

Sustainability Appraisal (SA) of the Wokingham Borough Local Plan Update

Interim SA Report

November 2021

Quality information

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1 Introduction

1.1 Background

- 1.1.1 AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Wokingham Borough Local Plan Update (LPU).
- 1.1.2 Once in place, the LPU will set a strategy for growth and change for the period to 2038, allocate sites to deliver the strategy and establish the policies against which planning applications will be determined.
- 1.1.3 SA is a mechanism for considering and communicating the effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives. SA is required for Local Plans.¹

1.2 SA explained

- 1.2.1 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004.
- 1.2.2 In-line with the Regulations, a report (known as **the SA Report**) must be published for consultation alongside the draft plan that essentially 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'. The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 1.2.3 More specifically, the SA Report must answer the following **three questions**:
 - What has Plan-making / SA involved up to this point?
 - including with regards to consideration of 'reasonable alternatives'
 - What are the SA findings at this stage?
 - i.e. in relation to the draft plan
 - What are next steps?

1.3 This Interim SA Report²

- 1.3.1 At the current stage of plan-making the Council is consulting on a Revised Growth Strategy under Regulation 18 of the Local Planning Regulations, building upon the Draft Plan consultation in 2020.
- 1.3.2 This report is published with the intention of informing the consultation and subsequent preparation of the final draft ('proposed submission') version of the plan.
- 1.3.3 This is the second Interim SA Report prepared by AECOM, with the first having been published as part of the Draft Plan consultation in 2020. Two earlier reports were prepared 'in-house' by the Council.

Structure of this report

- 1.3.4 Despite the fact that this is an 'Interim' SA Report, and does not need to provide the information required of the SA Report, it is nonetheless helpful to structure this report according to the **three questions** above.
- 1.3.5 Before answering the first question, there is a need to further set the scene by setting out:
 - the plan's aims and objectives; and
 - the scope of the SA.

¹ Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (NPPF, 2018). The Town and Country Planning (Local Planning) Regulations 2012 require that an SA Report is published for consultation alongside the 'Proposed Submission' plan document.

² See **Appendix I** for further explanation of the regulatory basis for answering certain questions within the SA Report, and a 'checklist' explaining more precisely the regulatory basis for presenting certain information.

2 Plan aims and objectives

2.1 Introduction

- 2.1.1 The aim here is to introduce the LPU more fully, including by setting out the established vision and the objectives that are in place to guide plan preparation. This can be considered the ‘plan scope’.

2.2 The plan area

- 2.2.1 Wokingham Borough is a complex area geographically, with the western part of the Borough comprising the eastern part of the Reading urban area, the eastern half abutting the Bracknell urban area, a dense network of major road and rail infrastructure, significant river corridors, varying geology and soils and wide-ranging environmental constraints in terms of biodiversity, heritage, air quality and other matters. There are also four existing Strategic Development Locations (SDLs), following the Core Strategy (2010), which are currently coming forward, delivering in the region of 10,000 homes along with major new infrastructure (see www.wokingham.gov.uk/major-developments/overview-of-major-developments/).
- 2.2.2 Figures 2.1 and 2.2 introduce the plan area.

2.3 The plan period

- 2.3.1 The plan period is the twenty years from 1st April 2018 to 1st April 2038. The previous proposal, at the Draft Plan consultation stage (2020), was to plan for an 18 year period to 2036, but it is good practice to plan for a longer time horizon where possible. The NPPF (2021) explains:

“Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.”

2.4 Legislative and policy context

- 2.4.1 The plan is being prepared under the Town and Country (Local Planning) Regulations 2012 and underpinning primary legislation. It must reflect current Government policy as set out in the NPPF (2021), and must also be prepared mindful of Government's online Planning Practice Guidance (PPG). In particular, the NPPF requires local authorities to take a positive approach to development, with an up-to-date local plan that meets objectively assessed needs, known as local housing needs (**LHN**) in the case of housing, as far as is consistent with sustainable development.
- 2.4.2 The plan is also being prepared taking account of objectives and policies established by various organisations at the national and more local levels, in accordance with the Duty to Cooperate established by the Localism Act 2011. For example, context is provided by the strategic growth aspirations of the Thames Valley Berkshire Local Enterprise Partnership (LEP). Wokingham Borough must also cooperate with neighbouring authorities, including the immediate neighbours: Windsor and Maidenhead, Bracknell Forest, Hart, Basingstoke and Deane, West Berkshire, Reading, South Oxfordshire and Wycombe.
- 2.4.3 It is also important to note that, as a Unitary Authority, Wokingham Borough has responsibility for planning matters covered by County Councils elsewhere, including transport (Local Transport Plan 3 was adopted in 2011, and LTP4 is [emerging](#)), education (for example, a Secondary Schools Strategy was adopted in 2017) and minerals and waste planning (a joint plan for Central and Eastern Berkshire is emerging).
- 2.4.4 Finally, it is important to note that the plan will be prepared mindful of the two ‘made’ Neighbourhood Development Plans (NDPs) within the Borough - namely the Shinfield Area NDP and the Arborfield and Barkham NDP – and the emerging NDPs for Remenham, Ruscombe, Hurst, Twyford, Wokingham Without, Finchampstead, Sonning and Charvil. NDPs must be in general conformity with the Local Plan, which means that made and emerging NDPs may need to be reviewed to bring them into line with the emerging plan; however, it is equally the case that made and emerging Neighbourhood Plans will be a consideration when preparing the Local Plan.

Figure 2.1: Wokingham Borough in the sub-regional context

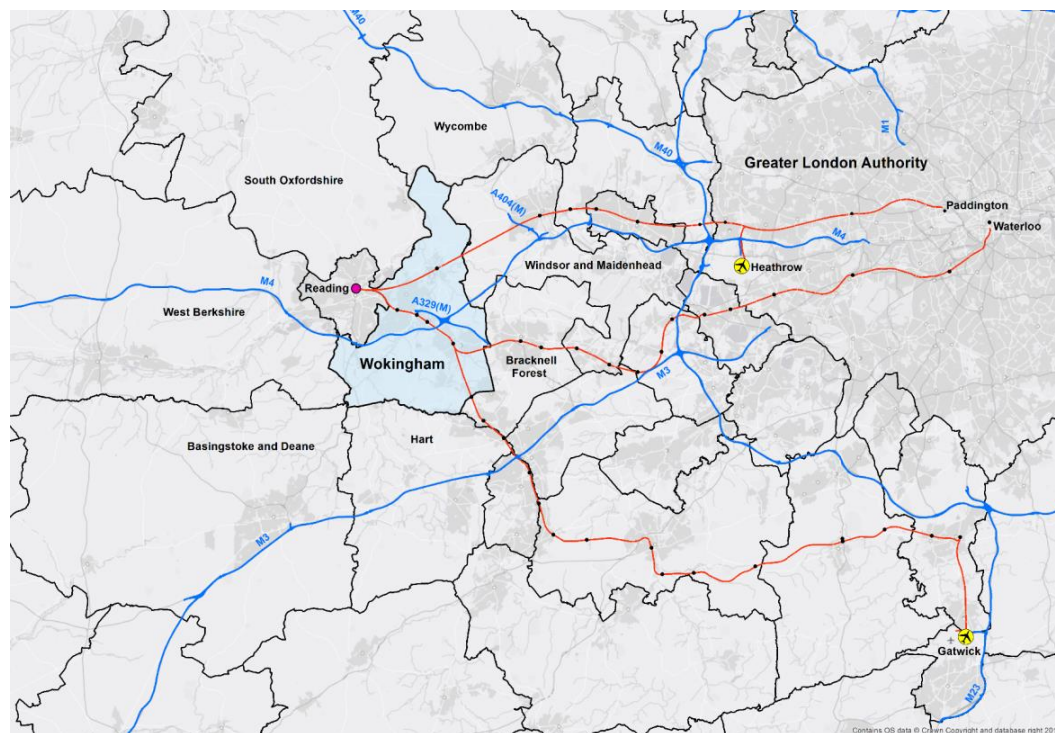


Figure 2.2: Parishes within Wokingham Borough



2.5 Plan vision and objectives

2.5.1 A detailed vision has been established for Wokingham Borough with the aim of guiding the preparation of the LPU. The vision was first presented in the 2020 Draft Plan, and remains unchanged at the current time. The vision is not repeated here for brevity but, in summary, is structured under three key themes:

- A borough that focuses on the needs of our communities.
- A borough that will be sustainable for generations to come.
- A borough where people choose to live, learn and work because both the places we build and the places we protect are valued and enriching.

2.5.2 The 2020 Draft Plan also presented a list of objectives to guide LPU preparation, which also remain unchanged at the current time. The objectives are:

- Make the fullest contribution possible to the mitigation of, and adaptation to, climate change and the transition to a low-carbon economy.
- Reduce the need to travel and widen travel choice, by providing local opportunities to access learning and employment, services and facilities, through ensuring that options for walking, cycling and public transport are attractive, accessible for all, convenient and safe, and by enabling digital connectivity.
- Improve strategic transport connectivity by walking, cycling, public transport and road, both between places within and outside of the borough.
- Maintain and strengthen the sense of place by securing quality designed development through protecting and enhancing the distinctive historic environment, landscape character, townscape character and biodiversity value, assisting vibrancy, and by keeping settlements separate.
- Champion thriving town and local centres to provide the focus of their communities both in social and economic activity, ensuring they can adapt to the challenges they face.
- Enable conditions to allow the economy to creatively grow by being adaptable to structural and technological change, ensuring the economic benefits are felt by all.
- Improve health and wellbeing by enabling independence, encouraging healthy lifestyles, facilitating social interaction and creating inclusive and safe communities.
- Contribute our fair share towards meeting the need for more housing, ensuring that a range of suitable housing options are available across both towns and villages which cater for and adapt to a variety of needs including affordable housing and the growing ageing and vulnerable groups in the population.
- Promote quality and innovation in the design of buildings and public spaces, ensuring they are attractive, accessible, welcoming and meet needs of all groups in the community.
- Facilitate timely provision of new and improved infrastructure by working with providers to achieve focused investment and by securing appropriate benefits from new development.

A strategic plan

2.5.3 There is a need to be clear that the LPU will be strategic in nature, and hence naturally omit consideration of some detailed issues in the knowledge that they can be addressed at subsequent stages of the planning process, namely at the planning application stage. For example, it is appropriate to defer certain detailed matters relating to masterplanning and design of development sites to the planning application stage.

2.5.4 The scope of the LPU is reflected in the scope of the SA.

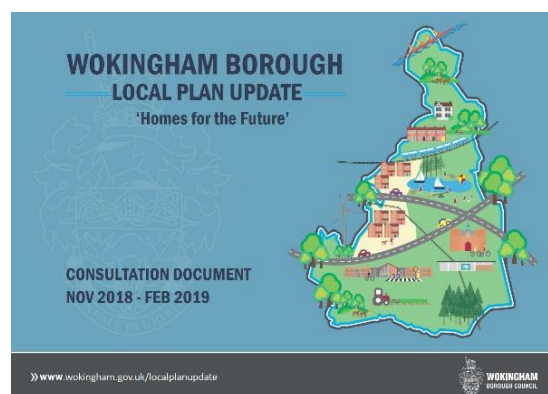
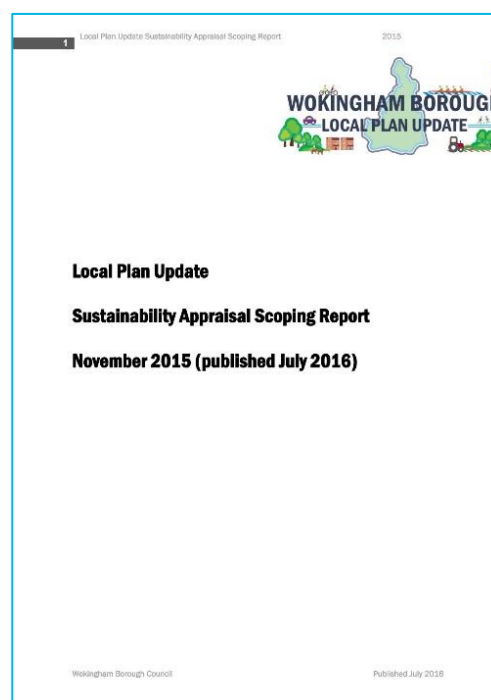
3 The SA scope

3.1 Introduction

- 3.1.1 The scope of the SA refers to the breadth of sustainability issues and objectives that are taken into account as part of the assessment of reasonable alternatives and the emerging plan. It does not refer to the scope of the plan (discussed above) or the scope of reasonable alternatives (discussed below, in Part 1).
- 3.1.2 The aim here is to introduce the reader to the *broad scope* of the SA. **Appendix III** presents further information; however, it is not possible to define the scope of the SA comprehensively. Rather, there is a need for the SA scope to be flexible and adaptable, responding to the nature of emerging preferred and alternative plan options, and the latest evidence-base.

3.2 Consultation on the scope

- 3.2.1 The SEA Regulations require that: *“When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e. the SA scope], the responsible authority shall consult the consultation bodies”*. In England, the consultation bodies are the Environment Agency, Historic England and Natural England.³ As such, these authorities were consulted on the SA scope in 2015.
- 3.2.2 The outcome of the scoping process was an SA ‘framework’ comprising 22 objectives, with this framework then used to structure appraisal findings presented within the Interim SA Reports published alongside LPU consultation documents in 2016 (‘Issues and Options’) and 2018 (‘Homes for the Future’).
- 3.2.3 Subsequently, in 2019, the decision was taken to rationalise the framework by grouping the 22 objectives under 13 topic headings. Also, modest adjustments were made to three objectives, namely those dealing with the historic environment, landscape and transport.
- 3.2.4 The adjusted SA framework was used for the purposes of appraisal in 2019 and 2020, with the findings presented within the 2020 Interim SA Report. Limited comments were received on the SA scope through the Draft Plan / ISA Report consultation (primarily from Bracknell Forest BC, who emphasised the need to account fully for groundwater flood risk and the M4 Air Quality Management Area, AQMA), hence the SA framework is unchanged at the current time. The framework is considered robust, including in light of the most recent national context, for example in respect of climate change; however, comments on the SA scope are nonetheless welcomed at the current time, and will be taken into account at the next stage.



³ In-line with Article 6(3) of the SEA Directive, these bodies were selected because *‘by reason of their specific environmental responsibilities,[they] are likely to be concerned by the environmental effects of implementing plans and programmes.’*

3.3 The SA framework

3.3.1 Table 3.1 presents the sustainability topics and objectives that form the 'backbone' to the SA scope.

Table 3.1: The SA framework

Topic	Objective(s)
Accessibility	<ul style="list-style-type: none"> • Improve accessibility to services, amenities and facilities in particular by safe walking and cycling routes • Raise educational attainment, skills and training opportunities
Air and wider environmental quality	<ul style="list-style-type: none"> • Minimise impacts arising from pollution and improve and prevent where possible
Biodiversity	<ul style="list-style-type: none"> • Conserve and enhance biodiversity, including wildlife and river corridors and networks and to maximise opportunities for building in beneficial features for biodiversity including limiting the impact of climate change
Climate change adaptation	<ul style="list-style-type: none"> • Reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment by ensuring no inappropriate development in any areas at risk of flooding and use sustainable drainage solutions and other solutions in line with advice from the Environment Agency where necessary
Climate change mitigation	<ul style="list-style-type: none"> • Increase energy efficiency and the proportion of energy generated from renewable sources in the Borough [N.B. transport emissions considered below]
Communities	<ul style="list-style-type: none"> • Reduce poverty and social exclusion • Improve the health and wellbeing of the population • Ensure a safe and secure environment • Create and sustain vibrant and locally distinctive communities
Economy	<ul style="list-style-type: none"> • Ensure high and stable levels of employment • Encourage 'smart' economic growth' • Maintain a buoyant and competitive economy with a range of jobs without adversely affecting the quality of life
Historic environment	<ul style="list-style-type: none"> • Protect and enhance the historic environment, ensuring new development makes a positive contribution, or leads to no material harm, taking into account the setting of assets and links with the wider landscape
Housing	<ul style="list-style-type: none"> • Make provision for local housing needs by ensuring that everyone has the opportunity to live in a decent sustainably constructed and affordable home
Land, soils and natural resources	<ul style="list-style-type: none"> • Improve efficiency in land use through the re-use of previously developed land, existing buildings, including the re-use of resources and remediation of previously developed land • Sustainably use resources (including renewable and non-renewable resources) • Maintain and where appropriate improve soil quality, and to ensure land affected by contamination is remediated to a condition suitable for use • Address waste by reducing and minimising waste as a priority and then managing waste in accordance with the waste hierarchy
Landscape	<ul style="list-style-type: none"> • Protect and enhance valued landscapes and the integrity of established character areas, ensuring new development makes a positive contribution, or leads to no material harm, also recalling links with the historic environment
Transportation	<ul style="list-style-type: none"> • Reduce road congestion on the local and strategic road network (SRN), and minimise air pollution and greenhouse gas emissions from transport, by improving carefully locating new development, minimising the need to travel and supporting 'sustainable transport' modes including safe walking and cycling routes and public transport
Water	<ul style="list-style-type: none"> • Maintain, and, where appropriate improve water quality (including groundwater and surface water) and to achieve sustainable water resource management of both surface and groundwater flows

Part 1: What has plan-making / SA involved up to this stage?

4 Introduction to Part 1

Overview

- 4.1.1 Plan-making has been underway since 2015, with three consultations having been held prior to this current consultation, and three Interim SA Reports having been published - see Figure 4.1.

Figure 4.1 Overview of the plan-making / SA process

	Plan-making	SA
2015	Evidence gathering and early engagement	Scoping Report
2016	Issues and Options consultation	Interim SA Report
2018	Homes for the Future consultation	Interim SA Report
2020	Draft LPU consultation	Interim SA Report
2021	Establish and explore reasonable alternatives	
	Revised Strategy consultation	Interim SA Report
2022	Establish and explore reasonable alternatives	
	Publication of the Proposed Submission LPU	SA Report
	Submission of the LPU to the Secretary of State	

Focus of Part 1

We are here

- 4.1.2 The focus here, within Part 1, is not to relay the entire 'backstory' of the plan-making /SA process, or to provide a comprehensive audit trail of decision-making over time. Rather, the aim is to report work undertaken to examine **reasonable alternatives** in 2021. Specifically, the aim is to:

- explain the reasons for selecting the alternatives dealt with - see **Section 5**
- present an appraisal of the reasonable alternatives - see **Section 6**
- explain the Council's reasons for selecting the preferred option - see **Section 7**

- 4.1.3 Presenting this information is in accordance with the regulatory requirement to present an appraisal of 'reasonable alternatives' and 'an outline of the reasons for selecting the alternatives dealt with' within the SA Report (N.B. this is not the SA Report, but aims to present the information required of the SA Report).

What about earlier stages of SA?

- 4.1.4 A considerable amount of work has been completed and published for consultation to date within the three Interim SA Reports introduced above, including work to explore reasonable alternatives. For example, an appraisal of reasonable alternatives was presented in Section 6 of the 2020 Interim SA Report.
- 4.1.5 Earlier work provided a key input to the process of establishing reasonable alternatives in 2021 and, as such, is discussed further below. However, findings of earlier work stages naturally become out-of-date and superseded, such that there is little to be gained from reporting findings in detail at the current time.

Reasonable alternatives in relation to what?

- 4.1.6 The legal requirement is to examine reasonable alternatives (RAs) taking into account the objectives of the plan (see Section 2). Following discussion of plan objectives with officers, it was determined appropriate to focus on spatial strategy, i.e. providing for a supply of land (primarily by allocating sites and broad areas – see NPPF paragraph 68) to meet objectively assessed needs and wider plan objectives. Establishing a spatial strategy is clearly an overarching objective of the Local Plan.⁴
- 4.1.7 The decision was made to refer to the spatial strategy alternatives as **growth scenarios**.

⁴ It was also considered appropriate to focus on 'spatial strategy' given the potential to define "do something" alternatives that are meaningfully different, in that they will vary in respect of 'significant effects'. This approach is in line with the SEA Regulations, and the PPG is clear that SA "should only focus on what is needed to assess the likely significant effects of the plan". It is also important to be clear that appraising a "do something" option versus a "do nothing" option does not equate to an appraisal of reasonable alternatives, as "do nothing" is the baseline situation (and given that significant effects are effects on the baseline).

What about site options?

- 4.1.8 Whilst individual site options generate a high degree of interest, they are not RAs in the context of most Local Plans. Were a Local Plan setting out to allocate one site, then site options would be RAs, but that is rarely the case, and is not the case for the LPU. Rather, the objective of the LPU is to allocate a package of sites to meet needs and wider objectives, hence RAs must be in the form of alternative packages of sites. Nonetheless, consideration is naturally given to the merits of site options as part of the process of establishing growth scenarios – see Section 5, and Sections 5.3 and 5.4 in particular.

Is the focus on housing sites?

- 4.1.9 In short, yes. Whilst the Local Plan is also tasked with meeting wider development needs, including in respect of employment land, establishing a supply of land to meet housing needs is considered to be a matter of overriding importance, such that it warrants being the focus of work to explore growth scenarios, also mindful of the pragmatic need to minimise the number of ‘moving parts’ to make the process manageable. Employment land supply to meet objectively assessed needs is discussed further below, as part of the process of arriving at growth scenarios, but the process can be described as ‘housing led’.

What about other aspects of the plan?

- 4.1.10 As well as establishing a spatial strategy, allocating sites etc., the Local Plan must also establish policy on thematic borough-wide issues and site-specific policies to guide decision-making at the planning application stage. Broadly speaking, these can be described as development management (DM) policies.
- 4.1.11 Firstly, there is a need to note that the current consultation document does not include a focus on DM policies. Secondly, it is important to note that it can be a challenge to establish DM policy alternatives that are genuinely reasonable.⁵ The matter of DM policy RAs will be revisited after the current consultation.⁶

Structure of this part of the report

- 4.1.12 This part of the report is structured as follows:
- **Section 5** – explains a stepwise process leading to the definition of growth scenarios
 - with supplementary analysis in Appendices III, IV and V;
 - **Section 6** – presents a summary appraisal of the growth scenarios;
 - with detailed appraisal findings in Appendix VI;
 - **Section 7** – presents a statement provided by WBC Officers setting out a response to the appraisal.

Who’s responsibility?

- 4.1.13 It is important to be clear that: selecting reasonable alternatives is the responsibility of the plan-maker (WBC), with AECOM acting in an advisory capacity; appraising the reasonable alternatives is the responsibility of AECOM; and selecting the preferred option is the responsibility of the plan-maker.

Commenting on this part of the report

- 4.1.14 Comments are particularly welcomed on: the decision to focus on ‘growth scenarios’ (this section); the growth scenarios selected, with reference to the process for defining these (Section 5); the appraisal of growth scenarios (Section 6); and Officers’ reasons for supporting the preferred scenario (Section 7).

⁵ Recalling that to be ‘reasonable’ alternatives must be meaningfully different, to the extent that it is ultimately for an appraisal to confidently differentiate between the alternatives in terms of significant effects.

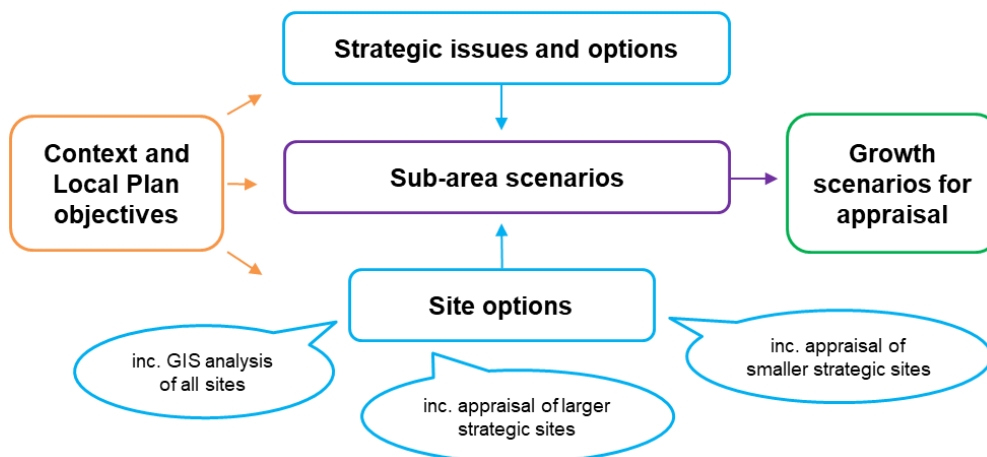
⁶ West Berkshire Council’s 2020 consultation responses stated: “*With respect to this report being an interim sustainability appraisal, the focus on the spatial strategy is reasonable. However, the final report will need to be open to the impact of appraising the other thematic issues and objectives not considered at this stage, especially with regard to possible cumulative impact. We welcome that that matter will be revisited subsequent to the current consultation.*”

5 Defining growth scenarios

5.1 Introduction

- 5.1.1 The aim here is to discuss the step-wise process that led to the definition of reasonable growth scenarios for appraisal and consultation. The process is summarised in Figure 5.1.

Figure 5.1 Establishing reasonable growth scenarios



Structure of this section

- 5.1.2 This section of the report is structured as follows:
- **Section 5.2** – explores strategic issues and options with a bearing on growth scenarios
 - **Section 5.3** – explores site (and site-specific) options with a bearing on growth scenarios;
 - **Section 5.4** – explores growth scenarios for individual sub-areas within the Borough;
 - **Section 5.5** – draws upon the preceding sections to define reasonable growth scenarios.

A note on limitations

- 5.1.3 It is important to emphasise that this section does not aim to present an appraisal of reasonable alternatives. Rather, the aim of this section is to describe the *process* that led to the definition of reasonable alternatives for appraisal. Further discussion of limitations is presented below.

5.2 Strategic issues and options

Introduction

- 5.2.1 The aim of this section of the report is explore the strategic issues and options with a bearing on the definition of reasonable growth scenarios. Specifically, this section of the report explores:

- Quantum – how many new homes are needed (regardless of capacity to provide them)?
- Distribution – which broad areas within the Borough are more suited and less suited to growth?

Quantum

- 5.2.2 This section sets out the established Local Housing Need (LHN) figure for the Borough, before exploring arguments for the LPU providing for a quantum of growth either above or below LHN.

Background

- 5.2.3 A central tenet of plan-making process is the need to **A**) establish housing needs; and then **B**) develop a policy response to those needs. The Planning Practice Guidance explains:

“Housing need is an unconstrained assessment of the number of homes needed in an area. Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from assessing land availability, establishing a housing requirement figure and preparing policies to address this such as site allocations.”⁷

- 5.2.4 With regards to (A), the NPPF (paragraph 60) is clear that establishment of **LHN** should be informed by an *“assessment conducted using the **standard method**... unless exceptional circumstances justify an alternative approach which also reflects... demographic trends and market signals”* [emphasis added].
- 5.2.5 With regards to (B), many local authorities will respond to assessed LHN by providing for LHN in full or, in other words, setting a **housing requirement** that equates to LHN, and a **housing supply** through policies sufficient to deliver the housing requirement (at a suitable rate/trajectory over time, which will invariably necessitate putting in place a ‘buffer’ to mitigate against the risk of unforeseen delivery issues). However, under certain circumstances it can be appropriate to set a housing requirement that departs from LHN.

Local Housing Need

- 5.2.6 A three-step standard method for calculating LHN was first published by the Government in 2017, and then a fourth step was added in 2020.⁸ This fourth step, known as the ‘cities and urban centres uplift’, does not have a bearing on Wokingham Borough’s LHN, but is nonetheless a growth quantum consideration (discussed further below), given the Borough’s close relationship with Reading.
- 5.2.7 There have also been some notable changes to guidance in respect of the data that should be utilised as an input to the standard method, since the method was first introduced. Specifically, following a consultation in late 2018, the PPG was updated to require that the household growth projections used as an input to the method must be the 2014-based projections, rather than more recent projections. The PPG explains that the change was made in order to:⁹ *“provide stability... ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government’s objective of significantly boosting the supply of homes.”* Updates to the PPG in late 2020 confirmed this approach.
- 5.2.8 The standard method derived LHN for the Borough is currently 768 dwellings per annum (dpa); however, there is also a need to be mindful that earlier versions of the method were in place during the first three years of the plan period (specifically, 864 dpa in year one, 804 dpa in year two and 789 dpa in year three). The average LHN over the twenty year plan period is therefore **776 dpa, or 15,513 homes in total**.¹⁰

Providing for above LHN?

- 5.2.9 All Local Plans must consider the implications of Paragraph 010 of the PPG on Housing and Economic Needs Assessment, which sets out reasons for potentially exploring ‘above LHN’ options:
- “The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area... there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.*
- ... Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of: growth strategies for the area that are likely to be deliverable... (e.g. Housing Deals); strategic infrastructure improvements that are likely to drive an increase in [need]; or an authority agreeing to take on unmet need from neighbouring authorities... There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need... are significantly greater than the outcome from the standard method.”*
- 5.2.10 In the Wokingham context there are limited arguments for providing for above LHN:
- There is no Housing Deal, or any equivalent growth strategy in place. Whilst housing need studies completed in 2016 and 2018 applied an ‘uplift’ to the demographic starting point to reflect the needs of the economy (and avoid unsustainable in-commuting), at the current time there is no evidence to suggest a need for any economic uplift on LHN.

⁷ Reference ID: 2a-001-20190220 at: <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

⁸ See [gov.uk/guidance/housing-and-economic-development-needs-assessments](https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments).

⁹ See paragraph 4 and 5 at: [gov.uk/guidance/housing-and-economic-development-needs-assessments](https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments)

¹⁰ This is an ‘uncapped’ figure, meaning that step 3 of the standard method (“Capping the level of any increase”) has no bearing on the LHN calculation. As such, there is no argument for exploring a higher (uncapped) standard method-derived LHN figure.

- It is not the case that previous levels of housing delivery, or previous assessments of need, serve as a reason for considering higher growth. Housing supply has been strong over recent years, as the rate of delivery at the Core Strategy allocated SDLs has picked up,¹¹ and previous assessments have served to suggest a housing need figure above that which the LHN standard methodology currently indicates; however, these do not serve as strong reasons for exploring higher growth options.
- With regards to “*strategic infrastructure improvements that are likely to drive an increase in the homes needed locally*”, the arrival of Crossrail is a strategic consideration for Twyford, although the significance of Crossrail services should not be over-stated. Also, there are a number of major road upgrades recently delivered, coming forward and in the pipeline (see the 2020 [Infrastructure Delivery Plan](#) and also latest information on major road schemes [here](#)); however, these schemes are being delivered in order to ‘consume the smoke’ of housing and employment growth, rather than to deliver a dramatic change to infrastructure capacity locally that might suggest a need to explore high growth scenarios.
- With regards to unmet need from neighbouring areas, this is discussed in Table 5.1, where the conclusion is reached that this is not likely to be a significant consideration for the LPU, but that there remains some residual risk of the LPU needing to provide for significant unmet need.

5.2.11 A final consideration is providing for affordable housing needs, with the PPG stating:¹² “*An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.*” Affordable housing need is a significant consideration locally, and does serve as a reason for exploring providing for above LHN through the LPU, recognising that affordable housing is (primarily) delivered as a proportion of market housing-led schemes.¹³ However, it is not necessarily reasonable to explore higher growth options that could theoretically lead to affordable housing needs being met in full. This is in recognition of the fact that, under higher growth scenarios, need for market housing could become a limiting factor, affecting development viability and deliverability.

Table 5.1 Progress on neighbouring Local Plans

LPA	Commentary on risk of needing to provide for unmet need
Basingstoke and Deane	The Local Plan was adopted in 2016, and a Local Plan Update was commenced in 2019, with an Issues and Options consultation held in 2020. On 2 September 2021, the Economic, Planning and Housing Committee held the first of a series of meetings to give views on where new homes should go in the Borough, with paragraph 2.7 of the accompanying report explaining clearly that the plan will provide for LHN. As such, there is no risk of unmet need.
Bracknell Forest	The Local Plan was published in 2021 and submission to the Secretary of State is anticipated soon. Significant parts of the plan area are heavily constrained, either by the Green Belt or the Thames Basin Heaths SPA; however, Policy LP3 proposes a housing requirement equating to LHN, and the plan also takes a proactive approach to planning for a ‘supply buffer’ above the requirement (see Policy LP3 alongside Tables 6 and 9). The SA Report explores both higher and lower growth options (albeit with limited underpinning spatial assumptions), but concludes: “ <i>whilst there are economic and social benefits to meeting and exceeding the need (including for affordable housing purposes), in general, these are likely to have a greater environmental impact which may increase disproportionately as the availability of suitable sites reduces as development progresses.</i> ” There is judged to be low risk of unmet need.
Hart District Council	The Hart Local Plan was adopted in 2020, and provides for locally arising LHN plus amount of unmet need from Surrey Heath. It was recently reported that a Local Plan Review is now likely to be imminent, with a statement explaining: “ <i>A Local Plan will need to consider the various options to deliver whatever level of future housing growth the government calculates for Hart. We will need to evaluate the benefits and issues with all such options.</i> ” As such, there is considered to be little or no risk of unmet need.

¹¹ See the most recent Annual Monitoring Report at: www.wokingham.gov.uk/planning-policy/planning-policy-information/planning-policy-supporting-information/

¹² See paragraph 024 at: gov.uk/guidance/housing-and-economic-development-needs-assessments

¹³ The most recent Local Housing Needs Assessment (2020), which was published as part of the Draft Plan consultation set out (see page 9) a need for 407 affordable homes per annum, which is a figure comfortably above 50% of the LHN figure, and hence is not likely to be delivered in practice, recognising that Policy H5 of the Draft Local Plan proposed up-to 40% affordable housing from specified types of qualifying housing schemes. There is also a need to account for tenures of affordable housing needed (Policy H5 of the Draft Plan proposed a 70:30 split between social rent and shared ownership).

LPA

Commentary on risk of needing to provide for unmet need

Reading	<p>Reading adopted a new Local Plan in November 2019, with paragraph 4.4.6 explaining: <i>“Delivering the level of housing set out in policy H1 will mean that there is a shortfall of 230 dwellings when considered against Reading’s need. This will need to be accommodated elsewhere within the Western Berkshire Housing Market Area. The other three authorities within the HMA recognise that there will be issues with Reading’s ability to accommodate its need within its own boundaries, and this issue is set out within the West of Berkshire Spatial Planning Framework to which the four authorities have signed up. There will be continuing dialogue on this matter between the affected authorities which will inform local plans.”</i></p> <p>The shortfall in practice could be greater than 230 homes, due to unforeseen delivery issues; however, the shortfall is nonetheless modest. The publication version of the Bracknell Forest Local Plan did not explicitly provide for unmet need from Reading, but WBC’s representation on the Bracknell plan suggested that a proportion of the plan’s identified oversupply should be made available for this purpose. It is anticipated that provision will ultimately be made, such that the unmet need does not fall solely on Wokingham.</p> <p>A further consideration is the December 2020 change to the LHN standard method, namely the cities and urban centres uplift, which means that the next review of the Reading Local Plan will need to address a significantly increased housing need figure.</p> <p>In conclusion, unmet need is a factor when defining reasonable growth scenarios.</p>
Slough	<p>Slough is some way distant from Wokingham, but well linked by road and rail, and also falls within the ceremonial county of Berkshire. In light of these points, there is a need to note the following statement within the most recent Spatial Strategy consultation document: <i>“There is a shortage of land for housing in Slough which means our proposed Spatial Strategy will have a shortfall of 5,000 homes compared to its housing needs.”</i> However, the document also explains that work is underway to explore Green Belt options, and explains an intention to meet any unmet need through “cross border expansion”, informed by the findings of a Wider Area Growth Study. In conclusion, there is low risk of unmet need.</p>
South Oxfordshire	<p>The Local Plan was adopted in 2020, setting a housing requirement to meet locally arising need and a proportion of Oxford City’s unmet need, and a supply figure 27.6% above the requirement. As such, there is no risk of unmet need.</p>
Surrey Heath	<p>A Draft Local Plan was published, under Regulation 18, in 2018 proposing to set a housing requirement below LHN and therefore rely on neighbouring authorities to provide for unmet need, reflecting the extent of Green Belt and SPA constraint affecting the Borough. The expectation was that unmet need would be provided in Hart and/or Rushmoor, as these authorities share a housing market area with Surrey Heath, and the Hart Local Plan subsequently provided for an amount of unmet need from Surrey Heath. Whilst there is uncertainty ahead of an updated Draft Local Plan, on balance there is considered to be a low risk of Wokingham needing to provide for unmet need from Surrey Heath.</p>
West Berkshire Borough Council	<p>A third Regulation 18 consultation document was published in late 2018. Significant parts of the plan area are heavily constrained, either by the North Wessex Downs (north and west of the Borough) or Atomic Weapons Establishment (AWE) safety zones (east); however, paragraphs 6.12 – 6.13 propose a housing requirement equating to LHN and a 14% supply buffer. Subsequently, in August 2021, the Council released a press release postponing the Local Plan Review. At the current time, it is fair to conclude a low risk of unmet need.</p>
Windsor and Maidenhead Borough	<p>The Local Plan was submitted in 2018 and there has been consultation on proposed modifications. The submission plan, as modified, proposes LHN as the housing requirement plus a 15.4% supply buffer (Policy HO1 and Table 7), hence there is low risk of unmet need.</p>
Wycombe District	<p>The Wycombe Local Plan was adopted in 2019, setting a housing requirement at a level below the established ‘objectively assessed housing need’ figure (on the basis of the extensive constraints affecting the district, most notably the Chilterns AONB) and a supply buffer of circa 7%. The unmet need is provided for by the recently adopted Vale of Aylesbury Local Plan, hence there is no risk of unmet need. Now forms part of Bucks Unitary Authority.</p>

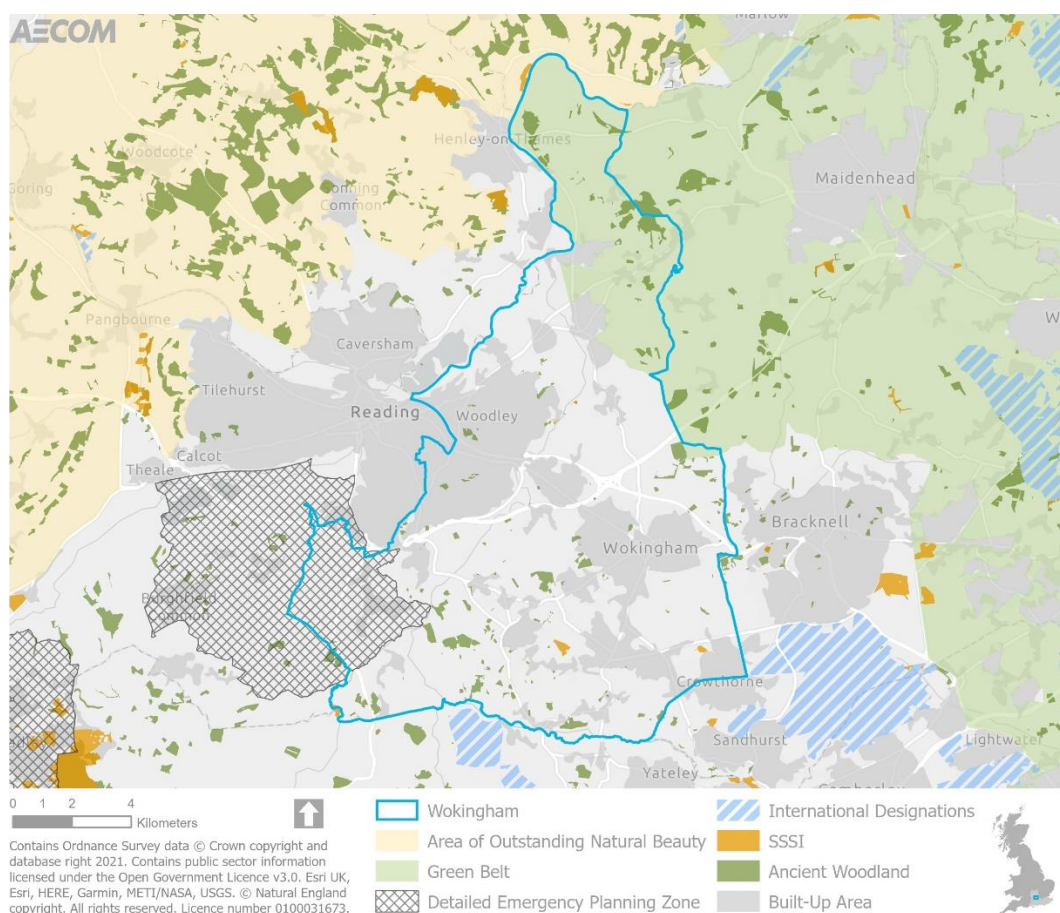
Providing for below LHN?

