

READING BOROUGH LOCAL PLAN PARTIAL UPDATE – DUTY TO CO-OPERATE STATEMENT

November 2024

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1. Introduction

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.”

1.1.3 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;
- Homes England;
- integrated care boards;
- NHS England;
- the Office of Rail and Road;
- 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 Partial Update 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 duty to co-operate actions that have taken place (Appendix 2).
- 1.2.3 This statement will be kept up to date as the process of preparing the Local Plan Partial Update 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 [Plan-making - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

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 Heads of Planning and Planning Policy leads.
- 1.3.3 Authorities across the local area are at quite different stages of plan production. The various authorities are at the following stages of plan production at the time of writing:
- Wokingham Borough Council: Consultation on the Local Plan Update: Proposed Submission Plan (Regulation 19) commenced on 30th September 2024 and lasts until 13th November.
 - West Berkshire District Council: The Local Plan Review was submitted on 31st March 2023 and is currently at examination. A consultation on main modifications is expected to be undertaken soon.
 - South Oxfordshire and Vale of White Horse District Councils: The Councils are preparing a Joint Local Plan 2041, a Publication version of which was published for consultation under Regulation 19 between 1st October and 12th November 2024.
 - Bracknell Forest Borough Council: Local Plan adopted on 19th March 2024
 - Royal Borough of Windsor and Maidenhead: Local Plan adopted on 8th February 2022
 - Basingstoke and Deane Borough Council: An Issues and Options consultation on the Local Plan Update was carried out between 22 January and 4 March 2024. Publication of a Submission Draft Local Plan under Regulation 19 was expected in the winter of 2024/25, although B&DBC is considering the implications of a new NPPF.

1.4 Identifying strategic matters and duty to co-operate partners

- 1.4.1 The Council has produced a Duty to Co-operate Scoping Strategy, the most recent version of which dates from December 2015². Although this is now nine years old, the strategic matters that it identifies remain broadly relevant. Engagement under the duty has therefore continued to follow the Statement, but there has needed to be some adaption to reflect relevant changes. The most important such changes include;
- Changes to the prescribed bodies in the Regulations, in particular 2023 changes to refer to the integrated care boards and NHS England.
 - The creation of Buckinghamshire Council as a combined authority which replaces the four districts and the county council, of which Buckinghamshire County Council, South Bucks District Council and Wycombe District Council are referred to in the 2015 Statement.

² [RBC_Duty_to_Cooperate_Scoping_Strategy_1215.pdf](#)

- The 2020 extension of the Detailed Emergency Planning Zone for AWE Burghfield has increased the importance of this issue in local planning in Reading, and strengthened the need for joint working with other authorities affected by the DEPZ on planning and emergency planning matters.
- National policy has moved away from the concept of housing market areas and functional geographies as a basis for undertaking joint working, but those areas formerly within the Western Berkshire Housing Market Area (West Berkshire, Wokingham and Bracknell Forest) continue to represent the closest functional links that Reading has alongside South Oxfordshire, which means that the most extensive duty to co-operate work still takes place within this area.
- National policy requires the identification of strategic policies, which are those necessary to address the strategic priorities of the area (and any relevant cross-boundary issues). Areas highlighted as strategic in the NPPF do not include any areas that were not already identified as strategic matters in the 2015 Statement. The Pre-Submission Draft Local Plan Partial Update identifies relevant policies as strategic.
- Engagement with the Mayor of London was identified in the 2015 Statement, in particular due to specific issues with how migration was being dealt with in respective authorities' housing evidence. This issue is no longer a part of Reading's housing need evidence, and, although the Mayor of London remains a consultee, the need to engage under the duty to co-operate is not as prevalent.

1.4.2 The content of the 2015 Statement is therefore considered to remain largely relevant, albeit with some adaptations as set out above. The strategic matters have not changed, but there have been some adaptations to the partners that are relevant to each issue, and Appendix 1 sets out a revised list.

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. It is not an exhaustive list of all duty to co-operate measures.
- 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 Statements of common ground

- 2.1.1 The Council has generally signed Statements of Common Ground (SoCG) with key duty to co-operate partners in the past, and the existing Local Plan is subject to a wide-ranging SoCG with Bracknell Forest Borough Council, West Berkshire Council and Wokingham Borough Council. However, this existing SoCG is relevant only to that adopted plan (in particular on matters such as housing needs) and a new statement or statements will be necessary for the Partial Update.
- 2.1.2 At this stage (Pre-Submission consultation) no SoCGs have been signed, but the intention is to prepare one with at least each of Reading's three neighbouring local planning authorities (South Oxfordshire District Council, West Berkshire District Council and Wokingham Borough Council) covering all relevant strategic planning matters.
- 2.1.3 **Relevant strategic matters:** Various
- 2.1.4 **Relevant duty to co-operate partners:** To be confirmed but including South Oxfordshire District Council, West Berkshire District Council, Wokingham Borough Council.

2.2 Housing Needs Assessment

- 2.2.1 In August 2023, the Council commissioned Opinion Research Services (ORS) to undertake a Housing Needs Assessment (HNA) for Reading. The aim was to assess the overall need for housing in Reading and understand how this relates to the need generated by the standard methodology, as well as assessing the need for different groups requiring housing.
- 2.2.2 Past evidence on housing needs (the Strategic Housing Market Assessment) had been undertaken jointly across the Berkshire authorities. However, there was no opportunity to do this on this occasion given the different stages of plan-making.
- 2.2.3 The need to comply with the duty to co-operate was built into the process. As findings started to emerge, on 19th March 2024, ORS facilitated an online workshop to which all authorities that the Scoping Statement lists as duty to co-operate partners on strategic housing were invited³. In the event, eight authorities⁴ attended the event. The workshop outlined the methodology for the HNA, and presented emerging findings about the overall level of housing need. The workshop included a question and answer session.

³ Basingstoke and Deane Borough Council, Bracknell Forest Borough Council, Buckinghamshire Council, Hampshire County Council, Hart District Council, Homes England, Oxfordshire County Council, Royal Borough of Windsor and Maidenhead, Rushmoor Borough Council, Slough Borough Council, South Oxfordshire District Council, Swindon Borough Council, Surrey Heath Borough Council, Test Valley District Council, Thames Valley Berkshire Local Enterprise Partnership, Vale of White Horse District Council, West Berkshire District Council, Wiltshire County Council, Wokingham Borough Council.

⁴ Bracknell Forest Borough Council, Buckinghamshire Council, Hart District Council, Royal Borough of Windsor and Maidenhead, Slough Borough Council, South Oxfordshire District Council, Vale of White Horse District Council, Wokingham Borough Council

2.2.4 As a follow-up, when a full draft report was available on 25th July 2024, it was sent to the same authorities that were invited to the workshop for their comment. No formal comments on the draft was received, although there was a response from Oxfordshire County Council seeking further information on RBC's approach to housing needs.

