

## READING BOROUGH COUNCIL

### REPORT BY EXECUTIVE DIRECTOR OF ECONOMIC GROWTH AND NEIGHBOURHOOD SERVICES

<b>TO:</b>	STRATEGIC ENVIRONMENT, PLANNING AND TRANSPORT COMMITTEE		
<b>DATE:</b>	16 MARCH 2020	<b>AGENDA ITEM:</b>	11
<b>TITLE:</b>	WOKINGHAM LOCAL PLAN UPDATE: DRAFT PLAN AND GRAZELEY UPDATE		
<b>LEAD COUNCILLOR:</b>	COUNCILLOR PAGE	<b>PORTFOLIO:</b>	STRATEGIC ENVIRONMENT, PLANNING AND TRANSPORT
<b>SERVICE:</b>	PLANNING	<b>WARDS:</b>	ALL
<b>LEAD OFFICER:</b>	MARK WORRINGHAM	<b>TEL:</b>	0118 9373337
<b>JOB TITLE:</b>	PLANNING POLICY TEAM LEADER	<b>E-MAIL:</b>	<a href="mailto:mark.worringham@reading.gov.uk">mark.worringham@reading.gov.uk</a>

#### 1. EXECUTIVE SUMMARY

- 1.1 Wokingham Borough Council is consulting on the next stage of preparing its Local Plan. This stage is a full draft plan. Consultation will last until 20<sup>th</sup> March. The plan sets out planning policies and identifies land for development up to 2036, and there are a number of implications for Reading. This report recommends that a draft response on behalf of Reading Borough Council be approved.
- 1.2 By far the most significant new site in the draft Local Plan is at Grazeley, just to the south of Reading. This proposal is for a development of 15,000 new homes, of which 10,000 would be in Wokingham and 5,000 in West Berkshire. Reading Borough Council has been working closely with its neighbours on taking this proposal forward and ensuring that any development is accompanied by timely delivery of the very significant infrastructure required. This report provides an update on the progress of this joint working so far.

#### 2. RECOMMENDED ACTION

- 2.1 That the consultation response to the Wokingham Local Plan Update: Draft Plan (Appendix 1) be approved.

**2.2 That Committee note the current position on Grazeley Garden Town.**

**3. POLICY CONTEXT**

- 3.1 Wokingham Borough Council's existing development plan is set out in its Core Strategy (adopted 2010) and Managing Development Delivery document (adopted 2014), which both have an end date of 2026. In common with other authorities in the area, there is a need for a new local plan for Wokingham to take account of changing national policy and ensure that there is an up-to-date policy position.
- 3.2 Wokingham Borough Council (WBC) consulted on an Issues and Options report for a new Local Plan in 2016, and then undertook a Homes for the Future consultation in 2018/19. Reading Borough Council responded to the latter consultation in February 2019.
- 3.3 The Grazeley Garden Town proposal is a site which, along with all other nominated sites, was subject to consultation in the Homes for the Future document. It forms an opportunity for a very significant new community that can help to meet housing needs over a long-term period. The area crosses administrative boundaries, falling primarily in Wokingham Borough and West Berkshire District, but there is also a very small area in Reading Borough, south west of Junction 11 of the M4.
- 3.4 The Reading Borough Local Plan was adopted on 4<sup>th</sup> November 2019, and this identifies the potential for a major development at Grazeley, and the need for this to be supported by significant investment in infrastructure, particularly transport links into Reading. It also identifies the small area of land within the Borough for uses associated with Grazeley.
- 3.5 Progress on the West Berkshire District Council (WBDC) Local Plan, which would need to cover the other portion of Grazeley, is somewhat behind Wokingham. A West Berkshire Local Plan Review Regulation 18 consultation took place in November and December 2018. The next consultation stage was timetabled for September 2019, but this has slipped, and a new programme has not yet been published.

**4. THE PROPOSAL**

(a) Current Position

Wokingham Local Plan

- 4.1 WBC published a Local Plan Update: Draft Plan for consultation, which began on 3<sup>rd</sup> February. The document is a full draft plan containing policies and site allocations. It is an initial draft, as the process requires a further draft, the Proposed Submission Draft that WBC intends to submit to the Secretary of State, at a later date.

- 4.2 The headlines of the Draft Plan with relevance to Reading are as follows:
- 769 homes each year to 2036;
  - Much more limited levels of employment and town centre development, to meet largely local needs;
  - Identification of Grazeley Garden Town for 10,000 homes in Wokingham Borough and 15,000 homes overall;
  - Continuation of the current Strategic Development Locations (south of the M4, Arborfield Garrison, South Wokingham and North Wokingham);
  - Other identified sites are much smaller scale and are generally more distant from Reading;
  - An improvement in sustainability standards, including carbon neutral standards for major housing development;
  - Safeguarding of important transport routes, including an additional crossing of the Thames and public transport provision on the A4/A329 corridor;
  - A policy for development on the University's Whiteknights Campus, which is similar, but not identical, to the Reading Local Plan policy;
  - Policies securing affordable housing at differing levels depending on scale and location from developments of five dwellings or more;
  - Policies on gypsy and traveller provision, including some identified sites around Finchampstead and Barkham, and with potential for inclusion within Grazeley;
  - A policy on development within the vicinity of the Atomic Weapons Establishment, Burghfield.

- 4.3 Consultation on the Draft Local Plan Update will last until 20<sup>th</sup> March. The document is available on WBC's website<sup>1</sup>, along with a variety of supporting evidence.