- 5.2.12 Paragraph 11 of the NPPF states: “... *strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, **unless**: i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*” [emphasis added]
- 5.2.13 There are parts of Wokingham Borough that are constrained by the “assets of particular importance” listed by the NPPF; however, there are also parts of the Borough that are not constrained by these assets. Furthermore, a lower growth strategy for Wokingham Borough would lead to ‘unmet need’ having to be provided for elsewhere within a constrained sub-region, notably with the North Wessex Downs to the north, Green Belt to the east or the Thames Basin Heaths SPA to the southeast - see Figure 5.2.

Conclusion on housing quanta options to examine further

- 5.2.14 In conclusion, when seeking to define reasonable growth scenarios there is a need to focus attention on providing for **LHN**, but also consider modest **higher growth** scenarios. With regards to lower growth scenarios (i.e. setting a housing requirement below LHN), these were judged reasonable to explore in principle in 2019/2020, as reported in the Interim SA Report, but are now judged to be unreasonable.
- 5.2.15 As a final point, it is important to reiterate that there is invariably a need to provide for a supply buffer over-and-above the housing requirement to ensure that the requirement is met in practice over the plan period (recognising that unforeseen issues with planned supply are inevitable), and ensure a robust supply trajectory, i.e. a situation whereby a five year housing land supply (5YHLS), as measured against the housing requirement, can be maintained throughout the entire plan period (as far as possible).¹⁴

Figure 5.2: Key strategic barriers to exporting unmet need to other authorities in the sub-region



¹⁴ The ideal situation is to provide for the total housing need figure for the plan period at a steady rate, and to set the housing requirement accordingly. However, as set out at paragraph 21 of the Government's PPG on Housing Supply and Delivery, there is flexibility to set a 'stepped' housing requirement, where there is evidence to demonstrate that this is necessary in light of wider sustainable development objectives. A stepped requirement is one whereby the requirement is set at a level below the annualised total plan period housing requirement in the early years of the plan, and then this is compensated for in the latter years.

Broad distribution

Introduction

- 5.2.16 This is the second of two sections examining 'strategic issues and options' of relevance to the matter of defining reasonable growth scenarios for the LPU. This section sets out a discussion of evidence and issues in chronological order before reaching a broad conclusion on the key broad housing distribution issues and options that should feed into definition of the reasonable growth scenarios.

Core Strategy (2010)

- 5.2.17 The Core Strategy categorised each of the Borough's settlements as either a 'major', 'modest' or 'limited' development location and allocated four Strategic Development Locations (SDLs), all of which are currently building-out and delivering significant infrastructure upgrades - see Box 5.1, Figure 5.3 and www.wokingham.gov.uk/major-developments/overview-of-major-developments/.
- 5.2.18 Related to this is the Settlement Hierarchy Assessment (2018), which assessed all settlements in respect of five criteria (key services, higher order services, employment units, public transport, distance to a higher order settlement) before placing each settlement into one of four tiers - see Figure 5.4.

Box 5.1: Strategic Development Locations (SDLs) update

The current consultation document presents an update on progress for each of the four existing SDLs:

- Arborfield Garrison SDL – several phases have now been completed or are under construction with around 1,000 new homes completed as of March 2021. A secondary school and primary school are both open, alongside the new Arborfield Cross Relief Road, and work to deliver a neighbourhood centre is progressing.
- South of the M4 SDL – 2,200 homes have been completed and much of the remaining is under construction. The Eastern Relief Road opened in 2017, the first of two planned new schools opened in 2020 and work to deliver a new supermarket as part of the Shinfield neighbourhood centre is well underway.
- North Wokingham SDL – 1,500 homes have been completed and much of the remaining is under construction. The Northern Distributor Road is nearing completion, and the new neighbourhood centre, planned primary school and community building at Matthews Green are all well under construction.
- South Wokingham SDL - Montague Park, the section of the major development to the north of the railway, has substantially been completed, including the planned primary school. The section to the south of the railway has been granted planning permission, and will include a major new road, a second primary school, neighbourhood centre and parks and open spaces.

Figure 5.3: Recent, ongoing and forthcoming major road upgrade schemes associated with the SDLs

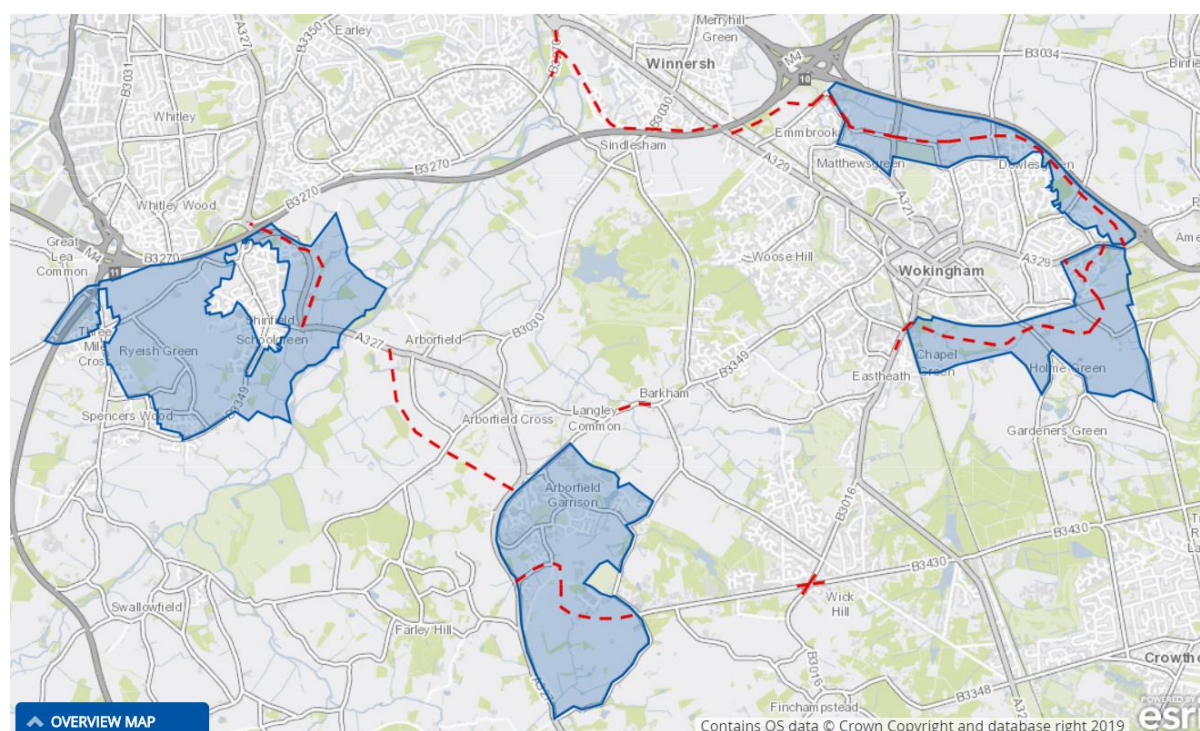
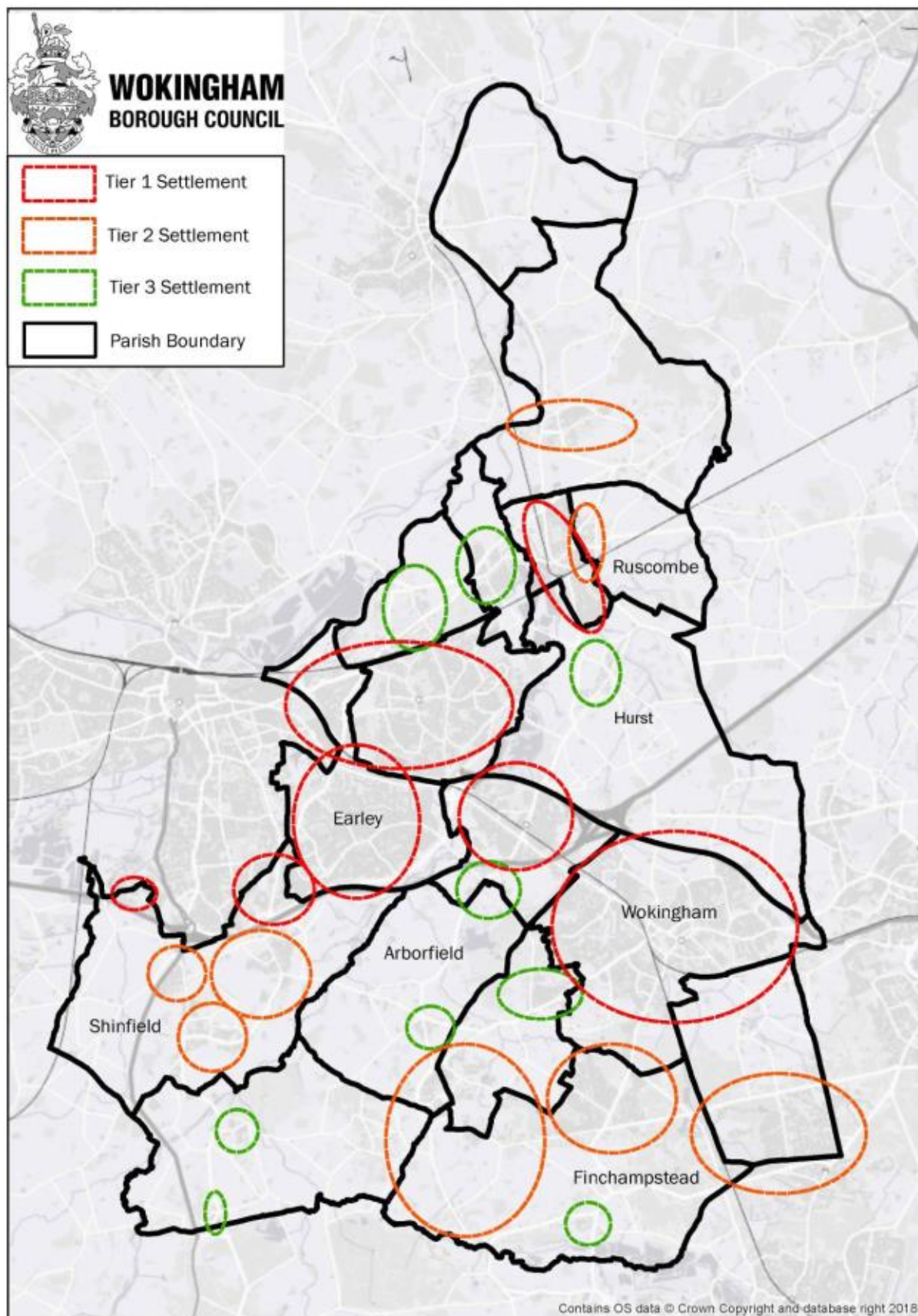


Figure 5.4: Outcomes of the Settlement Hierarchy Assessment (2018)



West of Berkshire Strategic Planning Framework (2016)

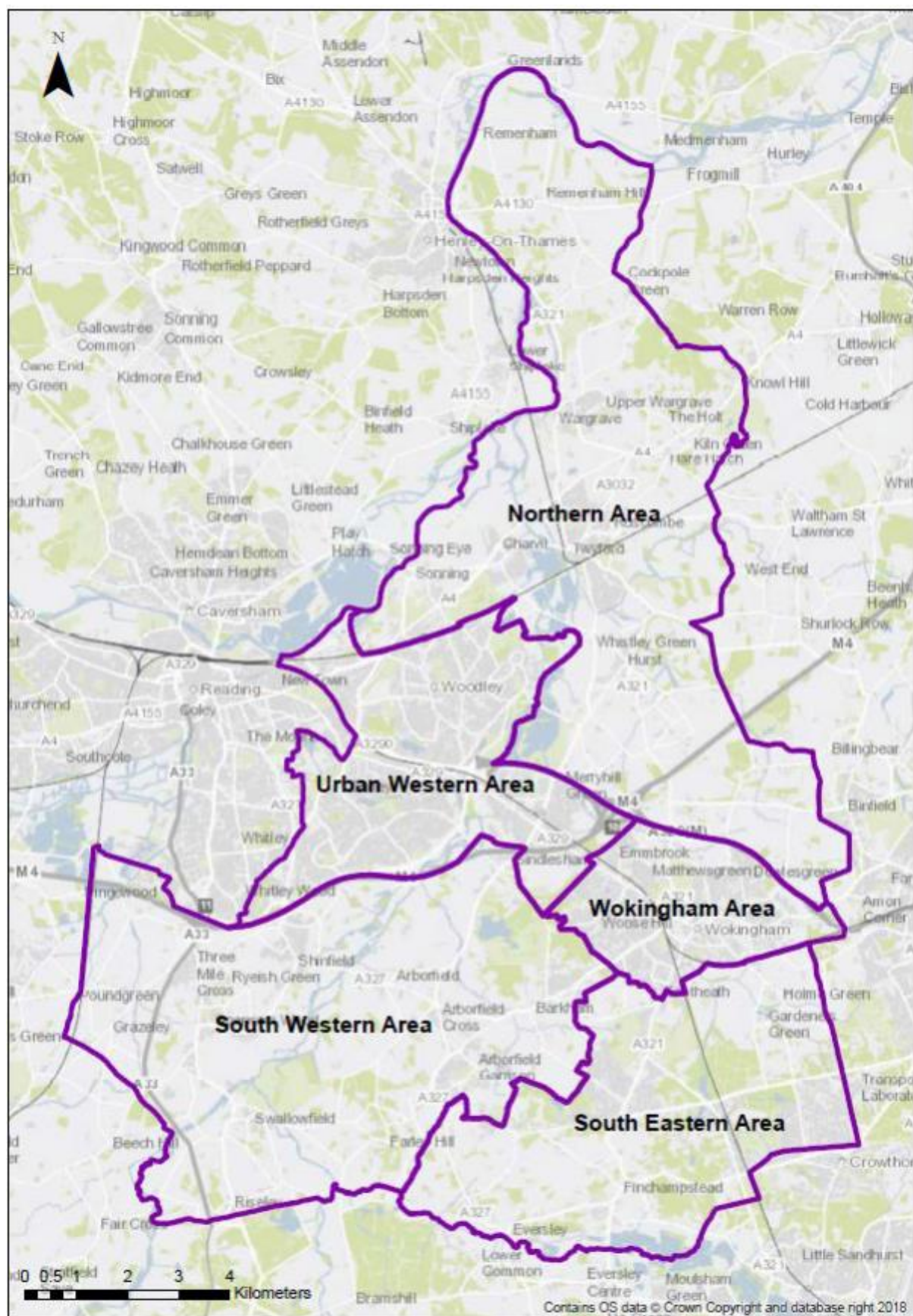
- 5.2.19 This non-statutory strategy sought to identify strategic growth areas as an input to Local Plan preparation for the four component authorities (Bracknell, Reading, West Berks and Wokingham). The key diagram identified four strategic opportunities of relevance:
- Major housing and mixed use development at Grazeley - Government funding was subsequently attained to assist in researching this strategic growth option as a Garden Community, and Grazeley Garden Town subsequently featured as a central component of the Draft Plan (2020) spatial strategy. However, the site now falls wholly within the Detailed Emergency Planning Zone of Atomic Weapons Establishment (AWE) Burghfield, and so development is not a reasonable option to explore further.
 - A focus on town centre/commuter hub development - Wokingham town centre falls into the category of being a commuter hub; however, the town centre has seen significant change and regeneration over recent years, and a number of further sites are committed, i.e. have planning permission. There are limited growth opportunities over-and-above commitments, as discussed further below.
 - Infrastructure investment at Twyford Station to support Crossrail - the Council is supportive of Crossrail related infrastructure investment, and a degree of development to facilitate investment is an option.
 - Sites that span the Bracknell Forest and Wokingham boundary - the western extent of the Bracknell urban area is expanding as far as the Wokingham Borough / Bracknell Borough administrative boundary directly to the north of the A329, through development of Land at Amen Corner, which is under construction. To the north and south of this committed site the Bracknell Forest Local Plan (2021) proposes designation of a 'Strategic Gap' with a view to maintaining settlement separation.

Homes for the future consultation (2018/19)

- 5.2.20 The consultation document identified all the sites promoted for development by land owners/developers, grouping sites into five sub-areas (see Figure 5.5), and sought views from residents, businesses, landowners and other interested parties. Further questions sought views on matters such as affordable housing and development density. A Statement of Consultation (2020) was subsequently prepared.
- 5.2.21 Drawing upon lessons learned through the preceding Issues and Options consultation (2016), the consultation document presented the following draft spatial principles:
- It is not possible to rely on just urban sites, or on land that has been built on previously for future development. There simply isn't enough urban land available that is realistically developable.
 - Generally, towns and larger villages have better facilities than smaller settlements; however, concentrating development in too few places can intensify disruption and limit choice.
 - Infrastructure can often best be provided through larger scale development sites. These offer the opportunity to limit local travel by providing new schools and facilities close to new housing.
 - As large sites can take longer to go from the planning stage to delivering homes, other smaller sites can help ensure a constant supply, something the Government places great importance on.
- 5.2.22 The consultation document included the following important statement:
- “Concentrating development in a small number of locations which each deliver large numbers of housing is one method. Like our existing strategy, this has the benefit of delivering infrastructure like the new roads we need and means that much more infrastructure investment can be funded by developers. Development of this scale takes longer to provide the houses than smaller scale developments.*
- High quality homes can also be delivered on smaller sites. These can often be quicker from planning to delivery, but it is harder to provide infrastructure improvements alongside. This means that new residents are likely to drive to do such things as, taking their children to school or going to the park.*
- In our 'Issues and Options' consultation, the majority of people who responded supported a range of site sizes, whilst supporting the use of larger developments to meet our needs....”*
- 5.2.23 With regards to the Interim SA Report published alongside the consultation document, a key finding was that a spatial strategy involving growth dispersed across small sites would lead to negative environmental impacts broadly similar to a spatial strategy involving a concentration of growth at large sites, but without the benefit of “much-needed infrastructure to deliver sustainable communities”.

- 5.2.24 The importance of building upon the experience of infrastructure delivery alongside the SDLs is not to be under-stated. Most recently, a comprehensive list of strategic infrastructure delivered alongside SDL housing growth was provided at the 12th November 2021 Extraordinary Executive, see 52 mins 45 seconds at: <https://wokingham.moderngov.co.uk/ieListDocuments.aspx?CId=129&MId=4158>.
- 5.2.25 With regards to consultation responses received, key messages included:
- AWE Burghfield - set out the national importance of not compromising operations and explained that an update of the AWE Site Development Context Plan was forthcoming.
 - Berkshire West CCG - discussed the need to update the Estates Strategy in order to support health provision infrastructure generally and primary care specifically.
 - Bracknell Forest Borough - highlighted a particular need to liaise in respect of the south-eastern part of the Borough and sought *"on-going discussions on cross-boundary issues such as transport, education provision, infrastructure and landscape matters..."*
 - Department for Education (DfE) - welcomed recognition that investment in schools infrastructure is more difficult when the pattern of development is dispersed. DfE also sought *"specific sites which can deliver the school places to support growth, based on the latest evidence of need..."*
 - National Highways - emphasised a risk of cumulative impacts on the M4 and particularly *"the potential cumulative impacts from growth in both Bracknell and Wokingham on specifically M4 Junction 10"*.
 - Historic England - made only 'general comments'.
 - Natural England - stated that it "does not consider that this Local Plan Update poses any likely risk or opportunity in relation to our statutory purpose, and so does not wish to comment on this consultation."
 - Reading Borough Council (RBC) - submitted a detailed response, covering a number of topics:
 - Mix of sites – *"... a mix of types of site will be needed... [but RBC] generally supports a continuation of WBC's existing strategy over recent years of concentration on major development locations, as this is an effective way to ensure that the right level of infrastructure is delivered at the right time."*
 - Student accommodation – *"[T]he University of Reading has recently revealed substantial growth ambitions over the next ten years, with student numbers estimated to increase from around 16,000 in 2017/18 to around 21,000 in 2028. The University submitted [analysis] to Reading's Local Plan Examination, which considered this growth and the potential implications for student accommodation needs. RBC has very significant concerns about this level of growth, in terms of both its realism and its implications. Reading certainly could not absorb any growth along these lines on its own..."*
 - New cross-Thames vehicular route - the Homes for the Future Consultation Document discussed a long standing aspiration for an additional cross-Thames vehicular route in the Thames Valley Park area. RBC responded to the consultation stating: *"The Strategic Outline Business Case produced in May 2017 demonstrates the proposed crossing would provide significant decongestion benefits to Wokingham, Reading and the wider area. Therefore, this scheme should be given sufficient weight within the emerging Local Plan to demonstrate its importance in enabling the planned growth..."*
 - Mass transit – RBC discussed a shared ambition with WBC in respect of delivering a mass rapid transit (MRT) and park & ride network around the urban area, including linking to Reading along the A4, A329(M) and A33 corridors. RBC was also *"fully supportive of proposals for park & ride at Thames Valley Park, Coppid Beech and expanding the current provision at Winnersh Triangle. However, the provision of the MRT link to avoid congestion on the A4 London Road is vital to ensure a comprehensive, commercial bus service... on this corridor."*
 - Growth locations – RBC was supportive of strategic growth at Grazeley, and raised a concern regarding other site options *"not in locations which enable an obvious connection to the existing or extended public transport network, as is the case for Grazeley."*
 - University of Reading - elaborated on the findings of the Campus Capacity Study (2019), describing *"the complexity of managing the future growth needs and ambitions of the University"*. They highlighted a likely issue regarding an increasing number of students living in Houses of Multiple Occupation (HMOs) in Wokingham Borough, and hence a need for purpose built student accommodation.
 - Thames Water - did not comment on spatial strategy but did propose wording for development management policy in respect of water supply and wastewater infrastructure.

Figure 5.5: Sub-areas defined at the time of the Homes for the Future consultation

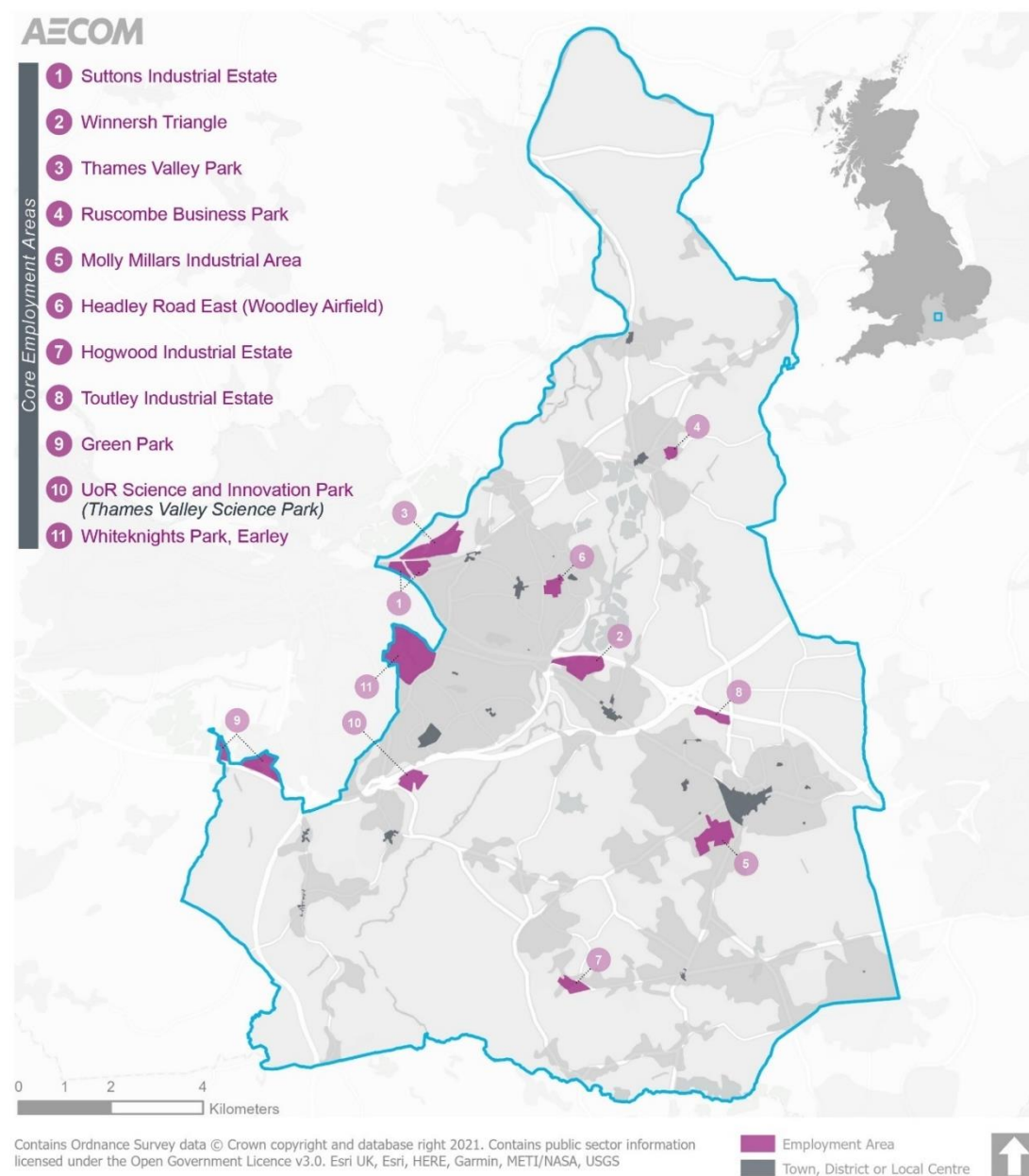
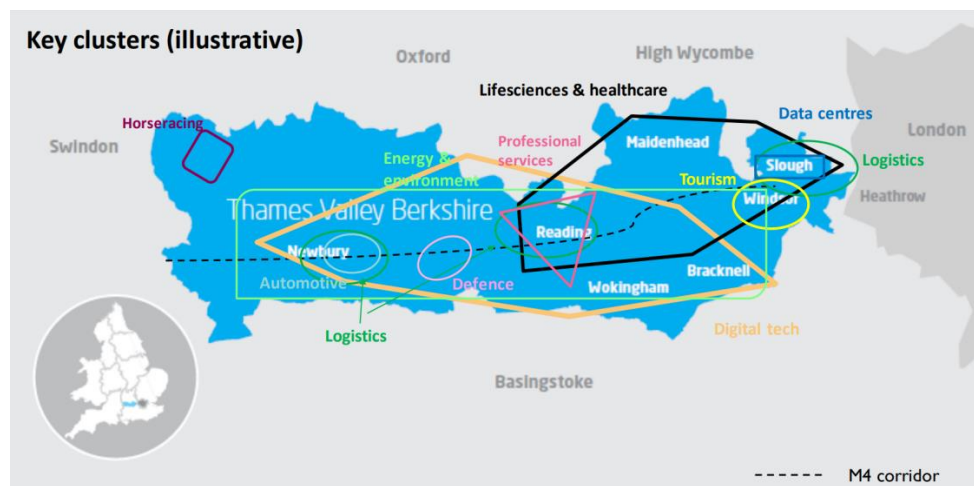


Employment land

- 5.2.26 In 2016 the six Berkshire authorities and the Thames Valley Local Enterprise Partnership jointly commissioned consultants to consider the economic geography of Berkshire. The report established that there are three Functional Economic Market Areas (FEMAs), with Wokingham Borough located in the Central FEMA, alongside Bracknell Forest, Reading and part of Windsor and Maidenhead. The Economic Development Needs Assessment (EDNA, 2016) then identified the future quantity of land or floor space that could be required for economic development uses in each FEMA and LPA area.
- 5.2.27 Subsequently, the Wokingham Borough Council Employment Land Needs Study (ELNS, 2020) was prepared to more accurately map specific job types to use classes and take into account more recent economic forecasts. The ELNS also provided a market analysis of the commercial property market in the Borough and considered how far existing floorspace was meeting requirements. The study found:
- “Wokingham has two distinct office markets; town centre and out of town. The town centre has dated purpose-built stock, which has seen offices lost to residential through permitted development rights (PDR). The prime out of town market locations are at Winnersh Triangle, Green Park and Thames Valley Park. With more secondary stock found at Molly Millars and Sutton’s Industrial Estate. We also see more specialist accommodation at Whiteknights, which benefits from its... links to Reading University.”*
- “The focus of the property market in Wokingham Borough is not industrial uses. The borough does not attract footloose requirements from large-scale B8 users... as these tend to go to Slough or Heathrow... The borough attracts a range of occupiers from traditional industries serving the local market through to international [firms] using the borough as their UK headquarters. Companies are attracted to the borough due to good quality purpose-built premises, and the close proximity to London.”*
- 5.2.28 Further context comes from the Draft Reading Local Transport Strategy 2036,¹⁵ which notably explains: *“Reading is situated within a wider area that includes Wokingham and Bracknell which functions as a city region: a densely populated urban area with a regional centre, sub regional hubs, major business/science parks and large suburban areas. This region currently encompasses the existing urban areas and planned development areas, and is expected to expand as additional development is identified at the edge of the existing region. The area forms a natural economic cluster which is forecast to be the UK’s fastest growing economy during 2018-2021, with Berkshire contributing £37.8bn GVA per annum.”*
- 5.2.29 Also of note are the priorities of the Thames Valley Berkshire Local Enterprise Partnership (LEP) – see <http://www.thamesvalleyberkshire.co.uk/>. Recent work has included a Recovery and Renewal Plan – which sets out a range of thematic priorities for the short, medium and long term, for example: *“Reimagine our town centres to become business and leisure hubs. Alongside an acceleration in new housing, we will develop hubs for those who want to start their own business. A template for this is The Deck in Bracknell, in which the LEP will invest £1m to leverage £20m of private sector funding.”*
- 5.2.30 Finally, it is important to note that the consultation response received from the LEP through the 2020 Draft Plan consultation emphasised the strategic importance of **Thames Valley Science Park (TVSP)** – see further discussion below, including within Box 5.2.
- 5.2.31 Further work to take account of more recent data, and to consider the implications of Covid 19, including increased home working and online retail, and the wider impact of Brexit, will be undertaken as the Local Plan progresses. This will support an assessment of economic development needs and supply options.
- 5.2.32 Core employment areas within the Borough are shown in Figure 5.6 (N.B. the figure shows the extent of core employment areas as they stood at the time of the Managing Development Delivery Plan, 2014). The economic geography is also understood from:
- Figure 5.7 – highlights key sectors as: digital tech; life sciences / healthcare; and energy / environment.
 - Figure 5.8 – shows the Reading Local Plan Key Diagram, which highlights employment land focused along the A33 corridor, but also the town centre and employment land along the rail corridor to the east, which links closely to Thames Valley Park and Sutton Industrial Estate in Wokingham Borough.
 - Figure 5.9 – serves to highlight the close links between Wokingham and major employment locations within Bracknell. Also, it is important to note that the plan proposes a garden village in the north of the Borough at Jealotts Hill including with a view to securing *“the future of an existing site as a centre for scientific research of national and international importance.”*

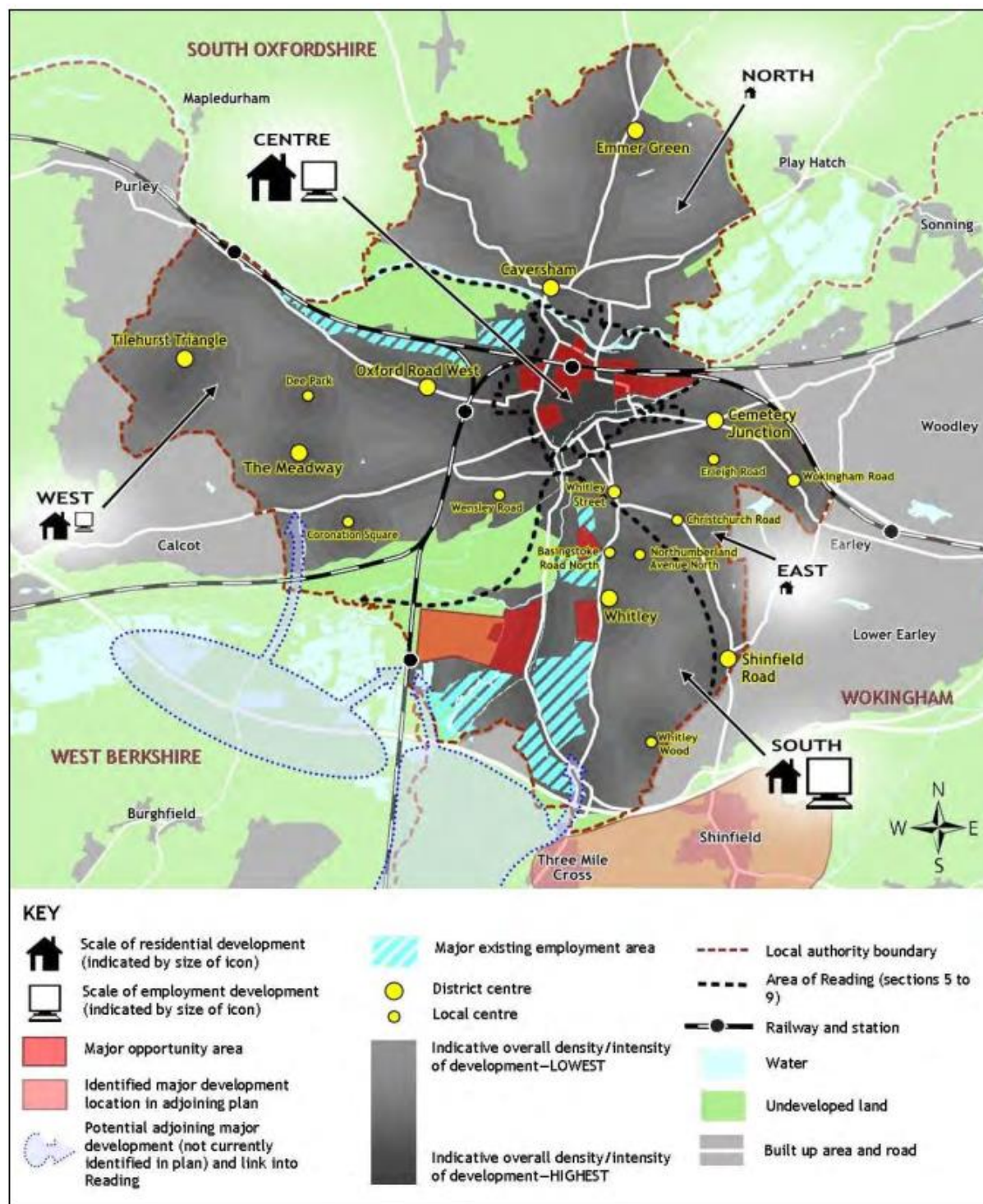
¹⁵ See <https://www.reading.gov.uk/transport/transport-strategy/>

Figure 5.6: Designated core employment areas and town/district/local centres in Wokingham Borough

Figure 5.7: Key economic sectors in Berkshire¹⁶

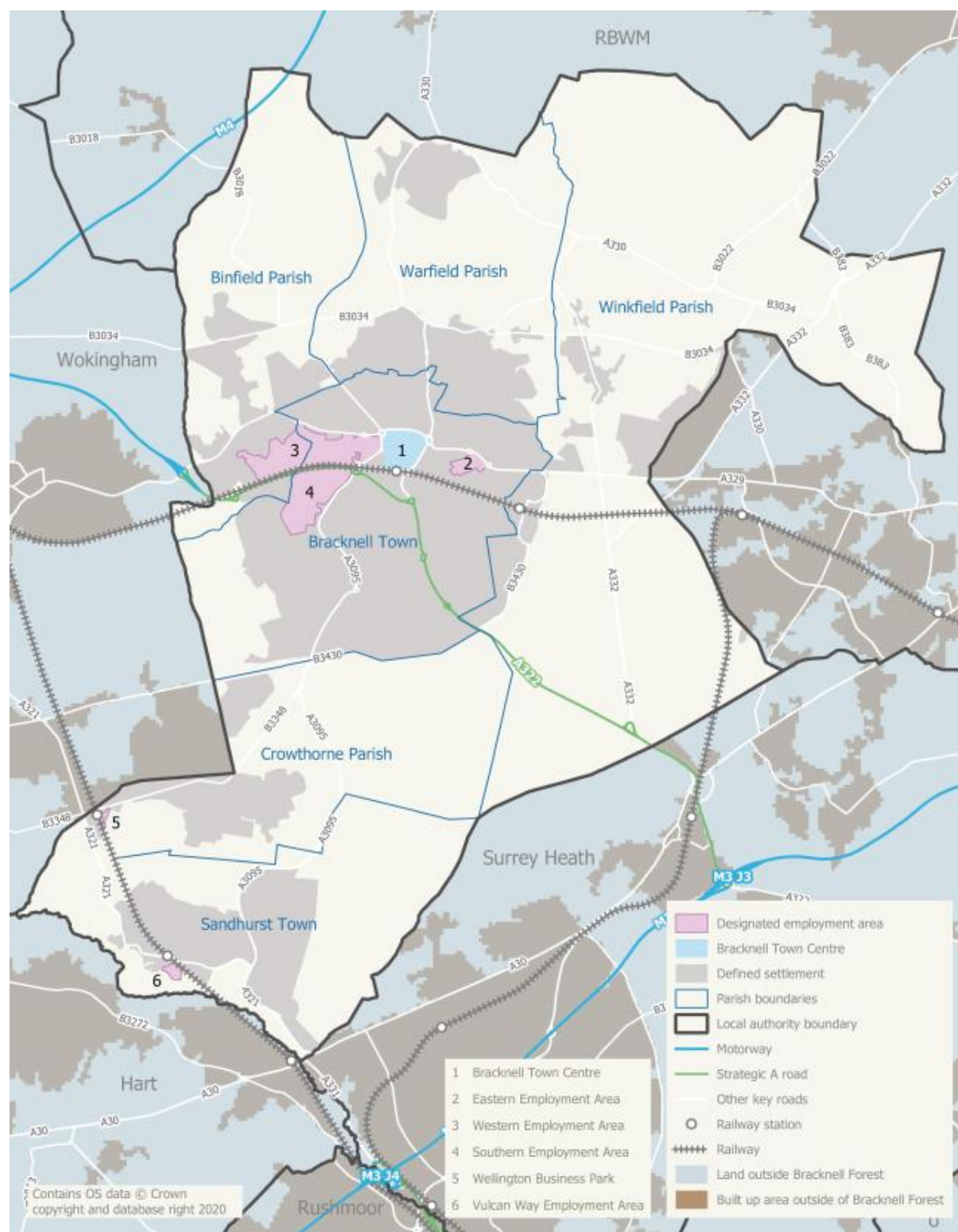
¹⁶ Sourced from Berkshire Net Zero Carbon Research study (Bioregional, 2021); in turn, sourced from Business in Berkshire 2020, Thames Valley Berkshire LEP.

Figure 5.8: Reading Local Plan Key Diagram – showing key employment locations



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Figure 5.9: Designated employment areas in Bracknell Forest (source: Pre-submission Bracknell Forest Local Plan)



Draft Plan consultation (2020)

- 5.2.33 A Consultation Outcomes report was published in January 2021, explaining that 721 individuals and organisations had submitted responses to the consultation. With regards to comments received on specific proposed allocations, there was notable variation between sites – see Figure 5.10.