2.2.5 The HNA was signed off in September 2024.

2.2.6 **Relevant strategic matters:** Housing needs and provision

2.2.7 **Relevant duty to co-operate partners:** Basingstoke and Deane Borough Council, Bracknell Forest Borough Council, Buckinghamshire Council, Hampshire County Council, Hart District Council, Homes England, Oxfordshire County Council, Royal Borough of Windsor and Maidenhead, Rushmoor Borough Council, Slough Borough Council, South Oxfordshire District Council, Swindon Borough Council, Surrey Heath Borough Council, Test Valley District Council, West Berkshire District Council, Wiltshire County Council, Wokingham Borough Council.

2.3 Reading's housing needs

2.3.1 Although the Local Plan Partial Update bases its level of housing need on the findings of the HNA, which can be fully met within Reading's boundaries, it was nonetheless considered necessary to make a request to neighbouring authorities under the duty to co-operate to understand the position if the Partial Update were to be based on the outcome of the standard methodology. The standard methodology at the time (2024) produced a level of need of 878 homes per year for Reading, whilst the assessed capacity at the time was 825 homes per year, which would mean that there would be an unmet need of 954 homes over the plan period to 2041.

2.3.2 Therefore, on 23rd August 2024 RBC wrote to all local planning authorities within 10 km of the RBC boundaries to understand whether there would be scope to accommodate any unmet needs that would arise should the Partial Update be based on the standard methodology. The letter is included as Appendix 3.

2.3.3 Responses were received from eight of the nine authorities contacted. The responses are set out in Appendix 4. In general, no responses identified any scope to meet any unmet needs that would arise from Reading. A brief summary of the responses is below, but please see the full text of the responses in the Appendix for the full picture of each authority's position.

- **Basingstoke and Deane Borough Council (responded on 2nd September):** no scope to accommodate unmet needs due to the high levels of need within the authority and the availability of sites, and the current stage of the Local Plan takes a stepped approach to growth due to concerns about availability of infrastructure to support growth.
- **Bracknell Forest Borough Council (responded on 17th September):** considered premature to be agreeing need issues when RBC is planning to meet its needs in full. Also, flexibility within the adopted Bracknell Forest Local Plan has been reduced by Inspector's removal of sites, and viability issues are also affecting delivery, meaning that there is unlikely to be any ability to accommodate needs.
- **Buckinghamshire Council (responded on 30th August):** due to the stage of plan preparation along with uncertainties around the NPPF is it not possible to confirm whether there would be any capacity to accommodate unmet needs, and in any case there is a weak relationship between Reading and Buckinghamshire that may mean accommodating Reading's unmet needs is inappropriate.
- **Hart District Council (responded on 20th September):** no scope to accommodate unmet needs for a variety of reasons including that unmet needs from Surrey Heath are already being met in Hart, uncertainty around future numbers and resulting unmet need from

adjoining authorities and relatively weak relationship of Hart and Reading when compared to other authorities.

- **Royal Borough of Windsor and Maidenhead (responded on 19th September):** No scope to accommodate unmet needs, as the Local Plan met its local housing need at the time in full only by Green Belt release, and figures would increase under current standard method and much more significantly under the proposed new method.
- **South Oxfordshire and Vale of White Horse District Council (responded on 17th September):** work on Joint Local Plan has not made any provision for meeting unmet needs from Reading as discussions had been on the basis of Reading meeting its own needs, and there should be a joint exploration of alternatives before any such provision would be made. South and Vale already engage with Oxford City Council around their unmet need.
- **West Berkshire District Council (responded on 16th September):** not in a position to assist with unmet needs, as the West Berkshire Local Plan is at examination and WBDC have needed to identify additional provision in response to the Inspector identifying a shortfall against needs, and some of this provision is subject to further work to inform allocations later in the plan period.
- **Wokingham Borough Council (responded on 25th October):** Note that, according to the NPPF, the urban uplift should be accommodated within the cities and urban centres unless there are voluntary cross boundary redistribution agreements in place, or where it would conflict with NPPF policies, and, as the base methodology can be accommodated within Reading, there is no requirement to seek to export the urban uplift. Any delivery in Wokingham is highly dependent on greenfield land which would conflict with the purpose of the urban uplift. Housing supply in the Local Plan is not sufficient to accommodate unmet need from other authorities. Also note the significant increases that would result from the proposed new standard methodology which would exceed capacity.

2.3.4 The only authority that did not respond was Surrey Heath Borough Council, and as noted above, Surrey Heath has its own unmet housing needs that Hart District Council are in co-operation over.

2.3.5 As a result, it is clear that there is no scope to meet any unmet need from Reading in any of the adjoining or nearby authorities, should that unmet need arise through use of the standard methodology.

2.3.6 **Relevant strategic matters:** Housing needs and provision.

2.3.7 **Relevant duty to co-operate partners:** Basingstoke and Deane Borough Council, Bracknell Forest Borough Council, Buckinghamshire Council, Hart District Council, Royal Borough of Windsor and Maidenhead, South Oxfordshire and Vale of White Horse District Councils, Surrey Heath Borough Council, West Berkshire District Council, Wokingham Borough Council.

2.4 Unmet needs from other authorities

2.4.1 Since the adoption of the existing Local Plan, RBC has received duty to co-operate requests relating to unmet needs from other authorities as follows:

- 27th January 2020 – request from Elmbridge Borough Council relating to unmet housing needs;
- 31st August 2021 – request from Bracknell Forest Borough Council relating to unmet industrial and warehouse floorspace need;
- January 2023 – request from West Berkshire District Council relating to unmet employment floorspace need;

- 29th November 2023 – request from Wokingham Borough Council relating to unmet need for gypsy and traveller accommodation.

