unmet housing needs over its Plan</p>	<p>Each HMA needs to work from the starting point that the need for housing should be met within the boundaries of the local authorities concerned. This requires HMAs to work together to understand the degree to which they can accommodate their own</p>

<p>period and that any shortfall will be accommodated elsewhere within the Western Berkshire Housing Market Area based on the West of Berkshire Spatial Planning Framework. The table immediately following paragraph 2.7.4 of the Statement appears to confirm that in arriving at the Framework, the four local authorities comprising the Western Berkshire HMA have not worked with any other Duty to Co-operate partners despite the fact that Appendix 1 of the Statement identifies other Duty to Co-operate bodies that would be relevant, including Slough Borough Council. There is no clear evidence to show a proactive or on-going Duty to Co-operate approach across administrative boundaries for helping to address a key strategic planning matter and area of common interest, namely boosting significantly the supply of housing to provide for the unmet needs for market and affordable housing originating from Slough consistent with national policy in respect of the Green Belt. Such an approach would also be consistent with the following statement on the Duty to Co-operate' comprising paragraph 5.1 of the May 2017 MOU referred to above: 'The six Berkshire authorities have agreed to work together to ensure that this full objectively assessed need for housing in the Western Berkshire HMA and Eastern Berks and South Bucks HMA will be met in the authorities' forthcoming Local Plan reviews, as far as is consistent with the policies set out in the NPPF'.</p>	<p>needs. The West of Berkshire Spatial Planning Framework is part of this process, and there is a commitment to accommodating the Western Berkshire HMA's needs within its boundaries, and sufficient work on potential approaches to indicate that this is likely to be achievable. However, there has not been an agreement within the Eastern Berkshire and South Bucks HMA about what can be accommodated within that area, and therefore there is no figure for potential unmet need. It is not for the Western Berkshire HMA to assess the capacities of other areas and speculate about what might not be accommodated, rather the proper process should be that there should be an agreement within the HMA and then engagement with adjoining HMAs. Western Berkshire is by no means the only HMA adjoining Eastern Berkshire in any case.</p> <p>Slough Borough Council have now made a formal duty to co-operate request to all Berkshire authorities to consider meeting a portion of its unmet need. The response from the Western Berkshire HMA has been that the first consideration should be what could be accommodated within that HMA. However, for the purposes of Reading's Local Plan, this debate is largely moot, because Reading cannot fully meet its own needs for housing.</p>
<p>5. Section 2.8 of the Duty to Co-operate Statement refers to a potential growth opportunity outside of the Reading boundary at Grazeley. The scale of the opportunity - up to 15,000 new homes supported by economic development and associated infrastructure - adds to the importance of wider dialogue within the framework of the Duty to Co-operate than the two partners listed in the table immediately following paragraph 2.8.4 (namely Wokingham Borough Council and West Berkshire District Council).</p>	<p>The reference in section 2.8 is to an expression of interest, jointly submitted by Wokingham, West Berkshire and Reading, and to specific streams of follow-up work, not to the wider implications of any proposal at Grazeley. No other local authorities were involved in this submission, and it is right that only Wokingham and West Berkshire are therefore listed.</p>

**APPENDIX 15: AGREED LETTER TO REGIONAL SCHOOLS COMMISSIONER
REGARDING VIABILITY OF CHILTERN EDGE SCHOOL**

**Children's Services
4th Floor
County Hall
New Road
Oxford
OX1 1ND
Lucy Butler, Director for
Children's Services**

25 January 2018

Dear Martin

Re: Sustainability of Chiltern Edge School

As you know, data previously supplied by Reading Borough Council indicated a growing need for Chiltern Edge School in Oxfordshire to provide sufficient school places for Reading's growing population.

Concerns were raised about this data as:

- a) it covered all of Reading rather than just North Reading, and there are doubts about how many pupils from south of the river would want a school place in the north or in Oxfordshire;
- b) it included the impact of planned housing growth, which cannot be assured;
- c) this area experiences a relatively large movement from state to independent sector, including at the Year 6-Year 7 transition point.

Further analysis has now been jointly undertaken by Oxfordshire County Council and Reading Borough Council.

- Data has been collated on current cohort sizes of primary pupils living in North Reading and attending primary school in Reading, and Oxfordshire pupils attending primary school in the three southern Oxfordshire school planning areas (Sonning Common, Henley and Woodcote)
- These cohorts have been rolled forward to estimate how many Year 7 places would be needed, over the next 7 years, in the absence of any housing impact.
- These cohorts need to be reduced to reflect the fact that not all children will transfer to state secondary schools. This transfer rate varies from place to place, and from time to time, not least in response to levels of satisfaction with the local state school offer. Different scenarios have therefore been modelled, with those assuming 10%-20% "leakage" at the Year 6-Year 7 transfer point considered to cover the realistic range.

The outcome of this work is that, excluding any housing impact, the two authorities can confirm that Chiltern Edge School at its current 4-form entry size is essential to meet the need for school places across this area. Even with the highest realistic assumption

regarding leakage, in some years there would still be a shortage of places, most severely in 2019 and 2021, which would justify Chiltern Edge School increasing its intake to 6 forms of entry at least in those years. If leakage rates are lower then Chiltern Edge School would need to provide 6 forms of entry on a sustained basis, and further additional capacity would be needed, at least in some years.

Planned/permitted housing growth across the Oxfordshire side of this area would be expected to generate around 2 forms of entry in additional pupils, although this will not fully affect secondary schools for some years. Planned housing growth across the Reading side of this area would be expected to generate another form of entry in additional pupils. This emerging need must be added to the deficit already arising from existing population growth.

It is therefore the conclusion of Oxfordshire County Council and Reading Borough Council that current pupil numbers support the need for Chiltern Edge School to remain open at 4 forms of entry, and in some years (at least) additional places will be required. Once housing growth is taken into account as well, it would be expected that Chiltern Edge School would be able to grow larger than 4 forms of entry without detriment to other schools, unless other additional capacity is created serving this area.

We would request that any decision-making about future growth of Chiltern Edge School, or other academies in this area (including any proposed new schools) should be informed by considerations of the sustainability of all schools in this area.

Yours sincerely



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