Figure 5.10: Site specific consultation responses received



- 5.2.34 The responses received from the following organisations/sectors are of particular importance to the task of arriving at reasonable growth scenarios:

- AWE Burghfield - the key point to note is that, subsequent to the start of the consultation, a change in legislation resulted in the redetermination of emergency planning arrangements around AWE Burghfield in the case of an incident. The redetermination significantly extended the area where emergency plans must be in place -see Figure 5.11.
- Basingstoke and Deane - commented primarily on the Grazeley proposal, and the importance of careful planning for the A33 / rail corridor south of Reading, including in light of an ongoing multi-modal study.

- BBOWT - emphasised the need to consider the targets within the Wokingham's Biodiversity Action Plan 2012 to 2024 for an increase in semi-improved grasslands from 32.5ha to 300ha and a 20% increase in woodland. BBOWT also encouraged work to establish strategic priority areas, and explained: *"In the mean-time we recommend that Biodiversity Opportunity Areas are specified as the strategic habitat restoration network in which biodiversity offsets should be provided."*
- Berkshire West CCG - presented a range of important background information on planning for healthcare facilities in the Wokingham context, and specifically commented that:
"Whilst primary care estate currently has some limited building capacity, there are undoubtedly some practices where pressure is being felt more acutely than others... It should also be noted that under the NHS Long Term Plan, practices are now employing a wider range of healthcare professionals. This is leading to an increasing pressure placed on surgery room space. In addition, a number of buildings are coming towards the end of their life expectancy and may require refurbishment or replacement..."
In the light of all these factors, the CCG believes that there needs to be targeted development of the current primary care estate, most likely by refurbishment and the extension of existing facilities through room conversion, room division and building extensions. It is the CCG's view that new facilities or extension of existing sites across the Borough should be funded by developer contributions..."
- Bracknell Forest Council - commented on a wide range of matters including:
 - Transport – *"BFC can see potential for additional pressures on the highway network, in particular around Forest Road in Binfield, and Nine Mile Ride in Crowthorne... It is therefore important for the two authorities to maintain their current close working relationship..."*
 - Strategic growth locations – *"BFC supports larger scale comprehensive development which can be served by public transport links such as rail."*
 - The Emm Brook – *"It should be noted that there is some ongoing [and planned] development in Bracknell Forest in areas within the upper parts of the Emm Brook catchment."*
- Buckinghamshire Council - commented on several transport corridors, but recognised that *"direct traffic impacts from Wokingham are expected to be minimal."*
- Environment Agency - made limited comments with implications for growth scenarios, but did highlight that both the existing North and South Wokingham SDLs relate to the corridor of the Emm Brook Water Framework Directive (WFD) waterbody, which is currently in 'poor' ecological condition, pointing out that *"any damage [to] the watercourse (physical, ecologically and/or chemical) could result in preventing the watercourse from improving its WFD status"* and also that *"development should have no impact or improve habitat connectivity."*
- Greater London Authority - commented: *"Given the District's strategic location within the transport network, it would be useful to understand the Council's consideration of land for industry and logistics..."*
- Hampshire County Council - commented primarily on Grazeley and the A33 corridor in the context of strategic growth at Grazeley.
- Hart District Council - commented: *"The logic of large-scale garden communities is understood. Indeed Hart is working on a garden community..."* The response also explained that transport is the key cross-border matter, and encouraged close engagement with Hampshire County Council.
- Historic England - raised a particular concern regarding the proposed Ashridge Farm allocation, within the North Wokingham SDL, as it is adjacent to the grade II* Ashridge Farmhouse and two associated grade II barns, questioning whether the land in this area should be SANG, and highlighting the importance of preparing site specific policy. Other general comments called for, amongst other things, detailed site specific policy to be drafted, and an enhanced historic environment evidence base.
- Home Builders Federation - emphasised the need to take careful account of any unmet housing need arising from Reading, and also encouraged consideration of any risk of unmet need from London.
- National Grid - stated that they had no comments.
- National Highways - explained: *"You will be aware that delivery of the Smart Motorway Scheme M4 J3-12 is well under way (<https://highwaysengland.co.uk/projects/m4-junctions-3-12-smart-motorway/>). The upgrade will provide much needed capacity to address current situation but it is not intended to deal with extra demand, which may be required as a result of additional growth within the plan period. We therefore wish to be further engaged as transport strategies are identified and developed to ensure that*

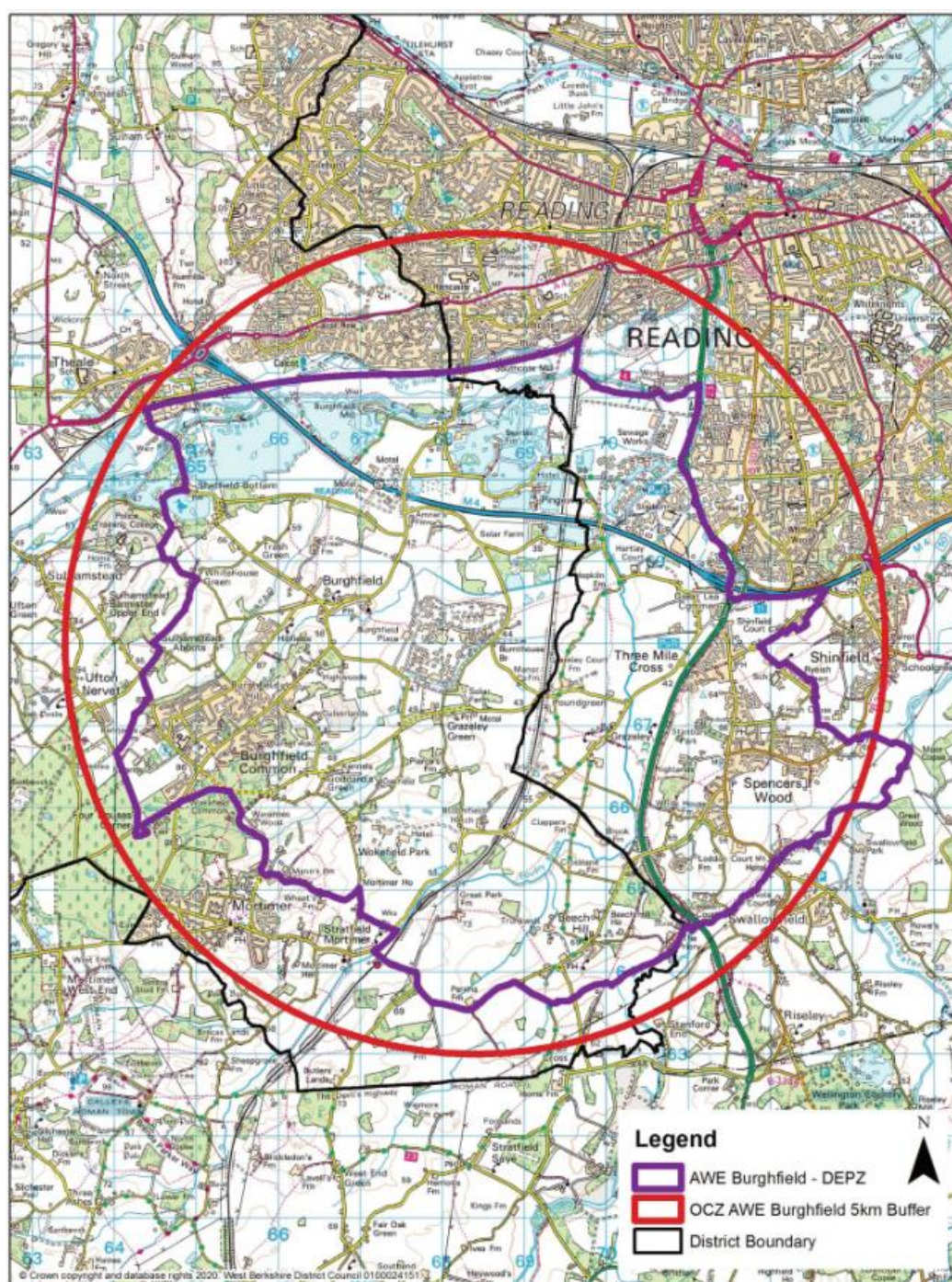
proper consideration is given to manage down demand to use the strategic road network, in this case the M4 motorway. Where necessary, appropriate package of mitigation measures should be provided with a reasonable prospect of delivery within the timescales of when the growth is planned and considered in the context of cumulative impact on Reading, Bracknell and Wokingham."

- Natural England – primarily commented on Grazeley, with notable requests for *"thought put into the exact location [of SANG] on the development site in order to ensure it links up with surrounding green infrastructure (GI) effectively"* and an *"aim for more than 10% net gain"*. The response also highlighted four other proposed allocations as being in proximity to a designated site.
- Network Rail - stated the following regarding the option of a new station in the Grazeley area: *"Our initial investigations show that a new station at this location is feasible, subject to further detailed timetable analysis and a 'GRIP 1' study of the new station proposal to be funded by promoters. We will continue to work closely with the three authorities in assisting with development of the scheme."*
- Oxfordshire County Council - discussed the importance of cross-boundary working on matters relating to strategic transport infrastructure, noting that Oxfordshire and Berkshire are covered by two separate regional transport bodies. A particular issue is the matter of a new Thames crossing to the east of Reading, which is not supported by Oxfordshire County Council, following a [motion](#) upheld by the Council on 10th September 2019. See further discussion below.
- Reading Borough Council - in addition to detailed comments on Grazeley, the detailed consultation response commented on matters including:
 - Safeguarded transport routes - RBC strongly supports reference to high quality express bus services or dedicated public transport route along the A4 and A329 corridors, and also seeks clarity within the Wokingham Local Plan regarding support – or otherwise – for a link between these two corridors, referred to as East Reading Fast Track Public Transport corridor. RBC also strongly supports the Third Thames Crossing proposal (discussed above and below).
 - Whiteknights Campus - which spans the boundary between Wokingham and Reading.
 - Gypsies and Travellers and Travelling Showpeople Provision - there is an unmet need from Reading.
- South Oxfordshire District Council - raised concerns regarding safeguarding of land to deliver a third Thames crossing ahead of options appraisal work having been completed, and due to potential conflicts with strategic objectives, including relating to decarbonisation. The response went on to explain: *"We note that the delivery of a third Thames crossing does not appear to be required to directly mitigate any of the strategic site allocations within your Draft Local Plan and would welcome a better understanding of the justification behind delivering a third Thames crossing in this location."*
- Thames Valley Berkshire LEP - made limited comments on the spatial strategy, but did highlight Thames Valley Science Park as *"a key site for development in the borough."*
- Thames Water - did not raise any particular concerns regarding Sewage Treatment Works capacity, but did make the following general comment: *"It is important not to under estimate the time required to deliver necessary infrastructure. For example... Sewage Treatment & Water Treatment works upgrades can take 3-5 years. Implementing new technologies and the construction of a major treatment works extension or new treatment works extension could take up to ten years... To minimise the likelihood of [issues] developers are advised to contact Thames Water as early as possible to discuss their development proposed and intended delivery programme."*
- West Berkshire Council - commented primarily on matters relating to Grazeley.
- The development industry - common themes across the issues raised included:
 - The plan should allocate additional sites of varied sizes and locations to provide sufficient flexibility in the likely event that the delivery of Grazeley garden town falls short
 - Proposed growth is disproportionately low in some areas, for example Twyford
 - The spatial strategy for employment is too limited in terms of the range of employment opportunities it provides as the policy approach does not support new or expanded business parks.
 - The plan's policies and proposals should be subject to a viability assessment informed by known/expected infrastructure costs.

5.2.35 With regards to the Interim SA Report (2020) and its [Non-technical Summary](#), key messages on broad distribution highlighted through the appraisal included:

- The preferred option at the time – which involved a primary focus at Grazeley – performed well relative to the alternative growth scenarios in a number of respects, with primary draw-backs relating to flood risk, historic environment constraint and landscape constraint. However, the appraisal conclusions reflected a wide range of assumptions in respect of infrastructure funding and delivery.
- The appraisal findings in respect of Option 1 are also of note, as this was a lower growth option that would not see allocation of a new strategic growth location. This option performed notably poorly in respect of socio-economic and transport objectives, as opportunities would not be realised.
- With regards to the appraisal of the Draft Plan as a whole, the appraisal notably predicted significant negative effects only in respect of 'land and soils' due to a predicted significant loss of best and most versatile (BMV) agricultural land. There is a particular concentration of this in the north of the Borough.

Figure 5.11: The AWE Burghfield Detailed Emergency Planning Zone and 5km consultation zone



Source: The Emerging Draft West Berkshire Local Plan, available [here](#)

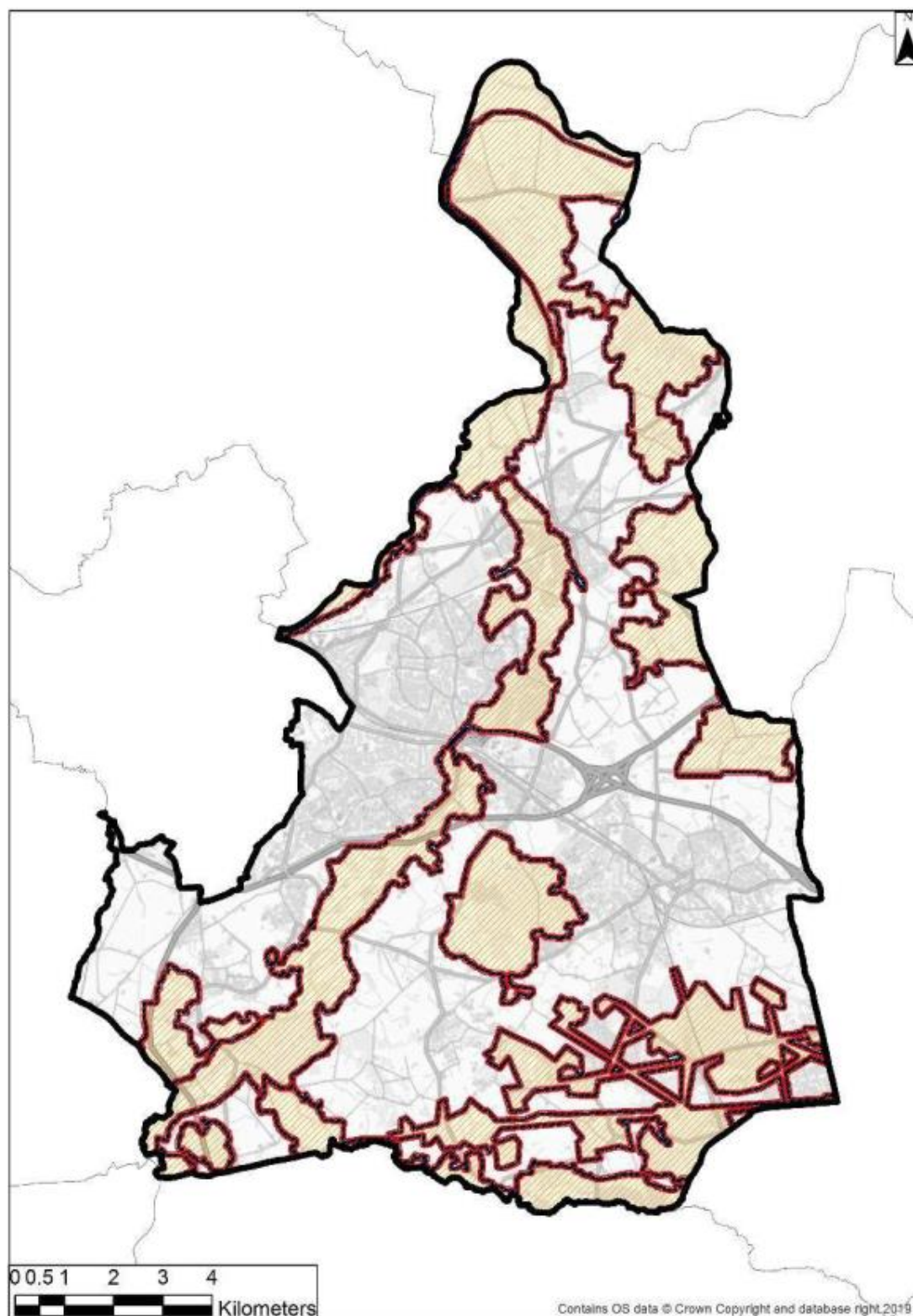
Latest context

- 5.2.36 Since the Draft Plan consultation there have been some considerable shifts to the national context to Local Plan-making, following the experience of the **C-19 pandemic** and national lockdowns. Considerations for the development of reasonable growth scenarios include:
- Employment land – there is uncertainty regarding the long term trend in respect of working from home, versus hybrid working models etc, also with implications for traffic modelling / transport planning;
 - Walking, cycling and public transport – a long term uptick in rates of walking and cycling is anticipated, supported by national Government investment, but long term public transport patterns are less clear;
 - Indoor and outdoor space – green infrastructure is more valued than ever as a recreational / well-being resource, and the importance of addressing spatial imbalances in accessibility – both to green infrastructure and quality housing - has come to the fore; and
 - Town and local centres – the rise of online retail shows little sign of abating (also with implications for planning for warehousing, distribution, logistics space and transport planning) whilst the wider socio-economic and community functions of town and local centres are increasingly valued, and wider context comes in the form of national changes to planning use classes and permitted development rights that create flexibility to convert away from retail and other traditional town centre uses.
- 5.2.37 The other key point to note, by way of updated national context with major implications for defining growth scenarios, is the increasing focus on Local Plan-making as a central component of the national strategy for addressing the **climate and ecological emergency**, including achieving a decarbonisation trajectory in-line with established targets dates.
- 5.2.38 Beginning with the Environment Act (2021), perhaps its centrally important component is a national requirement for 10% biodiversity net gain. This will be measured at the planning application stage, applying the latest Defra 'metric', but there is increasingly recognition that strategic planning through Local Plans has a key role to play, including by facilitating the right type of offsite compensatory (i.e. necessary to compensate for onsite biodiversity loss, and so achieve the requisite net gain) habitat enhancement (also referred to as 'offsetting') in the right locations. There is a need to target efforts at priority landscape scales (e.g. river valleys, historically wooded areas), in-line with established strategic objectives, although there is a need to balance this strategy with a desire to deliver compensatory enhancements in proximity to development locations, and a desire to avoid overly polarising landscapes over time.
- 5.2.39 The Environment Act also requires preparation of Local Nature Recovery Strategies (LNRSs) nationwide to guide efforts, and so it will be important for Local Plans to feed-into and integrate with LNRSs as far as possible, ensuring that they are prepared with an understanding of growth locations and means of effectively leveraging development industry funding. The Royal Town Planning Institute (RTPI) recently [commented](#) that there *"needs to be a much clearer requirement and encouragement for LNRS to take the contents of local plans into account when they are being devised and vice versa"*.
- 5.2.40 Ahead of a LNRS covering Wokingham, there is a need to draw-upon the long established network of Biodiversity Opportunity Areas (BOAs) defined for the entire South East region (albeit these are high-level / somewhat broad brush) and also emerging work led by the local Wildlife Trust to map a potential nature recovery map – see <https://www.bbwt.org.uk/nature-recovery-map>. Another source of evidence is the analysis presented in the Valued Landscapes Topic Paper (2020) – see Figure 5.12.
- 5.2.41 The need to avoid a situation whereby planning for biodiversity net gain leads to a net reduced emphasis on strategic, landscape scale interventions, due to an increased focus on small-scale / piecemeal interventions within development sites, was a point recently highlighted by a research study completed by ze Ermgassen et al. (2021).¹⁷ Whilst the Government had previously anticipated 25% of biodiversity units being achieved offsite, the research found the figure in practice to be much lower, and the study authors are concerned about an over reliance on onsite measures as this could lead to opportunities missed in respect of *"strategic investments in the local nature recovery networks"* and *"investments in regional biodiversity priorities that can help restore biodiversity at a landscape scale"*. The authors recognise that there are strong 'access to greenspace' arguments in favour of generating biodiversity units onsite, and that an onsite focus has *"broad support from across stakeholders"*, but suggest *"this priority risks overwhelming the biodiversity goals of the policy... potential trade-offs should be explicitly discussed."*

¹⁷ zu Ermgassen et al; see <https://conbio.onlinelibrary.wiley.com/doi/full/10.1111/conl.12820>

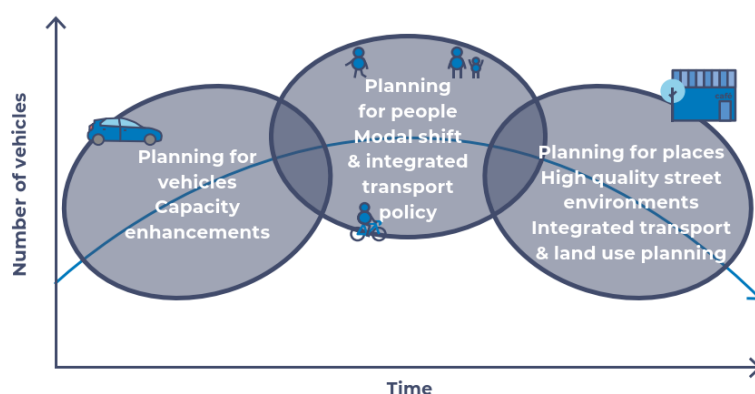
- 5.2.42 A related key national issue at the current time is water pollution. Nitrate and phosphate pollution affecting internationally designated aquatic and wetland sites is a key issue for Local Plans in several parts of the country, including Kent (River Stour catchment) and Hampshire (the Solent); however, there is also a focus more generally on issues relating to water pollution affecting rivers and the wider water environment. There is a need for further work to understand specific issues and opportunities for the LPU; however, from data on the River Loddon and its tributaries available [here](#), it is evident that issues do exist, for example the headline finding for the Twyford Brook is “bad ecological status”. A key issue for the Local Plan relates to careful planning to minimise the risk of capacity breaches at sewage treatment works, but there can also be opportunities to explore how Local Plans can help tackle pollution from agriculture.

Figure 5.12: Valued Landscapes in the Borough (from the Valued Landscapes Topic Paper, 2020)



- 5.2.43 With regards to **decarbonisation**, national context comes from the Ten Point Plan for a Green Industrial Revolution (2020), the Energy White Paper (2020) and the more recent Transport Decarbonisation Plan and Net Zero Strategy (the Heat and Buildings Strategy is currently awaited, at the time of writing).
- 5.2.44 Focusing on emissions from transport, the sub-national transport body – Transport for the South East - recently [responded](#) to the Net Zero Strategy as follows: *“These ambitious commitments support research conducted by TfSE which shows investment is needed across the whole transport network. Looking not only at increasing the availability, affordability and convenience of electric vehicles, but also working towards improving other modes of transport and reducing car-dependency. The additional investment in local transport systems and bus networks cited in the strategy will be essential to support this modal shift.”*
- 5.2.45 With regards to the bus network, the following statement from the National Bus Strategy: Bus Back Better is also of note: *“To avoid the worst effects of a car-led recovery – cities and towns grinding to a halt; pollution, road injuries, respiratory illness and carbon emissions all rising – we need to shift back quickly, by making radical improvements to local public transport as normal life returns. Buses are the quickest, easiest and cheapest way to do that.”* Bus Back Better encourages integration of transport and land use planning at the strategic level, and this is also a key message within the Transport for the South East Transport Strategy (2020) - see Figure 5.13. It is also important to note that Reading is a national success story in respect of use of public busses in place of the private car – see discussion in Appendix II.

Figure 5.13: A vision for transport planning over time, from the South East Transport Strategy (2020)



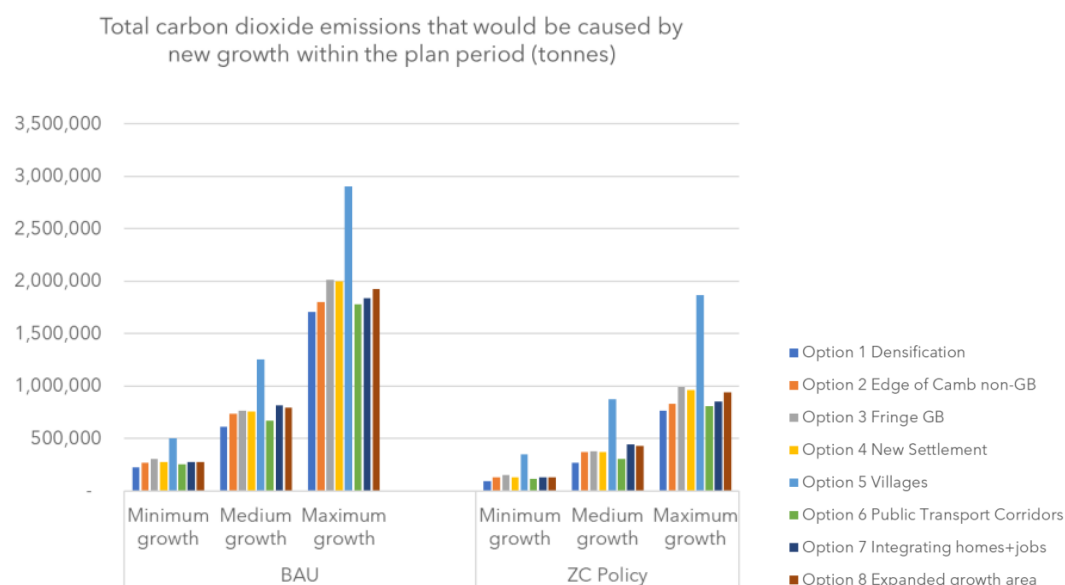
- 5.2.46 With regards to emissions from the built environment, the Ten Point Plan for a Green Industrial Revolution (2020) made clear the extent to which this is a national priority – see Figure 5.14 – and there is clarity on: the central importance of considering both operational (or ‘in use’) and non-operational (e.g. embodied) emissions; a focus on an ‘energy hierarchy’ approach to operational emissions; and also the need to focus on heating. For example, the UK Green Building Council (UKGBC) Policy Playbook (2021) explains: *“According to the Climate Change Committee, in order to reach net zero the UK must reduce its emissions from 430 MtCO₂e to around 29 MtCO₂e in 2050. This will require a reduction in the direct emissions from buildings from around **85 MtCO₂e in 2017 to around 4 MtCO₂e in 2050**. To achieve this, the Committee has made clear that this will require ‘a new approach that will lead to the full decarbonisation of buildings by 2050’, using a mixture of energy efficiency and low carbon heating measures.”* [emphasis added]

Table 5.14: Government’s Ten Point Plan (2020) – ranked by stated emissions savings

Ten point plan		GHG savings 2023-2032 (MtCO ₂ e)
7	Greener Buildings	71
2	Low Carbon Hydrogen	41
8	Carbon Capture, Usage and Storage	40
1	Offshore Wind	21
4	Zero Emission Vehicles	5
5	Public Transport, Cycling and Walking	2
6	Jet Zero and Green Ships	1
9	Natural Environment	-
3	Nuclear Power	-
10	Green Finance and Innovation	-

- 5.2.47 However, there is a need to distinguish between the role of emissions from new build development versus emissions from the existing built environment, and there is limited clarity nationally regarding the role of spatial strategy. Methods for scrutinising growth scenarios in terms of decarbonisation objectives are emerging, and the [work](#) recently undertaken in support of the emerging Greater Cambridge Local Plan should be reviewed as an example of emerging good practice. The study notably presents 48 emissions scenarios, where the variables are: 1) growth quantum; 2) spatial strategy; and 3) 'zero carbon policy' – see Figure 5.14. A key point to note is that the performance of 'spatial strategy' options is highly dependent on emissions from transport, leading to Option 5 (Dispersal to villages) performing very poorly.
- 5.2.48 Emissions from transport are a very significant consideration for Local Plans; however, there is also a need to recognise the role of spatial strategy in respect of minimising built environment emissions. For example, a spatial strategy option might be seen to perform well where it directs growth to: larger schemes with economies of scale; areas with strong development viability; sites with land-owners willing to accept land value capture for public benefit; sites controlled by developers with a proactive approach to decarbonisation; sites associated with inherent opportunities around sharing waste heat (e.g. a WwTW, industrial operation, leisure centre) or capturing or ambient heat (e.g. a watercourse); sites with inherent opportunities around renewable power (solar, wind, hydro; albeit recognising that major schemes typically feed into the national grid); and schemes where the masterplanning/design concept is supportive of decarbonisation, e.g. with high densities and a use mix supportive of fifth generation heat networks.
- 5.2.49 In the Wokingham context, key evidence comes in the form of the recently completed Renewable Energy Provision Statement, which concludes: *“Primary emphasis should be given to electric-led solutions such as [heat pumps], EVs and PV arrays. The majority of these technologies are possible for **development building at scale**. This removes up-front costs and ultimately improves the viability of the systems... Secondly, the suitability of battery storage, balancing technologies and active network management systems... [emphasis added].”* The study further concludes:
- “Prioritise passive and active energy efficiency measures within the masterplanning of developments;
 - Implement non-fossil fuel heating solutions;
 - Support the introduction of heat networks to optimise the heat use within the site areas, particularly focused at heavy energy anchors where commercially viable (e.g. hospital, film studios);
 - Encourage the introduction of renewable [power] generation technologies including solar PVs; and
 - Forward fund smart energy infrastructure and active network management systems...”

Figure 5.14: Emissions scenarios to inform the Greater Cambridge Local Plan (Etude, 2021)



- 5.2.50 Furthermore, by way of local context, there is a need to note the Wokingham Climate Emergency Action Plan (January 2020), and its July 2020 update - see wokingham.gov.uk/council-and-meetings/open-data/climate-emergency. There is a section on 'new development', which most notably sets out the goal of ensuring that all schemes of ten homes or more achieve net zero emissions from 2022.

- 5.2.51 Final important context comes from the recently published RTPI/TCPA *Guide for Local Authorities on Planning for Climate Change* (October 2021; see <https://www.tcpa.org.uk/planning-for-climate-change>). The study includes a focus on plan-making, but limited focus on decarbonisation principles to inform spatial strategy and site selection. The section on site selection points out that: “Reducing the need to travel, connecting to existing heat networks and avoiding areas of flood risk are obvious considerations.”

Conclusion on broad distribution options to examine further

- 5.2.52 On the basis of the discussion above, the following key messages emerge:

- There is much to commend the Core Strategy approach of supporting **large strategic schemes** as an option for the LPU, including in light of consultation responses received on the LPU to-date, as well as appraisal work completed to date. There has been successful infrastructure delivery alongside housing.
- However, there is also a need to support a **mix of site types**, and a degree of dispersal (mindful of the settlement hierarchy), in order to ensure a robust housing supply trajectory (thereby maintaining a 5YHLS) and ensure that local housing needs are met. There is also a need to avoid an undue imbalance of growth between the north and south of the Borough, as far as possible given the Green Belt constraint.
- There is a clear need to make best use of **previously developed sites** and redevelopment opportunities in urban areas, also aligning with wider objectives including around reimagining town centres and ensuring high quality place-making / ‘beauty’. However, previously developed sites are often associated with delivery challenges, and there is a need to consider strategic objectives for urban areas (e.g. Wokingham town centre functions must not be unduly eroded) and there is a need to ensure new homes with good space standards and access to green/open space. N.B. detailed work on development density has been completed recently, and is discussed in Section 5.4.
- There is also a clear need to protect the **Green Belt** as far as possible, in line with the NPPF, and taking account of the Bracknell Forest and Wokingham Green Belt Review (2016).
- There is a need to approach any further growth at the **SDLs** with caution, ensuring alignment with established strategic objectives, and supporting the ability of new communities to form and ‘bed in’.
- Objectively assessed needs for **employment land** are potentially associated with a degree of uncertainty at the current time, but there is a key strategic opportunity at Thames Valley Science Park.
- There is a need to support the ambitions of Reading Borough to deliver a network of public and active **transport corridors** linking residential areas and key employment locations. There is also a need to take account of issues and opportunities raised by Oxfordshire authorities (notably concerns in respect of a third Thames Crossing), Hampshire authorities (the A33 corridor) and Bracknell Forest. Equally, there are ‘within borough’ issues and opportunities, e.g. concerns with the two main road corridors south of Wokingham (although new and forthcoming road infrastructure is improving the situation).
- With regards to **community infrastructure** (also ‘grey’ infrastructure), there are no headline issues/opportunities (e.g. there is no location with an identified need for a new secondary school), but there is clear merit to directing growth to locations with infrastructure capacity and/or with the potential to deliver new and/or upgraded strategic infrastructure alongside housing.
- There is a need to take a strategic approach to planning for **green infrastructure** and landscapes, integrating with landscape / historic / settlement character and the emerging agenda of planning for biodiversity and wider environmental net gain. Other key ‘environmental’ considerations include planning for the water environment and avoiding the loss of BMV agricultural land.
- A priority issue for the LPU is aligning with the Climate Emergency Action Plan and hence supporting achievement of the Borough’s 2030 **net zero** target. There is a need to minimise per capita emissions both from transport (with well understood implications for spatial strategy) and the built environment (less well understood implications). All schemes of ten homes or more must be net zero from 2022.
- The AWE Burghfield Detailed Emergency Planning Zone rules out growth along the A33 corridor, south of Reading. In particular, it rules out **Grazeley**, which leads to a major gap in the housing land supply proposal from the Draft Plan consultation stage, recognising that, as a particularly large site, it was anticipated that Grazeley would be able to deliver a very large number of homes in the plan period (3,750). This clearly creates a significant issue for the LPU, but also leads to an opportunity to reconsider the opportunities of increased growth elsewhere, including at lower tier settlements.

- 5.2.53 This list does not aim to be comprehensive, but is considered to provide a useful ‘top-down’ input into the process of defining reasonable growth scenarios.

5.3 Site options

5.3.1 A large number of site options have been submitted by land-owners and developers, including WBC a landowner, and a process of Housing and Economic Land Availability Assessment (HELAA) has been prepared in order to identify a shortlist of sites that are available and potentially suitable for allocation. The HELAA provides an important starting point for defining reasonable growth scenarios, and is available at: www.wokingham.gov.uk/planning-policy/planning-policy-information/evidence-topics.

5.3.2 Within Wokingham Borough, as within other local authority areas, there is an important distinction between strategic and non-strategic sites. Strategic sites are those with a housing capacity in the several hundreds or thousands, and associated with economies of scale that enable delivery of a good mix of uses (also a good mix of homes in terms of type, size and tenure), potentially to include employment land, and/or enable delivery of new or upgraded strategic infrastructure (e.g. road, community, green infrastructure).

5.3.3 This section firstly considers the pool of available strategic sites in some detail (when read alongside Appendices III and IV), before a second section presents GIS analysis of all available site options.

Strategic site options

5.3.4 The adopted Core Strategy included a focus on strategic sites, in the form of the four allocated SDLs, and a more or less similar focus on strategic sites is an option for the LPU, as discussed above.

5.3.5 This being the case, in **2018** the Council commissioned a 'Strategic Growth Locations: Growth Scenarios' study that examined growth scenarios for five potential strategic growth locations, namely:

- Grazeley – the study examined scenarios involving 5,000, 10,000 and 15,000 homes;
- Twyford/Ruscombe - the study examined scenarios involving 500, 2,250 and 3,500 homes;
- Barkham Square - the study examined scenarios involving 500, 750 and 1,000 homes;
- Hall Farm - the study examined one scenario involving 1,000 homes; and
- Ashridge - the study examined one scenario involving 3,000 homes.

5.3.6 These sites/scenarios were a focus of detailed consideration at the time of preparing the Draft Plan in **2019**, as discussed in Section 5 and Appendix IV of the Interim SA Report (2020). Additionally, close consideration was given to the option of further strategic growth at the existing Shinfield (South of the M4) SDL; specifically, an option involving a package of sites to deliver 976 further homes was examined.

5.3.7 Ultimately, four strategic site options were progressed to the reasonable growth scenarios (Section 6 of the Interim SA Report), namely Grazeley (15,000 homes in total; 3,750 in the plan period), Twyford/Ruscombe (2,000 homes in total; 1,500 in the plan period), Shinfield (South of the M4) SDL expansion (976 homes) and Barkham Square (500 homes). The Draft Plan then proposed allocation of just one of these strategic sites, namely Grazeley.

5.3.8 Subsequently, in December **2020**, the Council announced that there would be a need to look at alternatives to Grazeley Garden Town, because the scheme might not be achievable (discussed above, also see: news.wokingham.gov.uk/news/council-local-plan-moves-away-from-grazeley-garden-town). It was subsequently confirmed that strategic development in this area is not achievable, and hence the option of strategic growth at Grazeley need not be considered further as an option for the LPU.

5.3.9 The task in **2021** was then to re-examine available strategic site options, mindful that there could well be a need to ultimately allocate more than one in order to fill the large supply gap left by the removal of Grazeley Garden Town from the LPU spatial strategy. As part of this, the Council commissioned DLA to undertake work (**Strategic Masterplan Report**, 2021) to examine masterplan options for Hall Farm (building upon the work completed in 2018) and one new strategic site option, namely South Wokingham SDL extension (specifically, this would involve an additional 835 homes at the southern extent of the SDL).

5.3.10 Furthermore, following discussions with AECOM, a need to undertake a further 'stock take' of all available strategic site options was identified. This led to identification of a longlist of 12 strategic site options, which fall into two categories: **larger** strategic site options; and **smaller** strategic site options. The longlist of strategic site options is presented in Table 5.2 and Figure 5.3. One further input at this stage was a Non-strategic Sites Report (DLA, 2021), which considers masterplanning options for ten sites.

Table 5.2: Introducing the longlist of strategic site options 2021

Type	Name	Area (ha)	Capacity (homes)	Notes
Larger	1. Hall Farm / Loddon Valley	527	4,500	A 1,000 homes scheme was ruled out relatively early in the process in 2019 (para 5.52 of the 2020 ISA Report). The Strategic Masterplan Report (2021) then identified the potential for a much larger and more holistic scheme, stretching across the Loddon Valley, with housing focused to the east and employment to the west, associated with the expanding Thames Valley Science Park (TVSP; see Box 5.1) and another headline issue is strategic planning for green and blue infrastructure along the Loddon Valley. 2,200 homes to be delivered in the plan period.
	2. Ashridge	226	3,000	Was ruled out early in the process in 2019 (para 5.49 of the ISA Report), but a detailed scheme proposal and supporting evidence was then submitted in August 2021. The promoters suggest 3,000 homes in the plan period, but there are potential delivery issues, so 2,000 in the plan period is a cautious assumption.
	3. Twyford / Ruscombe	154 / 232 ¹⁸	2,000 - 2,500	Three options were examined closely over the period 2018-20, before the ISA Report (2020) focused attention on a shortlist of two (2,000 and 3,000 homes; see Table A in Appendix IV) before further focusing on the 2,000 home option (see paragraph 5.52). The scheme promoter is proposing 2,500 homes, and recent reports in the local press suggest the potential for a new rail station; however, this was not mentioned as an option in the consultation response received in 2020, and nothing has been formally submitted to the Council in the time since the consultation. 1,500 homes to be delivered in the plan period (i.e. a relatively slow rate, because Berkeley propose to deliver the scheme as the sole house-builder).
Smaller	4. Home Farm, Winnersh	59	1,000	Ruled out relatively early in the process in 2019 (para 5.104 of the ISA Report, 2020), but the consultation response then proposed: “... up to 250 homes in the first five years of the plan period [and then] potential to grow via phased development to deliver [1,100 homes int total] as well as a new Primary School, Local Centre, Community Facility, Sport and Recreation Hub and Open Space.”
	5. Stokes Farm	80	1,000	Ruled out relatively early in the process in 2019 (para 5.84 of the ISA Report). A consultation response was received proposing 1,000 homes, but with very little detail, e.g. no concept masterplan. Closely to Binfield/Bracknell, but would not link well in urban form terms, given a proposed designated strategic gap.
	6. East of Finchampstead Rd	90	1,000	Ruled out relatively early in the process in 2019 (para 5.94 of the ISA Report), before a consultation response was received confirming availability and the potential to provide SANG, but providing limited further information. Capacity is unknown, and so 1,000 is assumed as a rough estimate.
	7. South Wokingham SDL ext.	59	800	Was unavailable in 2019/20. Examined through the Strategic Masterplan Report (2021). The land falls within the SDL boundary, but is shown as ‘potential green open space’ within the SDL SPD (2011). Land within the SDL to the north (south of the railway) has a resolution to grant planning permission for 1,600 homes and associated infrastructure.