- 2.4.2 In terms of housing, the Pre-Submission Draft Local Plan Partial Update is based on a need of 735 dwellings per year and provides for 825 dwellings per year, which over the full plan period results in 1,620 dwellings over and above the need. In theory, should this approach be found sound, this oversupply could form a contribution to unmet needs from elsewhere. However, at this stage, the only request that Reading has received is from Elmbridge. The Elmbridge Local Plan is currently at examination, and a letter from the Inspector dated 11 September 2024 makes clear that the plan is currently unsound in part because it is undertaken on a brownfield only basis and does not consider the release of Green Belt land. As such, it is not clear what the extent of any unmet needs arising from Elmbridge, if any, will be. In addition, Elmbridge is, at its closest point, over 30 km from Reading's boundary and there is little to suggest that there is any particular functional relationship. As such, no provision is made for meeting unmet housing needs from elsewhere.
- 2.4.3 In terms of employment, the level of need for both office and industrial/warehouse uses in Reading as evidenced by the Commercial Development Needs Assessment are high. The Local Plan Partial Update makes provision to meet its needs in full, but the capacity identified through the HELAA and other evidence does not allow any provision over and above Reading's own needs, meaning that unmet needs from other authorities cannot be accommodated. This changes the position somewhat from the adopted version of the Local Plan, where planned supply of office space exceeded the identified needs, and the Plan identified that this could potentially form a contribution to unmet needs from other authorities in the Central Berkshire Functional Economic Market Area (an area covering Reading, Wokingham, Bracknell Forest and Windsor and Maidenhead).
- 2.4.4 Finally, in terms of sites for gypsies and travellers, RBC undertook an exhaustive search of potential sites for both permanent and transit sites in preparing the existing Local Plan, which did not result in any suitable sites being identified, meaning that Reading has existing unmet needs. This process was refreshed on the basis of a different approach to flood risk for transit accommodation (on the assumption that transit accommodation would be a 'more vulnerable' use under the NPPF) and this led to a planning permission being granted for a transit site, but this would not have assisted in finding permanent sites due to those uses being classed as 'highly vulnerable'. No sites have arisen since the Local Plan was prepared that could meet either Reading's unmet need or any unmet need from other authorities.
- 2.4.5 **Relevant strategic matters:** Housing needs and provision, need and provision for gypsies and travellers, need and provision for economic development and town centres
- 2.4.6 **Relevant duty to co-operate partners:** Bracknell Forest Borough Council, Elmbridge Borough Council, West Berkshire District Council, Wokingham Borough Council.

2.5 Engagement with healthcare providers

- 2.5.1 Integrated care boards, in this case the Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board (BOBICB), are prescribed duty to co-operate partners, as is NHS England, although in practice engagement on plan making primarily also involves the Royal Berkshire NHS Foundation Trust. RBC has made a particular effort to engage with both the ICB in terms of primary healthcare and the Trust in terms of acute healthcare whilst preparing the Local Plan, particularly in view of recognised issues in access to primary care and the potential move of the Royal Berkshire Hospital.

Integrated Care Board

2.5.2 In terms of the ICB, planning officers met with representatives of the ICB on five occasions during 2023 and 2024, primarily to gain input for the Infrastructure Delivery Plan that accompanies the Local Plan, with the aim of a better understanding of where primary healthcare needs would arise in Reading and what form of provision would be needed. Research and data have also been shared between the ICB and Council on the capacity of the existing estate and how expected levels of development would impact on that capacity. The results of these discussions have informed the development of the Local Plan and Infrastructure Delivery Plan, as well as the ICB's formal input into the consultation which has resulted in a new policy on health impact assessment and identifying opportunities within the development allocations for on-site facilities.

Royal Berkshire NHS Foundation Trust

- 2.5.3 There has also been significant engagement with the Trust, beginning in September 2023 and including seven meetings. Most recently, some of these meetings have included Wokingham Borough Council due to the location of potential alternative sites within Wokingham Borough.
- 2.5.4 The main issues that have been discussed in these meetings are the possible relocation of the hospital, the future of the existing site if the hospital were to relocate or would need to be redeveloped in situ including modern requirements, opportunities for RBH staff housing within the Borough and reconfigurations of the overall delivery model. The Council has sought to engage on any proposal to move the hospital, including providing input to the search for a potential alternative site.
- 2.5.5 Of particular relevance for the Local Plan is policy ER3 on the Royal Berkshire Hospital site on London Road, and officers have sought clarity about the future of this site insofar as is possible given that decisions are dependent upon the outcome of government funding decisions under the New Hospitals Programme. The policy has therefore been drafted against a background of uncertainty but with close co-operation with the Trust, including provision of a draft policy for comment prior to Pre-Submission consultation.
- 2.5.6 **Relevant strategic matters:** Strategic healthcare infrastructure needs and provision
- 2.5.7 **Relevant duty to co-operate partners:** Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board, NHS England

2.6 Central and Eastern Berkshire Joint Minerals and Waste Local Plan

- 2.6.1 Reading Borough Council has worked 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 was 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.
- 2.6.2 Briefly, the four authorities entered into a Joint Working Agreement with Hampshire County Council to undertake the function of provision of a minerals and waste plan. Production of the plan commenced in 2016, and the plan was adopted by all four authorities, with final adoption being in January 2023. Further information is available on the dedicated website for the Minerals and Waste Local Plan⁵.
- 2.6.3 **Relevant strategic matters:** Planning for minerals, planning for waste

⁵ [Central and Eastern Berkshire - Joint Minerals & Waste Plan | Hampshire County Council \(hants.gov.uk\)](https://www.hants.gov.uk/central-and-eastern-berkshire-joint-minerals-and-waste-plan)

2.6.4 **Relevant duty to co-operate partners:** Bracknell Forest Borough Council, Royal Borough of Windsor and Maidenhead, Wokingham Borough Council, other duty to co-operate partners.

2.7 Other Measures

2.7.1 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.

2.7.2 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 progressing joint minerals and waste plans. The regular meetings that are part of these arrangements include Berkshire Heads of Planning and Development Plans Group (DPG), comprising the lead planning policy officers from each authority. 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 is required.

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

2.7.4 **Relevant strategic matters:** All

2.7.5 **Relevant duty to co-operate partners:** All.

3. Duty to co-operate representations

3.1 Representations at Regulation 18 stage

- 3.1.1 Any representations that have raised particular issues relating to the duty to co-operate at the Regulation 18 (Consultation on Scope and Content) stage are summarised below. Unsurprisingly, at this stage very few issues were raised.

Representations from duty to co-operate partners

- 3.1.2 There were no representations from duty to co-operate partners at Regulation 18 stage that raised duty to co-operate concerns.

Representations from others

- 3.1.3 There were a small number of representations from other organisations that specifically referenced the duty to co-operate at this stage. In all cases, the reference was in the context of planning for housing needs, highlighting that the Council must work with its neighbours under the duty if its housing needs cannot be met.
- 3.1.4 The Home Builders Federation noted that, under the NPPF, the Council must seek voluntary arrangements with neighbouring authorities under the duty to co-operate if Reading's housing needs under the standard methodology cannot be met. Both Fairfax and Gladman made similar points specifically in relation to engaging with South Oxfordshire District Council, whilst TOWN noted the need to engage with West Berkshire District Council, as well as stating that the fact that no adjoining local plans made specific provision for Reading's unmet needs under the adopted plan represented a failure under the duty.