#### *Grazeley Garden Town*

- 4.4 The Grazeley Garden Town proposal, the WBC portion of which is contained as a proposed allocation within the Draft Plan, is a large potential new settlement to the south of Reading, south of the M4, west of the A33 and straddling the Reading-Basingstoke railway line. The site sits mainly in Wokingham and West Berkshire, although a very small part of the site (around 3.8 ha) is within Reading. Potential for 15,000 homes has been identified, around 10,000 of which would be in Wokingham and 5,000 in West Berkshire. There are four primary landowner interests: the Englefield Estate (working with Crest Nicholson); a joint venture between Hallam Land Management and Wilson Enterprises; WBDC; and WBC. In addition, there are a number of much smaller landowners.
- 4.5 The site has considerable potential for a sustainable development to meet many of the housing needs in the area. Its location immediately to the south of Reading enables strong transport links to be created into Reading, and there is potential for the development to be served by a new station.

---

<sup>1</sup> <https://www.wokingham.gov.uk/planning-policy/planning-policy-information/local-plan-update/>

- 4.6 RBC has played an active and supportive role within the proposals for Grazeley so far. Whilst the housing needs that the development would meet would mainly be those of Wokingham and West Berkshire, the development nevertheless has potential to deliver a great deal of family housing, which Reading struggles to achieve on high-density town centre sites, although a wide range of homes would be provided to ensure a sustainable settlement, as well as a significant amount of affordable housing. RBC's support to date has, however, been entirely contingent on the timely delivery of the very significant infrastructure required by the development, in particular public transport links into Reading.
- 4.7 Although there have been development proposals in the area in the past, the current proposals first emerged in 2014, when a site was submitted to RBC's call for sites for the Local Plan (although it was subsequently withdrawn as it was outside the Borough). A joint Expression of Interest by WBC, WBDC and RBC was submitted in October 2016 to the Garden Village Prospectus. In March 2017, the authorities secured £224,000 of large sites capacity funding from the Homes and Communities Agency (now Homes England), which was used for masterplanning work, which in turn was used for stakeholder engagement feeding into Wokingham's local plan process.
- 4.8 The four authorities in the west of Berkshire (WBDC, RBC, WBC and Bracknell Forest Borough Council), together with the Thames Valley Berkshire Local Enterprise Partnership, collaborated on a West of Berkshire Spatial Planning Framework, which was published in December 2016. This was a non-statutory document to investigate possible future options for growth in the area. The potential for around 15,000 homes in Grazeley was identified as an option for further exploration in that document.
- 4.9 In November 2018, WBC, WBDC and RBC submitted a joint bid to the government's Garden Communities Prospectus for Grazeley to be awarded Garden Town status and capacity funding to help to deliver 15,000 homes. The bid was supported by the main landowners. The bid was successful, and, in May 2019, the authorities were awarded £750,000 for 2019-20, with the funding for additional years yet to be determined.
- 4.10 The three authorities also co-operated on a much larger bid to the Housing Infrastructure Fund (HIF) for £252 million for forward funding of infrastructure to support a development of 15,000 homes. Stage 2 of this bid, the detailed business case, was submitted in March 2019. The particular infrastructure items covered by that bid were as follows:
- 8km of site contained strategic roads;
  - New M4 Bridge providing a direct link from Grazeley to Green Park and its railway station with provision for public transport, walking and cycling only;
  - Three new A33 accesses;
  - M4 Junction 11 Improvements;
  - Two new east-west railway crossings;

- A Fast Track Route, which is a public transport solution for moving within the site, to Reading Town Centre linking to the South Reading Fast Track Public Transport scheme, Mortimer and beyond;
  - Other transport measure including a 500 space town centre car park, park and ride infrastructure, a new bridge over the Kennet and Avon canal and bus service and bus stop infrastructure contributions;
  - A 2 form entry primary school;
  - Health Hub (first phase);
  - Enhancement and extension of electric and gas infrastructure;
  - Infrastructure for potable and foul water; and
  - Technical studies and planning application preparation.
- 4.11 The items that could be covered by the HIF bid were limited to those that could be delivered by April 2024. Therefore, not all essential infrastructure was part of that bid, in particular the provision of a new railway station, as it could not be delivered within that timescale. However, as the development builds out, considerable funding would be generated through the Community Infrastructure Levy, which would be sufficient to provide the remaining infrastructure including the station and a series of new primary and secondary schools.
- 4.12 At this stage, there has been no government announcement about the bid. Some successful HIF bids elsewhere have been announced, but the lack of an announcement about Grazeley so far does not mean that it has been unsuccessful.
- 4.13 In terms of governance, a Grazeley Joint Delivery Board (GJDB) has been established, and first met in September 2019. This comprises three Councillors from WBC, two from WBDC and one from RBC, and meets on a bi-monthly basis. At this stage, the GJDB operates mainly as a steering body, but work is underway to consider how this group evolves, including whether some statutory powers can be delegated by the three authorities. This may include plan-making and planning decision-making powers, compulsory purchase and spending. Any delegation of functions will need to be agreed by the relevant Council meetings in due course.
- 4.14 An Expression of Interest was also submitted in February 2020 on behalf of the three authorities under the New Development Corporation Competition. Under this competition, a total of £10 million is available to be divided between up to ten successful bidders for capacity funding to investigate the establishment of a Development Corporation or alternative delivery model. Should the authorities decide to establish a more formal delivery vehicle, this will take some time to be set up, and in the meantime the GJDB will continue to direct the process, potentially with some delegated powers.
- 4.15 The capacity funding referred to in paragraph 4.9 is mainly to be used for staffing and for commissioning work. A dedicated project team is in the process of being assembled and recruited. Although WBC has led this process so far, the team would report directly to the GJDB. This team will include a

transport officer with particular emphasis on ensuring that the development ties up with Reading's existing and developing transport system.