¹⁸ The smaller area assumes no land south of the railway. There are sensitivities here, and so the assumption in 2019/20 was that a c.2,000 home scheme would focus to the north only; however, at the current time there is some uncertainty regarding whether there could be a need for homes and/or new infrastructure south of the railway under a ‘2,000-2,500 home’ scenario.

Type	Name	Area (ha)	Capacity (homes)	Notes
	8. Barkham Square	58	500	Three options were examined closely over the period 2018-20, before the ISA Report focused attention on a shortlist of two (500 and 750 homes; see Appendix IV) before further focusing on the 500 home option (see paragraph 5.52). A consultation response was received proposing 750-1,000 homes, but Officers maintain that a 500 homes scheme, in the form of an extension to the Arborfield Garrison SDL, is a more appropriate assumption.
	9. Land at Church Farm & Finchampstead Rd	46	500	Ruled out relatively early in the process in 2019 (para 5.118 of the ISA Report), but two detailed consultation responses were received in respect of the two adjacent sites (384 homes to the west of Finchampstead Road, 118 homes to east). A coordinated scheme has not been proposed, but could feasibly be an option.
	10. Arborfield Cross	55	500	Ruled out early in the process in 2019 (para 5.113 of the ISA Report), but subsequently identified as a comparator to Barkham Square. A cluster of four sites would comprise most (but not all) land between the SDL and Arborfield Cross, with a stand-out large site (Duck's Nest Farm) west of the B3030, in respect of which a detailed consultation response was received in 2020 (275 homes). Proposals for land east of the B3030 are less clear. Total capacity is unknown, and so 500 is assumed as a rough estimate.
	11. Blagrove Lane	57	400	Ruled out relatively early in the process in 2019 (para 5.84 of the ISA Report), but a detailed consultation response was then received in 2020, proposing a 500 home scheme. The site was then examined through the Non-strategic Sites Report (DLA, 2021), which identified two options: 336 homes and 455 homes.
	12. Heathlands Road	95	Unknown	A loose cluster of adjacent submitted sites; however, no coordinated scheme has been proposed.

Box 5.2: Thames Valley Science Park (TVSP)

The situation in respect of existing, under-construction, committed and proposed employment uses in the TVSP area is complex. The Strategic Site Report (2021) explains matters as follows:

“Supported by the Core Strategy and Managing Development Delivery Document, the [TVSP] has been expanding within University-owned land to the west of the site. Phase 1 of TVSP was given outline planning permission for 18,580sqm of floorspace in May 2010 and is now occupied by approximately 80 different science and technology companies. Phase 2 was granted outline permission for 57,110sqm of floorspace in July 2017. Phase 3 is expected to provide a further 40,000sqm of science and technology floorspace. A Full application for the erection of TV Studio Building including studio space, workshop/storage area and production/office to form part of ‘Cine Valley’ was granted permission in October 2021.

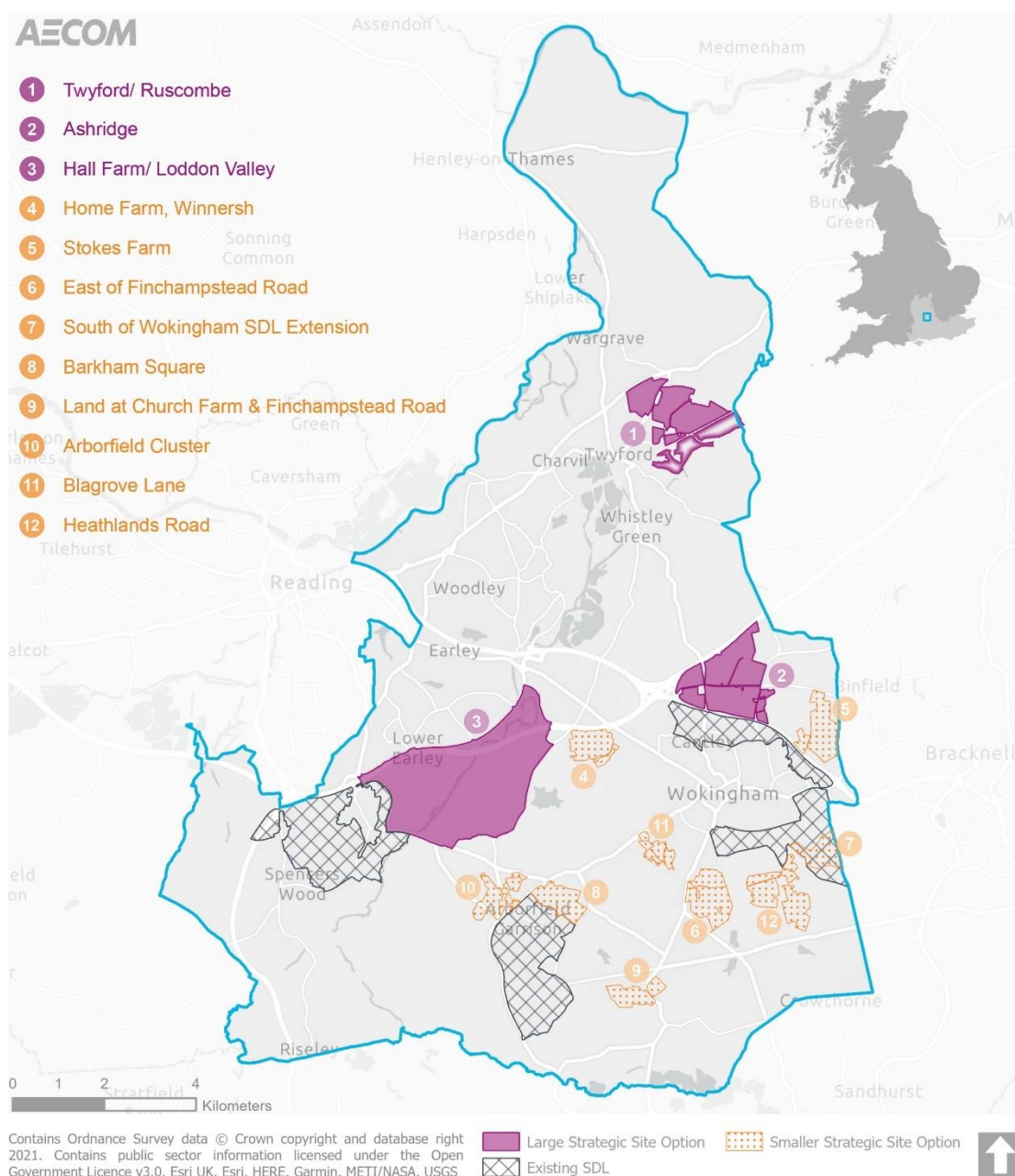
To the south of Cutbush Lane, planning permission was also granted in March 2019 for the British Museum Archaeological Research Collection, consisting of a 15,600sqm research and storage facility with 80 parking spaces, currently under construction. Outline consent was also granted for up to an additional 15,000sqm of research and storage floorspace.

Adjacent to the west of the British Museum site, a full application for the erection of film studio stages and workshops (for a temporary period of 5 years) was permitted in March 2021...

In the longer term, additional medical uses are also proposed, including a potential major teaching hospital.

Together these proposals contribute to the University’s development concept for the area, an enterprise which aims to create a hub of commercial, recreational and scientific activities based on film and media; innovation and tech; heritage and arts and health and life sciences...”

Figure 5.15: Longlist of strategic site options 2021



5.3.11 A comparative appraisal of the three **larger strategic site options** is presented in **Appendix III** of this report, with the conclusion that all are associated with relative pros and cons. The appraisal finds all three sites to be associated with pros and cons, and on the basis of the appraisal alone it is not possible to rule out any of the three sites. As such, all three are progressed for further consideration.

5.3.12 With regards to the nine **smaller strategic sites**, the first step was to present these to the WBC Planning and Transport Policy Member Working Group (TPMWG), which acts as a working group for the Executive Member of Planning and Enforcement, and does not have decision making powers. Further discussions were then held between WBC Officers and AECOM, which led to the identification of a shortlist of four sites. These four sites were then subject to a comparative appraisal (**Appendix IV**), on the basis of which WBC Officers were able to identify one of the four sites as performing relatively poorly, such that it can be ruled out of further consideration. The other three sites are progressed for further consideration.

Conclusion on strategic site options

5.3.13 In conclusion, in light of the discussion above (including the detailed analysis presented in Appendices III and IV), the decision was made to progress all three larger strategic site options and three smaller strategic site options for further consideration in Section 5.4.

Table 5.3: Conclusions on smaller strategic site options

Site	Conclusion
Home Farm, Winnersh	Ruled out: The latest proposal from the scheme promoters (August 2021) is for two smaller sites within the wider site, specifically a scheme for 49 homes and a scheme for 180 homes, serving to suggest that a 'strategic' site is not a deliverable or developable option. This is a sensitive area from a historic environment and settlement separation perspective (and potentially wider landscape perspective), but does link relatively well to Wokingham.
Stokes Farm	Ruled out following the TPMWG meeting. A sensitive location from a settlement separation perspective and would not relate well to Binfield given the Bracknell Forest Local Plan proposal to designate a strategic gap to the east. It is unlikely that growth here would be supported by BFC. There is a high density of ancient woodland patches in this area, and there is a need to guard against piecemeal expansion north of the A329. The consultation response received in 2020 gave little insight regarding addressing issues/opportunities.
East of Finchampstead Road	Ruled out following the TPMWG meeting. A recent refusal for a 216 home scheme on the northern part of this site was dismissed by the Planning Inspectorate following an appeal, including on transport grounds, and there is no evidence that a larger, strategic scheme could address the issues raised. However, land here does relate relatively well to Wokingham, so there may be a need to explore solutions moving forward. The 2020 consultation response was brief and did not propose a linked scheme across the two component sites.
Land at Church Farm & Finchampstead Road	Ruled out following the TPMWG meeting. Two separate schemes are being promoted, and it is not clear that a linked strategic scheme is feasible or would deliver any particular benefits. Land here relates well to Finchampstead Cross Roads local centre, and Crowthorne station is within cycling distance, but higher order settlements are more distant. There are also significant landscape and historic environment constraints, noting rising land (with public rights of way) to Finchampstead Church Conservation Area and scheduled monuments, plus there is a need to consider current built form / settlement pattern south of Nine Mile Ride.
Heathlands Road	Ruled out following the TPMWG meeting. Land here falls in-between main road corridors, is distant from a rail station, associated with a horticultural cluster and contributes to settlement separation. Development here would not form a logical extension of the South of Wokingham SDL given a flood risk zone, a committed area of greenspace (as per the recent resolution to grant permission) and a proposed location for a sports hub (at Gray's Farm, which is now owned by WBC). A preferable location for SDL extension is discussed below.
Arborfield Cross	Ruled out following the appraisal in Appendix IV. The option of growth here has a degree of merit, particularly the proposal to deliver a significant new area of green-space in a strategically important location. However, this option is judged sequentially less preferable to the option of growth at Barkham Square, and the option of growth both here and at Barkham Square is judged to be unreasonable, as this would amount to over-allocation in this part of the Borough, recognising that the Arborfield SDL will be under construction for several years to come, and also recognising that accessibility and transport connectivity in this part of the Borough is relatively low. Furthermore, there is no current evidence of landowner intention to bring this cluster forward together, which clearly leads to implications for deliverability.
S. Wokingham SDL extension	Progressed for further detailed consideration (Section 5.4).
Barkham Square	Progressed for further detailed consideration (Section 5.4).
Blagrove Lane	Progressed for further detailed consideration (Section 5.4).

Non-strategic site options

- 5.3.14 **Appendix V** presents the findings of a quantitative GIS-based exercise, involving examining the spatial relationship (proximity and intersect) between **all site options** and a range of constraint/push (e.g. flood zones, heritage assets) and opportunity/pull (e.g. schools) features for which data is available in digitally mapped form for the Borough as a whole. The limited nature of the analysis is such that it does not enable overall conclusions to be reached on the merits of individual site options (i.e. no sites were identified as poorly performing, such that they should be sifted out); however, issues and opportunities highlighted through the analysis fed into the consideration of site options by sub-area, as discussed below.
- 5.3.15 All 359 site options were run through the analysis, i.e. both strategic and non-strategic sites. However, there is more to be learned regarding **non-strategic site options** from GIS analysis of this nature. This is because strategic sites can be masterplanned to deliver new community infrastructure and also address environmental sensitivities within or nearby to the site boundary.
- 5.3.16 Having run site options through GIS analysis it becomes possible to compare and contrast the performance of sub-sets of site options, highlighting trends that can provide insights. The following is a brief selection of some of the more notable trends discussed in Appendix V:
- Agricultural land - 41 sites intersect land that is shown to be of grade 1 or grade 2 quality by the nationally available 'provisional' agricultural land dataset, albeit it is recognised that this dataset is very low resolution. The analysis does not show a significant difference in percentage intersect between sites supported by the HELAA (suitable or potentially suitable) versus not supported (unsuitable or excluded).
 - Air quality - 27 sites are within or adjacent to an AQMA, and in 22 of these cases the AQMA in question is that associated with the M4 motorway. A further 85 sites are then within 1km of an AQMA. Sites supported by the HELAA tend to be closer to an AQMA than sites not supported by the HELAA.
 - Biodiversity - six sites intersect or are adjacent to a SSSI, of which two are supported by the HELAA, namely: 5WW009 (Ravenswood Village), which is adjacent and judged potentially suitable for housing; and 5BA033 (Land at Rooks Nest Farm), which is near adjacent and also judged potentially suitable.
 - Communities –
 - 81 sites are more than 2km from a secondary school (within Wokingham Borough), and are judged to stand-out as performing poorly. The top 34 worst performing sites (bar one) are located in one of four parishes (Hurst, Finchampstead, Shinfield and Swallowfield). N.B. in Shinfield has a secondary school, but land within the Parish to the west of the A33 is distant.
 - 48 sites are more than 1.5km from a primary school, and are judged to stand-out as performing poorly. Risely is notable as a village – associated with numerous site options - without a primary school. 105 sites are less than 1km from a primary school, and so stand-out as performing well.
 - 55 sites are more than 2km from a GP surgery (within Wokingham Borough). The top 26 worst performing sites are all located in one of three parishes (Hurst, Finchampstead and Shinfield). N.B. Shinfield has a GP surgery, but land within the Parish to the west of the A33 is distant.
 - Flood risk - 41 sites intersect flood zone 2 by more than 20%. 14 of these sites are supported by the HELAA (i.e. judged suitable or potentially suitable), including four where the percentage intersect is c.50% or more. The average size of sites judged to perform poorly is 29.4 ha (in contrast to 9.4 ha across all site options), a scale at which there will typically be good potential to avoid flood risk.
 - Historic environment - 56 site options are within 500m of a grade 2* listed building. Lock's House, within Wokingham Without Parish, stands out as a grade 2* listed building where there is a large number of sites supported by the HELAA (or consented) in relative proximity (seven sites within 800m).
 - Core employment areas – 115 sites are less than 1km from a core employment area, and so stand-out as performing well. However, in practice it is recognised that there is little reason to assume that a significant proportion of residents within any given community will work within the nearest core employment area. Also, there is a need to be mindful that where a site option intersects an employment area it could be an indication of a proposal to redevelop the employment area for housing (five sites significantly intersect an employment area: one HELAA suitable; one HELAA potentially suitable; one HELAA potentially suitable for retail; one HELAA suitability unknown; and one HELAA unsuitable).

5.4 Sub-area scenarios

Introduction

- 5.4.1 Discussion has so far focused on A) 'top down' considerations of housing quantum and broad distribution issues and options; and B) 'bottom-up' consideration of site options. The next step is to consider each of the Borough's sub-areas in turn, exploring how sites might be allocated in combination.

What sub-areas?

- 5.4.2 The Homes for the Future consultation document (2018) divided the Borough into five sub-areas based on the overall geography (see Figure 5.5, above); however, as part of SA work completed in 2019 (as reported in Section 5 of the 2020 ISA Report) it was determined appropriate to use sub-areas defined to reflect the clustering of site options. 14 sub-areas were defined on this basis.
- 5.4.3 Just one adjustment has been made to the sub-areas since the 2020 ISA Report. Specifically, land directly to the south of the M4 and east of the Shinfield Eastern Relief Road is now included within the 'South of the M4, west of Wokingham' sub-area, as opposed to the 'South of the M4, east of the A33' sub-area, to reflect the extent of the Hall Farm / Loddon Valley site option (discussed in Section 5.3).
- 5.4.4 There are arguments for making further adjusts to the sub-areas, and the sub-areas can be revisited subsequent to the current consultation, to feed-into SA work ahead of Regulation 19 publication.
- 5.4.5 The 14 sub-areas are shown in Figure 5.16, below.

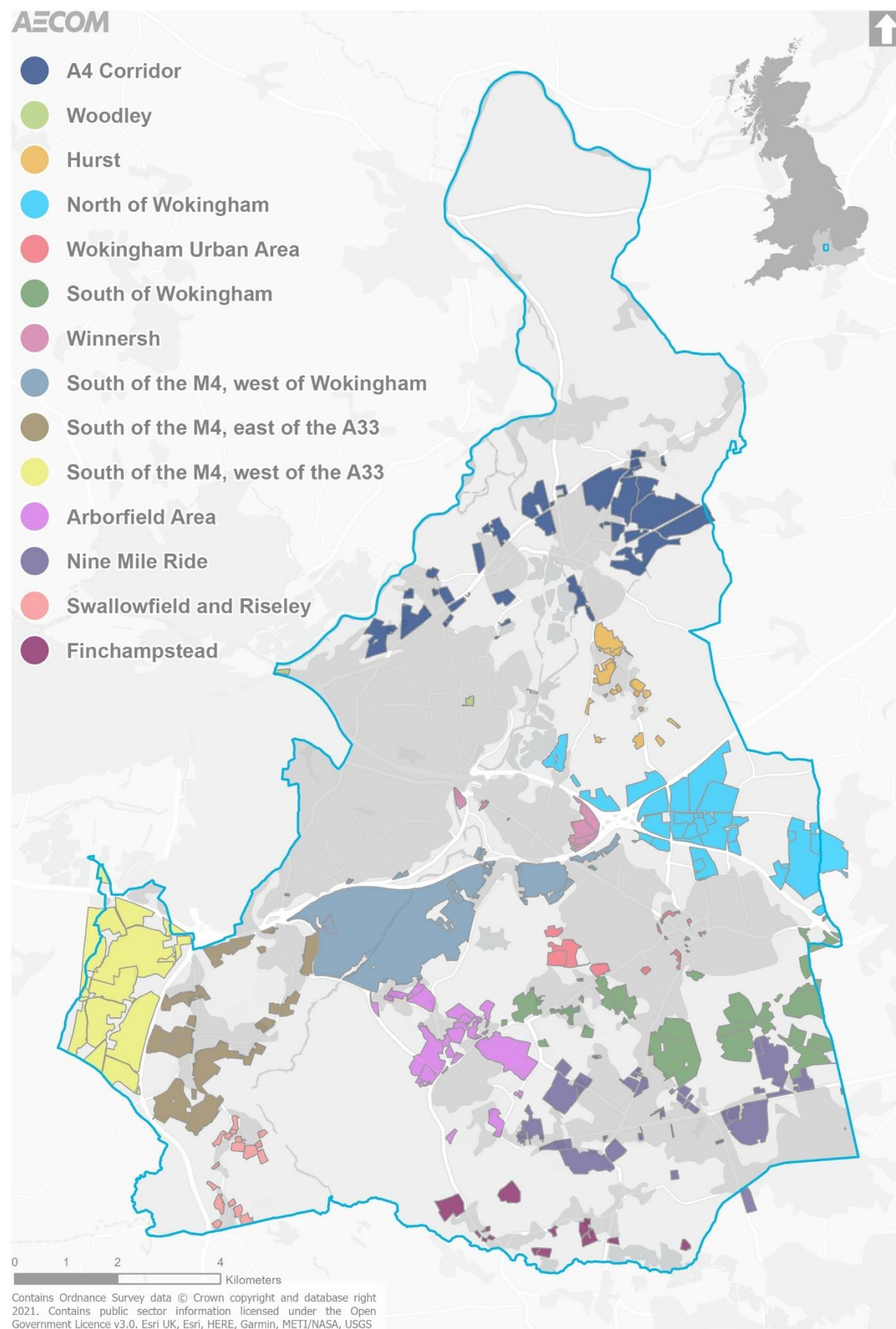
Structure of this section

- 5.4.6 This section considers each of the sub-areas in turn, discussing the site options that are feasibly in contention for allocation, taking the HELAA findings as a starting-point, before then considering scenarios involving allocating sites in combination. The sub-areas are discussed in order of geographical location.

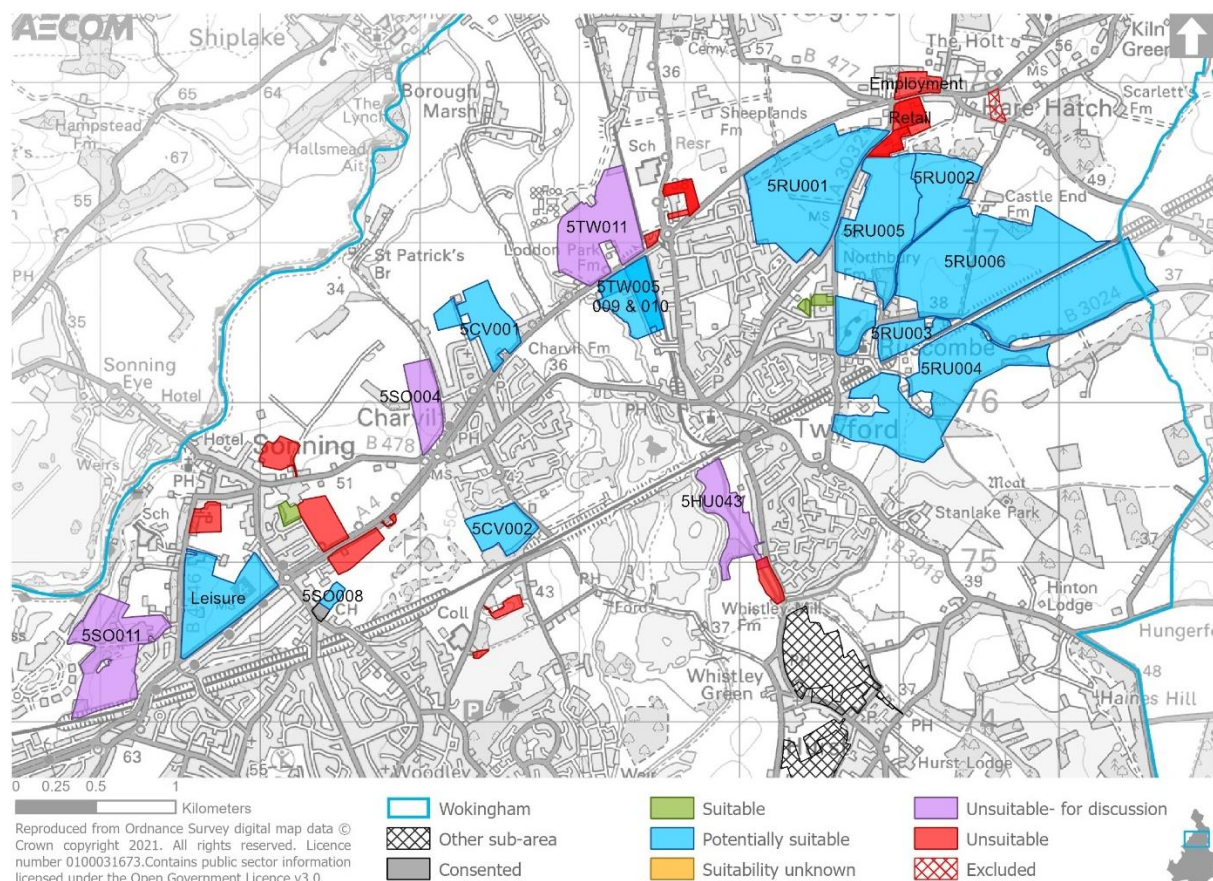
A note on methodology

- 5.4.7 The discussions are **systematic** to an extent, particularly in that:
- the Council's HELAA is a key starting point;
 - there is broad consistency with the approach taken to defining growth scenarios in 2019/20;
 - there is a focus on 'new' sites over-and-above proposed allocations from the Draft Plan stage (2020);
 - there is reliance on the Strategic and Non-strategic Sites Reports prepared by DLA in 2021; and
 - there is a focus on larger sites over-and-above smaller sites (because larger sites will tend to have greater potential to give rise to significant effects), including discussion of all 41 site options above 20ha.
- 5.4.8 However, in order to make the process of selecting and appraising growth scenarios manageable and effective, there is an inevitable need to apply **professional judgment** when identifying sites and site combinations: for detailed discussion versus less detailed discussion; to progress or not progress to the borough-wide growth scenarios (Section 5.5); to progress to the borough-wide growth scenarios as a constant versus as a variable. The aim is not to systematically consider each and every site option to the same level of detail. A consistent GIS-based methodology is applied to the analysis of all site options in Appendix V of this report, which feeds into the discussion of site options presented below.
- 5.4.9 It is important to emphasise that the aim of this section is not to present a formal appraisal of reasonable alternatives. Rather, the aim is to discuss site and sub-area options in order to inform the definition of reasonable alternatives (i.e. borough-wide growth scenarios). Certain consultation responses received in 2020 (notably from Bracknell Forest Council) called for a more detailed and systematic consideration of options under the sub-area headings; however, there is a need to ensure proportionality, as part of the task of arriving at reasonable alternatives (growth scenarios). The analysis presented below goes into detail over-and-above the equivalent analysis presented in the 2020 ISA Report, and there will be the potential to go into further detail still at the next stage of SA work. In particular, there is the potential to define and formally appraise sub-area specific growth scenarios for select sub-areas, and stakeholder views on which sub-areas might be selected for this additional work would be welcomed.

Figure 5.16: Site options grouped into clusters / sub-areas



A4 corridor



- 5.4.10 The HELAA identifies three sites as **suitable** for housing, all three of which were proposed allocations in the Draft Plan 2020. The largest of these sites (SO001) is an existing allocation from the MDD Local Plan, but no planning application has been forthcoming.
- 5.4.11 The latest proposal is to maintain the capacity of 5SO001 (25 homes), but to increase the capacity of 5RU007 (to 12 homes) and 5RU008 (to 20 homes), on the basis of the Pattern Book work presented in the Non-strategic Sites Report. There is no need to revisit the findings of this work through the SA process.
- 5.4.12 The HELAA identifies 12 sites as **potentially suitable**, of which six together comprise the East of Twyford/Ruscombe large strategic site option, which is discussed above (Section 5.3), where it is established that that the site warrants detailed consideration. One question-mark is in respect of how to treat land to the south of the railway line, with there being an argument for containing growth to the north.
- 5.4.13 With regards to the remaining six sites, through discussion with WBC Officers all six were identified as emerging preferred allocations. Taking these sites in turn:
- 5CV001 (Land east of Park View Drive North, Charvil) – was a proposed allocation in the Draft Plan, and led to a high number of objections from local residents (see Figure 5.10). The proposal is now to decrease the capacity to 78 homes on the basis of the Pattern Book work.
 - 5CV002 (Land west of Park Lane, Charvil) – was a proposed allocation in the Draft Plan, and also led to a high number of objections from local residents. The proposal is now to decrease the capacity to 61 homes on the basis of the Pattern Book work.
 - 5TW005/009/010 (Land at Bridge Farm, Twyford) – was an allocation in the Draft Plan, and also led to a high number of objections from local residents. The proposal is now to increase the capacity to 180 homes on the basis of the Pattern Book work presented in the Non-strategic Sites Report. The ISA Report (2020) raised certain concerns regarding the site (search for 'Land at Bridge Farm'), noting that the scheme would extend Twyford to the west of the railway, into a landscape strongly associated with the River Loddon (with extensive floodplain grazing marsh priority habitat), and also noting the likelihood of grade 2 (i.e. better quality) agricultural land; however, there is no other potentially suitable site able

to deliver homes at Twyford – a Tier 1 settlement – whilst avoiding the Green Belt (which constrains land to the north and east), and there are strategic arguments for housing growth at Twyford.

- 5SO008 (Land east of Pound Lane, Sonning (Sonning Golf Club)) – was judged unsuitable by the previous HELAA and not a proposed allocation in Draft Plan. It is a modest sized site (24 homes), which would extend a site with planning permission, and is well related to existing built form to the north. It does not appear not to be associated with any headline environmental constraints, although the concern raised by the HELAA regarding possible long term “development creep through the golf course” remains.

5.4.14 In summary, therefore, the **emerging preferred approach** was established as one involving 400 homes at the HELAA suitable and potentially suitable sites that fall outside the Green Belt (and the East of Twyford/Ruscombe strategic site). Of these 400 homes, 180 would be at Twyford, 32 would be at Ruscombe, 139 would be at Charvil and 49 at Sonning (where there is also a consented site for 13 homes).

5.4.15 There is also a reasonable need to explore **higher growth**, mindful of arguments for rebalancing housing growth in the Borough more towards the north, and recognising that the A4 corridor sub-area benefits from relatively good accessibility (to community infrastructure, employment etc) and connectivity (both by car and non-car modes).

5.4.16 The first port of call is a scenario involving additional allocation of strategic growth at East of Twyford/Ruscombe (circa 2,000 homes in total, with circa 1,500 homes in the plan period). Under a scenario that sees allocation of East of Twyford/Ruscombe there would be an argument for not allocating 5TW005/009/010; however, on balance, the assumption here is that this site would also be allocated.

5.4.17 Following discussion with WBC Officers, it was determined appropriate and reasonable to also explore a further higher growth scenario, specifically one without allocation of a strategic site.

5.4.18 As such, there was a need to explore HELAA **unsuitable** sites, with considerations as follows:

- There are numerous larger sites at Sonning; however, all are judged to have limited merit on the basis of Sonning’s position in the settlement hierarchy, and relative sensitivity in environmental terms, particularly noting the extensive village conservation area and the village’s association with the River Thames corridor, including the Thames Path. There are strong arguments for protecting the landscape gaps between Sonning and Charvil to the east and the Reading urban area to the west. Two stand-out large sites are 5SO011 and 5SO012; however, the former is associated with the sensitive Sonning Hill area (landscape, settlement separation, biodiversity and potentially heritage constraint), whilst the latter is associated with sports facilities, and is judged potentially suitable for enhanced leisure uses.
- The option of expansion to the west of Charvil is also not supported. There are limited arguments for growth at a Tier 3 settlement in excess of 139 homes, and the site in question (5SO004) would erode the landscape gap to Sonning and is in close proximity to a major cluster of scheduled monuments. The current edge of Charvil is considered to represent a robust edge to the village, with open fields beyond.
- This leaves options for growth at Twyford/Ruscombe, where an immediate consideration is the Green Belt, which strongly weighs against sites located to the east and north east (east of the railway). In this light, attention focuses on two larger sites - 5TW007/011 and 5HU043 - however, the latter is ruled out of contention on the basis of flood risk, given extensive areas are subject to Flood Zone 3

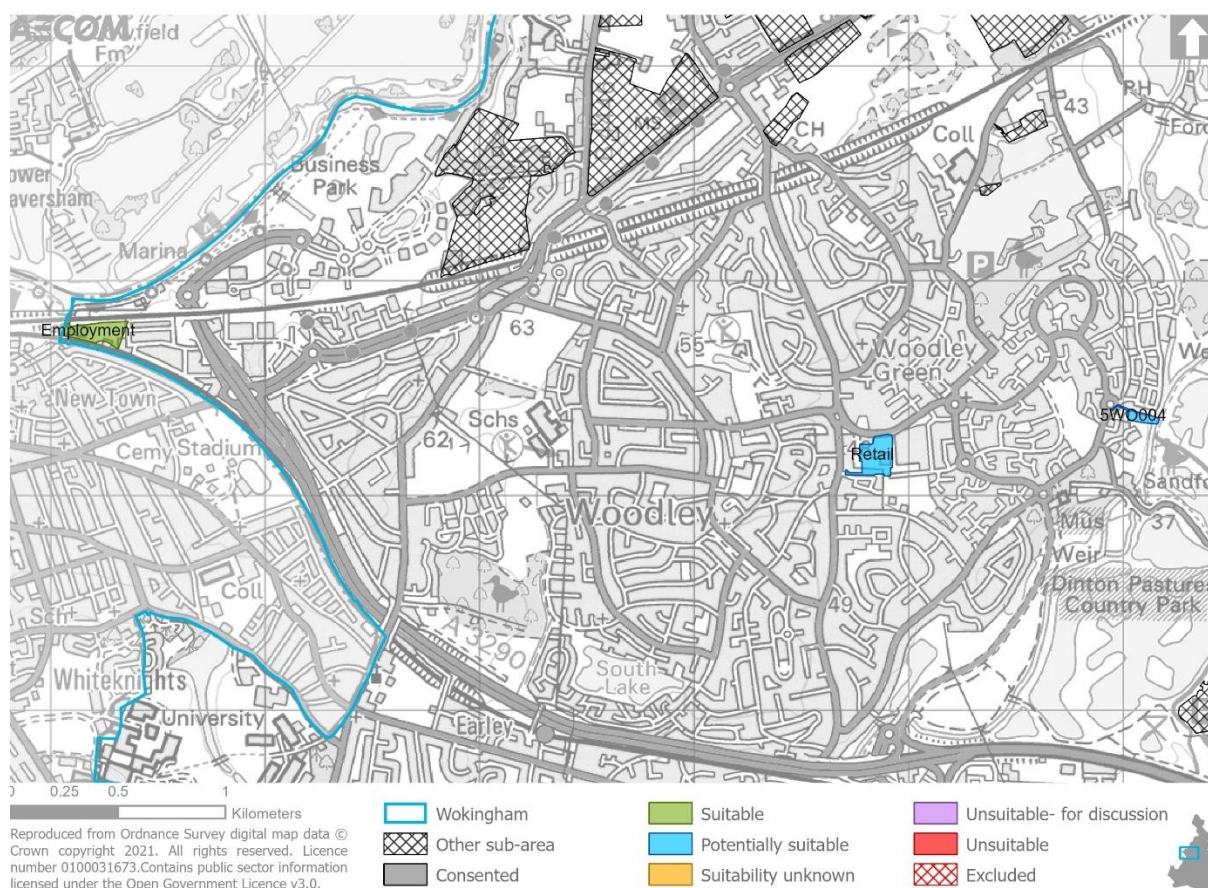
5.4.19 In light of these bullet points, attention focuses on the option of additional growth through allocation of HELAA unsuitable site 5TW007/11 (Land north of the A4). This site was examined through the Non-strategic Sites Report (DLA, 2021) and identified as having a capacity of 150 homes plus 4ha employment.

5.4.20 In **conclusion**, there are three reasonable growth scenarios to consider further in Section 5.5:¹⁹

- 1) 400 homes at the seven HELAA sites judged suitable or potentially suitable by the HELAA;
- 2) Option 1 plus 150 homes at HELAA unsuitable site 5TW007/11; and
- 3) Option 1 plus strategic expansion east of Twyford/Ruscombe.

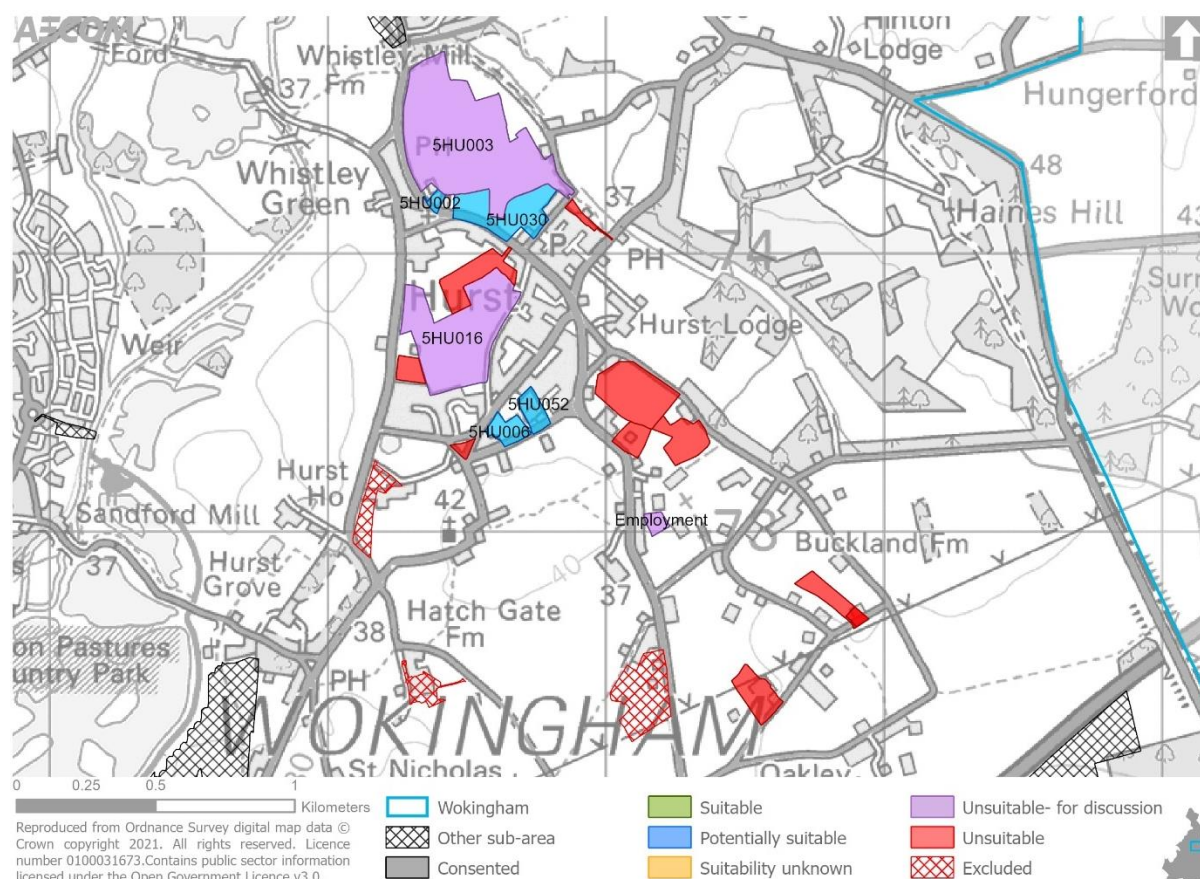
¹⁹ Further supply is from consented site SO005 (which does not require an allocation).

Woodley



- 5.4.21 As an initial point, it is apparent that a very low number of sites have been promoted for future development in Woodley, largely because the area is already built up (N.B. windfall sites still can and likely will come forward through the planning application process).
- 5.4.22 The HELAA does not identify any sites as suitable, and identifies just one site as **potentially suitable** for housing - 5WO004 (Land at Sandford Mill Pumping Station). Two other sites are judged to be either suitable for employment but not requiring an allocation, or suitability unknown.
- 5.4.23 Focusing on site 5WO004, through discussion with WBC Officers allocation of this site for 15 homes was identified as the **emerging preferred approach** for the sub-area. This site is constrained in terms of flood risk, with the majority of the site falling within flood risk zone 2; however, it benefits from relatively good accessibility and connectivity, recognising that Woodley is a Tier 1 settlement.
- 5.4.24 There is an argument for further exploring a **lower growth** scenario (i.e. a scenario whereby 5WO004 is not allocated); however, on balance, the decision was made not to progress a lower growth scenario to Section 5.5 (see appraisal of 5WO004 in Part 2 of this report). It is not possible to foresee any reasonable **higher growth** scenario, due to a lack of available sites.
- 5.4.25 In **conclusion**, there is only one reasonable growth scenario to consider further in Section 5.5. This involves allocation of 5WO004 for 15 homes.