3.2 Representations at Regulation 19 stage

- 3.2.1 Any representations highlighting duty to co-operate concerns at Pre-Submission (Regulation 19) stage will be summarised here after consultation.

Appendix 1: Summary of strategic matters and relevant duty to co-operate bodies

A1.1 This table lists the strategic matters and those duty to co-operate bodies that have identified as being potentially relevant. Please note that, depending on the degree to which the strategic matter is addressed, not all duty to co-operate bodies listed will be relevant.

Table 2: List of strategic matters and relevant duty to co-operate bodies

Strategic matter	Relevant duty to co-operate bodies
Housing needs and provision	<p>Main bodies: Bracknell Forest Borough Council, Homes England, Oxfordshire County Council, South Oxfordshire District Council, West Berkshire District Council, Wokingham Borough Council</p> <p>Other bodies (as required): Basingstoke and Deane Borough Council, Buckinghamshire Council, Hampshire County Council, Hart District Council, Royal Borough of Windsor and Maidenhead, Rushmoor Borough Council, Slough Borough 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, Wiltshire Council</p>
Needs and provision for gypsies and travellers	Bracknell Forest Borough Council, Homes England, Oxfordshire County Council, South Oxfordshire District Council, West Berkshire District Council, Wokingham Borough Council
Needs and provision for economic development and town centres	<p>Main bodies: Bracknell Forest Borough Council, Oxfordshire County Council, Royal Borough of Windsor and Maidenhead, South Oxfordshire District Council, Thames Valley Berkshire Local Enterprise Partnership, West Berkshire District Council, Wokingham Borough Council</p> <p>Other bodies (as required): Basingstoke and Deane Borough Council, Buckinghamshire Council, Hampshire County Council, Hart District Council, Rushmoor Borough Council, Slough Borough Council, Surrey County Council, Surrey Heath Borough Council, Swindon Borough Council, Test Valley Borough Council, Vale of White Horse District Council, Wiltshire Council</p>
Strategic transport infrastructure needs and provision	<p>Main bodies: Bracknell Forest Borough Council, Highways England, Office of Rail and Road, Oxfordshire County Council, South Oxfordshire District Council, Thames Valley Berkshire Local Enterprise Partnership, West Berkshire District Council, Wokingham Borough Council</p> <p>Other bodies (as required): Basingstoke and Deane Borough Council, Buckinghamshire Council, Hampshire County Council, Hart District Council, Royal Borough of Windsor and Maidenhead, Rushmoor Borough Council, Slough Borough Council, Surrey County Council, Surrey Heath Borough Council, Swindon Borough Council, Test Valley Borough Council, Vale of White Horse District Council, Wiltshire Council</p>
Strategic education infrastructure needs and provision	Oxfordshire County Council, South Oxfordshire District Council, West Berkshire District Council, Wokingham Borough Council
Strategic healthcare infrastructure needs and provision	Bracknell Forest Borough Council, Buckinghamshire Oxfordshire and Berkshire West Integrated Care Board, NHS England, South Oxfordshire District Council, West Berkshire District Council, Wokingham Borough Council
Strategic landscape considerations	Natural England, South Oxfordshire District Council, West Berkshire District Council, Wokingham Borough Council

Strategic matter	Relevant duty to co-operate bodies
Strategic biodiversity considerations	Berkshire Local Nature Partnership, Natural England, South Oxfordshire District Council, West Berkshire District Council, Wokingham Borough Council
Strategic flooding considerations	Environment Agency, South Oxfordshire District Council, West Berkshire District Council, Wokingham Borough Council
Climate change and mitigation	As required from Basingstoke and Deane Borough Council, Berkshire Local Nature Partnership, Buckinghamshire Council, Environment Agency, Hampshire County Council, Hart District Council, Natural England, Oxfordshire County Council, Royal Borough of Windsor and Maidenhead, Rushmoor Borough Council, Slough Borough Council, 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 District Council, Wiltshire Council, Wokingham Borough Council
Open space and recreation provision	South Oxfordshire District Council, West Berkshire District Council, Wokingham Borough Council
Historic environment	Main body: Historic England Other body (as required): West Berkshire District Council
Tall buildings and strategic views	Civil Aviation Authority, Historic England, South Oxfordshire District Council, West Berkshire District Council, Wokingham Borough Council
Utilities infrastructure needs and provision	South Oxfordshire District Council, West Berkshire District Council, Wokingham Borough Council
University of Reading	Wokingham Borough Council
Planning within the Detailed Emergency Planning Zone for AWE Burghfield	Basingstoke and Deane Borough Council, West Berkshire District Council, Wokingham Borough Council
Planning for minerals	Bracknell Forest Borough Council, Buckinghamshire Council, Environment Agency, Hampshire County Council, Marine Management Organisation, Oxfordshire County Council, Royal Borough of Windsor and Maidenhead, Slough Borough Council, Surrey County Council, West Berkshire District Council, Wokingham Borough Council
Planning for waste	Bracknell Forest Borough Council, Buckinghamshire Council, Environment Agency, Hampshire County Council, Oxfordshire County Council, Royal Borough of Windsor and Maidenhead, Slough Borough Council, Surrey County Council, West Berkshire District Council, Wokingham Borough Council

Appendix 2: Chronology of events relevant to the duty to co-operate

Table 2: Chronology of significant duty to co-operate events

Date	Measure
7 th October 2022	Duty to co-operate meeting with West Berkshire District Council to discuss WBDC's unmet employment needs
12 th September 2023	Meeting with Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board regarding primary care needs in Reading
13 th September 2023	Meeting with RBH NHS Foundation Trust regarding the future of Royal Berkshire Hospital and primary care
22 nd September 2023	Duty to co-operate meeting with Wokingham Borough Council
6 th October 2023	Duty to co-operate meeting with South Oxfordshire District Council
18 th October 2023	Duty to co-operate meeting with West Berkshire District Council
31 st October 2023	Duty to co-operate meeting with Bracknell Forest Borough Council
1 st November 2023	Duty to co-operate meeting with Wokingham Borough Council
2 nd November 2023	Duty to co-operate meeting with Oxfordshire County Council
27 th November 2023	Consultation commences on the Local Plan Partial Update: Consultation on Scope and Content
29 th November 2023	Duty to co-operate request received from Wokingham Borough Council with regard to unmet needs for gypsy and traveller accommodation
30 th November 2023	RBC responds to duty to co-operate request from Wokingham Borough Council with regard to unmet needs for gypsy and traveller accommodation
30 th November 2023	Duty to co-operate meeting with Basingstoke and Deane Borough Council
22 nd January 2024	Meeting with RBH NHS Foundation Trust regarding the future of Royal Berkshire Hospital
31 st January 2024	Consultation closes on the Local Plan Partial Update: Consultation on Scope and Content
31 st January 2024	RBC adopts the Central and Eastern Berkshire Joint Minerals and Waste Plan
11 th March 2024	Meeting with RBH NHS Foundation Trust to discuss transport assessment work for the Royal Berkshire Hospital
19 th March 2024	Duty to co-operate workshop on Housing Needs Assessment, presenting methodology and draft headline results, attended by Bracknell Forest Borough Council, Buckinghamshire Council, Hart District Council, Royal Borough of Windsor and Maidenhead, Slough Borough Council, South Oxfordshire District Council, Vale of White Horse District Council, Wokingham Borough Council
15 th May 2024	Meeting with Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board regarding primary care needs in Reading
22 nd May 2024	Meeting with Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board regarding primary care needs in Reading
2 nd July 2024	Meeting with Historic England to discuss the relationship between sustainability policies and heritage assets.
24 th July 2024	Duty to co-operate meeting with Wokingham Borough Council