- 4.16 Ahead of an announcement on HIF funding, there are limitations on the work that can be undertaken. However, some work is underway in particular on two areas. Firstly, work is starting on masterplanning for the Grazeley proposal. Some masterplanning work had already been undertaken to support the various bids for funding and to feed into the local plan process. However, the work starting now is ultimately intended to lead to the production of a Supplementary Planning Document to inform and guide planning applications for the site. This would be a joint planning policy document, adopted by all three of the authorities. Secondly, work has been commissioned on developing a brand for Grazeley, including a website and engagement strategy.
- 4.17 Should there be a positive announcement on HIF, there would need to be swift delivery of infrastructure to meet the HIF deadlines. It is therefore expected that there would be considerable activity on these matters once an announcement is made.

(b) Option Proposed

Wokingham Local Plan

- 4.18 A draft RBC response to the Draft Local Plan Update consultation has been prepared and is included as Appendix 2, and would be submitted to WBC before the consultation deadline of 20<sup>th</sup> March.
- 4.19 The six areas of greatest importance for RBC to respond to are as follows:
- Overall housing provision;
  - Grazeley Garden Town;
  - Strategic transport infrastructure;
  - University of Reading Whiteknights Campus;
  - Housing mix and affordability;
  - Gypsy and traveller provision.
- 4.20 The first issue for any Local Plan to address is housing need. Policy H1 of the Draft Plan states that WBC is planning for 769 homes each year up to 2036. This is short of the number of homes that would be expected in accordance with the standard methodology for calculating housing need in national policy, which would currently total 804 homes each year. WBC sets out a case why it is considered that its housing need should be lower, specifically that the nationally-calculated affordability ratio that feeds into the methodology does not take account of certain key local factors. However, when calculating the homes actually provided for in the plan, it equates to 933 each year. WBC is in fact proposing to deliver considerably more than the plan's housing provision policy suggests. This results in unnecessary confusion, and RBC's proposed comments pick up on this.

- 4.21 The comments on Grazeley Garden Town are generally supportive, although they restate the position emphasised throughout joint work on this issue, which is that RBC's support is dependent on securing the necessary infrastructure in a timely manner.
- 4.22 In terms of strategic transport infrastructure, the measures are generally welcomed, although some clarification is requested in the response, as well as a clearer statement of policy support for the strategic schemes.
- 4.23 The policy on Whiteknights Campus is ostensibly very similar to the policy in our own Local Plan. However, there are some small changes to wording that actually have very significant implications. Firstly, the policy explicitly references the University's Accommodation Strategy and Campus Capacity Study, which were submitted to RBC's Local Plan Examination and generated significant concern due to the ambitious and unevidenced growth proposals. As drafted, WBC's policy would give these documents some level of policy weight. Secondly, the policy omits the safeguards around ensuring that proposals for new academic floorspace are accompanied by supporting student accommodation. RBC's response suggests amendments to address these matters.
- 4.24 In general, the proposals to provide high levels of affordable housing and to provide an overall mix of sizes of market housing are to be welcomed. However, it is worth making the point to WBC that RBC's housing provision will be necessarily focused on smaller, flatted accommodation due to the type of site available, and that there is therefore a strategic role for adjoining authorities such as WBC to include significant proportions of family housing to help to address this.
- 4.25 Finally, there is a proposed criteria-based policy on gypsy and traveller sites, three identified sites for permanent pitches as well as the possibility of some delivery as part of Grazeley Garden Town. However, there is no explicit attempt to meet RBC's unmet need for permanent gypsy and traveller provision, and the comments therefore re-emphasise the need to consider whether provision can be made for Reading's unmet need as well as RBC's willingness to work together to deliver a site that meets needs jointly.
- 4.26 A variety of other, more detailed points are covered in the proposed response.

#### Grazeley Garden Town

- 4.27 It is recommended that Committee notes the progress made on Grazeley Garden Town set out in paragraphs 4.4 to 4.17.

#### (c) Other Options Considered

- 4.28 The alternative option to making a response to the Draft Local Plan Update consultation would be to not make a response. However, this would mean that some key issues of importance for Reading are not addressed, and would lead to a number of potential impacts on the Borough, some of which would be significantly adverse.

## **5. CONTRIBUTION TO STRATEGIC AIMS**

- 5.1 Continued engagement in Wokingham's Local Plan Update and in the proposals at Grazeley Garden Town will contribute to the following priorities in the Corporate Plan 2018-21:
- Securing the economic success of Reading; and
  - Improving access to decent housing to meet local needs.