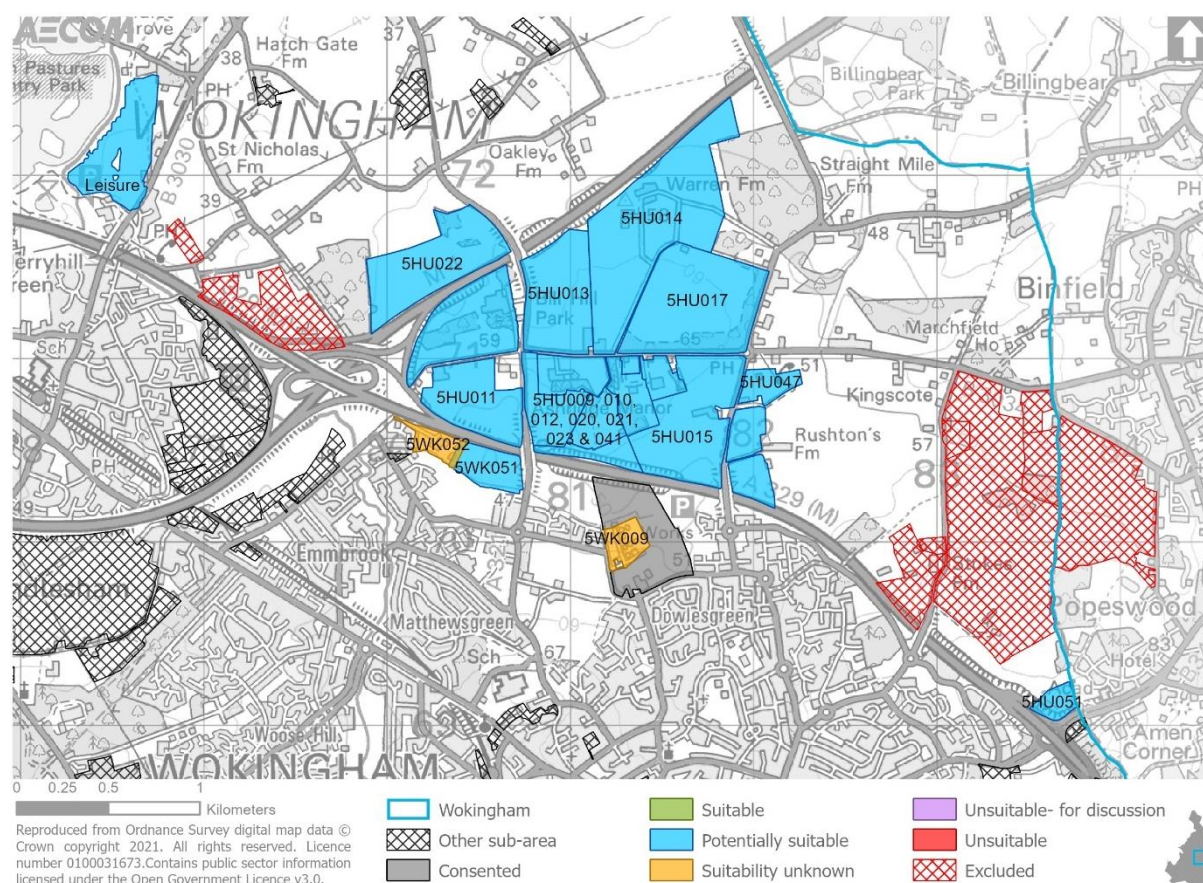
Hurst



- 5.4.26 The HELAA does not identify any sites as suitable, but identifies four sites as **potentially suitable**.
- 5.4.27 Through discussion with WBC Officers the emerging **preferred approach** was established as involving allocation of two of these sites (which are adjacent), namely:
- 5HU002 (Land adjacent to Whistley Green Cottage, Whistley Green) – was a proposed allocation in the Draft Plan for 3 homes, and this remains the proposed capacity at the current time, in light of the Pattern Book work presented in the Non-strategic Sites Report (2021).
 - 5HU030 (Land North-West of Hogmoor Lane) – was a proposed allocation in the Draft Plan for 12 homes, and this remains the proposed capacity at the current time, in light of the Pattern Book work.
- 5.4.28 There is also a reasonable need to test a **higher growth** scenario, mindful of arguments for rebalancing housing growth in the Borough more towards the north, and recognising that 15 homes amounts to a relatively low growth strategy in comparison to other similar villages, such as Sonning (allocations for 49 homes, plus an existing permission for 13 homes) and Charvil (allocations for 139 homes). Furthermore, Hurst does benefit from reasonable transport connectivity and accessibility in comparison to certain other Tier 3 settlements, notably Swallowfield and Riseley in the south of the Borough.
- 5.4.29 The first port of call is the two remaining **potentially suitable** sites – 5HU006 (Land on the North Side of Orchard Road) and 5HU052 (Land at the rear of Vine cottage). However, these are small sites, and do not stand-out as having particular merit. The sites are in very close proximity to the village hall and primary school; however, 5HU006 is potentially valuable open space (used annually for the Hurst Show), whilst 5HU052 contains a grade II listed building and is a proposed Local Wildlife Site (LWS).
- 5.4.30 In turn, there is a need to explore the possibility of allocating one or more HELAA **unsuitable** sites. Two such sites stand-out on the basis of being larger sites in proximity to the village core, namely 5HU003 (Whistley Meadow St Nicholas, Whistley Green) and 5HU016 (Land on the east side of Lodge Road). However, 5HU003 forms the separation between Hurst and Twyford to the north and is considered to perform poorly on this basis.

- 5.4.31 This leaves 5HU016, which is being promoted for 250 homes, having previously been promoted for 300 homes (see www.landeastoflodgeroad.co.uk). However, the DLA Pattern Book methodology (50% developable area; 30 dwellings per hectare) suggests a capacity more in the region of 150 homes.
- 5.4.32 Allocations for a total of 165 homes (3 + 12 + 150) would amount to a high growth strategy for a Tier 3 settlement, but is judged to be a reasonable scenario to progress to Section 5.5.
- 5.4.33 In **conclusion**, there are two reasonable growth scenarios to consider further in Section 5.5:
- 1) 15 homes at two HELAA potentially suitable sites; and
 - 2) Option 1 plus 150 homes at unsuitable site 5HU016

North of Wokingham



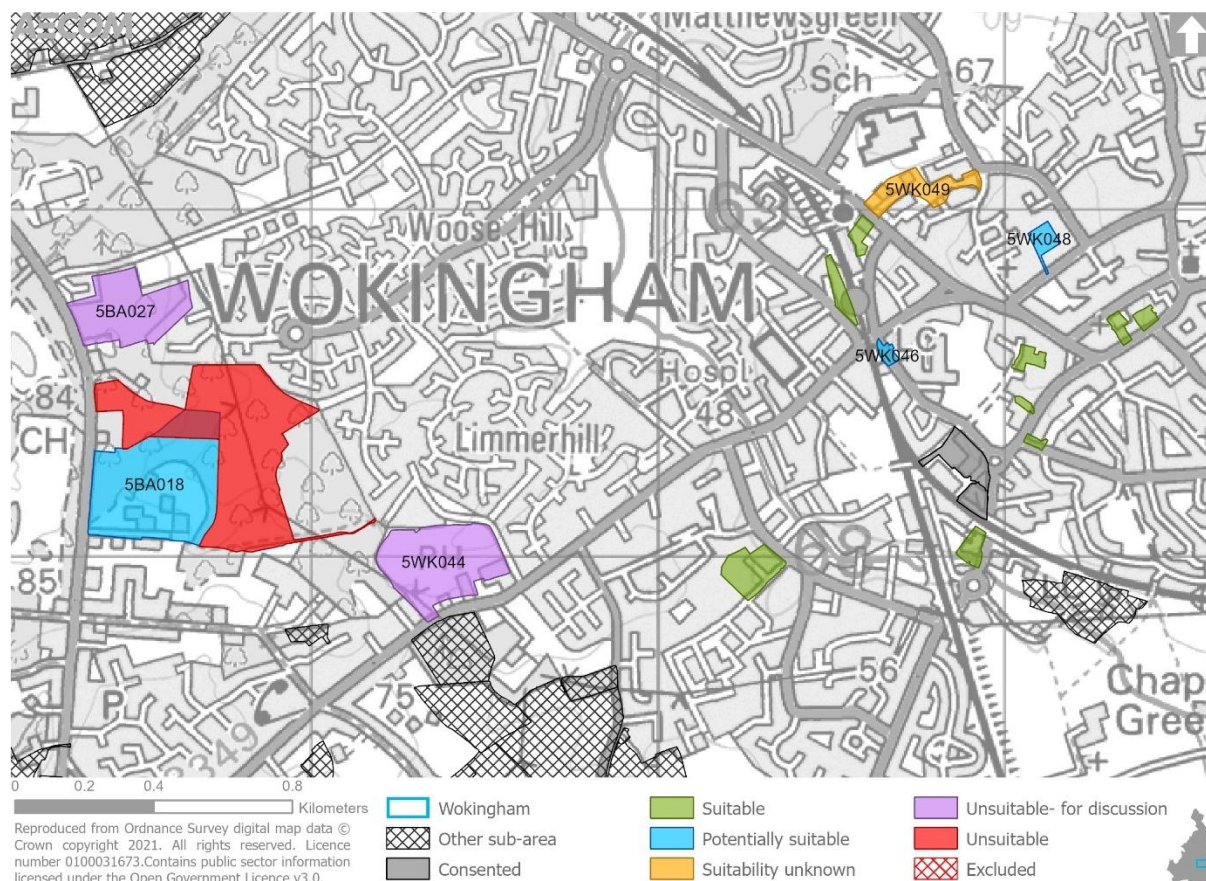
N.B. there is an argument for including sites west of Emmbrook / east of the M4 within this sub-area, recognising that the North Wokingham Distributor Road, which is currently under construction, passes through this area.

- 5.4.34 Firstly, there is a need to note the extent of the [committed SDL](#), much of which is now either built-out or under construction. Also, within the SDL site 5WK002 (Ashridge Farm, Warren House Road) was recently granted permission for a scheme involving 153 homes in the southern part of the site and an area of strategic greenspace to the north (ref. [201515](#)). This site is discussed above (paragraph 5.2.32) as being associated with historic environment sensitivity.
- 5.4.35 The HELAA identifies 16 further sites as **potentially suitable**, of which 14 together comprise the Ashridge large strategic site option, which is discussed above (Section 5.4), where it is established that that the site warrants detailed consideration. One question-mark is in respect of how to treat land within 5HU022 to the west of the M4, which is does not feature in the concept plan materials submitted by the site promoter.
- 5.4.36 With regards to the remaining two sites, through discussion with WBC Officers the emerging **preferred approach** was established as one involving allocation of both. Taking these sites in turn:

- 5WK051 (Land east of Toutley Depot) – was a proposed allocation in the Draft Plan for 100 homes, and the proposal is now to increase the capacity to 130 homes plus a care home, in line with a submitted planning application (ref. [211777](#)), although this warrants scrutiny in light of the work presented in the Non-strategic Sites Report. It is also noted that the site is an existing employment allocation following the Managing Development Delivery (MDD) Local Plan; however, employment has not come forward.
 - 5HU051 (Land North of London Road and East of A329) – is located adjacent to the A239M/A329/B3408 junction, such that it is bounded by roads on two sides, and on a third side is bounded by a recent housing development within Bracknell Forest. It was examined through the Non-strategic Sites Report (2021), which identified capacity for 45 homes.
- 5.4.37 There is an argument for further exploring a **lower growth** scenario involving omission of 5HU051; however, on balance, the decision was made not to progress a lower growth scenario to Section 5.5 (see appraisal of 5HU051 in Part 2 of this report).
- 5.4.38 With regards to **higher growth** scenarios, the first port of call is a scenario involving additional allocation of strategic growth at Ashridge (circa 3,000 homes in total, with circa 2,000 homes in the plan period). Under a scenario that sees allocation of Ashridge there would be an argument for not allocating 5HU051; however, on balance, the assumption here is that 5HU051 would also be allocated.
- 5.4.39 The second port of call, when exploring higher growth scenarios, is the two sites for which the current HELAA conclusion is **suitability unknown**. However, both sites are clearly associated with detailed site specific achievability/deliverability issues. Taking the two sites in turn:
- 5WK009 (Wokingham STW, Bell Foundary Lane) – is an operational sewage treatment works, with no evidence available to show it is surplus to requirements. The fluvial flood risk zone of the Emm Brook also intersects the northern part of the site.
 - 5WK052 (Toutley Depot) – is within an existing designated Core Employment Area, and the existing SDL policy calls for its retention. Relocation of the existing business use would be required, were the site to be redeveloped for housing, and the achievability of this is currently unknown.
- 5.4.40 All other site options available for housing are **excluded** by the HELAA, primarily on the basis of being poorly related to an existing settlement. This includes stand-out larger sites 5HU033 (Land at Stokes Farm, Binfield Road), which is discussed above (Section 5.3) as a smaller strategic site option; and 5HU024 which is proposed for SANG, for which it gained consent in 2017, albeit this was not implemented.
- 5.4.41 In **conclusion**, there are two reasonable growth scenarios to consider further in Section 5.5:²⁰
- 1) 175 homes at two HELAA potentially suitable sites; and
 - 2) Option 1 plus strategic growth at Ashridge.

²⁰ Further supply is from consented site 5WK002 (which does require an allocation).

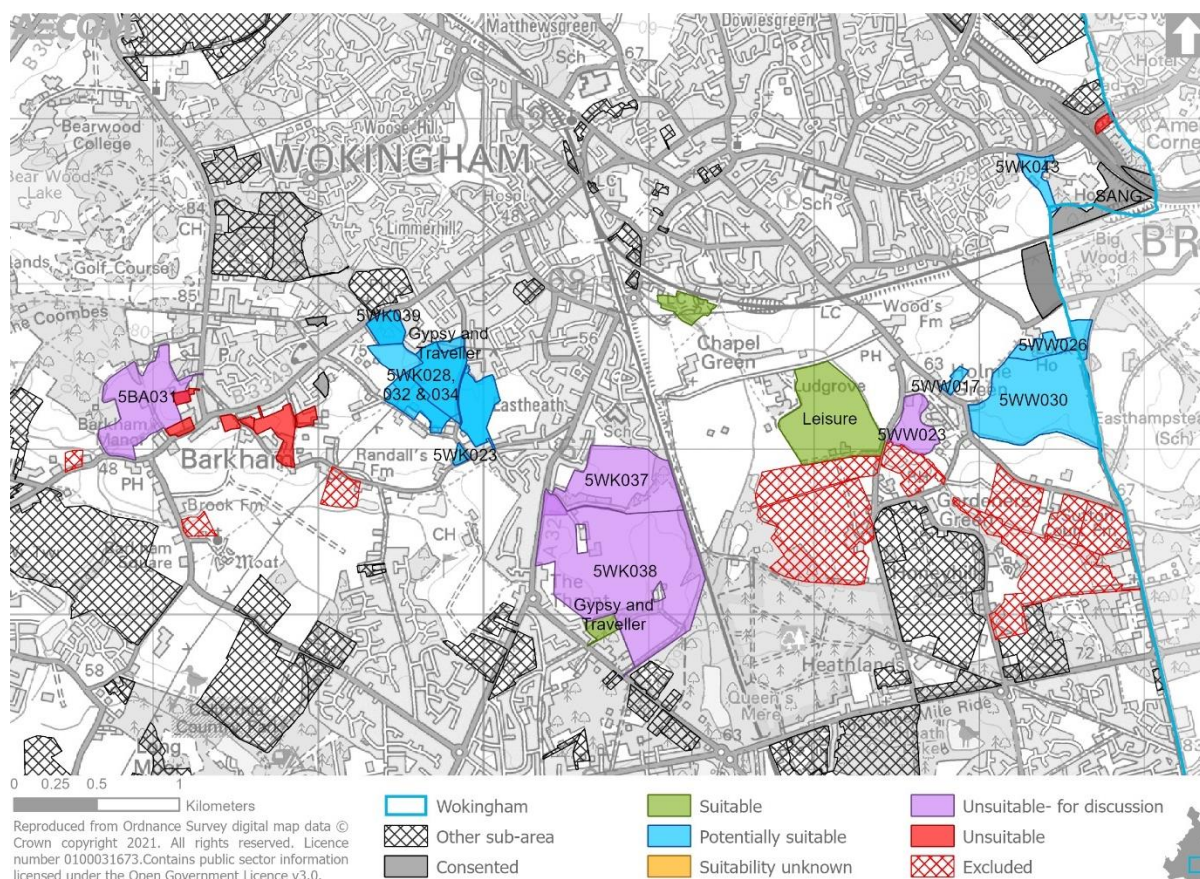
Wokingham urban area



- 5.4.42 The HELAA identifies ten sites as **suitable**; however, only seven of these are suitable for allocation, with the other three (5WK017, 5WK018 and 5WK015) associated with uncertain deliverability.
- 5.4.43 The HELAA also identifies three sites as **potentially suitable** and, in discussion with WBC officers, it was established that the emerging preferred approach is to allocate two of these, with the third (5BA018) judged not to be suitable for allocation on balance. This site is an operational car breakers yard, such that development could amount to a good use of previously developed land; however, the site is associated with Barkham (Tier 3 in the settlement hierarchy), rather than the Wokingham urban area, does not relate well to the village and is associated with transport and biodiversity constraints.
- 5.4.44 In summary, therefore, the **emerging preferred approach** was identified as one involving allocation of nine sites for a total of 291 homes, plus an allowance for around 200 homes to come forward within the town centre, including across the sites that are judged to be suitable but with uncertain deliverability.
- 5.4.45 Allocation of eight sites amounts to a proactive approach to making best use of previously developed sites within the Borough's main urban area, and is a higher growth strategy relative to the Draft Plan. There has also been careful consideration given to development density / massing / heights since the Draft Plan, through the work reported in the Non-strategic Sites Report (DLA, 2021), which notably led to a significant decrease in capacity at one of the previously proposed allocations (5WK029; Station Industrial Estate, Oxford Road) and a significantly increased capacity at the other (5WK012; 54-58 Reading Road).
- 5.4.46 There are few strategic arguments for exploring **lower growth** scenarios, recognising the importance of making best use of previously development land within an area with very good accessibility. Emerging preferred allocations 5WK030 (Millars Business Park, Molly Millars Lane) and 5WK045 (Land at Bridge Retail Park) stand out as warranting scrutiny because they are: new proposed allocations since the Draft Plan stage; in existing industrial and retail use respectively; and located outside the town centre. However, there is no reasonable need to explore a lower growth scenario involving omission of one or both of these sites, also mindful of the new class E to residential permitted development rights.

- 5.4.47 With regards to **higher growth** scenarios, a first port of call is potentially suitable site 5BA018 (Land at Highland Avenue), which is associated with Barkham, much more so than the Wokingham urban area. The site comprises PDL, but the HELAA finds that the site relates poorly to the existing settlement pattern and performs poorly in accessibility terms. Whilst there is a footpath into Barkham, to the south, the village does not benefit from a local centre or a primary school.
- 5.4.48 The next port of call is then HELAA **unknown suitability** site 5WK049 (Wokingham Youth & Community Centre, Wokingham Bowling Club and Foxwood); however, relocation of the existing community facilities would be required and the achievability of this is currently unknown.
- 5.4.49 With regards to the two **unsuitable** sites, these are located to the south west of Wokingham where there is an extensive area woodland priority habitat that represents an important asset (albeit there is limited accessibility). 5WK044 (Land at Limmerhill Road) stands out as having no priority habitat onsite (although woodland, including priority habitat woodland, is adjacent, and there is a mature hedgerow or tree belt through the site that is shown on the 1888-1913 map), and the HELAA does record that the site performs “comparatively well in respect of highways and accessibility issues”; however, the site is currently public open space (see the Wokingham Borough Planning Constraints map [here](#)).
- 5.4.50 A further feasibly higher growth scenario could see increased densities on some or all of the allocations; however, this is not considered to be a reasonable scenario to explore further, noting that densities are investigated in the Non-Strategic Site Report, with site specific design considerations helping to inform indicative site masterplans for some sites.
- 5.4.51 In **conclusion**, there is only one reasonable growth scenario to consider further in Section 5.5. This involves allocation of seven HELAA suitable sites and two HELAA potentially suitable sites for a total of 291 homes, plus a further 200 home allowance.²¹

South of Wokingham



N.B. this is an extensive sub-area, and could warrant being sub-divided.

²¹ Further supply is from consented sites 5WK019 and 5WK035 (which do not require an allocation).

5.4.52 Firstly, there is a need to note the extent of the [committed SDL](#), with a distinction between:

- North of the railway - has now largely been completed, including the planned primary school. Also, 5WK026 now has permission for Suitable Alternative Natural Greenspace (SANG; ref. [190900](#)). One further site is now under consideration for additional housing (5WK043), discussed further below.
- South of the railway - there is now a resolution to grant planning permission for a 1,434 home scheme (ref. [191068](#)), including a primary school, local centre, strategic greenspace and a distributor road. Additionally, there is resolution to grant permission for a 215 home scheme on HELAA site 5WW016 (re. [190914](#)); several further sites for housing within the SDL are discussed further below; and Gray's Farm, adjacent to the SDL (5WW006), is proposed for outdoor and indoor sports and community uses.

5.4.53 The remainder of this section considers sectors within the sub-area in turn.

Western sector (B3349 to A321)

5.4.54 There are five HELAA **potentially suitable** sites in this area, of which four together comprise the Blagrove Lane smaller strategic site option, which is discussed above (Section 5.3), where it is established that the site warrants detailed consideration.

5.4.55 Through discussion with WBC Officers, the emerging **preferred approach** was established as involving nil allocations within this sector.

5.4.56 With regards to **higher growth**, the first port of call is a scenario involving allocation of Blagrove Lane for circa 400 homes. The second port of call is then the final HELAA potentially suitable site, namely 5WK023 (Rosery Cottage and 171 Evendons Lane). However, this is a small site and does not stand-out as having particular merit, to the extent that there is a reasonable need to explore further the option of allocation. Whilst development could utilise PDL, development would run contrary to existing settlement form and pattern, risking problematic 'sprawl' along Evendons Lane.

5.4.57 Finally, within this broad sector of land, it is appropriate to consider the cluster of sites at **Barkham Hill**, all of which are either excluded relatively early in the HELAA process, or judged to be unsuitable. In short, there is not considered to be any strategic argument for exploring the option of allocating any of these sites. Barkham is a Tier 3 settlement, but there is limited argument for allocation here, recognising that:

- two small sites (5BA006 and 5BA024) have recently come forward (the latter is under construction, and so warrants an allocation);
- Barkham is not well linked in transport terms (distant from a rail station; between A-road corridors), and this factor is considered strongly to weigh against significant growth, e.g. allocation of 5BA031, which is a large site to the west of the village, which has been proposed for 300-350 homes; and
- there is a need to give long term consideration to the value of the Barkham – Bearwood ridge of raised land (also the valley of the Barkham Brook to the south) as a strategic separation between growth / potential growth locations to the north (Wokingham) and south (Arborfield and land south of the M4).

5.4.58 In **conclusion** there are two reasonable scenarios: A) nil allocations; or B) allocation of Blagrove Lane.

Central section (A321 to the railway)

5.4.59 There are no sites in this area judged potentially suitable for housing; however, 5FI001 (Tintagel Farm, Sandhurst Road) is judged potentially suitable for Gypsy and Traveller pitches, having been a proposed allocation for this use in the Draft Plan (2020).

5.4.60 Through discussion with WBC Officers, the emerging **preferred approach** was established as involving nil allocations within this sector, other than Tintagel Farm for five pitches.

5.4.61 With regards to **higher growth**, attention focuses on adjacent HELAA unsuitable sites 5WK037 and 5WK038, which are discussed above (Section 5.3) as a potential strategic site ('East of Finchampstead Road'). However, the conclusion in Section 5.3 is that this option need not be progressed.

5.4.62 In **conclusion** there is only one reasonable scenario: allocation of 5FI001 for Gypsy and Traveller pitches.

Eastern section (railway to Bracknell Forest boundary)

- 5.4.63 Firstly, one site is HELAA **suitable** for housing, namely 5WK006 (Land South of Gipsy Lane), which is located within the South Wokingham SDL. This was a proposed allocation in the Draft Plan for 17 homes, and the latest proposal is to maintain this capacity. The Non-strategic Sites Report suggests a higher capacity; however, there is a need to account for constraints, including vehicular access and flood risk.
- 5.4.64 Secondly, 5WW006 (Gray's Farm) is proposed for outdoor and indoor sports and community uses.
- 5.4.65 Thirdly, 5WK043 (Land at St Anne's Drive), which is located within the SDL to the north of the railway, is HELAA **potentially suitable** for housing and, through discussion with WBC officers, it was established that the emerging preferred option is to allocate this site for 54 homes, in line with a current planning application (ref. [203544](#)) and mindful of onsite and adjacent constraints (the Non-strategic Sites Report suggests the potential for a higher capacity). This site warrants scrutiny as a new and larger proposed allocation, and recognising that the South of Wokingham SDL SPD (2014) identified land here as a "potential green open space location"; however, on balance, the decision was made not to progress any scenario involving non-allocation to Section 5.5 (see appraisal of 5WK043 in Part 2 of this report).
- 5.4.66 Fourthly, there is a need to consider the cluster of HELAA **potentially suitable** sites 5WW017, 5WW026 5WW037. These three sites, along with intervening and additional land to the south, were combined and explored through the Strategic Sites Report (2021), and are discussed above (Section 5.3) as the South of Wokingham SDL extension smaller strategic site option.²² Through discussion with WBC officers allocation of a scheme involving 835 homes was identified as an emerging preferred option. This site clearly warrants scrutiny as a new and large proposed allocation, and recognising that the South of Wokingham SDL SPD (2014) identified land here as a "potential green open space location"; however, on balance, the decision was made not to progress any scenario involving non-allocation to Section 5.5 (see appraisal of this site in Part 2 of this report). This approach reflects a view that the scheme has merit relative to the other smaller strategic site options discussed in Section 5.3, and in the knowledge that there is a strategic argument for supporting strategic sites through the LPU (as discussed in Section 5.2).
- 5.4.67 In summary, therefore, the **emerging preferred approach** was identified as one involving allocation of 5WK006 and 5WK043 within the SDL, Wokingham SDL extension and 5WW006 for outdoor and indoor sports and community uses, and there is no reasonable need to explore **lower growth**.
- 5.4.68 With regards to **higher growth**, attention focuses on land between the South of Wokingham SDL / Gray's Farm (5WW006) and the Nine Mile Ride sub-area. The option of a smaller strategic site option centred on Heathlands Road is discussed above (Section 5.3), and there is also a cluster of large sites (including stand-out large site 5WW025) to east, centred on Easthampstead Road. However, the general view of Officers is that there is little or no strategic argument for allocation in this area. This is because there is no Tier 3 settlement in this area (i.e. Gardeners Green and Holme Green are no more than hamlets) and, whilst Crowthorne to the south is a Tier 2 settlement, accessibility and transport connectivity in this area is generally poor. Also, there is a need to consider the proximity of the South of Wokingham SDL, which will be building-out for much of the plan period. Sites in this area could not form a logical extension to the SDL, given flood zones and planned / proposed areas of strategic leisure and greenspace, also recognising the value of Holme Green/Grange as a historic settlement.
- 5.4.69 In conclusion there is only one reasonable scenario, namely allocation of: 5WK006 and 5WK043 within the SDL; Wokingham SDL extension; and 5WW006 for outdoor and indoor sports and community uses.

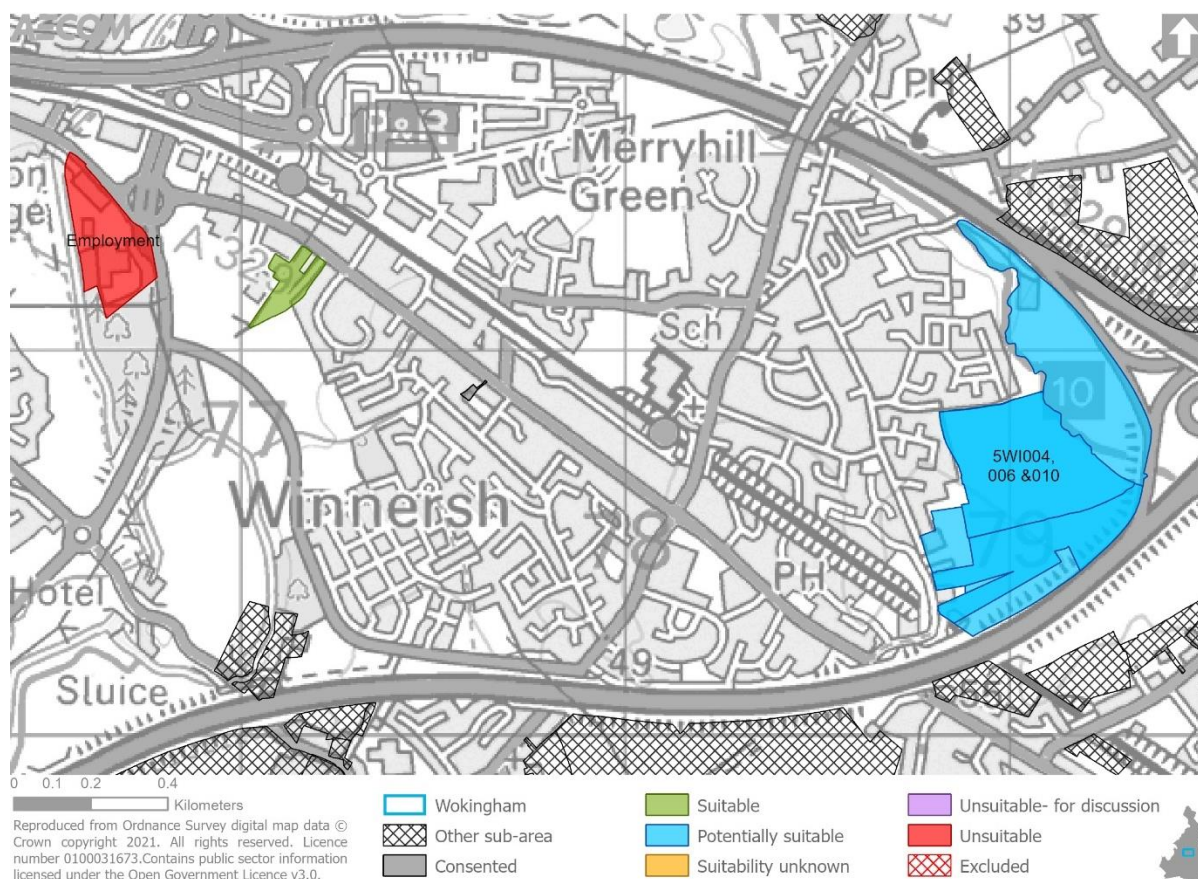
Overall conclusion for this sub-area

- 5.4.70 In **conclusion**, there are two reasonable growth scenarios to consider further in Section 5.5:²³
- 1) 906 homes and 5 pitches at: two HELAA suitable sites; one HELAA potentially site within the SDL; the South of Wokingham SDL extension; and a new sports hub; and
 - 2) Option 1 plus 400 homes at Blagrove Lane.

²² It is important to note that the area under consideration extends to the south beyond the SDL boundary; however, this southern land parcel (specifically, south of the Emm Brook) is proposed for strategic open space and/or SANG (N.B. the Strategic Sites Report did also explore the option of housing in this southern parcel).

²³ Further supply comes from consented sites within the SDL, plus 5BA006.

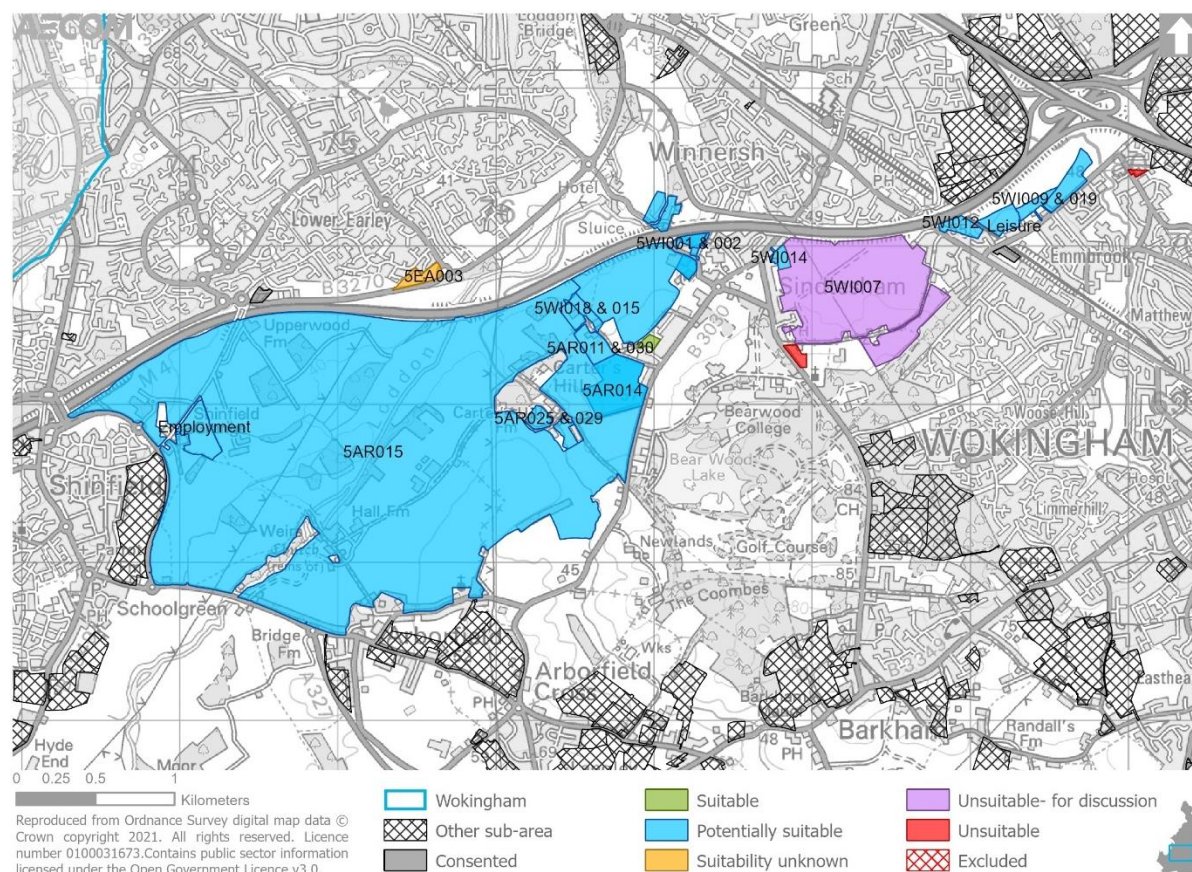
Winnersh



- 5.4.71 The HELAA identifies one site as **suitable** for housing, namely 5WI008 (Winnersh Plant Hire). This site was allocated for 20 homes in the Draft Plan (2020); however, the latest proposal is to increase the capacity to 85 homes, in light of the analysis presented within the Non-strategic Sites Report (2021). This site was identified by Officers as an emerging preferred option, and this approach has merit in the sense that the site is highly accessible, with Winnersh Triangle Station nearby; however, the site is located within flood risk zone 2.
- 5.4.72 The HELAA also identifies three further sites as **potentially suitable** for housing, namely 5WI004, 5WI006 and 5WI010. These three adjacent sites were proposed for allocation in combination for a total of 250 homes within the Draft Local Plan, with the combined scheme known as Winnersh Farms. The latest proposal is now to increase the capacity to 287 homes, mindful of a current planning application (ref. [212404](#)) for 87 homes and a SEN school on the southern part of the site. This was identified by Officers as an emerging preferred option, and this approach has merit in the sense that Winnersh is a Tier 1 settlement; however, it also gives rise to a degree of concern given: areas of flood risk constraining the northern part of the site; the adjacent M4 AQMA; and potentially access / connectivity challenges.
- 5.4.73 In summary, therefore, the **emerging preferred approach** was identified as one involving allocation of the sites discussed above for a total of 372 homes.
- 5.4.74 There are arguments for exploring **lower growth**; however, on balance the decision was made not to progress a lower growth scenario to Section 5.5 (see appraisal of 5WI008 and 5WI004/006/010 in Part 2).
- 5.4.75 With regards to **higher growth**, the only other available site is 5WI005; however, this site is only proposed for employment uses, and is judged unsuitable due to intersecting flood risk zone 3b.
- 5.4.76 In **conclusion**, there is one reasonable growth scenario to consider further in Section 5.5, involving allocation of one HELAA suitable site and the three linked potentially suitably sites for 372 homes in total.²⁴

²⁴ Further supply is from consented site 5WI003 (which does not require an allocation).

South of the M4, west of Wokingham



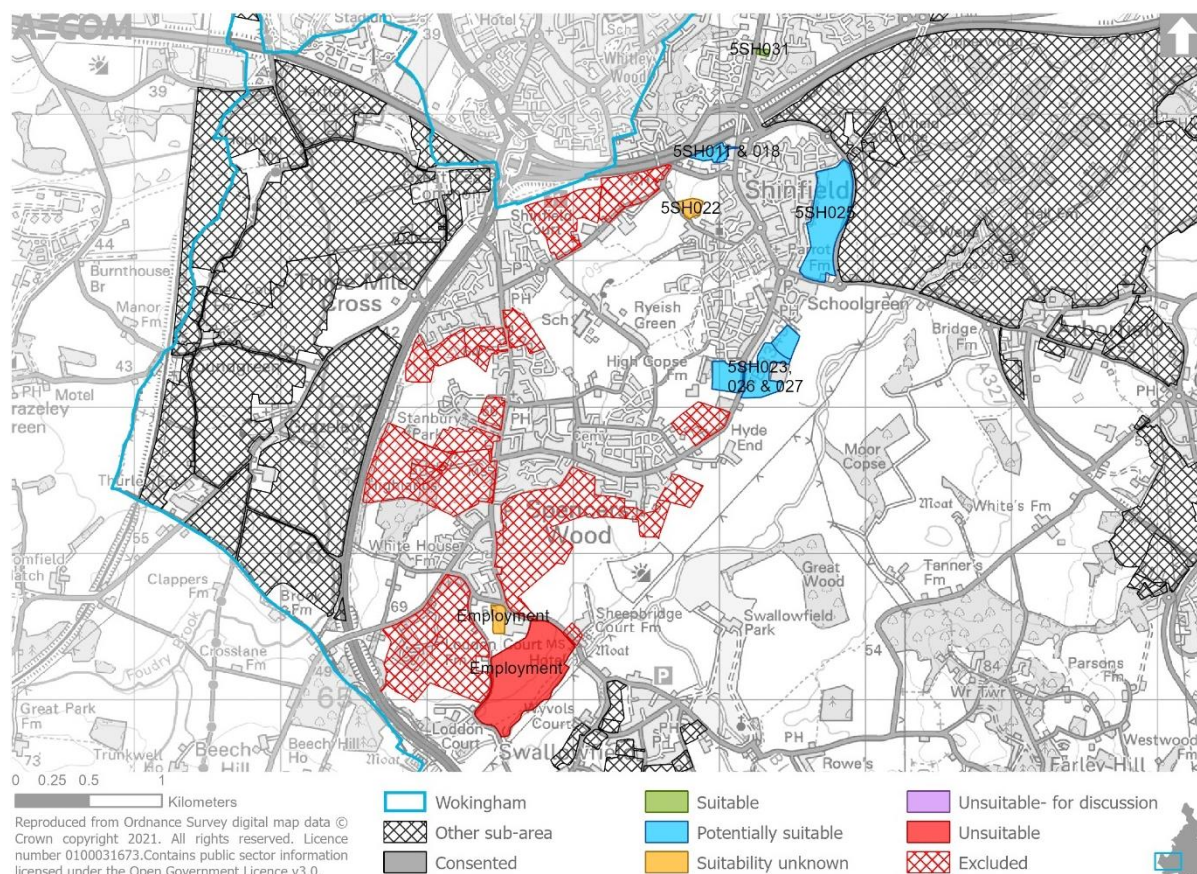
- 5.4.77 The HELAA identifies one site as **suitable**, namely 5WI011 (Wheatsheaf Close). This was an allocation for 24 homes in the MDD Local Plan and included in the Draft Plan (2020). It is noted that the possibility of a lower capacity could warrant consideration, in light of the Non-strategic Sites Report, and noting the adjacent historic lane (bridleway) and nearby listed building.
- 5.4.78 The HELAA identifies 15 sites as **potentially suitable**, of which 10 together comprise the Hall Farm / Loddon Valley large strategic site option, which is discussed above (Section 5.3), where it is established that that the site warrants detailed consideration, and which was identified as an emerging preferred option following discussion with WBC Officers. As an initial point, it is important to note that the proposal is for land to the north of the river / east of Shinfield to come forward for employment, with all housing delivered to the south of the river, between Sindlesham in the north and Arborfield in the south. Also, by way of orientation, it is important to note the proposal for a bridge over the M4 to the south east of Earley, linking to the Lower Early way roundabout with Rushey Way / Mill Lane.
- 5.4.79 With regards to the remaining four sites, through discussion with WBC Officers it was established that the emerging preferred option is to allocate all four. Taking these sites in turn:
- 5WI009 (Land on the North West Side of Old Forest Road) - was partly allocated (specifically, that part to the south of the Wokingham Northern Distributor Road, which is currently under construction) in the Draft Plan for 35 homes, and is now proposed for 36 homes. The site appears to comprise an element of previously developed land (base for the road works).
 - 5WI019 (Land to the rear of Toutley Hall, north west of Old Forest Road) is a new greenfield site, not considered through the previous HELAA. It is well contained, and there appears to be potential to achieve access; however, this will presumably necessitate some loss of mature hedgerow (shown on the 1888-1913 OS map). Biodiversity impacts here are a consideration, noting areas with high densities of woodlands to the north and south, and the impacts to hedgerows and the millennium arboretum following construction of the distributor road. It is noted that the part of the millennium arboretum to the south of the distributor road (5WI013) is identified by the HELAA as potentially suitable for leisure uses "subject to there being no unacceptable harm to the arboretum".