Date	Measure
25 th July 2024	Copy of draft Housing Needs Assessment sent for comments to the following: Basingstoke and Deane Borough Council, Bracknell Forest Borough Council, Buckinghamshire Council, Hampshire County Council, Hart District Council, Homes England, Oxfordshire County Council, Royal Borough of Windsor and Maidenhead, Rushmoor Borough Council, Slough Borough Council, Swindon Borough Council, Surrey Heath Borough Council, Test Valley District Council, West Berkshire District Council, Wiltshire County Council, Wokingham Borough Council. No comments on the draft received.
21 st August 2024	Meeting with RBH NHS Foundation Trust and Wokingham Borough Council regarding the future of Royal Berkshire Hospital
23 rd August 2024	Letter requesting information under the duty to co-operate on unmet needs in the event that the standard methodology for housing needs is used set to the following: Basingstoke and Deane Borough Council, Bracknell Forest Borough Council, Buckinghamshire Council, Hart District Council, Royal Borough of Windsor and Maidenhead, Surrey Heath Borough Council, West Berkshire District Council, Wokingham Borough Council.
29 th August 2024	Meeting with RBH NHS Foundation Trust to discuss the future of the RBH site
30 th August 2024	Draft version of policy ER3: Royal Berkshire Hospital provided to Royal Berkshire Hospital NHS Foundation Trust for comment
30 th August 2024	Response from Buckinghamshire Council to the duty to co-operate request of 23 rd August.
2 nd September 2024	Response from Basingstoke and Deane Borough Council to the duty to co-operate request of 23 rd August.
9 th September 2024	Meeting with RBH NHS Foundation Trust as part of ongoing working group around the future of the hospital
18 th September 2024	Meeting with RBH NHS Foundation Trust as part of ongoing working group around the future of the hospital
11 th October 2024	Copy of draft Strategic Flood Risk Assessment provided to the Environment Agency for comment

Appendix 3: Duty to co-operate request relating to Reading's housing need

Your contact is: Mark Worringham, Planning Section

Dear colleague,

Re. Duty to co-operate request regarding housing needs

I am writing to you on behalf of Reading Borough Council (“the Council”) under the duty to co-operate in respect of Reading’s housing needs. In this letter, we are asking you to tell us whether your authority would have any scope to accommodate any unmet housing need from Reading that would arise between 2023 and 2041 as a result of use of the current standard methodology in national policy, equating to a total of 954 dwellings.

Background

The Reading Borough Local Plan was adopted in November 2019. In line with statutory requirements, a review was carried out in March 2023 which determined that a Partial Update of the Local Plan was required, in particular due to changes to the approach to assessing housing need. A Regulation 18 consultation on Scope and Content was carried out between November 2023 and January 2024, and our Local Development Scheme (LDS) timetables a Pre-Submission Draft Local Plan Partial Update under Regulation 19 for November 2024.

Policy H1 (Provision of Housing) of the existing Local Plan is based on a need of 699 homes per year between 2013 and 2036. This was derived from the Berkshire (including South Bucks) Strategic Housing Market Assessment (SHMA) 2016. Policy H1 plans for 689 homes per year and identifies a shortfall of 230 dwellings over the plan period which is to be met within the Western Berkshire Housing Market Area. Any arrangements for meeting this shortfall outside Reading relate only to the level of need as calculated by the SHMA, not to any alternative calculations of need. It is worth noting that, as set out the housing trajectory in recent versions of our Annual Monitoring Report, we now expect that Reading will be able to meet all of the need of 699 homes per year within its own boundaries.

Under the current National Planning Policy Framework (NPPF), local housing need for Reading identified using the standard methodology would be 878 homes per year based on most recent figures. This includes a 35% uplift to need due to Reading being one of the 20 largest urban areas in England.

In 2023, Reading Borough Council commissioned consultants ORS to undertake a separate assessment of local housing needs, to understand the extent of genuine local housing need in Reading. The draft of this Housing Needs Assessment was shared with your authority on 25th July 2024. The report came to the conclusion that Reading’s housing need is 735 homes per year between 2023 and 2041, and that there are exceptional circumstances why Reading should plan for this level of need rather than the local housing need under the standard methodology.

Reading’s intended position was set out in the Regulation 18 consultation. The position was that the updated policy H1 will be based on the assessed need for 735 homes per year, but will plan to exceed this figure by providing for the assessed capacity of approximately 800 homes per year. This figure has now been refined by more detailed work since the consultation was undertaken using a Housing and Economic Land Availability Assessment (HELAA) based on a methodology agreed between five Berkshire authorities, and is now expected to be 825 homes per year. The intention is that the Regulation 19 version of the Partial Update will plan for provision of 825 homes per year compared to a need of 735 homes per year.

It is therefore important to note that Reading's position is that its Partial Update will meet its housing needs in full, and that it does not intend that there will be unmet needs that neighbouring authorities need to accommodate.

However, as you will no doubt be aware, the Council's approach to housing provision will be subject to significant scrutiny at examination, particularly given the requirement to demonstrate exceptional circumstances for an alternative approach to housing need. We are therefore keen to fully understand the implications of all eventualities, including if Reading's housing need were to be based on the standard methodology. For this reason, we are writing to you, along with all local planning authorities within 10km of Reading's boundaries, under the duty to co-operate to understand your authority's position in terms of any unmet needs that would arise from Reading if the standard methodology were to be used.

Position regarding the consultation version of the NPPF

A consultation on amendments to the NPPF was published in July. Under the proposed standard methodology contained within the consultation, as for many other authorities, local housing need would increase substantially for Reading, from 878 homes per year to 1,023. This is clearly a figure which exceeds the estimated capacity of the Borough.