## **6. ENVIRONMENTAL AND CLIMATE IMPLICATIONS**

- 6.1 Wokingham Borough Council declared a Climate Emergency in July 2019. Policies in the Draft Plan seek to address this issue. In terms of sustainable construction, standards are proposed to increase for all development, and the plan includes a requirement for major new residential development to be 'carbon neutral' (policy SS8). This will bring WBC's standards into line with those in the Reading Borough Local Plan.
- 6.2 The Grazeley Garden Town proposal has the potential to be a highly sustainable community, based on significant investment in public transport (including a railway station), walking and cycling, and with sustainable design and construction measures built in from the outset. The alternative is likely to mean development taking place in locations where they can be less well supported by infrastructure, and where there is less critical mass to enable a sustainable community. However, whether this is achieved at Grazeley is dependent on the right infrastructure being delivered at the right time. RBC continues to be involved throughout the process to ensure that, if this development takes place, that the required infrastructure is delivered in a timely manner.

## **7. COMMUNITY ENGAGEMENT AND INFORMATION**

- 7.1 Consultation on the Wokingham Local Plan Update began on 3<sup>rd</sup> February and will last until 20<sup>th</sup> March 2020. The responses to this consultation will feed into the next stage of the Local Plan, which is expected to be a Proposed Submission Draft for consultation. Consultation on development plans is required to be in accordance with the authority's Statement of Community Involvement (SCI). Wokingham's SCI was adopted in March 2019.
- 7.2 Consultation on the Grazeley Garden Town proposal will initially take place through the respective Local Plans. As well as this current Wokingham Local Plan Update consultation, this will also mean through consultations on West Berkshire's Local Plan, which has not yet been published in draft form. It is proposed that a Masterplan SPD also be produced, which would be adopted by all three authorities, including RBC. Consultation on that document is not yet timetabled but would need to be in accordance with Reading's adopted SCI (2014).

## **8. EQUALITY ASSESSMENT**

- 8.1 Wokingham Borough Council has completed an Initial Equality Impact Assessment for the Draft Plan, which is available on WBC's website.

## **9. LEGAL IMPLICATIONS**

- 9.1 Local plans are produced under the Planning and Compulsory Purchase Act 2004. The process for producing local plans is set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. Regulation 18 states that a local planning authority should consult on what a local plan should contain. The Wokingham Local Plan Update: Draft Plan is prepared in accordance with this Regulation 18 requirement.

## **10. FINANCIAL IMPLICATIONS**

- 10.1 The response to the Wokingham Local Plan Update consultation has been managed from existing budgets.
- 10.2 The Grazeley Garden Town proposal has been the subject of two bids for government funding on behalf of the three authorities. The first bid was to the Garden Settlement Prospectus for capacity funding to enable work on developing the proposal. This bid was successful, and £750,000 was awarded in May 2019 for the 2019/20 year, which has been used for background work and studies as well as to start to assemble a dedicated team. Money awarded in following years will be subject to further announcements.
- 10.3 The three authorities also submitted a bid in March 2019 for £252 million under the Housing Infrastructure Fund. This would enable forward funding of key pieces of infrastructure to support the development, including transport and engineering schemes, education and healthcare facilities. No announcement has yet been made, but the authorities are liaising closely with Homes England on the proposal. Whilst not all of the infrastructure would be funded by this money (if successful), the bid would cover the essential items required at an early stage. Subsequent infrastructure funding would come from developer contributions primarily under the Community Infrastructure Levy as the development progresses.

### Value for Money (VFM)

- 10.4 The proposal for much of the development in the area to take place in one development, at Grazeley Garden Town, offers particular value for money as it enables much of the infrastructure necessary to support growth to be delivered at the same time and in a co-ordinated manner, rather than being distributed around different parts of the area. In particular, it has allowed for the bid to be made for HIF funding where it can be demonstrated that it delivers significant housing growth.

## Risk Assessment

10.5 There are no direct financial risks associated with the report.

## 11. BACKGROUND PAPERS

- Wokingham Local Plan Update: Draft Plan:  
<https://www.wokingham.gov.uk/EasySiteWeb/GatewayLink.aspx?allId=508528>
- Wokingham Local Plan Update evidence base:  
<https://www.wokingham.gov.uk/planning-policy/planning-policy-information/draft-local-plan-consultation/>

## APPENDIX 1: Wokingham Draft Local Plan Update Draft response from Reading Borough Council

Reading Borough Council (RBC) is grateful for the opportunity to make representations on the Wokingham Draft Local Plan Update. RBC works closely with Wokingham Borough Council (WBC) on a range of strategic planning matters and looks forward to continuing this process throughout the Local Plan Update process. We welcome the progress that has been made on the Local Plan Update.

As WBC will be aware, the Reading Borough Local Plan (RBLP) was adopted on 4<sup>th</sup> November 2019, and this provides important context to many of RBC's representations on the Local Plan Update.

RBC wishes to make the following comments on specific policies in the plan.

### Policy SS1 - Spatial Strategy

Policy SS1 is an overall spatial strategy policy that draws together many of the strategic elements of the plan. RBC's comments on most of these issues are contained in our response to the relevant policy, e.g. SS3, H1 and H5.

However, there are some specific comments we would like to make.

Firstly, policy SS1 includes the following reference

*“Large scale development will not be supported in the wider area around Grazeley garden town to avoid the over-concentration of development.”*

We would seek some clarification around this reference. We understand that the identification of Grazeley should not be seen as a blank cheque for further development beyond that highlighted in policy SS3, but as currently worded it might prevent sustainable development taking place on the edge of Reading that is supported by adequate infrastructure provision. There may be circumstances where this is appropriate, and RBC therefore considers that this statement should be caveated accordingly.