- 5WI012 (Land to the rear of Bulldog Garage, Reading Road) – is a new proposed allocation, having been judged unsuitable by the previous HELAA on the basis of access challenges, recognising that the new distributor road cuts through the northern part of the site. There is now confidence in the ability to achieve access, and the site appears to be somewhat degraded following use as part of the distributor road construction project; however, there is a need to consider noise and air pollution issues with this site, given the railway, M4, A329, distributor road and adjacent retail, including a motorbike showroom.
- 5WI014 (69 King Street Lane, Winnersh) – is a new proposed allocation, having been judged potentially suitable by the previous HELAA but not proposed for allocation on balance, nor was it progressed to the growth scenarios in 2019/20, with paragraph 5.102 of the ISA Report explaining: “... *on balance, ruled out as not suitable for allocation for strategic reasons, specifically that Sindlesham is a tier 3 settlement not well suited to growth, and development could set a precedent for expansion of Sindlesham to the east towards Wokingham, thereby impacting on the landscape setting of the Sindlesham Conservation Area.*” At the current time there is increased argument for growth Tier 3 settlements, given the loss of Grazeley; however, it is recognised that site 5WI011, discussed above, is within Sindlesham, plus there is a need to consider the proximity of the Hall Farm / Loddon Valley strategic growth option. With regards to the site itself, the adjacent conservation area is a clear constraint, as is the proximity to the M4; however, it is not clear that growth would impact on the setting of any listed building, and the site is potentially quite well contained and visually screened, and contains an element of PDL. The site capacity is understood to be in the region of 25 homes, which is notably fewer than the 38 homes previously proposed through a planning application on the site (ref. [171497](#)).

- 5.4.80 In summary, the **emerging preferred approach** was identified as one involving allocation of the sites discussed above for a total of 2,334 homes. There is no reasonable need to explore **higher growth**.
- 5.4.81 With regards to **lower growth**, the first port of call is a scenario involving just allocation of the five smaller HELAA potentially suitable sites for 132 homes. There is an argument for exploring further scenarios involving non-allocation of one or more of the smaller potentially suitable sites (notably 5WI014); however, on balance, the decision was made not to progress any such scenario to Section 5.5 (see appraisal of these sites in Part 2). This decision was made in the knowledge that this part of the Borough is generally quite well connected to both Winnersh and Wokingham.
- 5.4.82 There are limited arguments for exploring scenarios involving allocation of HELAA **unsuitable** sites; however, 5WI007 (Home Farm, Bearwood Road) warrants discussion. As discussed in Section 5.3, the site promoters submitted a proposal for two modest sized schemes, within the wider site, to the Council in August 2021. As an immediate point, it is apparent that the two proposed schemes would be bounded by weak or non-existent field boundaries, which gives rise to a concern regarding piecemeal growth within the wider 5WI007 site over time. Having said this, it is noted that the proposed 49 home scheme adjoining Sindlesham would comprise 67% open/green space, including a large area at the eastern edge of the scheme, which reduces concerns.
- 5.4.83 A final site of note is 5EA003 (Land at Meldreth Way), which is identified a status of **suitability unknown** within the HELAA, and where there is a live application for housing and a supermarket (ref. 211686). The site relates well to a Tier 1 settlement, namely Earley; however, the site has been identified as suitable for LGS designation. The site is covered by an area TPO, and it is difficult to see how access could be achieved without impacts to valued trees. It is noted that only the western circa half of the site is shown as priority woodland habitat by the nationally available dataset ([magic.gov.uk](#)), and that land here is not shown as wooded on historic OS maps (rather, it appears to comprise part of an agricultural field); however, the TPO designation is nonetheless a significant constraint. Land to the west is publicly accessible open space, and so the possibility of extending the publicly accessible open space into this site, thereby creating a linear park at the southern extent of Earley c.1.2km in length could be explored.
- 5.4.84 In **conclusion**, there are two reasonable growth scenarios to consider further in Section 5.5:²⁵
- 1) 134 homes at five HELAA suitable and potentially suitable sites; and
 - 2) Option 1 plus additional allocation of Hall Farm / Loddon Valley.

²⁵ Further supply is from consented sites 5EA001 and 5WK025 (which do not require an allocation).

South of the M4, east of the A33



5.4.85 The HELAA identifies one site as **suitable**, namely 5SH031 ('Rustlings', 'The Spring' and land to the rear of 'Cushendall', Shinfield Road). This was an allocation for 10 homes in the Draft Plan (2020), and the proposed capacity is unchanged at the current time. This is an intensification scheme, involving redevelopment of two homes (seemingly without notable historic character), and loss of rear gardens.

5.4.86 The HELAA then identifies six sites as **potentially suitable**, and through discussion with WBC Officers it was established that the emerging preferred option is to allocate four. Taking these sites in turn:

- 5SH025 (Land South of Cutbush Lane / North of Arborfield Road) – the northern half of this site is under construction, and the emerging preferred option is to allocate the southern half for 191 homes. This approach contrasts with that at the Draft Plan stage, when allocation was not supported (nor was it progressed for appraisal through the borough-wide growth scenarios), in light of nearby Grazeley. Allocation gives rise to a tension with Policy 1 of the made Shinfield Neighbourhood Plan (2017); however, the site appears to be subject to limited constraint (the adjacent flood zone and wetland priority habitat is consideration) and is very well contained and connected by road.
- 5SH023/27 (Land East and West of Hyde End Road) – the emerging preferred option is to allocate the (combined) site for 175 homes, in line with the findings of the Non-strategic Sites Report. This approach contrasts with that at the Draft Plan stage, at which time the site was identified as potentially suitable, but not proposed for allocation. It was, however, examined closely through the SA process, as a variable across the growth scenarios (see Section 6 of the ISA Report). Specifically, it was one of a package of sites within the SDL that featured under certain 'no Grazeley' scenarios. The appraisal highlighted a number of issues, for example relating to the adjacent ancient woodland patches, and it is important to note that whilst falling outside of the AWE Burghfield DEPZ it does fall within the 5km consultation zone.
- 5SH011 (Lane End House, Shinfield Road) was allocated for five homes in the Draft Plan, and the proposed capacity is currently unchanged. The site is well contained, although in proximity to the M4.

5.4.87 In summary, the **emerging preferred approach** was identified as one involving allocation of the sites discussed above for a total of 381 homes.

5.4.88 There is limited argument for progressing a **lower growth** scenario involving non-allocation of one or more of these sites. Whilst there are certain site specific issues to explore further (see Part 2 of this report), a key consideration is the Detailed Emergency Planning Zone, which serves to reduce the amount of promoted land where development is achievable, and therefore concerns regarding piecemeal growth (or 'sprawl') over time. It is recognised that there are clear issues to consider around the possibility of growth to the east of Shinfield in combination with strategic growth at Hall Farm / Loddon Valley; however, there are also potentially opportunities, e.g. recognising that a strategic scheme would support employment growth, strategic green/blue infrastructure and road infrastructure upgrades to the east of Shinfield.

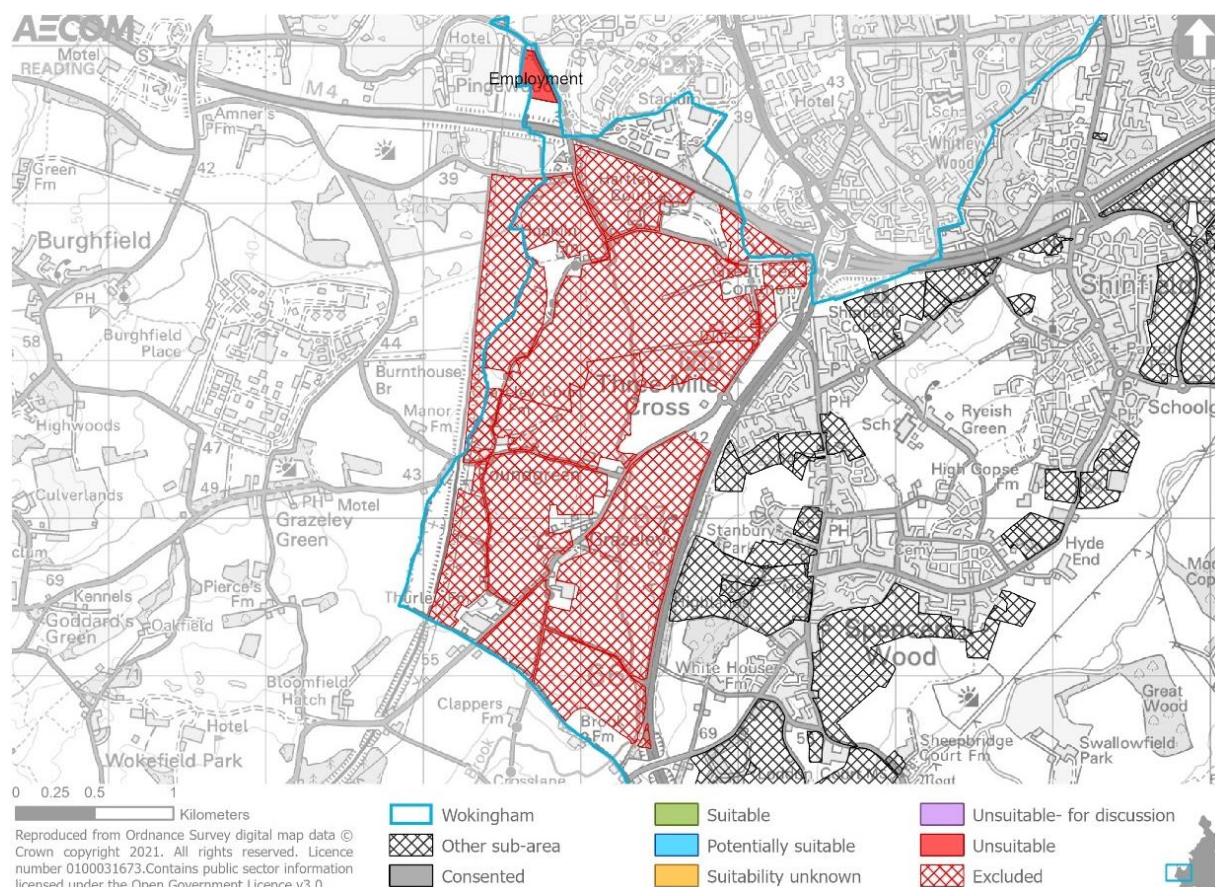
5.4.89 With regards to potential **higher growth** scenarios, the only site options reasonably in contention – given the Detailed Emergency Planning Zone (which notably rules out larger sites 5SH013, 5SH017, 5SH035, 5SW004 and 5SW015) – are the two remaining potentially suitable sites; however, both sites are small and do not stand-out as having particular merit:²⁶

- 5SH026 (Land South of Millworth Lane) – is currently Shinfield Cricket Club. The HELAA finds the site potentially suitable for housing, but there is no known plan to relocate the club.

5SH018 (Lane End Villas) – is located between 5SH011 and the M4, and is judged to perform poorly relative to other potentially suitable sites. Part of the site could potentially form a modest extension to 5SH011, but this would necessitate impacting a mature field boundary (shown on the 1888-1913 OS map, indeed shown as treed and the southern extent of 'the Grove', presumably landscaped parkland). There is a live appeal on this site (ref. 203560) following refusal for 23 dwellings and a community centre. Reasons for refusal include, design and layout, landscape and trees, ecology and biodiversity, highway safety, noise attenuation barrier, infrastructure, affordable housing and employment skills.

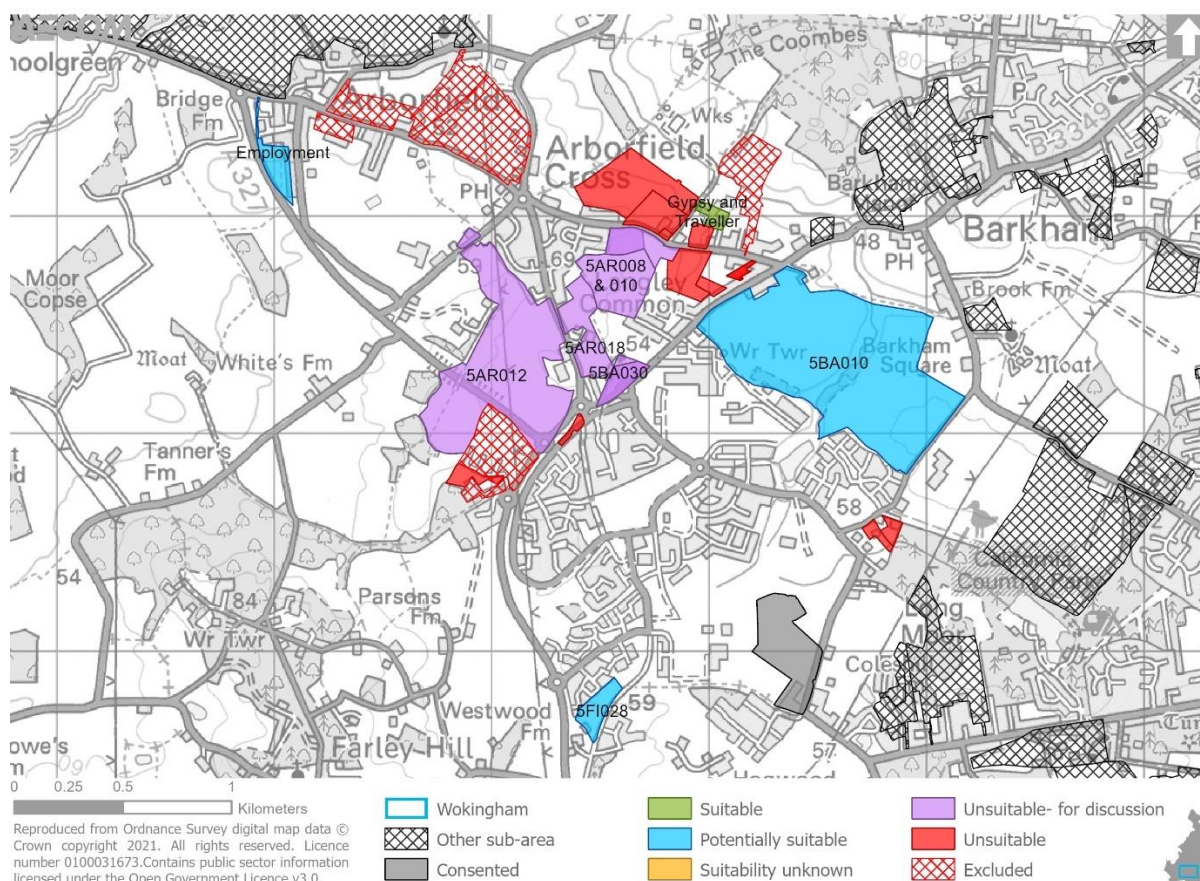
5.4.90 In **conclusion**, there is only one reasonable growth (allocation) scenario to consider further in Section 5.5. This involves allocation of the four of the six HELAA supported sites for 381 homes.

South of the M4, west of the A33 (all sites excluded due to DEPZ)



²⁶ One site is (5SH022) is suitability unknown on account of being consented for allotments, in association with approved SDL development, and whilst the allotments have not been delivered, their deliverability is unknown at the current time.

Arborfield area



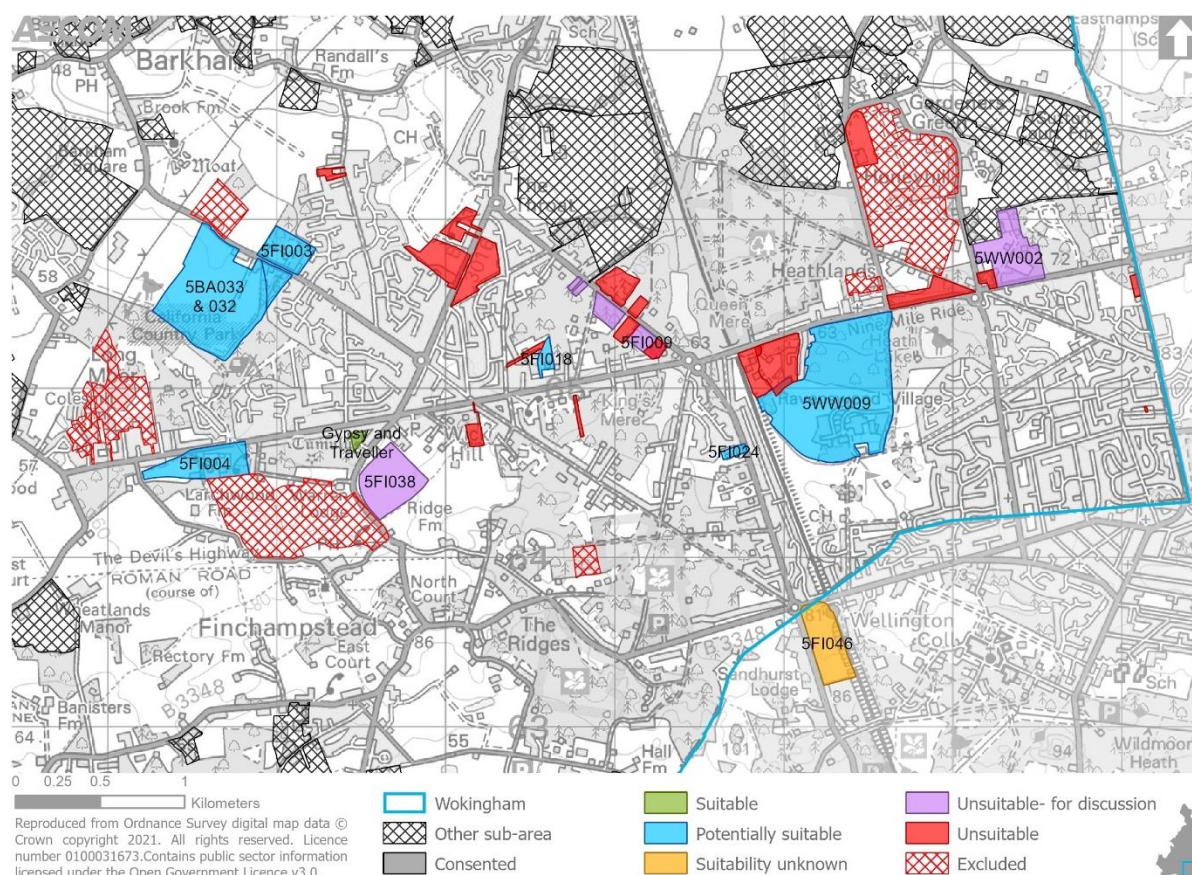
- 5.4.91 Firstly, there is a need to consider 5BA012 (Reading Football Club Training Ground, Hogwood Park, Park Lane), which has outline planning permission for 140 homes, and warrants a Local Plan allocation on the basis that the development has not yet commenced.
- 5.4.92 The HELAA does not identify any sites as suitable for housing, but does identify one site as suitable for Gypsy and Traveller pitches. This site (5BA013; Woodlands Farm, Wood Lane) was a proposed allocation for 15 pitches in the Draft Plan (2020), and the proposed capacity remains unchanged at the current time.
- 5.4.93 The HELAA then identifies two sites as **potentially suitable**:
- 5BA010 (Barkham Square) – is discussed above, within Section 5.3, as a smaller strategic site that warrants further close consideration through the appraisal of borough-wide growth scenarios.
 - 5FI028 (Westward Cottage, Sheerlands Road) – was identified as potentially suitable in the previous HELAA, noting that it includes an element of PDL, but was not proposed for allocation on balance, noting onsite constraints in the form of a grade 2 listed building and quite extensive TPOs, including one area shown as woodland priority habitat by the nationally available dataset (magic.gov.uk). At the current time the emerging preferred option is to allocate the site for ten homes.
- 5.4.94 In summary, the emerging **preferred approach** was identified as one involving allocation of 5FI028 (plus allocation of 5BA013 for Gypsy and Traveller pitches; plus allocation of 5BA012, which has planning permission). There is no reasonable need to explore a **lower growth** option, recognising the size of the sites in question (see appraisal of these sites in question in Part 2).
- 5.4.95 With regards to **higher growth**, the first port of call is additional allocation of 5BA010 (Barkham Square) for 500 homes.

5.4.96 There are numerous other HELAA **unsuitable** sites that could feasibly come into contention; however, none stand-out as warranting detailed scrutiny through the appraisal of borough-wide growth scenarios.²⁷ The option of strategic growth to the south of Arborfield Cross is discussed in detail in Section 5.3, but ruled out as performing relatively poorly on balance. With regards to smaller sites, there is a need to guard against piecemeal growth and recognise that this is not a particularly accessible or well-connected part of the Borough, e.g. falling equidistant between rail corridors. Also, there is a need to recognise recent, committed and proposed further growth nearby at Arborfield Garrison.

5.4.97 In **conclusion**, there are two reasonable growth scenarios to consider further in Section 5.5:²⁸

- 1) Ten homes at 5FI028 plus 15 pitches at 5BA013 the HELAA;
- 2) Option 1 plus 500 homes at Barkham Square.

Nine Mile Ride



5.4.98 The HELAA does not identify any sites as suitable for housing, but does identify one site as suitable for Gypsy and Traveller pitches. This site (5FI015) was a proposed allocation for four pitches in the Draft Plan (2020) and has since obtained planning permission (ref. [201143](#)).

5.4.99 The HELAA then identifies seven sites as **potentially suitable** and, through discussion with WBC Officers, the **emerging preferred approach** was identified as involving allocation of five of these sites (noting that two are adjacent and will come forward as a combined scheme) for a total of 451 homes. Specifically:

²⁷ There is also one potentially suitable employment site that is not proposed for allocation, namely 5AR024 (Land to the south of Bridge Farm Business Park). This site is mostly PDL, appears to be quite well contained and is located adjacent to the A327 and an existing employment area, hence it would appear to have considerable merit as a rural employment site. It will require further consideration moving forward, including mindful of the nearby Hall Farm / Loddon Valley strategic site option.

²⁸ Further supply is from consented site 5BA012 (which does require an allocation).

- 5BA032/33 (Land at Rooks Nest Farm and 24 Barkham Ride) – is a new site, having not been considered through the previous HELAA. It is a sensitive site, given its location adjacent to Longmoor Bog SSSI, and also noting the generally high density of priority habitat in the vicinity; however, the proposed capacity of 270 homes amounts to a gross density of just 6.5 dwellings per hectare, suggesting good potential to design in greenspace to buffer the SSSI and ensure net biodiversity benefits. A further issue here is erosion of the landscape gap between Nine Mile Ride and Arborfield Garrison SDL to the west. However, there is the potential to improve pedestrian and cycle connectivity between Rooks Nest Wood Country Park (to the north) and California Country Park (to the south).
- 5FI004 (Greenacres Farm, Nine Mile Ride) – was identified as potentially suitable through the previous HELAA, but was not proposed for allocation in the Draft Plan, nor was it progressed to the reasonable growth scenarios, with the ISA Report explaining one of the factors as being relatively poor accessibility and connectivity in this part of the Borough, and another consideration being the potential for allocations to be made through the emerging Finchampstead Neighbourhood Plan. The site does benefit from partly comprising an element of PDL, and there is the potential for development to fit with the existing built form along Nine Mile Ride. It is noted that the proposed capacity of 100 homes is significantly below the capacity range of 163-217 homes proposed by the Non-strategic Sites Report (2021), and fewer than the 150 homes proposed by the site promoter through the Draft Plan consultation. The site is currently subject to consultation as a potential allocation through the Finchampstead NDP as one that could be supported for development (see finchampstead-pc.gov.uk/community-projects/neighbourhood-development-plan).
- 5FI003 (31 and 33 Barkham Ride) - was identified as potentially suitable through the previous HELAA, but was not proposed for allocation in the Draft Plan, nor was it progressed to the reasonable growth scenarios, with the ISA Report explaining one of the factors as being “notably abuts Rooks Nest Wood Country Park, which is a designated SANG”. The site does benefit from being quite well contained, although there is a need to consider in-combination effects with adjacent site 5BA032/33, particularly in terms of biodiversity objectives. The site, which has capacity of 66 homes, is in two separate ownerships, and there is a current planning application for 31 Barkham Ride (ref. [211937](#)).
- 5FI024 (Jovike, Lower Wokingham Road) – is a smaller site that was proposed for 15 homes in the Draft Plan, with the proposed capacity unchanged at the current time.

5.4.100 There is an argument for exploring one or more **lower growth** scenarios, involving non-allocation of one or more of these sites (notably 5BA032/33), recognising that allocations for 451 homes represents a significant departure from the strategy at the Draft Plan stage, when the proposal was to allocate one sites for 15 homes. However, on balance, the decision was made not to progress any lower growth scenario to Section 5.5 (see appraisal of these sites in Part 2). This decision was made in light of the fact that the loss of supply from Grazeley, relatively to the Draft Plan stage, gives weight to the argument for higher growth at lower tier settlements across the Borough.

5.4.101 There is limited or no argument for exploring **higher growth** scenarios; however, it is noted that there are two further potentially suitable sites:

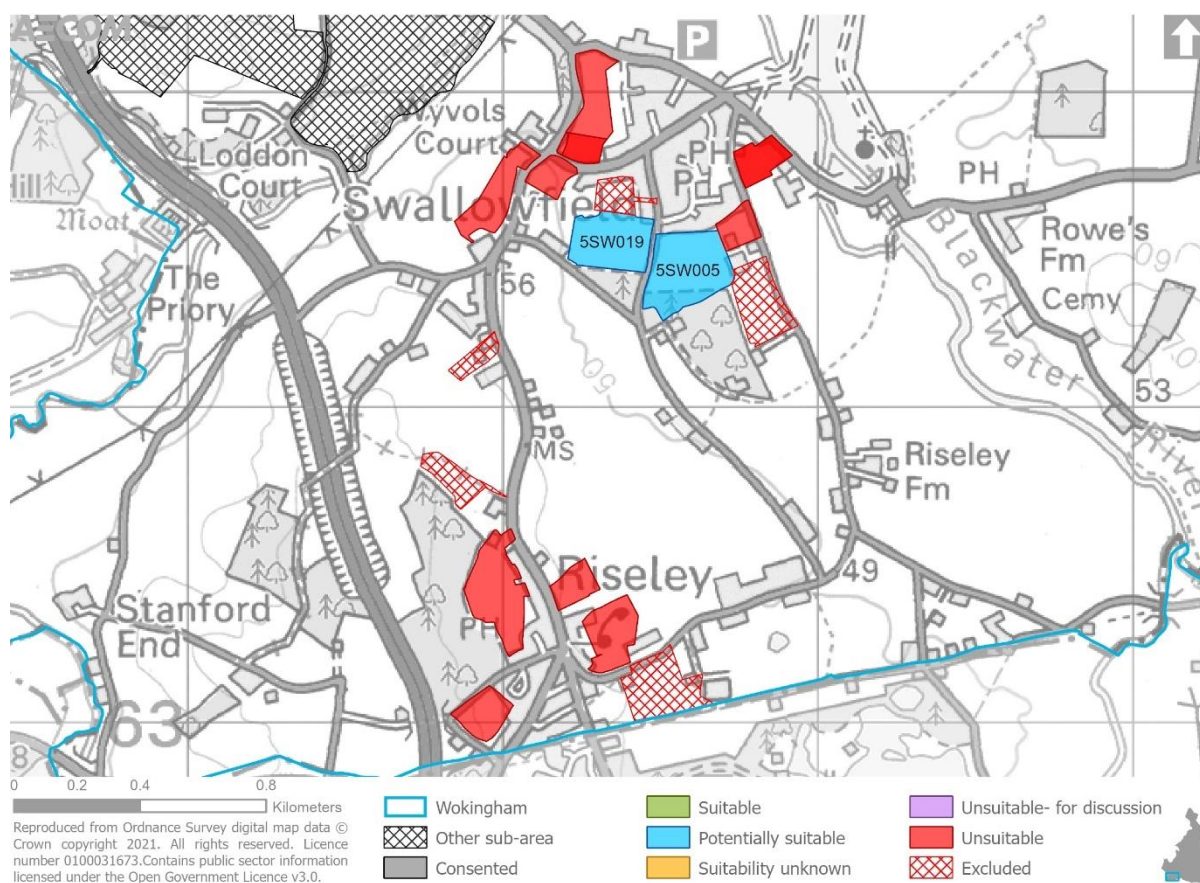
- 5WW009 (Ravenswood Village) – is partially PDL, is well screened by woodland and Crowthorne station is nearby, as is a primary school; however, flood risk is a constraint, as is the adjacent Heathlake SSSI.
- 5FI018 (Land to the rear of No. 6 Johnson Drive) – is a small backland site comprising PDL that has previously seen development proposals refused and dismissed at appeal.

5.4.102 Finally, there is a need to note:

- 5FI046 (Land east of Wokingham Road, and south of Duke's Ride (Derby Field)) – which the HELAA identifies as having **unknown suitability** because only a very small section of the site is located within Wokingham Borough and it is unknown whether this could be developed as part of the wider Bracknell Forest proposed allocation.
- Stand-out **unsuitable or excluded** sites, namely:
 - adjacent sites 5FI009/049 and 5FI038, which are discussed above, within Table 5.3; and
 - 5WW002 (Pinewood, Nine Mile Ride) which is a 10.7 ha site judged unsuitable by the HELAA but where the emerging preferred option is to allocate the site for self-funded regeneration, without any assumption made regarding the number of homes that will come forward, if any. The site is notably constrained in biodiversity terms, with almost one third of the site comprising priority habitat. There are also uncertainties about the feasibility of re-providing facilities elsewhere if necessary.

5.4.103 In **conclusion**, there is only one reasonable growth scenario to consider further in Section 5.5. This involves allocation of five potentially suitable sites for 451 homes plus one site for 4 Gypsy and Traveller pitches.

Swallowfield and Riseley



5.4.104 The HELAA identifies two sites as potentially suitable, and through discussion with WBC officers it was identified that the **emerging preferred approach** is to allocate one of these sites, namely 5SW019 (Land to the north of Charlton Lane and west of Trowes Lane) for 70 homes. This is a new proposed allocation, relative to the Draft Plan stage, at which time it was identified as unsuitable through the HELAA. The site is well contained and does not appear to be subject to any headline environmental constraints; however, Trowes Lane is a narrow lane with a clear rural character.

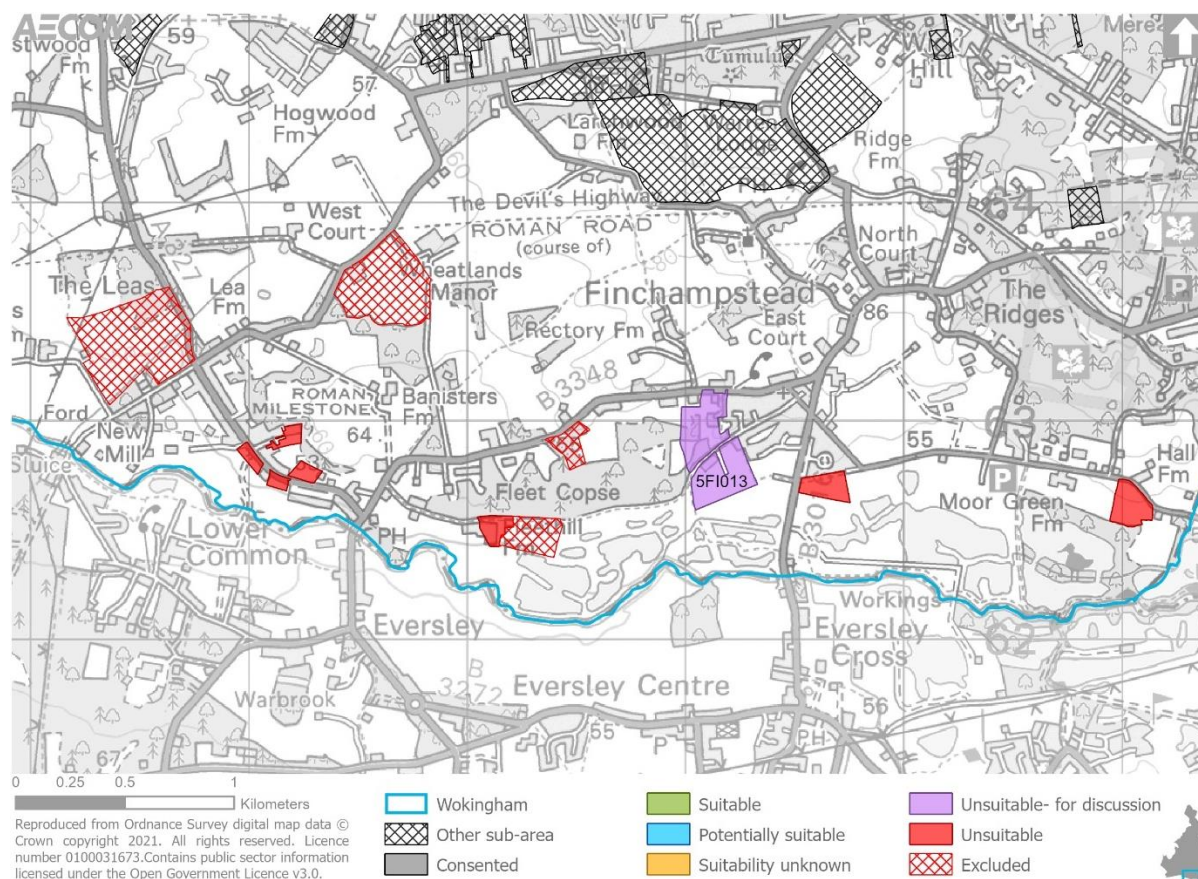
5.4.105 This site warrants close scrutiny, including on the basis that Swallowfield is a relatively rural settlement in the Wokingham context; however, on balance, there is no reasonable need to explore a **lower growth** scenario (see appraisal of 5SW019 in Part 2 of this report).

5.4.106 With regards to **higher growth**, attention focuses on the second potentially suitable site - 5SW005 (Site bounded by Trowes Lane and Oakleigh Farm) – which is adjacent to 5SW019 (located on the opposite side of Trowes Lane). On balance it is reasonable to explore a higher growth scenario involving allocation of this site, because the site stand-outs as being subject to limited constraint (bar the flood risk zone to the east that does intersect the site to a small extent) and in light of the fact that the loss of supply from Grazeley, relative to the Draft Plan stage, gives weight to the argument for higher growth at lower tier settlements. This site would deliver around 80 homes, such that under this higher growth scenario there would be allocations for 150 homes in total (with a clear issue around capacity of Trowes Lane / safe access). This would represent a high growth strategy for a Tier 3 settlement (also noted that there is a consented site for 20 homes at the village, and also that there is a consented site for 83 homes at nearby Riseley, within Hart District), but is a reasonable scenario to explore further on balance.

5.4.107 In **conclusion**, there are two reasonable growth scenarios to consider further in Section 5.5:

- 1) 70 homes at 5SW019;
- 2) Option plus 80 homes at 5SW005.

Finchampstead



5.4.108 The HELAA does not identify any sites as suitable or potentially suitable and, through discussion with WBC Officers, it was established that the **emerging preferred approach** is not to allocate any sites at the village itself, mindful of the high growth strategy proposed within the northern part of the parish, discussed above as the Nine Mile Ride sub-area, and also mindful of the potential to allocate one or more additional sites through the emerging Neighbourhood Plan.

5.4.109 With regards to unsuitable sites that could potentially come into consideration, attention potentially focuses on 5FI013; however, on balance, there is no reasonable need to progress a scenario involving allocation of this site to Section 5.5. The HELAA identifies concerns in respect of access and settlement form / character, plus there is biodiversity constraint, with southern part of the site intersecting Fleet Copse LWS. There is a need to consider proximity to the Thames Basin Heaths SPA to the south.

5.4.110 In **conclusion**, there is only one reasonable growth scenario to consider further in Section 5.5, namely nil allocations (recalling that sites are allocated within the northern part of the parish, and also mindful of the potential to allocate one or more additional sites through the emerging Neighbourhood Plan).

5.5 Reasonable spatial strategy alternatives

Introduction

- 5.5.1 Having gone through a process (see Figure 5.1) involving consideration of strategic issues/options (Section 5.2), site options (Section 5.3) and sub-area scenarios (Section 5.4), the final task is to draw together the understanding generated in order to arrive at a single set of reasonable growth scenarios.
- 5.5.2 In practice, this involves considering ways of combining the sub-area specific site allocation scenarios introduced above. Additionally, supply from the sub-area scenarios is combined with:
- **Completions** – 4,002 homes have already been completed since the start of the plan period;
 - **Commitments** – 7,273 homes are already committed, in that they are set to be delivered at a site that benefits either from planning permission (5,554) or an existing allocation 1,719 (this is predominantly the South Wokingham SDL, which has a resolution to grant permission);
 - **Windfall allowance** – 1,360 homes can be anticipated to come forward at small sites benefitting from planning permission and projected windfall allowance (i.e. new sites not allocated in the plan);
 - **Wokingham town centre** – a higher rate of windfall (200 homes in total) can be anticipated in Wokingham town centre as there are known sites that whilst not currently available for redevelopment, have a high likelihood of becoming available for redevelopment in the plan period.
- 5.5.3 Total supply from the above sources is 12,835 homes, which is a figure c.2,680 homes short of the established LHN figure, which is discussed in Section 5.2 as the minimum figure at which the housing requirement might be set. Additionally, there is a need to ensure a supply buffer (i.e. a total supply comfortably in excess of the requirement). For these reasons, there is a need to consider combinations of sub area site allocation scenarios that would deliver *at least* circa 3,000 homes.

Combining sub area scenarios

- 5.5.4 Reasonable site allocation scenarios for each sub-area are presented in Table 5.4, which is a summary of the sub-area specific conclusions presented in Section 5.4. The colour coding is as follows:
- Blue – involves additional allocation of a large strategic HELAA potentially suitable site;
 - Purple – involves additional allocation of a smaller HELAA potentially suitable site;
 - Red – involves additional allocation of a HELAA unsuitable site.