The NPPF consultation lasts until 24th September. Therefore, at the time of writing, the proposals within the consultation remain subject to change. There are also proposed transitional arrangements, which will mean that some authorities that are at Regulation 19 stage may be able to proceed to examination under the existing NPPF, although those transitional arrangements are also subject to possible change.

For clarity, the request in this letter does not relate to the housing need derived from the proposed new standard methodology. If and when a new NPPF is in place, and if it affects Reading's emerging Local Plan Partial Update, the Council will need to consider its approach accordingly.

Information requested

As set out above, the Council's proposal is to base need levels on the results of the Housing Needs Assessment, which can be accommodated within our boundaries. However, in the event that the current standard methodology were to be used, the figure arising for Reading using latest figures in 2024 would be 878 dwellings per year. As set out above, Reading's capacity over the plan period 2023 to 2041 is considered to be 825 dwellings per year. This would mean an unmet need of 53 dwellings per year over the plan period, or 954 dwellings in total.

We would like to know whether your authority would be in a position to accommodate any of this unmet need over some or all of the plan period, and if so, how much and when.

We would be grateful for an answer to this request by **Monday 16 September**.

I am happy to have a further discussion about this content of this letter with you if it would be of help.

Please feel free to contact me if there are any queries.

Yours sincerely

Mark Worringham
Planning Policy Manager

Appendix 4: Responses to duty to co-operate request relating to Reading's housing need

Basingstoke and Deane Borough Council

Dear Mark

Thank you for your email regarding Duty to Co-operate and housing numbers. Your letter is helpful in setting out the current position in Reading.

The letter specifically asks whether, under the Duty to Cooperate, Basingstoke and Deane Borough Council is in a position to assist with meeting the housing needs of Reading. I can confirm, in response, that unfortunately the council does not have any scope to accommodate any unmet housing need from Reading that would arise between 2023 and 2041 as a result of use of the current standard methodology. This is in light of the current high housing number within this borough and the availability of suitable sites to deliver new homes.

We are currently in the early stages of updating the adopted Basingstoke and Deane Local Plan (2011-2029) and undertook a Regulation 18 consultation earlier in the year. This set out a spatial strategy for meeting the Borough's own housing needs in full but adopted a stepped approach due to concerns about the ability of local infrastructure to cope with the proposed high levels of growth (effectively allowing some infrastructure to catch up) and also due to the nature of the spatial strategy which, due to the high numbers involved, included large scale strategic sites which will take some time to deliver new homes on the ground. As noted in your letter, the Government recently published a draft new NPPF which proposed a significant increase in housing numbers across many parts of the UK, including Basingstoke and Deane. The council has significant concerns about whether such a high level of growth can ever be sustainably accommodated. At this stage, we are reviewing the draft Regulation 18 version of the Plan in light of the outcomes of the consultation but also the implications of the proposed new NPPF and are considering next steps.

It is also worth highlighting that the current high housing number generated by the Standard Method for the borough, coupled with a shortage of deliverable sites, has led to the council being unable to demonstrate a full five year housing land supply for a number of years. Whilst the council is taking proactive steps to address this, the position remains at 4.2 years. Setting aside the outcome of the new formula and Local Housing Need figure published alongside the draft NPPF, this further demonstrates the difficulty of meeting our own high housing number and therefore the inability to accommodate further additional homes from neighbouring areas.

As always, we welcome the ongoing dialogue between our Councils and are happy to be assist in the production of relevant statements of common ground if that would be helpful.

Kind regards

Jo

Joanne Brombley
Planning Policy Manager
Basingstoke and Deane Borough Council
01256 845410
Joanne.Brombley@basingstoke.gov.uk

Bracknell Forest Borough Council

Dear Mark,

Duty to co-operate request regarding Reading Borough's housing needs

I refer to your letter dated 23 August 2024.

Thank you for indicating that you are intending to plan for 825 homes per year compared with a need for 735 homes per year (based on your 2023 ORS assessment of housing need as opposed to the current standard methodology and the urban uplift) in the Regulation 19 version of the Partial Update of the Reading Borough Local Plan. It is noted that there should not therefore be any unmet needs arising from Reading Borough that neighbouring authorities will need to accommodate.

It is agreed that Reading Borough Council's approach to housing provision (which is supported by Bracknell Forest Council) is likely to come under significant scrutiny at examination, due to the requirement to demonstrate exceptional circumstances for an alternative approach. It is noted that using the current standard methodology would result in a figure of 878 dwellings per year. Over the plan period (2023-2041) this would result in an outstanding need of 954 dwellings (53 dpa). However, this position has not yet been imposed upon you and it is considered premature to be agreeing need matters on this basis.

As you will be aware, Bracknell Forest Council adopted the Bracknell Forest Local Plan (BFLP) in March 2024. This identifies sufficient sites to meet the needs of Bracknell Forest over the period 2020/21-2036/37 with a small amount of flexibility. Due to the deletion of a number of sites by the Inspectors through Main Modifications, the degree of flexibility incorporated into the adopted version of the BFLP is less than originally planned. Furthermore, issues associated with viability are now having an impact on some of our sites which means that in the short to medium term, we are having to draw upon that flexibility. As a result, we are unlikely to be in a position to accommodate any potential unmet need.

As far as the implications of the increase in local housing need suggested through changes to the formula used in the standard methodology are concerned, it is considered too early to make any comments as much depends on the outcome of the current consultation. If the Government was to confirm the use of the suggested formula, this would have significant implications for Berkshire as a whole and further discussions would need to take place on a sub-regional basis.

If you have any queries, please do not hesitate to contact the Development Plans team by emailing development.plan@bracknell-forest.gov.uk.

Yours sincerely

Jo Male

Assistant Director: Planning

Buckinghamshire Council

Dear Mark Worringham,

Buckinghamshire Council response – Duty to co-operate request regarding housing needs

Thank you for your letter of 23 August 2024 within which you asked whether Buckinghamshire Council would be in a position to accommodate any of Reading Borough Council's unmet housing need over some or all of the plan period, and if so, how much and when.

Buckinghamshire Council is pleased to note that Reading Borough Council is intending that its Partial Update to the Local Plan will meet its housing needs in full, and that it does not intend that there will be unmet needs that neighbouring authorities need to accommodate. We further note that the purpose of your letter is to understand the risk if Reading Borough Council's housing need were to be based on the (current) standard method, and that if this occurred Reading would be likely to have a shortfall in supply of some 53 dwellings a year.

Buckinghamshire Council is still at an early stage in the preparation of a Local Plan for Buckinghamshire. We have previously consulted on an attitudes survey and on a draft vision and objectives using the responses received to inform work on the Local Plan. We have not yet reached the stage of fully understanding the capacity of appropriate suitable sites to meet Buckinghamshire's housing needs.

