


## Comment

Consultee	Kimble Earl (1334988)
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Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Comment by	Kimble Earl (1334988)
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Consultation Point	Policy SP 12 Approach to Housing Delivery ( <a href="#">View</a> )
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### 1. Do you consider the Local Plan Review is legally compliant?

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

Yes

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

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

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

*Please tick all that apply:*

**Positively Prepared:** The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.

**Justified:** the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. . No

**Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.**

**Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.** . No

**Please give reasons for your answer**

The Plan appears to be based on an outdated concept of housing targets. These targets were previously binding, but recent policy changes announced by Housing Secretary Michael Gove mean they are now advisory.

West Berkshire Council therefore had the opportunity to set their own more enlightened target of allowing building only on brownfield, previously developed land, of which there are over 45 hectares in the district, which could accommodate over 2,500 homes. Given that so many GP surgeries are no longer accepting new patients, and other similar examples of overstretched local resources, 2,500 new homes would be a stiff target to meet but at least one based on the logic of not removing farmland from food production or harming the countryside in general.

**4. Proposed Changes**

**Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).**

*You will need to say why this change will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.*

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**5. Independent Examination**

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

**6. Notification of Progress of the Local Plan Review**

**Do you wish to be notified of any of the following?**

*Please tick all that apply*

**The submission of the Local Plan Review for Independent Examination**

**The publication of the report of the Inspector appointed to carry out the examination**

**The adoption of the Local Plan Review**