Table 5.4: Reasonable sub-area scenarios

Sub-area	Homes at allocations in the plan period		
	Scenario 1	Scenario 2 <i>Scenario 1 and...</i>	Scenario 3 <i>Scenario 1 and...</i>
A4 corridor	400	+ 150	+ 1,500
Woodley	15	-	-
Hurst	15	+ 150	-
North of Wokingham	175	+ 2,000	-
Wokingham urban area	291	-	-
South of Wokingham	906	+ 400	-
Winnersh	372	-	-
South of the M4, west of Wokingham	134	+ 2,200	-
South of the M4, east of the A33	381	-	-
South of the M4, west of the A33	0	-	-
Arborfield area	10	+ 500	-
Nine Mile Ride	451	-	-
Swallowfield and Riseley	70	+ 80	-
Finchampstead	0	-	-

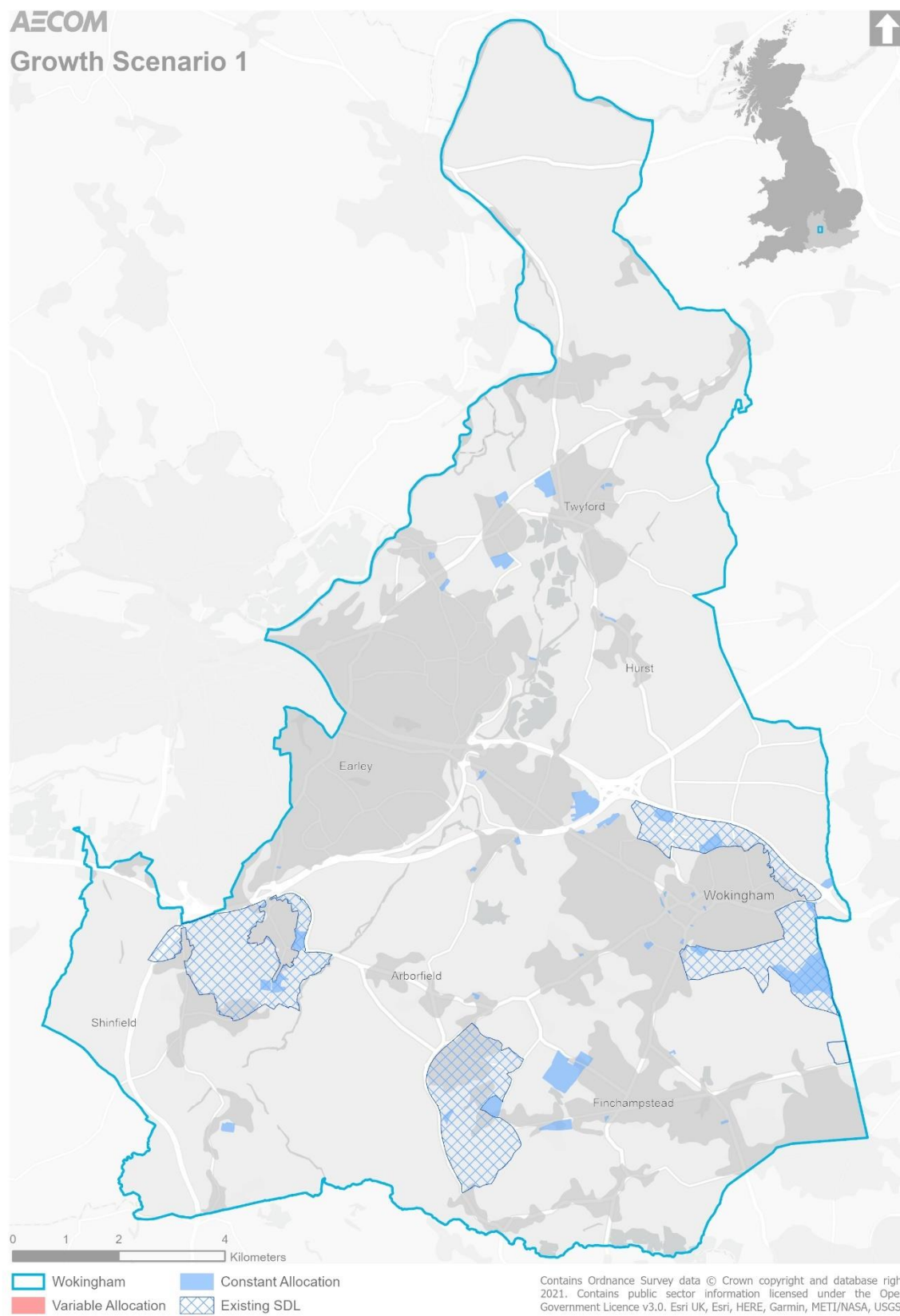
- 5.5.5 The first port of call is a Borough-wide growth scenario involving the lowest growth scenario (i.e. Scenario 1 from Table 5.4) at each of the sub-areas. This would lead to a total housing supply of 16,298 homes over the plan period, which is 5% above the housing requirement, assuming that the housing requirement is set at the established LHN figure of 15,514 homes over the plan period. There is a strong argument to suggest that this growth scenario is unreasonable, as it would involve an insufficient supply buffer, leading to a risk of the housing supply trajectory falling below the required rate at some point in the plan period; plus there is a need to consider the possibility of the Local Plan base date needing to be brought forward (see Appendix K of the current Revised spatial Strategy consultation document). However, on balance it is appropriate to test this as a reasonable low growth scenario. This is Growth Scenario 1.
- 5.5.6 Next there is a need to consider higher growth scenarios without allocation of a larger strategic site. There are many feasible combinations, but on balance it was considered reasonable to test:
- additional allocation of the three identified HELAA potentially suitable sites; and
 - additional allocation of the two identified HELAA unsuitable sites *and* the two HELAA unsuitable sites.
- 5.5.7 Next there is a clear need to test scenarios involving the package of sites under growth scenario 1 plus allocation of one large strategic site. This leads to three further growth scenarios.
- 5.5.8 Next there is a clear need to test scenarios involving the package of sites under growth scenario 1 plus allocation of one large strategic site, plus additional sites to deliver higher growth. There are many feasible combinations, but on balance it was considered reasonable to test:
- East of Twyford/Ruscombe – plus one smaller strategic HELAA potentially suitable site, leading to two further growth scenarios;
 - Ashridge – as above; and
 - Hall Farm / Loddon Valley – plus all identified additional sites *that are compatible*, namely all bar Barkham Square and Blagrove Lane, leading to one further growth scenario.
- 5.5.9 Finally, it is reasonable to explore a higher growth option involve allocation of two larger strategic sites, with a view to ensuring a robust housing supply trajectory across the plan period and into the next plan period (also mindful that there could be a need to bring forward the Local Plan base date from 2018 to perhaps 2023, as discussed in Appendix K of the Revised Growth Strategy consultation document), and mindful of arguments for setting the housing requirement at a figure above 15,514 homes in order to meet affordable housing needs more fully and given a risk – albeit small – of Wokingham Borough needing to provide for unmet housing need from a neighbouring local authority.
- 5.5.10 There is considered to be only one such reasonable scenario, which would see allocation of both Hall Farm / Loddon Valley and Ashridge. Allocation of two large strategic sites to include East of Twyford/Ruscombe is judged to be unreasonable, because the site is located within the Green Belt. It is difficult to foresee the potential to demonstrate the exceptional circumstances to justify Green Belt release (NPPF paragraph 141) under a scenario whereby the site is allocated as part of a high growth strategy.
- 5.5.11 The above discussion leads to 12 reasonable growth scenarios, which are presented in Table 5.5 and across the subsequent maps in order of total growth quantum. Table 5.5 notably:
- differentiates between ‘constant’ and ‘variable’ elements of supply;
 - splits the ‘constant allocations’ into (non-sub area) categories in-line with the split presented in the Growth Scenarios consultation document (see tables 2, 3 and 4 in the consultation document); and
 - uses the approach to colour-coding set out at paragraph 5.5.4 to differentiate between the variables.
- 5.5.12 Table 5.6 considers FAQs. There are two related overarching points to make:
- There is invariably a need to make simplifying assumptions in order to arrive at a manageable number of scenarios for appraisal, and in the case of Local Plan growth scenarios (in the form of alternative key diagrams) it is fair to say that there is a need for major simplifying assumptions.
 - *“the phrase all reasonable alternatives does not equate to all conceivable alternatives.”²⁹*

²⁹ See <https://www.aylesburyvaldedc.gov.uk/sites/default/files/VALP/VALP%20Report.pdf>

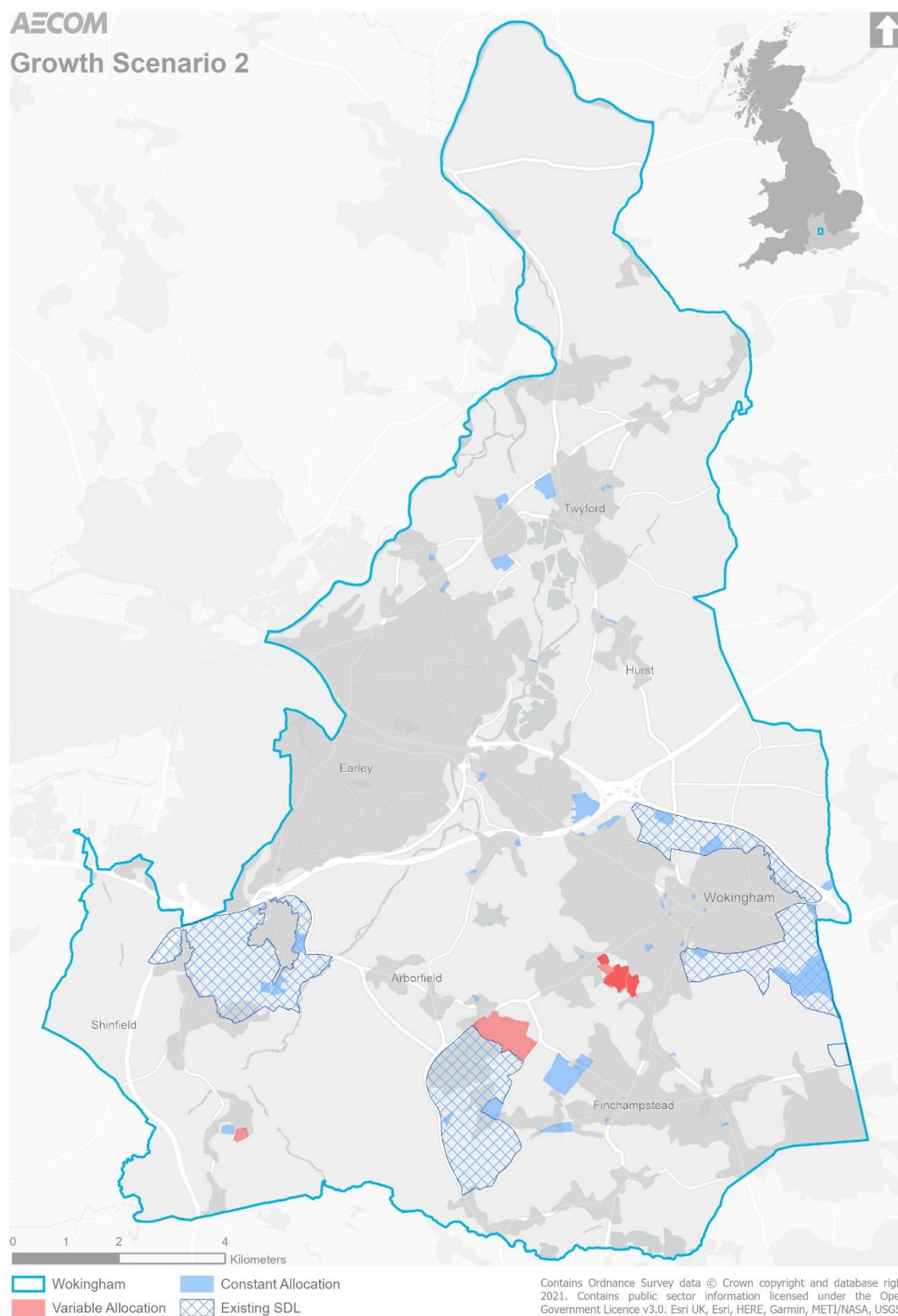
Table 5.5: The reasonable growth scenarios - with constants greyed-out, allocations split according to whether a constant or a variable and higher growth sub-area scenarios differentiated using the colour coding introduced in Table 5.4

Supply component		Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7	Scenario 8	Scenario 9	Scenario 10	Scenario 11	Scenario 12
		Do minimum	HELAA Potentially Suitable (PS)	HELAA PS + select unsuitable	East of T/R	East of T/R + Blagrove Ln	East of T/R + Barkham Sq	Ashridge	Hall Farm LV	Ashridge + Blagrove Ln	Ashridge + Barkham Sq	Hall Farm LV + compatible	Hall Farm LV + Ashridge
Completions		4002	4002	4002	4002	4002	4002	4002	4002	4002	4002	4002	4002
Commitments	Sites with planning permission	5554	5554	5554	5554	5554	5554	5554	5554	5554	5554	5554	5554
	Existing allocations	1719	1719	1719	1719	1719	1719	1719	1719	1719	1719	1719	1719
Windfall ³⁰		1360	1360	1360	1360	1360	1360	1360	1360	1360	1360	1360	1360
Additional windfall within Wokingham TC		200	200	200	200	200	200	200	200	200	200	200	200
Constant allocations	Draft Plan (2020) small sites	947	897	897	897	897	897	897	897	897	897	897	897
	New small sites	875	875	875	875	875	875	875	875	875	875	875	875
	South of Wokingham SDL extension	835	835	835	835	835	835	835	835	835	835	835	835
	Other sites within existing SDLs	875	897	897	897	897	897	897	897	897	897	897	897
Variable allocations	A4 corridor	-	-	150	1500	1500	1500	-	-	-	-	150	-
	Hurst	-	-	150	-	-	-	-	-	-	-	150	-
	North of Wokingham	-	-	-	-	-	-	2000	-	2000	2000	-	2000
	South of Wokingham	-	400	400	-	400	-	-	-	400	-	-	-
	South of the M4, west of Wokingham	-	-	-	-	-	-	-	2,200	-	-	2,200	2,200
	Arborfield area	-	500	500	-	-	500	-	-	-	500	-	-
	Swallowfield and Riseley	-	80	80	-	-	-	-	-	-	-	80	-
Total potential supply*		16304	17284	17584	17804	18204	18304	18304	18504	18704	18804	18884	20504
% above LHN (15,513)		5%	11%	14%	15%	17%	18%	18%	19%	21%	21%	22%	32%
Housing requirement		LHN											Above LHN?
* includes 24 Gypsy and Traveller pitches		Increasing growth ➡											

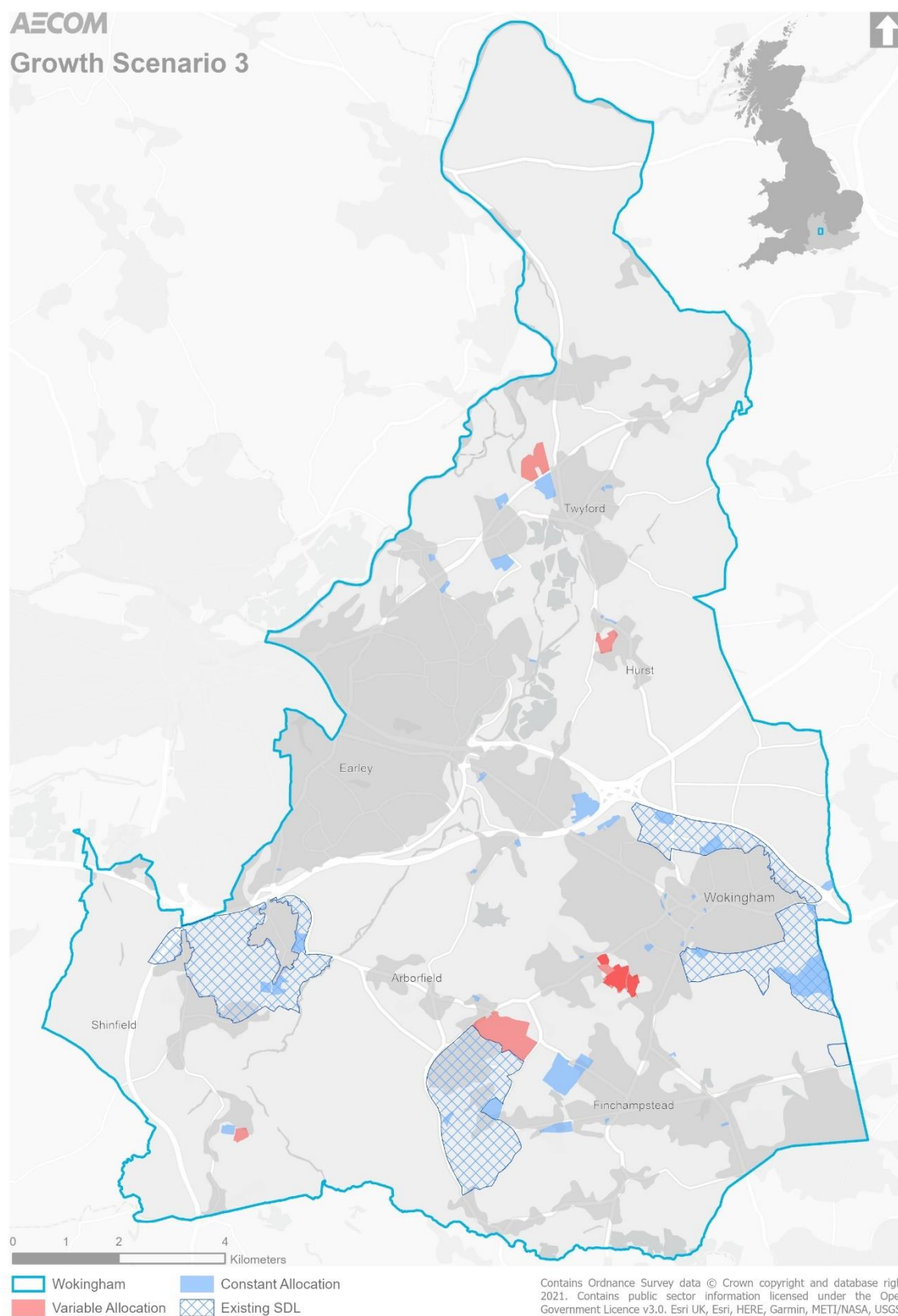
³⁰ Small sites benefitting from planning permission and projected small sites windfall allowance.

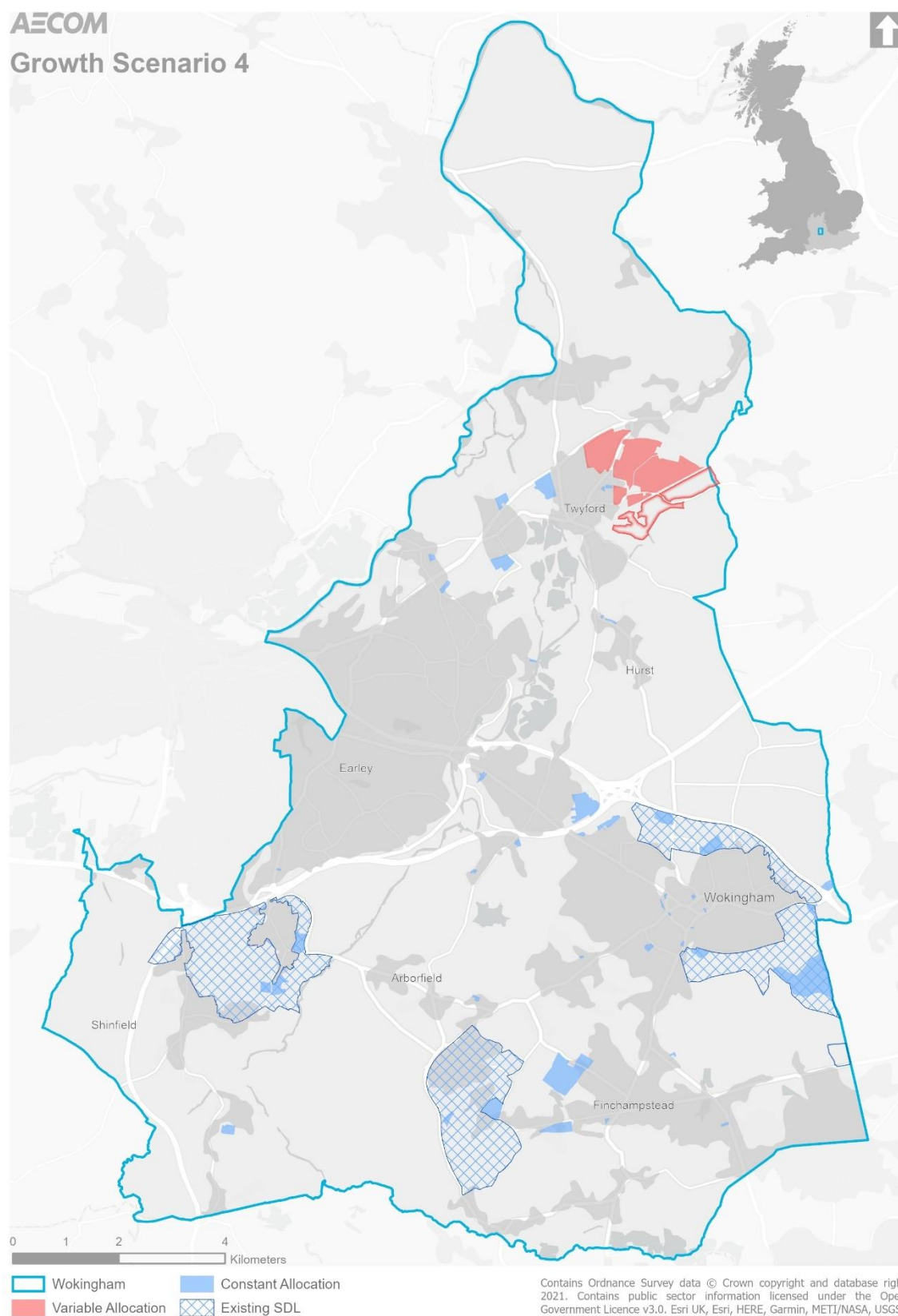
Scenario1: Do minimum

Scenario 2: Scenario 1 plus smaller potentially suitable (PS) sites

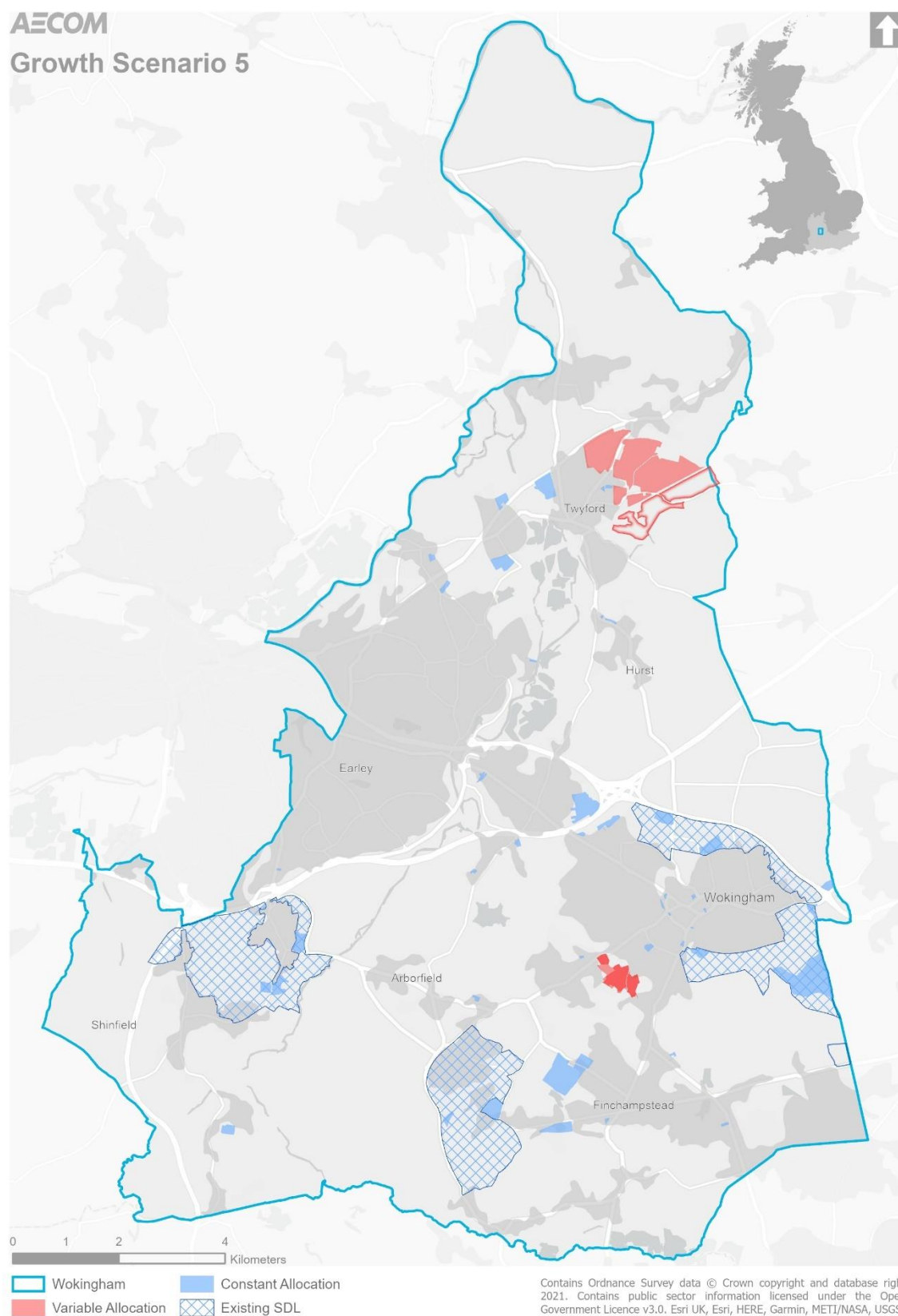


Scenario 3: Scenario 1 plus smaller PS sites and two unsuitable sites

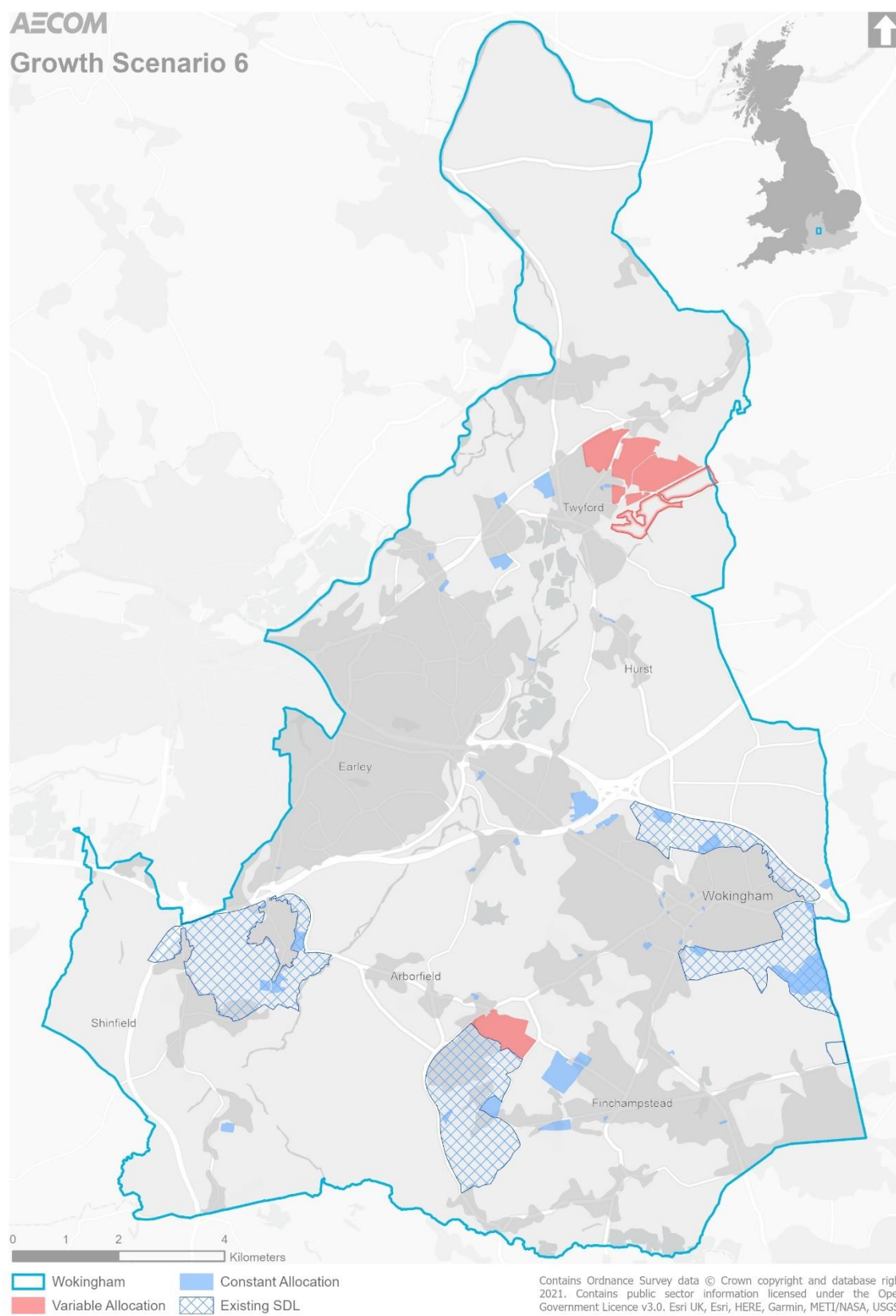


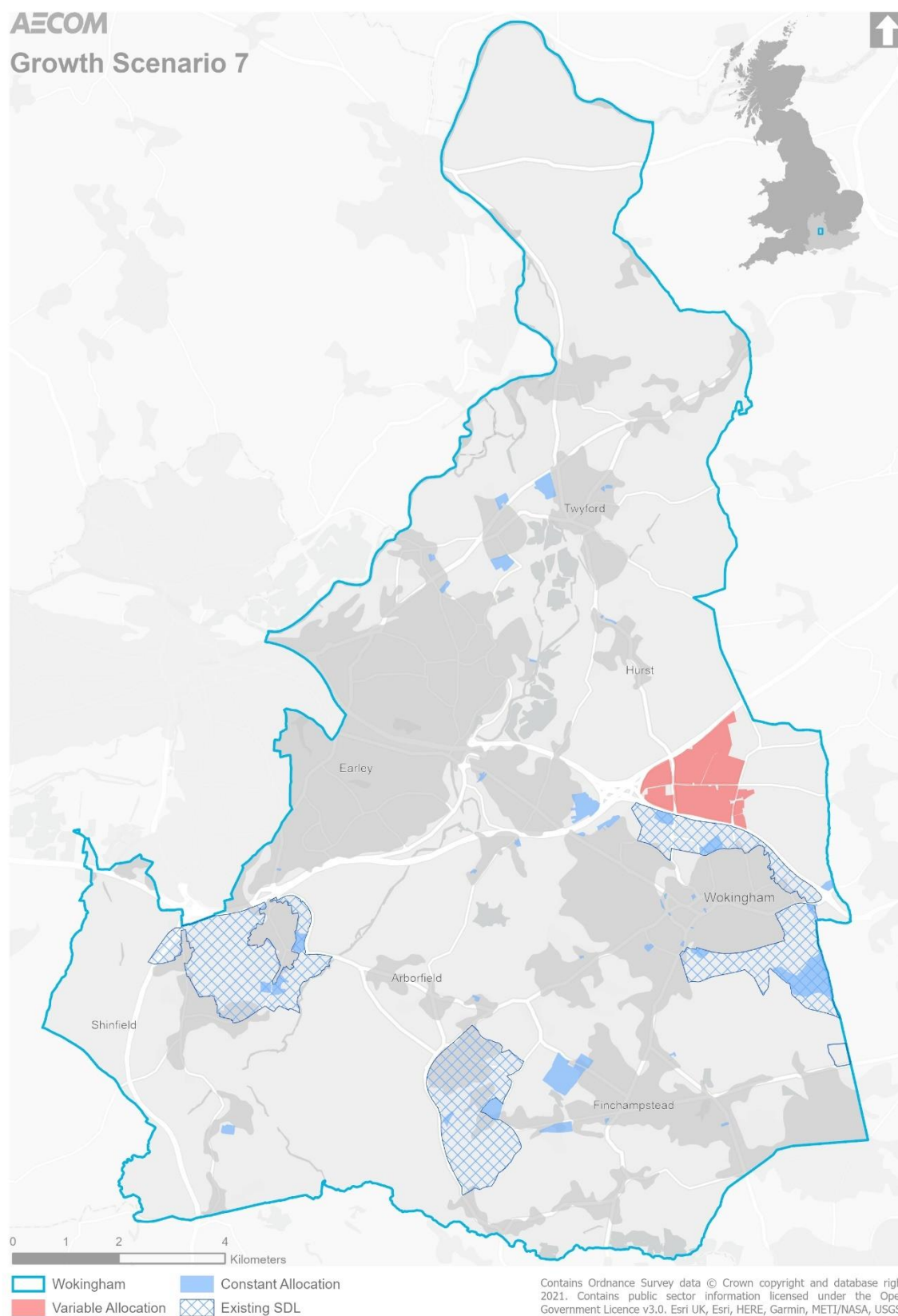
Scenario 4: Scenario 1 plus East of Twyford/Ruscombe

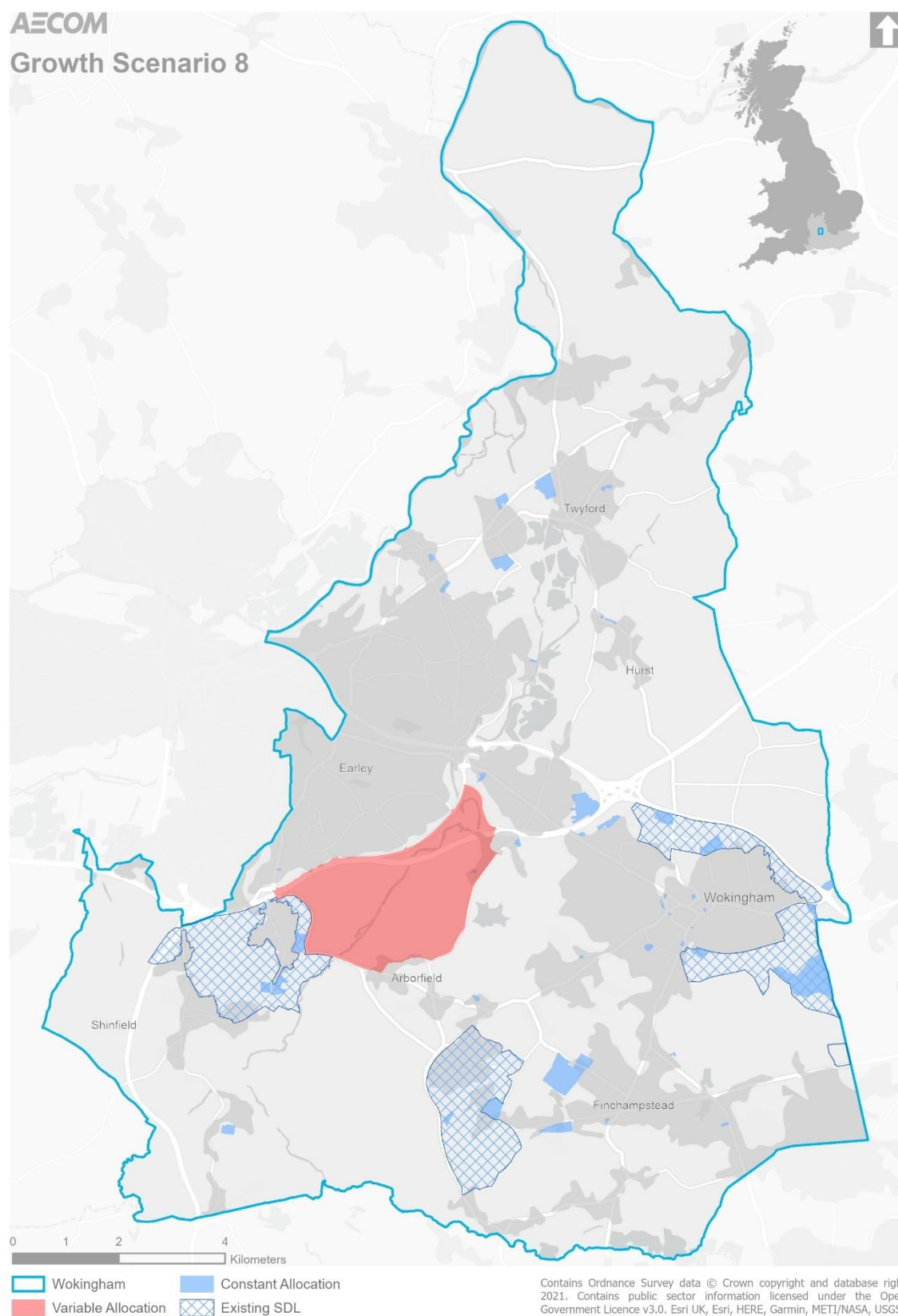
Scenario 5: Scenario 1 plus East of Twyford/Ruscombe and Blagrove Lane