There is further uncertainty related to the government's ongoing consultation on proposed changes to the NPPF, and specifically the proposals relating to the standard method for calculating housing need. For Buckinghamshire, the proposed changes produce a 41.5% uplift from the current standard method calculations, resulting in a housing need of 4,122 dwellings per year (up from 2,912 dwellings per year using the current standard method).

So, to respond to your specific question as to whether we would be in a position to accommodate any of this potential unmet need over some or all of the plan period, and if so, how much and when – because of the early stage of preparation of the Local Plan and further uncertainty around changes to national policy, Buckinghamshire Council is unable to determine if we have a sufficient supply of sites to meet our own need let alone assist with meeting an unmet need from Reading Borough Council.

Other Matters

Buckinghamshire Council notes that Buckinghamshire itself is not adjacent to Reading Borough Council, nor is there a particularly strong relationship in housing market area or travel to work terms between Buckinghamshire and Reading. Data from the 2011 census shows that of the four legacy district areas that now make up Buckinghamshire, only Wycombe sat within the top ten commuting flows to and from Reading. This was at position ten and of the 42,309 commuters coming into Reading from other areas, only 651 were coming from Wycombe. The 2021 census was undertaken during abnormal conditions with Covid-19 impacting on commuting patterns, nevertheless of the 20,844 commuters coming into Reading from other areas, only 429 were coming from Buckinghamshire as a whole.

Given the fact that (1) Buckinghamshire is not adjacent to Reading and the NPPF requires plans to consider the unmet needs of neighbouring areas; and (2) the weak relationship between Reading and Buckinghamshire, we would question the appropriateness of Buckinghamshire assisting with unmet housing needs from Reading.

If you have any questions on this response, please contact me: Stephen Miles, Senior Policy Planning Officer, at Stephen.Miles@buckinghamshire.gov.uk or 01494 475885.

Yours sincerely

Stephen Miles

Stephen Miles

Senior Planning Policy Officer

Planning, Growth and Sustainability

Buckinghamshire Council

Royal Borough of Windsor and Maidenhead

Dear Mark,

Duty to co-operate request regarding housing needs

Thank you for your letter dated 23rd August 2024.

We note that your recent Housing Needs Assessment concluded that Reading's housing need is 735 homes per year, below the 878 homes p.a. based on the current standard methodology, and that you consider there are exceptional circumstances to justify this. I further note that your Regulation 19 Partial Update plans to provide for 825 homes p.a. compared to the assessed need for 735 homes p.a. Therefore, we welcome your comment that the Partial Update will meet the housing needs assessed on this basis in full.

You go on, however, to state that if the current standard methodology were to be used, the figure arising for Reading would be 878 dwellings per year and this would mean an unmet need of 53 dwellings p.a. (954 dwellings in total).

As you will know, RBWM adopted its Borough Local Plan in 2022, based on an objectively assessed need of 712 dwellings per annum (for the period 2013-33). We were able to meet this need in full, but we had to release Green Belt land in order to do so. Using the current standard method, our need figure would increase to 866 dpa and under the proposed revised standard method set out in the draft NPPF, it would increase significantly further to 1,341 dpa. Meeting this in full would be extremely challenging. **Consequently, the Royal Borough can confirm that in the event that the standard method is used, it would not be able to meet any of the unmet need for housing arising in Reading Borough Council.**

I look forward to continuing constructive discussions with Reading BC under the Duty to Cooperate as your Local Plan Partial Update progresses.

This response has been approved by the Council's Assistant Director of Planning, Adrien Waite.

Yours faithfully,

I.D.Motuel

Ian Motuel
Planning Policy Manager
Royal Borough of Windsor and Maidenhead

South Oxfordshire and Vale of White Horse District Councils

Dear Mr Worringham

RE: DUTY TO CO-OPERATE REQUEST REGARDING HOUSING NEEDS

Thank you for your letter of 23 August regarding potential unmet housing needs of Reading and the ability of your neighbouring authorities to accommodate unmet needs.

Our officers have engaged with your colleagues and consultants to understand your local housing need assessment and the emerging partial review of the Reading Local Plan. We therefore understand that Reading Borough Council is writing to its neighbours to clarify to what extent any alternative options for meeting housing need may exist.

South and Vale already engage with Oxford City to help meet their agreed unmet housing need. Our position on meeting any unmet need is that we will not make provision in our emerging Joint Local Plan to meet unmet needs until that need is fully justified, and it is considered necessary within South and Vale, which should be explored through a joint exploration of alternatives.

As you will be aware, we have not engaged with you previously on unmet housing needs specifically. The Reading emerging plan has not advocated meeting unmet need in South and Vale, and we have therefore not taken any steps in the production or evidence gathering of our emerging Joint Local Plan, soon to be considered at the 18 September (Vale) and 19 September (South) Special Council meetings for progressing to the Regulation 19 publication and submission stages.

We would also observe that both South and Vale's current adopted plan spatial strategies and the emerging spatial strategy in the Joint Local Plan do not envisage significant growth near to Reading. This is because the area near to Reading has a number of physical, infrastructure and landscapes constraints in particular.

We will engage with your forthcoming Regulation 19 publication Local Plan in due course, and we will confirm our stance to unmet need in any formal duty to cooperate statements or statements of common ground if required.

Yours sincerely

Emma Baker
Planning Policy Team Leader

West Berkshire District Council

Dear Mr Worringham,

Duty to Co-operate request regarding housing needs - Reading Borough Council Local Plan Partial Update

Thank you for your letter dated 23rd August 2024 setting out a Duty to Co-operate request from Reading Borough Council regarding housing needs.

West Berkshire District Council (WBDC) welcomes engagement under the Duty to Co-operate (DtC) and acknowledges Reading Borough Council's position with regards to housing needs over the plan period 2023 – 2041.

WBDC notes that the recent housing trajectory published within the Reading Borough Council Annual Monitoring Report demonstrates that the Council is able to meet all of its identified housing need, (699 dwellings per annum) as set out in Policy H1 of the existing Local Plan, within its own boundaries.

WBDC also notes that Reading Borough Council's position is that its Partial Update to the Local Plan will meet its housing needs in full as identified through an alternative approach to calculating housing need rather than the Local Housing Need (LHN) identified under the standard methodology. It welcomes the intention that under this approach the Regulation 19 version of the Partial Update due for consultation later this year will plan for the provision of 825 dwellings per annum compared to the identified need of 735 dwellings per annum, and therefore it is not intended that there will be any unmet needs to be accommodated in neighbouring authorities.