Secondly, in the supporting text, paragraph 4.9 (in reference to Grazeley) says that:

*“A successful outcome will enable the upfront delivery of a wide package of infrastructure including measures designed to mitigate traffic effects.”*

We would suggest altering the emphasis to say that *“a successful outcome depends on the upfront delivery ...”*

### Policy SS3 - Grazeley Garden Town

RBC supports the identification of Grazeley Garden Town in policy SS3. This is a highly sustainable location to help meet some of the area's substantial needs for additional homes. As WBC will be aware, RBC's support is dependent on adequate

and timely delivery of the necessary infrastructure to support the development and ensure that it does not impact on existing infrastructure. RBC is therefore pleased to see upfront recognition in the first paragraph of the policy of the importance of the necessity of this infrastructure provision, as well as the itemised list of vital upfront infrastructure in the table at the end of the policy, and the references to delivering infrastructure throughout the policy. RBC want to ensure that these references remain as part of the policy in the final version of the plan.

A small part (around 3.8 ha) of the Grazeley site falls within Reading Borough, and the RBLP identifies this land as SR4f (Land south west of Junction 11 of the M4) for:

***“... uses associated with any major development around Grazeley if identified in plans of Wokingham Borough Council and West Berkshire District Council. The form of any development, if identified, is yet to be determined and therefore no further details are set out in this policy.”***

References to essential joint working between the three authorities are contained throughout policy SS3, and RBC can confirm its continued commitment to this joint working. This includes joint working around the issues that would arise as a result of any changes in the Detailed Emergency Planning Zone, as well as to masterplanning, leading to the production of a Masterplan and Infrastructure Delivery Plan SPD to be adopted by all three authorities.

RBC supports the specific development principles highlighted, in particular the reference in (i) to sustainable transport links into Reading. This will be essential to make sure that the development does not place an unacceptable burden on the existing transport network.

RBC welcomes the references in the policy to the potential for provision for gypsies and travellers. The establishment of an entirely new settlement represents a unique opportunity to consider the provision for travellers from the outset as part of the settlement, and to address the relationship with homes for the settled community as part of the design. As WBC will be aware, RBC has an unmet need for permanent gypsy and traveller pitches (see the comment on policy H11), and would like to explore what can be delivered at Grazeley to meet needs across the area. As stated in reference to that policy, RBC would be happy to discuss what resources would be required to help in meeting these needs.

### **Policy SS5: South of the M4 Strategic Development Location**

RBC supports the continued emphasis on Strategic Development Locations, including the South of the M4 SDL, in line with the existing Core Strategy, and supported by adequate levels of infrastructure provision to ensure that impacts on Reading's infrastructure is adequately mitigated.

### **Policy SS8: Climate Change**

RBC declared a Climate Emergency in February 2019, and the RBLP improves sustainability standards across the board to ensure that new development plays its

role in addressing this. In particular, policies require Zero Carbon Homes for new development. RBC welcomes policy SS8, which has similar expectations for Wokingham, and ensures a broadly level playing field for development across the two authorities.

RBC does, however, consider that the Local Plan could benefit from being clearer on how 'Carbon Neutral' development will be achieved for major residential. Ensuring that the Local Plan is as clear as possible will reduce opportunities to water down the approach at application stage. Having recently adopted a Supplementary Planning Document on Sustainable Design and Construction to implement the Local Plan policies, RBC is happy to discuss this matter further with WBC, in particular whether there are opportunities to work together on carbon offsetting.

Point (g) seems to contain an error, in that it advocates measures to reduce the energy efficiency of new buildings. It is assumed that this should say increase.

### **Policy SS9: Adaptation to Climate Change**

Policy SS9 on adaptation to climate change contains wording which is very much in line with RBLP policy CC3. RBC therefore welcomes this policy.

### **Policy SS11: Safeguarded Routes**

Policy SS11 safeguards land for key transport schemes, as shown on the Proposals Map. There are three routes identified in the policy which RBC particularly supports, as follows:

- (c) High quality express bus services or dedicated public transport route along the A4 and A329 corridors. This project is dependent on Reading Borough Council's 'Cross-town Link'
- (d) iv. Improvements to highway capacity along the A33
- (e) Third Thames Crossing from Thames Valley Park Drive/A3290 to South Oxfordshire.

RBC strongly supports reference to high quality express bus services or dedicated public transport route along the A4 and A329 corridors. As you will be aware, two recent planning applications by RBC for a link to meet these vital policy ambitions from both authorities, using the alignment shown in both RBC and WBC's existing plans, have recently been refused by WBC's Planning Committee, against officer recommendation. RBC therefore considers it essential that the Wokingham Local Plan is more specific about how and where it expects this link to be delivered, so that it is clearer how any future applications sit with WBC's planning policy. It should also be noted that 'Cross-town Link' is not an expression which is used or supported by RBC, with RBC's aspirations to work with Wokingham to provide high-quality sustainable transport options being referred to as East Reading Fast Track Public Transport corridor. It is important to recognise that this link is of importance to both authorities, and the policy should not therefore imply that it is solely a link that services Reading but rather a fundamental element to a wider

public transport corridor serving Reading, Wokingham and Bracknell as well as Rail-air services to Heathrow and Gatwick.

RBC also continues to fully support the Third Thames Crossing proposal, and will continue to work with WBC, as well as South Oxfordshire District Council, Oxfordshire County Council and the Local Enterprise Partnerships through the Cross-Thames Travel Group to ensure that this vital piece of strategic infrastructure is delivered.

