

<b>Community and Social Service Facilities</b>	
<b>Summary of Comments Received (respondent ref in brackets)</b>	<b>Council's Response</b>
Unless and until Government guidance changes, contributions must meet guidance in Circular 1/97 and demonstrate that meet tests of reasonableness set out in Circular. Draft SPG goes beyond these. (26, 24, 23, 14, 12, 4, 1)	Various amendments have been proposed to the Core Guidance paper. The Council considers that the revised SPG is fully consistent with Government guidance and case law.
Suggest that topic papers on public libraries, community and social service facilities, health care provision, recycling facilities, environmental enhancements, air quality, archaeology, conservation, public art, fire and rescue, crime and disorder are all amalgamated into no more than three topic papers. Subdivision complicates calculations, points of contact and clarity (3)	Whilst it is proposed to amalgamate some topic papers, the Council considers it appropriate to retain 12 topic areas. This helps to avoid confusion and indicates the range and scope of possible contributions. It also assists with any review of elements of the guidance.
Contributions represent an attempt to remedy existing deficiencies where such provision is normally secured through the national and local taxation system. (24) Facilities that should be provided using existing public funds should be done so in that way, otherwise could potentially lead to facilities being paid for twice.(4)	There is no attempt to remedy existing deficiencies. The SPG aims to ensure the impacts of development are appropriately met.
Unreasonable to introduce blanket application of policy- contributions only appropriate where new development directly generates need that cannot be met from existing or programmed resources (24)	The SPG aims to ensure the impacts of development are appropriately met.
Seeking funding into general pot is not appropriate . No guarantee that such a payment results in provision of facilities that actually serve the development (12, 4, 1) Paragraph 2.0 relating to small developments should therefore be deleted. (12, 1)	Contributions are required to be related to the proposed development. It is envisaged that a central fund will be established into which contributions will be paid, but the contributions will be towards community and social service facilities targeted at the areas within which the development is occurring in order to ensure the direct relation between development and contribution. Paragraphs 1.2 and 2.1 have been revised to reflect the changes to the core guidance paper.
Funding for facilities all very well but shortage of qualified staff (2)	Comments are noted.
Paper uses "expected" and "required"- more suitable wording to	Various changes have been made to the text to incorporate <b>words</b>

<b>Community and Social Service Facilities</b>	
<b>Summary of Comments Received (respondent ref in brackets)</b>	<b>Council's Response</b>
reflect tests and processes of Circular 1/97 is "sought" (14)	<b>such as 'seek' and 'sought' where appropriate.</b>
Would like to see provision for youth facilities as subject heading. PPG17 highlights need to provide sporting and gathering areas for them. Young are more at risk of being victims of crime. (25)	The topic paper allows for a range of facilities related to the development to be considered.
SPG is unclear whether it also relates to the provision of built sport and recreational facilities. such as sports halls. SPG should require the contribution to such facilities from all forms of development, as required by PPG17, and such facilities should be specifically referred to within the core guidance. (29)	This matter will be considered further in any review of this guidance and following an assessment of sport and recreation in West Berkshire to be carried out to inform the development of the proposed new Local Development Framework.
<b>Thresholds</b>	
Greater clarity required where no minimum standards or targets stated (28)	Due to the varied nature of community and social facilities the formulaic approach suggested by this response is not considered possible at present. However, the Council will continue to consider whether formulae for provision can be introduced as they have been for other forms of local service or facility.
Some Justification should be provided for threshold of 200 dwellings (23) Requirement for major housing developments of approx. 200 dwellings or more to make on site provision for community facilities is unreasonable and excessive – likely to reduce the number of housing schemes that come forward in West Berkshire (24)	It is considered that this level of development, which could generate 500 people or more, may create the need for on site facilities. It is considered reasonable that such provision is made where the development has generated the need.
Para 4.3 states that major housing development will generate pressure...on existing social services...resulting in need...not necessarily on site. True of all development, more likely small developments- not in line with other topic papers (3)	There have been various revisions to other topic papers and the core guidance paper. The threshold for seeking contributions has been revised.
<b>Processes</b>	
Objection to expectation that developers undertake community needs assessment to assess scale and nature of facilities required. (24)	It is appropriate that such assessments are undertaken to assess the impacts of the development.