However, WBDC acknowledges that the approach proposed to be taken will come under scrutiny and under the current standard methodology the identified housing need for the Borough over the plan period 2023 – 2041 would be higher, a figure of 878 dwellings per annum which includes a 35% urban uplift. Under the current NPPF consultation this figure would increase further to 1,023 dwellings per annum under the proposed new standard methodology should the published proposals be taken forward in the future. In the event that the current standard methodology was to be used to identify housing need within Reading Borough, WBDC acknowledges there would be a shortfall in provision.

As you are aware WBDC is currently at examination with its Local Plan Review (LPR), and further hearing sessions are scheduled for early October 2024. A Post Hearing Letter was published by the Inspector on 31 July 2024 (IN30) setting out some interim findings and further action points for WBDC. In his letter the Inspector identified that there could be a shortfall in housing provision over the plan period of around 850 dwellings. As such the Inspector requested WBDC consider how the LPR could be modified to boost the housing land supply in light of the possible shortfall identified.

WBDC has identified additional provision, but some of this provision is subject to further work to inform allocations later in the plan period and through an early review of the Plan. West Berkshire's housing land supply will be subject to further discussion at the hearing sessions in early October. Given the current circumstances WBDC is not in a position to assist Reading with any unmet need that might arise within Reading Borough over the plan period to 2041.

WBDC is committed to an early review of the Local Plan and can, if necessary, consider this request again as part of this work. We will continue to work closely with Reading Borough Council and other neighbouring authorities in considering strategic planning issues in the area.

Yours sincerely,

Laura Callan

Laura Callan

Service Lead – Planning

Wokingham Borough Council

Dear Mark,

SUBJECT: Duty to cooperate request regarding housing need

Firstly, I apologise once again for the slowness of formally responding to your request and thank you for your understanding that our resources have had to be directed towards the publication of our Proposed Submission Plan.

Turning now to the detail of your request, you have written regarding Reading Borough Council's (RBC's) decision to undertake a partial update to the adopted Reading Local Plan. Your letter invites comment on the matter of housing need, specifically the potential for unmet housing need which might in your view arise in specific circumstances.

It is important to acknowledge at the outset that whilst badged as a duty to cooperate request, the outlined position is that RBC will be progressing their partial update on the basis of meeting housing need in full and that it is not intended for there to be any unmet need. Nevertheless, RBC wish to understand opportunity should this situation change.

Adopted Reading Local Plan

The adopted Reading Local Plan identified an unmet housing need of 230 dwellings over the plan period to 2036. Housing delivery has however proved to be stronger than anticipated at the time of the plan's preparation and housing need is now projected to be met in full within Reading Borough. This is consistent with information you shared with me in meetings relating to the preparation of the Wokingham Borough Local Plan Update.

For completeness, and as we have also discussed, housing delivery in Wokingham Borough has also been strong, with completions exceeding our housing need as calculated in the Berkshire (including South Bucks) Strategic Housing Market Assessment (SHMA) and all other assessments of need. At 31 March 2023, completions since 2013 exceeded comparative need in the SHMA by 1,833 dwellings.

Current standard method

As you state, the standard method for calculating housing need as set out in the national planning practice guidance calculates the housing need for Reading Borough as 878 dwellings per year. Looking at the detail of the standard method, it is notable that the base formula calculates housing need to be 650 dwellings, with the additional step of the urban uplift, which Reading Borough is subjected to, adding a further 228 dwellings.

Your letter outlines that housing capacity within Reading Borough is estimated to equate to 825 dwellings a year. Should RBC be required to use the standard method figure of 878 dwellings per year, an unmet need of 954 dwellings would arise over the proposed local plan period 2023 to 2041.

It is important in our response to acknowledge advice contained within the National Planning Policy Framework regarding the standard method and the urban uplift. Paragraph 62 states:

"The standard method incorporates an uplift which applies to certain cities and urban centres, as set out in national planning guidance. This uplift should be accommodated within those cities and urban centres themselves except where there are voluntary cross

boundary redistribution agreements in place, or where it would conflict with the policies in this Framework.”

Footnote 27 expands stating:

“In doing so, strategic policies should promote an effective use of land and optimise site densities in accordance with chapter 11. This is to ensure that homes are built in the right places, to prioritise brownfield and other under-utilised urban sites, to utilise existing infrastructure, and to allow people to live near the services they rely on, making travel patterns more sustainable.”

Our reading of the above is that where a local authority is unable to meet housing need as calculated by the base formula, cooperation is expected to enable this need to be met. There is however no requirement or expectation on RBC to seek to export the proportion of housing need required by the urban uplift step.

From the information provided, RBC is able to meet the housing need as calculated by the base formula (650 dwellings per year). There is therefore no unmet housing need which national planning policy expects to be exported.

Notwithstanding this however, and for the avoidance of doubt, housing delivery in Wokingham Borough is highly dependent on developing greenfield land. Exporting any proportion of housing need required by the urban uplift to Wokingham Borough would require further significant greenfield land to be utilised. This would be in clear conflict with the intended purpose of the urban uplift and national planning policy and our view be inappropriate.

For completeness, our Proposed Submission Plan is based on meeting the housing need for Wokingham Borough as defined by the current standard method. The enabled land supply is capable to address non-implementation, but is not sufficient for the housing requirement to be increased to formally accommodate unmet housing need from other local authorities.

Proposed reforms to the NPPF and other changes to the planning system

You have not requested comment on the recent consultation on proposed changes to the National Planning Policy Framework and have simply stated that RBC would need to consider its approach at the appropriate time.

Whilst not requested, it is worth reflecting on the scale of potential challenge. As you state, under the proposed changes, housing need for RBC would rise to 1,023 dwellings per year. Wokingham Borough's need would rise from 748 to 1,308 dwellings per year. Increases would also occur for West Berkshire District Council, Bracknell Forest Council, as well other surrounding local authorities.

Based on our current understanding of housing land supply within Wokingham, the scale of need would exceed capacity. This includes the potential capacity should all strategic development sites be deemed developable, including a site within the designated Green Belt. If the land supply position remains similar going forward, WBC is likely to have unmet housing needs, possibly at a similar or greater scale than RBC. I expect other local authorities will also have a mismatch of housing land supply and need.

We would support senior engagement between the Berkshire local authorities and suggest a report is taken to the Berkshire Prosperity Board to provide context and ask how we might best

work together and also with neighbouring local authorities. This might include joint working on a technical evidence base, as well as engagement on a cross authority spatial strategy.

I hope the above is of assistance. Should you require anything further or wish to discuss any aspect, please do not hesitate to contact me.

Yours sincerely,

Ian Bellinger

Ian Bellinger

Head of Planning Policy