It is worth noting that, whilst the wording of the policy safeguards the land from other uses, there is not any explicit policy support for the proposals themselves within the policy wording, although it is implied. Policy SS12, which identifies other transport improvements, does include such a statement, and RBC considers that this should be reflected in SS11.

RBC therefore proposes the following amendments to policy SS11:

***“1. Land is safeguarded to support the delivery of strategic transport infrastructure as listed below and shown on the Policies Map. The council will work with appropriate partners, stakeholders, and bodies to deliver these schemes. Proposals for development which would prejudice the delivery of these schemes or their effective operation will not be supported.***

- a) *Provision of a Park and Ride near the Coppid Beech roundabout on the A329 in Wokingham*
- b) *Winnersh relief road*
- c) *High quality express bus services or dedicated public transport route along the A4 and A329 corridors. This project is dependent-on-to be jointly developed with Reading Borough Council’s ‘Cross-town-Link’ in line with the aspirations of the East Reading Fast Track Public Transport corridor.*
- d) *Improvements listed in Policies SS4, SS5, SS6 and SS7:*
  - i. *Improvements to highway capacity along A327 (including Eversley Bypass, subject to review by Hampshire County Council as lead authority)*
  - ii. *Arborfield Cross Relief Road*
  - iii. *Extension of Nine Mile Ride to the A327*
  - iv. *Improvements to highway capacity along the A33*
  - v. *South Wokingham Distributor Road (junctions at both Finchampstead Road and London Road) and associated improvements to the railway bridges on the A321 Finchampstead Road, Wokingham*
  - vi. *Northern Distributor Road*
- e) *Third Thames Crossing from Thames Valley Park Drive/A3290 to South Oxfordshire.”*

#### **Policy SS12: Improvements to Transport Routes**

Policy SS12 identifies other transport proposals which will be supported in addition to the strategic transport proposals. RBC supports delivery of these transport

schemes, particularly the transport infrastructure proposals for Grazeley (see our response to policy SS3).

### **Policy ER1: Meeting employment needs**

RBC understands that WBC considers that there is no quantitative need for new office and industrial or warehouse floorspace within the area. RBC co-operated with WBC on the initial Central Berkshire Economic Development Needs Assessment that identified high levels of employment need in both authorities, and this formed the main evidence base for the Reading Borough Local Plan. However, it is understood that WBC has produced new evidence which reached different conclusions for Wokingham, and RBC does not have any concerns about the robustness of that evidence.

As a point of clarity, it might be helpful for policy ER1 to explicitly state that there is no identified quantitative need for significant employment floorspace, to ensure that position is as clear as possible and has full policy weight.

### **Policy ER6: The hierarchy of centres**

RBC supports the focus on strengthening and supporting the network and hierarchy of centres in policy ER6. RBC particularly welcomes the identification of Shinfield Road as a district centre. This centre straddles the boundary between Wokingham and Reading, and its district centre status matches that in policy RL1 of the RBLP.

It is not entirely clear from reading the Local Plan what the quantitative level of town centre development planned for is. It is understood that the level of development will be in line with the role of the centres in the hierarchy, but it would assist clarity if any quantitative targets, that they are included in policy - or, if there are none, that this is explicitly stated.

### **Policy ER10: Whiteknights Campus**

The Whiteknights Campus of the University of Reading (UoR) spans the boundary between Wokingham and Reading, and is therefore an important strategic matter that has been subject to cross boundary liaison. RBC notes that policy ER10 as drafted is in most senses identical to the corresponding policy ER2 of the RBLP, and therefore generally support most aspects of the policy.

However, there are significant differences from our policy ER2, which are as follows:

- The inclusion of a second paragraph which refers to supporting the business needs of the UoR; and
- The absence of the following clause which makes up part of ER2: “Where development would result in a material need for additional students to be housed, it should be supported by an appropriate increase in existing or planned student accommodation.”

In terms of the second paragraph, the aim of supporting the role of the UoR is agreed, as it is a vital element of the economic success of the area. However, as worded, it seems to give unlimited scope for expansion, in particular because it explicitly refers to the Accommodation Strategy and Campus Capacity Study, and therefore gives them a form of policy weight. These documents were submitted to the RBLP examination and were considered as part of that process. The Accommodation Strategy is of particular concern as it contains highly ambitious and untested plans for growth, equating to an increase in around 10,000 students by 2028. Student accommodation already competes with general residential for town centre sites in Reading, and contributes to the RBLP being unable to meet the full identified housing needs. Significant growth in numbers of students will seriously exacerbate pressure on the housing market in both Reading and Wokingham, and there is little prospect of the area being able to absorb these levels of growth without significant problems. RBC has concerns about the robustness of the Accommodation Strategy in particular as a basis for future planning, which are documented in the Statement of Common Ground between RBC and the UoR. Although RBC has less of an issue with the Campus Capacity Study, there are still a number of aspects of it with which we disagree. Therefore, whilst we appreciate that these documents should be taken into account in drawing up the Local Plan, we are extremely concerned with any suggestion that they should be given policy weight by being referred to in the policy, or, indeed, by the role in planning decision making suggested in paragraph 6.57.

In addition, we consider that the lack of a reference to ensuring that new development can be supported by student accommodation is an important omission. Given the scale of the ambitions of the UoR, additional academic facilities require consideration as to whether they can be supported by student accommodation. As it stands, there is a discrepancy between the approach of the two authorities which means that a large-scale development on the part of the Whiteknights campus in Wokingham could take place without this consideration that would lead to a very extensive increase in need for student accommodation in both authorities and pressure on the housing market and housing sites.

The wording from ER2 referred to above was agreed between RBC and the UoR as part of the Statement of Common Ground that fed into the Examination, and we therefore strongly consider that it would be appropriate for inclusion in ER10.

We would therefore like to see the following changes to ER2:

***“Wokingham Borough Council will continue to work proactively with the University of Reading and Reading Borough Council to support the continued development of Whiteknights Campus as a focus for the University of Reading, to ~~meet the University’s longer-term business needs for educational and academic uses as set out in their Whiteknights Campus Development Plan, Accommodation Strategy and Campus Capacity Study~~ allow the University to continue to fulfil its important role in the economic success of the area.*”**

***Where development would result in a material need for additional students to be housed, it should be supported by an appropriate increase in existing or planned student accommodation. Provision of new student accommodation on***

*the Whiteknights Campus, or as a reconfiguration or extension of nearby dedicated accommodation, will therefore be acceptable subject to other policies in the Plan.”*

In addition, the following changes are proposed to paragraph 6.57:

“The University has produced an Accommodation Strategy and Campus Capacity Study in September 2018. The Capacity Study draws on the information contained in the University’s Development Plan, and provides a high-level quantitative assessment of the potential capacity of the University’s existing sites to accommodate additional academic and residential development on both campuses and adjacent landholdings. The Campus Capacity Study and Accommodation Strategy ~~should be used to inform any future development proposals on the Whiteknights Campus~~ are useful context for the future plans of the University, but do not form part of the adopted planning policy for the area.”

## H1: Housing provision

### Local Housing Need

As outlined in section 7, the Draft Local Plan proposes to provide 769 homes per year. Use of the standard methodology, in line with the NPPF and Planning Practice Guidance, would lead to a need for 804 homes per year.

The Local Plan justifies this by referring to the following flaws in the standard methodology, which are explained more fully in the Topic Paper on housing need and exceptional circumstances:

- the upwards impact of substantial house building on the median house price (contrary to the premise of the standard method that higher house building will stabilise or lower house prices);
- the failure to recognise the functional economic relationship with Reading Borough; and
- the way the cap is applied does not take local plan-making circumstances into account.

RBC agrees that the exceptional amount of new build housing in Wokingham is likely to have had a distorting effect on the results of the methodology. The Topic Paper addresses this issue by feeding the median house price of non-new build housing into the standard methodology. However, this response exaggerates the exceptional nature of the area, because it excludes all new build housing. All authorities have an element of new build on the market, and it would be more appropriate to exclude a proportion of new build from the calculation, based on the extent to which the proportion of sales that are new build in Wokingham exceeds the national average, which is around 50% according to paragraph 5.11 of the Topic Paper.

In terms of the functional relationship with Reading, this is in reference to workplace-based income levels, which feed into the affordability ratio that makes up part of the standard methodology calculation. The argument is that the area is unusual in that a significant number of Wokingham residents work in Reading, and

that their incomes are actually on average higher than workers based in Wokingham. The Topic Paper argues that residence-based earnings should be used instead, and this further reduces the affordability ratio and therefore housing need.

RBC does not disagree that there is a clear functional relationship with Reading. However, simply using residence-based earnings does not address the likelihood that there are those who work in Wokingham whose housing need is rightly in Wokingham, but who are currently forced to live further afield or in unsuitable accommodation. Rather than substituting residence-based earnings for workplace-based, it would be preferable to calculate the extent of the distorting effect of the relationship with Reading. This could perhaps be achieved on the basis of the latest commuting statistics, and applying Reading's workplace based earnings to a proportion of Wokingham residents using these figures.

In terms of the cap on local housing need, the purpose of this within the standard methodology is to prevent an unreasonable increase in the burden being placed on a local authority as a result of the new need figure. As such, it is a simple calculation based on the most recently adopted plan, which in Wokingham's case is the Core Strategy, and the cap would exceed the local housing need generated by the standard methodology. Whilst it is agreed that there were particular circumstances in terms of the South East Plan examination that led to the Core Strategy figure, ultimately it was a reflection of the capacity that existed in Wokingham at the time. As demonstrated in Tables 2 and 3, the capacity to provide an uncapped level of housing need continues to exist.

In general, we would question the degree to which national policy allows these considerations to be taken into account. The NPPF is clear that need should be calculated in accordance with the standard methodology unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals (paragraph 60), and the methodology used does not appear to take into account all of these additional factors. The most recent full assessment of housing need taking the full range of local circumstances into account was the Western Berkshire OAN Sensitivity Testing (GL Hearn, March 2018), which identified a need in Wokingham of 801 dwellings per year.

However, RBC notes that the actual proposed delivery shown in Tables 2 and 3 totals 16,802 over the plan period, which equates to 933 dwellings per year between 2018 and 2036. This is some way ahead of the need generated by the standard methodology. WBC's approach of focusing on Strategic Development Locations has an excellent recent track record of delivery, and RBC is confident that these figures can be achieved. RBC is not therefore concerned that WBC will under-deliver against its housing need as set out in the standard methodology, but does believe that the wording of H1 and the reduction generates unnecessary confusion that will inevitably lead to considerable debate at examination and appeals. It would be far simpler and less open to debate therefore if policy H1 was based on the need generated under the standard methodology.

### Unmet Need from Reading

As has been highlighted in previous representations to the Local Plan Update process, the Reading Borough Local Plan, adopted in November 2019, identifies an unmet need for housing totalling 230 dwellings over the whole plan period. A Memorandum of Understanding between WBC, RBC, West Berkshire District Council and Bracknell Forest Borough Council signed in October 2017 agrees that the shortfall arising from the RBLP will be met within the area of the four authorities.

However, the RBLP was submitted in March 2018, before the cut-off for considering housing need using the standard methodology. The housing need for Reading of 699 dwellings per year was based on objectively assessed need as identified in the Berkshire (with South Bucks) Strategic Housing Market Assessment (2016), and the RBLP plans for 689 per year based on the capacity of Reading. The Wokingham Local Plan is to be considered against the standard methodology, and it would not be logical to apply an unmet need that arises under an alternative methodological approach. Under the standard methodology, Reading's local housing need would have been 635 dwellings per year, so, when considered on this basis, the unmet need disappears.

In any case, as has already been noted, projected delivery in Tables 2 and 3 exceeds the housing figure in H1, and would in fact have been sufficient in any case to cover an unmet need of 230 dwellings.

### **H2: Sites allocated for residential/mixed use**

RBC has no particular comments to make on the sites identified for residential and mixed use under policy H2, none of which are particularly close to our boundary or of a scale that is likely to have significant implications for Reading.

RBC does welcome the provision of sites to meet the permanent accommodation needs of travellers in Wokingham. RBC has its own unmet needs for permanent traveller provision, which are referred to in the response to policy H11, and there may be opportunities of sites closer to the RBC/WBC boundary that can meet needs jointly.

### **H3: Housing mix, density and standards**

Policy H3 states that "The mix of housing provided should reflect and respond to the identified housing needs and demands of the borough's households as set out in the most up to date evidence contained within the Local Housing Needs Assessment, or successor documents" (point 2). Whilst RBC is delivering good levels of housing against its identified needs, there are issues with the mix that can realistically be achieved within Reading. Meeting housing needs within our boundaries relies upon medium and high density development. In particular, around half of housing development in the plan period will be in the centre of Reading, and inevitably largely in the form of smaller flats. Reading is not likely to deliver the mix profile that is needed. Therefore, it is considered that there should be some consideration of the wider levels of delivery across the functional area, with authorities such as Wokingham well-placed to deliver larger, family

accommodation which sits well with the existing character of the area. In our view, this should be reflected in policy H3.

We welcome the requirement for all new housing to be built in line with part M4(2) of the Building Regulations, and for 6% of housing on developments of 20 or more dwellings to be built in line with M4(3). This should ensure that there is flexibility built into the local housing stock to allow for changing circumstances to be accommodated without placing pressure on the housing market.

#### **H5: Affordable Housing**

RBC welcomes the policy on affordable housing, and the minimum levels of affordable housing provision between 20 and 40 % depending on the location and size of the site. We particularly support the proposal to seek affordable housing contributions from sites of less than 10 dwellings, and strongly agree that there is an exceptional case for divergence from national planning policy in this area. It is for WBC's evidence to determine the size threshold above which it is viable and appropriate to require contributions to affordable housing, but the evidence may well point to contributions from developments down to one house being justifiable, as was the case in the RBLP.

#### **H11: Gypsies and Travellers and Travelling Showpeople Provision**

As set out in the RBLP, RBC has unmet needs for permanent accommodation for gypsies and travellers. RBC's Gypsies and Travellers, Travelling Showpeople and Houseboat Dwellers Accommodation Assessment (September 2017) identified a need for 10-17 permanent pitches for gypsies and travellers. After thorough assessment of potential land within Reading, RBC has concluded that this need cannot be met within Reading.

RBC will therefore be seeking to work with adjoining authorities to understand how these needs can best be met. On 21st February 2018, RBC made a request under the duty to co-operate to a number of authorities, including WBC, to understand whether there is potential to meet these permanent needs outside Reading's boundaries. WBC's response of 6th March 2018 noted that WBC was still assessing its likely capacity for pitches to meet its own needs, and was not able to meet needs from Reading. It is not clear what the outcome of assessment of capacity to meet unmet needs for travellers is. RBC wishes to ensure that the scope to meet its unmet gypsy and traveller needs is considered as part of the Local Plan process. RBC would be happy to discuss what resources would be required to help in meeting these needs.

The identification of potential for traveller provision within Grazeley may help to meet some of the needs emerging over the plan period, and this is a discussion that RBC wishes to continue. However, the delivery of the Grazeley site is long term, and this would not address those needs which already exist.

RBC is exploring the potential of a sites across the Borough to meet traveller needs. One of the potential sites is within Reading but adjoins the RBC/WBC

boundary, and would be accessed from within Wokingham. RBC wishes to continue a dialogue with WBC about the potential of this site, and any other sites that arise.

**DH7: Energy**

**DH8: Environmental standards for non-residential development**

**DH9: Environmental standards for residential development**

**DH10: Low carbon and renewable energy generation**

RBC supports these policies in line with our comments on policy SS8.

**HC10: Development in the vicinity of Atomic Weapons Establishment (AWE), Burghfield**

RBC supports this policy. Considering the cumulative impact of development within the Detailed Emergency Planning Zone (DEPZ) on the Off-Site Emergency Plan is a cross-boundary, strategic matter which needs to be kept under review by all affected authorities. Whilst RBC is currently outside the DEPZ, it is understood that boundaries are subject to change during the plan period, and RBC will continue to work jointly with WBC and West Berkshire District Council to address this.