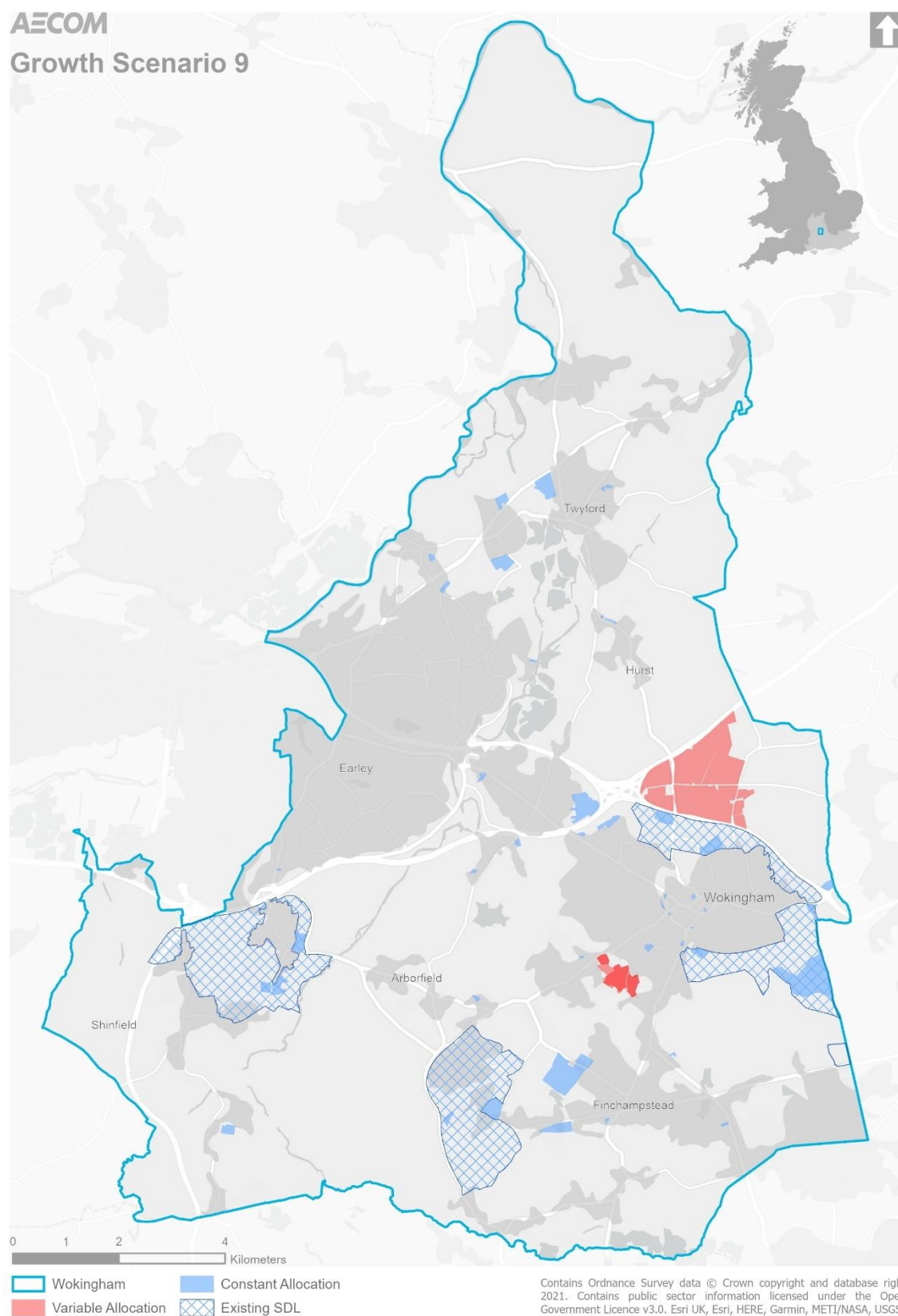


Scenario 6: Scenario 1 plus East of Twyford/Ruscombe and Barkham Square

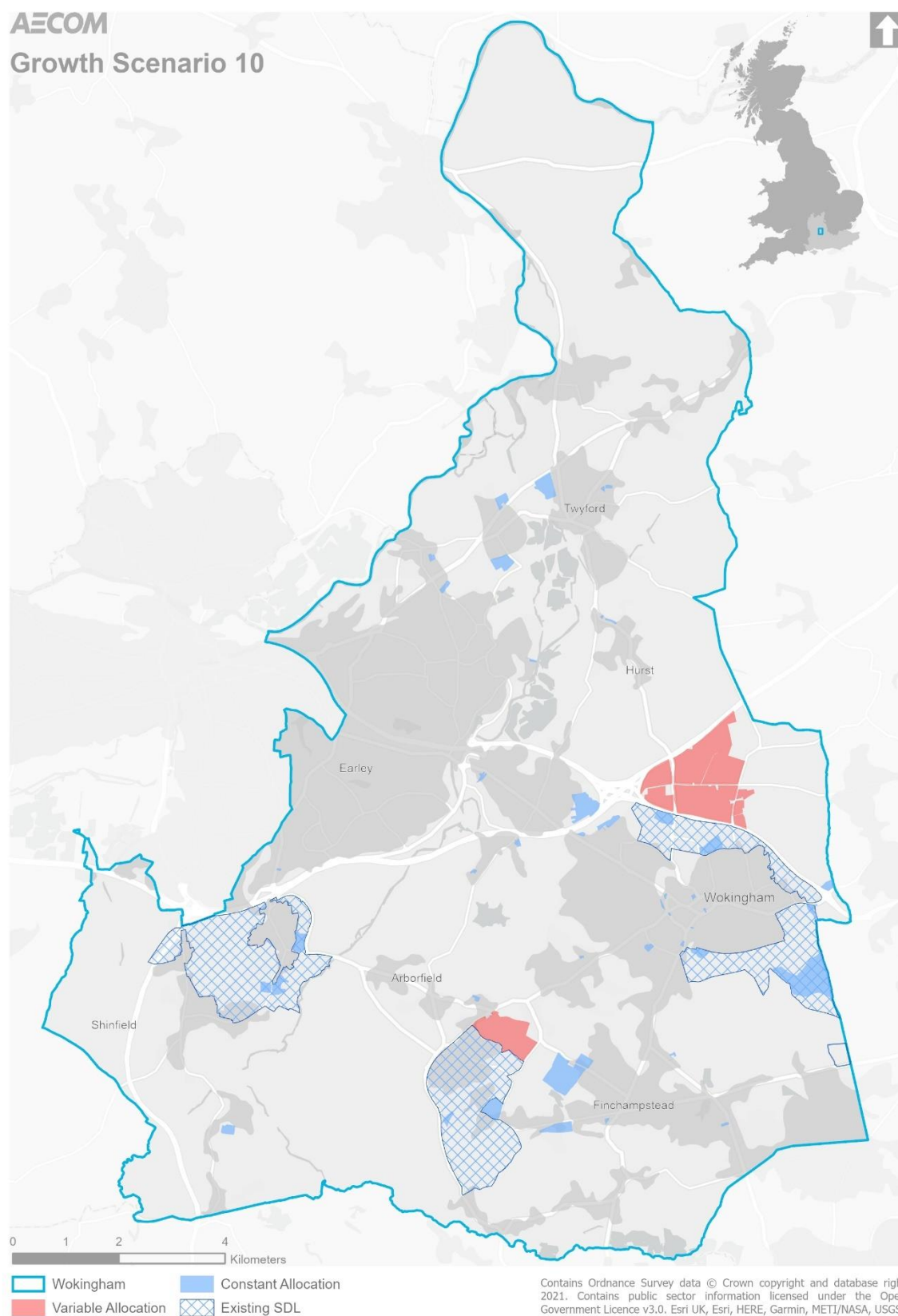


Scenario 7: Scenario 1 plus Ashridge

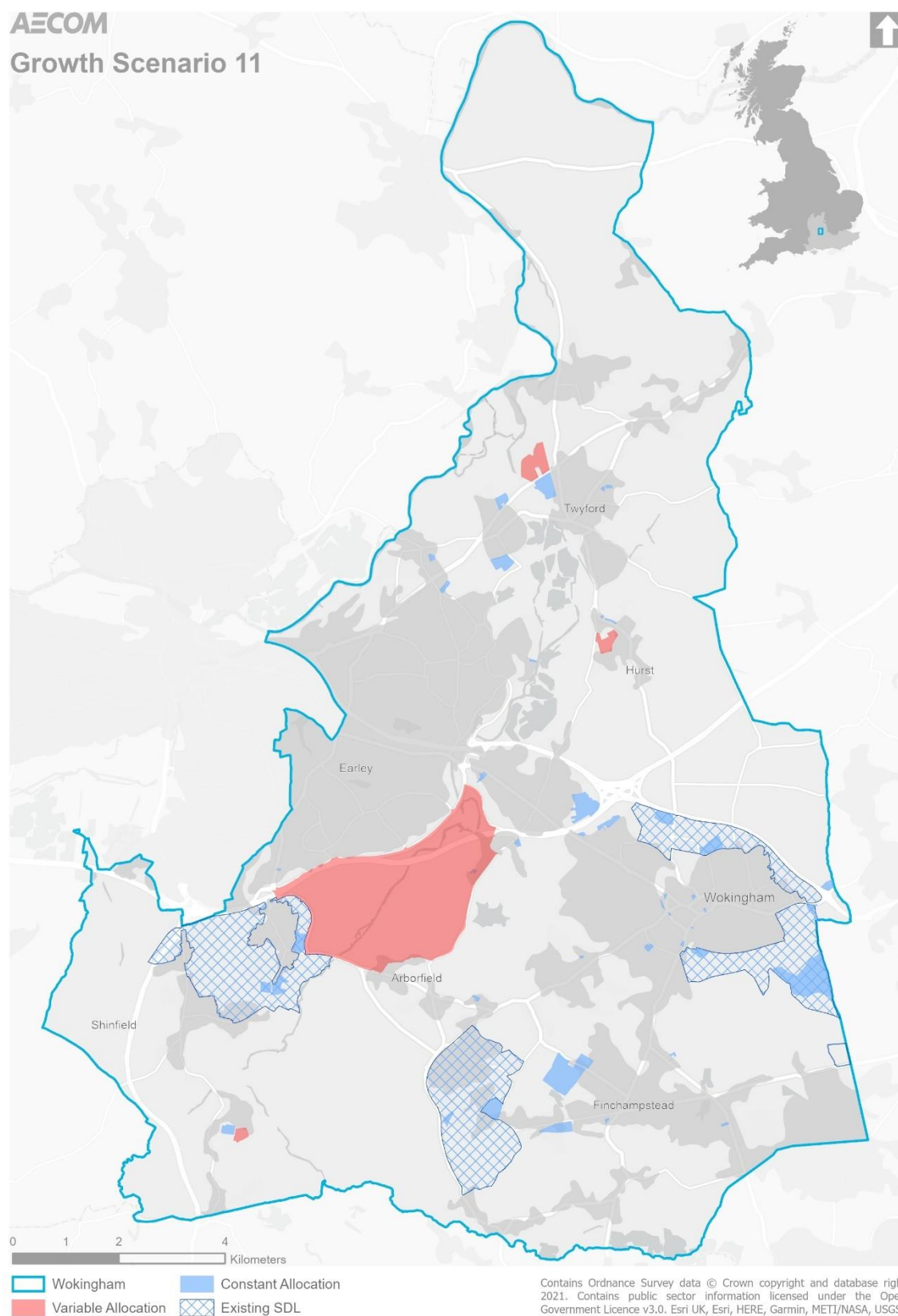
Scenario 8: Scenario 1 plus Hall Farm / Loddon Valley (LV)

Scenario 9: Scenario 1 plus Ashridge and Blagrove Lane

Scenario 10: Scenario 1 plus Ashridge and Barkham Square



Scenario 11: Scenario 1 plus Hall Fam LV, one small PS site and two unsuitable sites



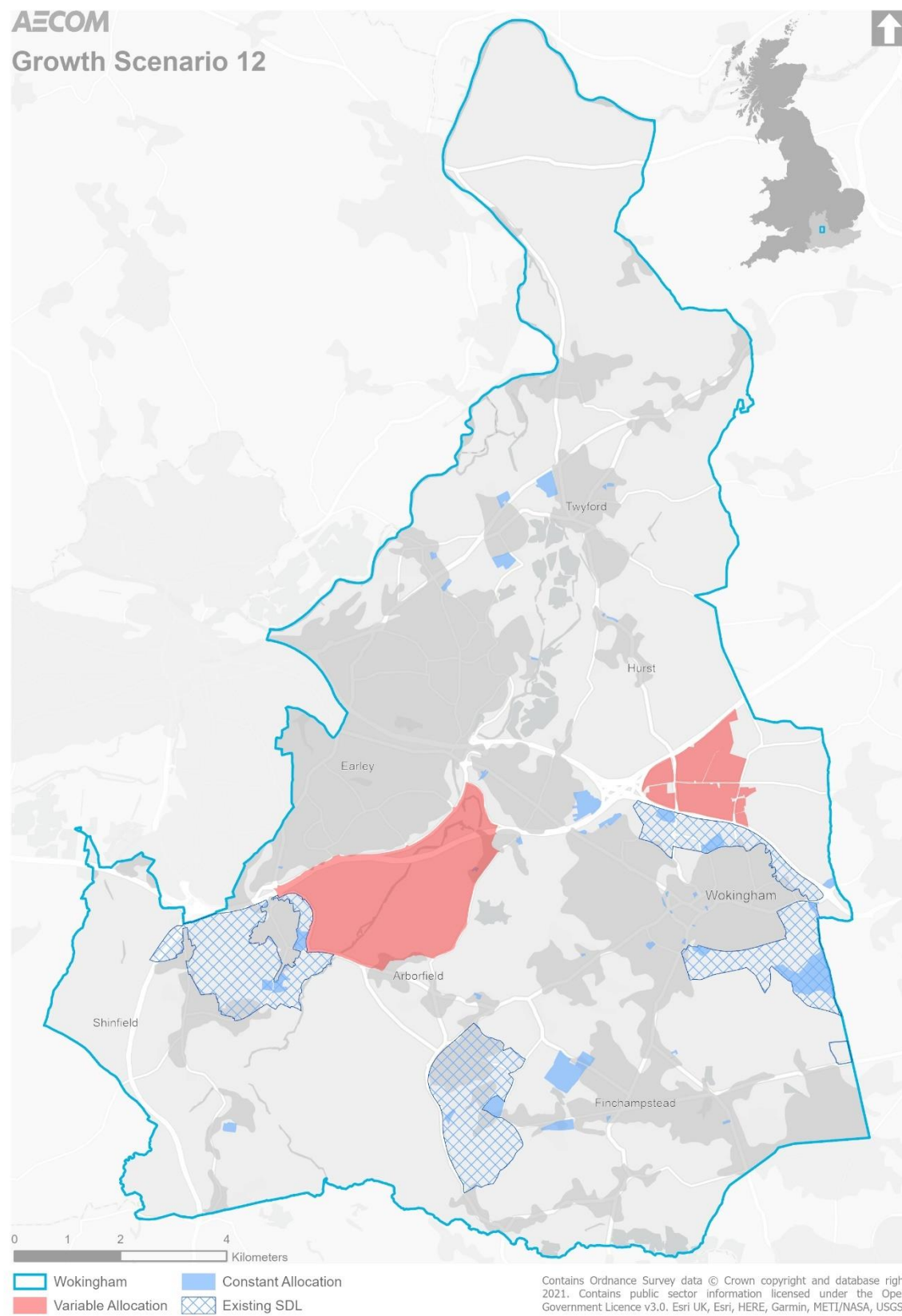
Scenario 12: Scenario 1 plus Ashridge and Hall Fam LV

Table 5.7: Frequently asked questions on the reasonable growth scenarios

Question	Response
Why are there so many completions and commitments?	<p>The Plan period began on 1st April 2018, and the rate of completions and sites gaining planning permission has been strong over the three monitoring years since, such that total supply from completions and commitments is 11,427 homes, or 73.6% of the homes required for the entire 20 year plan period (2018 – 2038).</p> <p>There arguments for maintaining a 2018 base date; however, there are also arguments for bringing forward the base date. Were the base date to be brought forward then there would be a risk of a smaller proportion of the required housing coming from completions and commitments, and hence a need for more allocations.</p>
Why is supply from windfall held constant?	<p>Anticipated supply from windfall is calculated on the basis of a formula explained within the Council's 5YHLS Statement. Calculating anticipated supply from windfall is considered to be a relatively technical, objective exercise, with little in the way of a policy choice to explore through the SA process, nor through growth scenarios appraisal. Whilst there can be arguments for assuming a rate of windfall higher or lower than past trends due to a change in development management policy (e.g. a more or less permissive approach to higher densities), in the Wokingham context there is no strong argument for doing so.</p>
What is the Wokingham town centre allowance?	<p>This is a windfall allowance specific to the town centre, to reflect its specific circumstances, namely a situation whereby there are several buildings that are currently unavailable, but which could well become available during the plan period, and are suitable to deliver higher density redevelopment.</p>
Why are Draft Plan (2020) small site allocations, new small site allocations and sites within existing SDLs held constant?	<p>This is a simplifying assumption, but is justified on the basis of the analysis presented in Sections 5.2, 5.3 and 5.4. In particular, Section 5.4 draws upon preceding analysis to discuss each of the sites in turn (also site clusters), setting out the issues before reaching a conclusion that these are not such that any of these sites warrant being a variable across the growth scenarios, recognising that there is only potential for a limited number of variables. It is also important to recall that all proposed allocations are appraised in Part 2 of the report, just as all were appraised in Part 2 of the 2020 Interim SA Report.</p> <p>There are two final points to note. Firstly, it is clearly the case that certain of these proposed smaller allocations are associated with issues over-and-above others, and this is reflected in the nature of examination presented in Section 5.4. One stand-out larger site is Land at Rooks Nest Farm within the Nine Mile Ride sub-area.</p> <p>Secondly, it is worth noting that the approach of holding smaller proposed allocations constant is broadly as per the approach taken in 2019/2020. Within the growth scenarios at that time it was only a package of small site allocations at the edge of the Shinfield SDL that were a variable.</p>
Why is South Wokingham SDL extension held constant?	<p>This is a large site (classified as a smaller strategic site, for the purposes of the process discussed in Section 5), hence there is naturally a strong argument for it being a variable across the growth scenarios. However, on the other hand, there is only the potential for a limited number of variables, and the conclusion is reached that there are other sites with a stronger case for being a variable.</p> <p>This conclusion is reached on the basis of the analysis presented in Sections 5.2, 5.3 and 5.4. In particular, Section 5.3 discusses how a shortlist of smaller strategic site options was subjected to a comparative appraisal, with the conclusion reached that South of Wokingham SDL extension is the strongest performing.</p> <p>It is fair to say that this site is the stand-out 'near miss' variable site, given its scale. It is a focus of detailed appraisal in Part 2 (with a dedicated paragraph under each of the relevant topic headings)</p>
In Scenario 2, what about other potentially suitable sites?	<p>There are several potentially suitable sites that do not appear in Scenario 2, but most are small sites (it is judged appropriate to focus on larger sites) and others are judged to not warrant detailed scrutiny for the reasons set out in Section 5.4.</p>

Question	Response
In Scenario 3, why is there a focus on just two unsuitable omission sites?	The two unsuitable omission sites that feature in Scenario 3 were judged to stand-out as having a relatively strong case for allocation on the basis of the analysis presented across Sections 5.2, 5.3 and 5.4. In particular, within Section 5.4. there is an explanation of how these sites are associated with a degree of merit in both site specific and strategic terms. With regards to the latter, a key point to note is that both sites are in the north of the Borough (and one benefits from being located at Twyford, a higher order centre), where there is a strategic argument for growth under a scenario that does not assume a strategic allocation in the north of the Borough.
With regards to Scenarios 5 and 6, why are there not further site combinations?	<p>These options deal with allocation of East of Twyford/Ruscombe plus additional growth from one or more potentially suitable omission sites.</p> <p>In the case of additional allocation of the site at Swallowfield, it was decided not to test this option on the basis that the site is small and so likely to deliver little in the way of planning gain, plus there are site/settlement specific issues, as discussed in Section 5.4.</p> <p>In the case of testing a scenario involving allocation of both Barkham Square and Blagrove Lane, there are certain concerns regarding both sites in combination.</p>
With regards to Scenarios 9 and 10, why are there not further site combinations?	As above
With regards to Scenario 11, why are there not further site combinations?	There is considered to be little or no reasonable potential to bring forward Hall Farm / Loddon Valley in combination with either Barkham Square or Blagrove Lane, due to proximity (which gives rise to a particular concern regarding marketability) and shared transport corridors.
With regards to Scenario 12, why are there not further site combinations?	There is considered to be only one reasonable scenario involving allocation of two strategic sites. This is because the effect would be to put in place a high growth strategy, and under such a scenario there would be little or no potential to demonstrate the exceptional circumstances necessary to allocate East of Twyford/Ruscombe.
Why not test higher and/or lower growth scenarios?	The range of growth quanta test is deemed to be reasonable. There are arguments to suggest that Scenario 1 involves insufficient supply (once account is taken of the need for a supply buffer, and a robust supply trajectory across the whole plan period, as far as possible; also the possibility of the plan base date being brought forward), and there are arguments that Scenario 12 would involve over-supply (given low likelihood of the LPU needing to provide for unmet need), but on balance it is considered reasonable and appropriate to test these scenarios.
Is 12 scenarios too many?	12 scenarios is not ideal, from a perspective of wishing to support a concise, accessible and manageable appraisal. However, it was necessary to accept this number of scenarios in order to reflect as many variables as possible. Moving forward, the aim should be to arrive at circa five growth scenarios.

6 Growth scenarios appraisal

6.1 Introduction

6.1.1 The aim of this section is to present an appraisal of the reasonable growth scenarios. The reasonable growth scenarios are set out in summary below, for ease of reference.

Table 6.1: The reasonable growth scenarios – summary

Scenario	Description	Potential supply
1	Do minimum	16,304
<i>Scenario 1 plus...</i>		
2	Smaller potentially suitable (PS) sites	17,284
3	Smaller PS sites and two unsuitable sites	17,584
4	East of Twyford/Ruscombe	17,804
5	East of Twyford/Ruscombe and Blagrove Lane	18,204
6	East of Twyford/Ruscombe and Barkham Square	18,304
7	Ashridge	18,304
8	Hall Fam / Loddon Valley (LV)	18,504
9	Ashridge and Blagrove Lane	18,704
10	Ashridge and Barkham Square	18,804
11	Hall Fam LV, one small PS site and two unsuitable sites	18,884
12	Ashridge and Hall Fam LV	20,504

6.2 Appraisal findings

6.2.1 Summary appraisal findings are set out in Table 6.2, which comprises: 13 rows - one for each of the topics that comprise the core of the SA framework (see Section 3); and 12 columns (one for each of the growth scenarios). For each of the sustainability topics in turn, the aim is to both categorise the performance of each of the reasonable growth scenarios in terms of significant effects (using **red** / **amber** / **light green** / **green**)³¹ and rank the reasonable growth scenarios in order of preference.

Further points on methodology

- Significant effects – in accordance with the SEA Regulations, the primary aim is to “identify, describe and evaluate” significant effects in respect of each element of the established appraisal framework in turn. Equally, the aim is to differentiate effectively, regardless of significant effects.
- Systematic appraisal – conclusions on significant effects and relative performance are reached on the basis of available evidence and understanding of key issues and opportunities, mindful of the guidance presented within the Schedules 1 and 2 of the SEA Regulations, and the Planning Practice Guidance.
- Evidence – a key consideration is the extent to which it is appropriate to take account of materials submitted by site promoters, in respect of proposals for bringing forward sites (e.g. mix of uses, areas of greenspace) and directing limited funds to measures aimed at mitigation (e.g. infrastructure upgrades) and ‘planning gain’ (e.g. affordable housing). There is certainly a need to take site specific proposals into consideration; however, there is a need to apply caution, as site specific proposals are subject to change, and there is a need to avoid unduly biasing in favour of development schemes for which more work has been undertaken.

³¹ **Red** indicates a significant negative effect; **amber** a negative effect with limited or uncertain significance; **light green** a positive effect with limited or uncertain significance; and **green** a significant positive effect. No colour indicates a neutral effect.

Table 6.2: Appraisal of the reasonable growth scenarios

Scenario	1	2	3	4	5	6	7	8	9	10	11	12
	Do minimum	HELAA Potentially Suitable (PS)	HELAA PS + select unsuitable	East of T/R	East of T/R + Blagrove Ln	East of T/R + Barkham Sq	Ashridge	Hall Farm LV	Ashridge + Blagrove Ln	Ashridge + Barkham Sq	Hall Farm LV + compatible	Hall Farm LV + Ashridge
SA topic	Rank of preference and categorisation of effects											
Accessibility	3			2				★1	2			★1
Air quality	2	3	2	★1		2						3
Biodiversity	2			★1	2		3		4		2	4
CC adaptation	★1	2		★1		2	★1	3	★1	2	3	
CC mitigation	5			3	4		2		3			★1
Communities	2	3					2	★1	2		3	2
Economy	3							★1	3		2	
Historic environment	★1	2		3	4		★1		2		★1	
Housing	8	7	6		5		4	3	2		★1	
Land, soils, resources	2	3	4			3	★1	3	2	★1	3	2
Landscape	★1	2										
Transport	2			★1		2	3	★1	3	4	3	5
Water	★1											2

Discussion

- **Accessibility** (to community infrastructure) – there is support for large strategic schemes able to deliver strategic community infrastructure alongside new housing, and particular support for Hall Farm LV, which would notably deliver a secondary school and three primary schools, plus there is potentially the option of supporting a major new hospital facility (subject to further investigation, including around traffic / road infrastructure). This leads to support for Scenarios 8 and 12.

At the other end of the spectrum: Scenario 1 performs poorly as there could be a risk of development coming forward at unallocated sites outside of the plan led system sites in sub-optimal locations, the presumption in favour of sustainable development; whilst Scenario 2 does not involve a strategic allocation, and sees a high growth strategy at Swallowfield, where there is no primary school and dependency on the car to access higher order services/facilities, plus Barkham Square performs relatively poorly from an accessibility/connectivity perspective.

With regards to the mid-performing scenarios, specific considerations include: the option of higher growth at Hurst performs relatively poorly, but the village does benefit from relatively good connectivity to higher order centres; Blagrove Lane performs relatively well, given good connectivity to Wokingham and the proposal to deliver significant community infrastructure including a primary school (to be confirmed); and Ashridge could be reasonably well connected to Wokingham by walking/cycling, plus the A329M is a strategic public transport corridor between Reading and Bracknell, but the scheme would not deliver a secondary school.

- **Air quality** – there is support for East of T/R, which would deliver a relief road to reduce traffic through the Twyford crossroads Air Quality Management Area (AQMA). This leads to support for Scenario 4 and, on balance (N.B high uncertainty), Scenario 5, which would see additional allocation of Blagrove Lane, where there would be potential to walk and cycle to Wokingham town centre, but a risk of increased traffic through the town centre AQMA.

At the other end of the spectrum, it is appropriate to flag a concern with Scenario 12 for two reasons. Firstly, both Ashridge and Hall Farm LV are adjacent to major road corridors, with Ashridge leading to a particular concern (noting that Hall Farm LV would see employment adjacent to the M4). Secondly, in the absence of traffic modelling examining the cumulative impacts of these sites coming forward together there is a need to flag the risk of significant or even severe traffic impacts, including potentially within an AQMA.

Scenario 3 is also judged to perform poorly, as there would be a focus at: smaller sites with low trip internalisation; certain sites likely to be associated with high car dependency; sites in the south of the Borough that would load traffic onto highways and junctions with acknowledged congestion, for example the B3349; and a site NW of Twyford (TW007) that is associated with environmental quality issues (adjacent A-road, railway and sewage treatment works) and is not ideally located for accessing the village centre (where there is an AQMA) by walking/cycling.

- **Biodiversity** – there is support for East of T/R, as a larger site option – potentially supportive of a strategic approach to green/blue infrastructure and, in turn, biodiversity net gain – in a relatively unconstrained location, although the site does contain one Local Wildlife Site (LWS). It is difficult to see how onsite or nearby habitat enhancement or creation would lend *particular* support for strategic, landscape scale biodiversity objectives, although there are concentrations of habitat to the east and south east, which could serve to effectively contain growth, and could provide an offsite strategic habitat creation/enhancement opportunity. This leads to support for Scenario 4, though not Scenarios 5 or 6 (i.e. the other two scenarios involving East of T/R), as both Barkham Square and Blagrove Lane are associated with a notable degree of constraint (the Emm Brook corridor with associated ancient woodland in the case of the former; and the likely need for access through a woodland LWS in the case of the latter).

At the other end of the spectrum, both Ashridge and Hall Farm LV are subject to notable constraint, namely concentrations of ancient woodland in the case of the former, and the River Loddon and Barkham Brook corridors (also a concentration of woodland patches) in the case of the latter. As large strategic sites there would be excellent potential to design-in green/blue infrastructure, so as to avoid sensitive areas and ensure well-targeted habitat creation/enhancement, and opportunities are particularly apparent at Hall Farm LV; however, on balance, at this early stage, it is appropriate to flag a biodiversity risk for scenarios involving one or both of these sites.

With regards to the mid-performing scenarios, Blagrove Lane and Barkham Square have already been discussed as being subject to constraint. With regards to the three remaining smaller sites, all are thought to be relatively unconstrained, although the site north west of Twyford (north of the A4) would be adjacent to the River Loddon corridor – with its extensive floodplain grazing marsh priority habitat – and there is a need to consider in-combination impacts given two nearby sites that are a constant across the scenarios (Bridge Farm and NE of Charvil) that also abut the flood zone / priority habitat. The possibility of the sites in combination (c.470 homes in total) delivering strategic enhancements to this valued landscape (the Loddon/Thames confluence) could be explored.

Finally, with regards to Scenario 1, which comprises just the sites that are a constant across the scenarios, it is important to note that there are some significant biodiversity issues – see further discussion in Part 2.

- **Climate change adaptation** – the key consideration here is flood risk, and particularly fluvial flood risk. The stand-out sites here are Hall Farm LV and Barkham Square, both of which are strongly associated with a river corridor (it is important to note that scenarios involving both sites in combination are ruled out as unreasonable, including mindful of impacts to the Barkham Brook corridor). Focusing on Hall Farm Loddon Valley, it should be possible to avoid sensitive uses in the fluvial flood zone, but there is also a need to be mindful of downstream flood risk affecting Earley and Winnersh. It is fair to assume high quality Sustainable Drainage Systems (SuDS), and there could be the potential for 'betterment' (e.g. development could fund new strategic flood water attenuation onsite, leading to reduced flood risk affecting the A3290/b3270 and other areas downstream; a study was completed in 2018, as discussed within the Level 2 Strategic Flood Risk Assessment, 2021), but there is a need for caution at this stage.

The other sites of note are the 150 home site north west of Twyford and the 80 home site at Swallowfield, both of which abut and modestly intersect the fluvial flood zone. Finally, with regards to Scenario 1, which comprises just the sites that are a constant across the scenarios, it is important to note that there are some significant flood risk issues, as discussed in Part 2.

- **Climate change mitigation** – it is inherently challenging to differentiate between the scenarios, including because there can be tensions between objectives around minimising per capita built environment emissions on the one hand and, on the other hand, minimising per capita transport emissions. With regards to transport emissions, matters have already been discussed above, and are discussed further below, under Transport.

Focusing on **built environment emissions**, whilst it is understood that there will be a policy requirement for net zero developments across all sites (involving ten homes or more), it is nonetheless very important to support schemes where there is a particular locational or site-specific opportunity, or where the land-owner / promoter is proposing a particular focus on decarbonisation measures (which invariably lead to significant cost). As a broad rule of thumb, large strategic schemes can lead to an opportunity over-and-above smaller scale schemes, and this assumption is reflected in the approach taken to ranking the performance of the reasonable growth scenarios, i.e. Scenario 12 is tentatively identified as best-performing, because there would be a major focus of growth at two large strategic schemes. It is difficult to conclude that any of the large strategic sites in question are associated with a *particular* opportunity, on the basis of the available evidence, and noting uncertainties at this stage regarding what is achievable and viable (given competing funding priorities); however, work to identify site and scheme specific opportunities has been undertaken for both Hall Farm LV (Renewable Energy Provision Statement, 2021) and Ashridge (submitted promoter materials, 2021), and it is also the case that these sites are notably larger than East of T/R, so it is appropriate to highlight Hall Farm LV and Ashridge as the preferable sites. Comparing the two, it is fair to highlight that Ashridge could benefit from being a more nucleated scheme, although Hall Farm LV could be associated with an opportunity due to its mixed use nature and/or drawing ambient heat from the River Loddon.

With regards to effect significance, there is a need to balance an understanding that climate change mitigation is a global consideration, such that local actions can only ever have a limited effect, with the fact that there is a highly ambitious local net zero target in place. On this basis, and on balance, it is considered appropriate to flag a concern with all scenarios. This reflects a view that the 2030 net zero target date is so ambitious that decarbonisation must be a key driving factor influencing spatial strategy, site selection and development of site-specific proposals.

- **Communities** – with the matter of access to community infrastructure already having been a focus of discussion above (under 'Accessibility'), the focus here is on supporting successful place-shaping/making, including avoiding impacts to existing communities (N.B. a further key matter at the 2020 Draft Plan stage was the AWE safety zone, but this is now less of an issue for the SA process, because there is absolute clarity on the extent of the zone).

Large strategic site options give rise to a particular opportunity in respect of place-making, as understood from recent experience in the Wokingham context. Taking the three options in turn:

- Ashridge gives rise to very low concerns regarding direct impacts to existing communities, although there are concerns regarding indirect impacts, in terms of traffic and pressure on community infrastructure.
- Hall Farm LV is associated with a particular place-making opportunity – with the river corridors and woodlands providing a structural framework for masterplanning, and the potential for new communities to integrate with a regionally significant employment cluster, itself with a clear masterplanning vision (the four valleys) – and enhancing the river corridor as a strategic green/blue infrastructure asset represents a significant opportunity, with the potential to benefit existing as well as new communities, e.g. residents of Lower Earley. There is an issue around impacts to the existing communities within Shinfield and Arborfield parishes, both of which have seen, and continue to see, very significant growth through the Shinfield Parish (South of the M4) and Arborfield Garrison SDLs; however, in both cases the historic cores of these settlements are set back from the Hall Farm LV site, and there is good potential to mitigate impacts through masterplanning (e.g. use of land north of the river for employment will be supportive of ensuring Shinfield's distinct sense of place; with regards to Arborfield, south of the river, this could benefit from further investigation (see discussion under Historic Environment)).

- East of T/R performs less well, because of a concern regarding impacts to existing communities over-and-above the other two large strategic site options. It is also important to note that the East of T/R includes a permanent Gypsy and Traveller site, which would certainly be impacted, and, in all likelihood, enveloped by any strategic expansion scheme, which leads to the possibility of negative impacts on the existing Gypsy and Traveller community, given a tendency for Gypsy and Traveller communities to prefer a degree of isolation or, at least, separation from 'bricks and mortar' communities. There would be good potential to relocate the site as part of the development; however, the Gypsy and Traveller community might have concerns about any such plan.

With regards to the smaller site options that are a variable across the growth scenarios, the key consideration is high growth at Hurst and Swallowfield under Scenarios 3 and 11 (also Scenario 2 in the case of Swallowfield). There is perhaps greater concern regarding the site at Swallowfield, due to a need for vehicular and pedestrian access from a narrow rural lane, plus it is difficult to see how the scheme could deliver anything in the way of significant planning gain (there is seemingly no potential to plan comprehensively for growth south of Swallowfield in order to deliver a primary school for the village). As for the site at Hurst, there is a firm proposal to deliver significant new public open / green space and play facilities in a central location within the village, and the scheme would serve to nucleate the village to some extent. Both sites in question are well contained (particularly so the site at Swallowfield), such that there are few if any concerns regarding long term 'sprawl'.

- **Economy** – the overriding consideration here is the potential for housing growth directed to Hall Farm LV to support, indeed enable, the University of Reading's aspiration to create an International Employment Hub based around the Four Valleys of Cinema, Heritage, Medical and Nano. Progress has already been made towards achievement of the vision (most notably in the form of Thames Valley Science Park), and is set to continue regardless of strategic housing growth (most notably in the form of Shinfield Studios), but realising the vision in full is likely to require strategic housing growth to the south, on land also owned by University, including so as to fund and deliver major new road infrastructure. Furthermore, bringing forward an aspirational major new community adjacent (or near adjacent, given the intervening river valley) will be supportive of the Four Valleys vision. In summary, there is certainly a significant opportunity, although there is still a need to consider the option of achieving a version of the Four Valleys vision without strategic housing growth. Delivering a major new medical facility, potentially in the form of a new hospital, would certainly represent a highly significant opportunity, and one that could probably only be realised alongside strategic housing growth, because there would be a need to fund and deliver M4 Junction 10a, but there is no certainty, at the current time, in respect of what type of medical facility, if any, would come forward.

None of the other sites that are a variable across the growth scenarios would deliver large-scale new employment land, although there would be some small scale opportunities associated with the other two large strategic sites, and the site north west of Twyford is identified by the Non-strategic Sites Report (2021) as having potential to deliver 4ha of employment land (in a good location, on the A4). Under all of the scenarios without Hall Farm LV there could be a risk of employment land needs not being met, and this could be a particular concern under higher growth scenarios (because there could be a greater disconnect between jobs and population locally, potentially leading to problematic out commuting); however, there is considerable uncertainty at the current time regarding employment land needs, e.g. in light of homeworking trends (N.B. Wokingham is not discussed as a location particularly well suited for warehousing/distribution uses, which is a key employment land issue regionally and nationally).

Other than enabling or facilitating delivery of new strategic employment land, a further, less significant consideration is delivering new homes in locations well-linked to existing centres of employment, with a view to supporting those centres to thrive and potentially grow. A number of the sites that are a variable across the growth scenarios are associated with merit, notably sites along the A4 road (and rail) corridor.

N.B. a final consideration is the risk of negative effects due to problematic traffic congestion under Scenario 12.

- **Historic environment** – all three of the large strategic site options that are a variable across the growth scenarios are associated with notable constraint, as are the two smaller strategic sites (Blagrove Lane and Barkham Square). However, it is East of T/R that stands out as most constrained, as it seems clear that there would be a significant impact to the setting of Ruscombe Conservation Area, where there is a grade 1 listed church and six other listed buildings. Furthermore, there is a need to consider the value of historic links between Ruscombe and assets / clusters of assets in the surrounding countryside, including Hare Hatch to the north east. There is little reason to suggest that historic environment impacts are a 'showstopper', but there is a need to flag a significant risk at this current stage, ahead of further work on masterplanning etc and consultation with Historic England.

With regards to Hall Farm LV and Ashridge, both are associated with one stand-out cluster of assets, but in both cases it is safe to assume that the cluster would be integrated as part of the strategic green infrastructure network. In the case of Ashridge, there is a cluster of five listed buildings associated with Bill Hill Park, plus there is a remnant parkland landscape; however, the firm proposal is for land here to mostly (though not entirely) be used for accessible greenspace, and there could be an opportunity around opening-up access to former parkland west of the M4.

With regards to Hall Farm LV, the primary concentration of assets is considered likely to be at Hall Farm itself, where there is a grade 2 listed farmhouse and an adjacent ruined church, which is a scheduled monument, and where there is a listed tomb. This is a historic river crossing, and there remains a public footbridge over the river, hence the assets may be quite well appreciated; however, there will be good potential to conserve the assets as part of a green/blue infrastructure strategy. A final consideration is the remnant parkland landscape adjacent to the west of Hall Farm / the ruined church, associated with Arborfield Hall (demolished 1955), its lodge houses (still present), Arborfield Grange (not listed) and a grade 2 listed rectory. The current high level concept masterplan suggests developing this land for residential, which potentially gives rise to a cause for concern, but significance is unclear, given few listed buildings, and it is recognised that there would be further masterplanning work undertaken.

Briefly, with regards to the other sites in question:

- Barkham Square - there is only one Grade II listed building in the vicinity (c.100m from the site), but there would be an impact to the landscape gap to the historic village of Barkham (albeit no designated conservation area), which stretches along Barkham Street with historic cores at either end (the southern core being of particular note). There would also likely be some traffic through the Arborfield Cross Conservation Area, although Arborfield Cross benefits from a recently opened relief road, and development traffic might follow this route.
- Blagrove Lane - is also considered to be relatively unconstrained. However, there are two adjacent small historic farmsteads - one comprising a cluster of three grade 2 listed buildings and the other four - which are likely associated with a rural/agricultural setting, and which may contribute to a sense of historic settlement separation / historic landscape character. A further consideration is a known 'archaeological site' that intersects the site.
- The three other smaller sites in question – are all seemingly quite unconstrained. In the case of the Hurst site, the site currently under consideration does not extend to the A321 Broadwater Lane, where there is a cluster of assets. In the case of Twyford, the site in question is associated with a landscape potentially with archaeological significance, noting the major cluster of scheduled monuments a short distance to the west.
- **Housing** – Scenario 12 clearly performs well, as a high growth scenario that would give the flexibility to potentially set the Borough's housing requirement above Local Housing Needs (LHN), in order to seek to meet a higher proportion of affordable housing needs and/or enable flexibility to provide for any unmet needs that may arise from other constrained local authorities in the sub-region. However, as a strategy involving a major focus on strategic growth locations, there would be inherent delivery risk, such that there would be a need to ensure a very substantial 'supply buffer' over-and-above the established housing requirement, in order to avoid a situation whereby WBC struggles to maintain a five year housing land supply (measured against the housing requirement), or fails the Housing Delivery Test, over the course of the plan period, leading to the plan being seen as out-of-date and the presumption in favour of sustainable development potentially being triggered (NPPF paragraph 11).

In light of these points, Scenarios 9, 10 and 11 are judged to perform equally or nearly as well as Scenario 12. In particular, Scenario 11 performs well, because Hall Farm is judged to be associated with relatively low delivery risk, in comparison to Ashridge, given one major land-owner (University of Reading) and a second major land-owner, with developer involvement, for a part of the site that is understood to be relatively straight-forward to deliver. With regards to Ashridge, whilst it is recognised that delivery concerns are already 'baked-in' to the assumed capacity of 2,000 homes in the plan period (the site promoters suggest 3,000), it is nonetheless considered appropriate to flag a delivery concern with scenarios involving this site over-and-above equivalent scenarios involving Hall Farm. This reflects an understanding that land-ownership is relatively fragmented, with more work needed to demonstrate that land-owners are set to work together effectively, and also uncertainties around road infrastructure upgrades (albeit it is recognised that this also applies strongly to Hall Farm LV).

With regards to Scenario 8, this is judged to also perform well, given that there would be a significant supply buffer over-and-above LHN (which would be set as the housing requirement). A healthy supply buffer is not only important in order to account for delivery risks, but also to account for the possibility of the plan's base date being brought forward. Delivery has been very strong over the three monitoring years since the start of the plan period, and is set to be very strong for the immediately forthcoming monitoring years, such that bringing the plan base date forward (perhaps to 2023/24, when adoption is anticipated) would likely result in a need for more homes from allocations in comparison to a 2018/19-based plan (see Appendix K of the Revised Growth Strategy consultation document).

With regards to the low growth scenarios, these inherently perform relatively poorly, albeit these are associated with low delivery risk, on account of either involving no large strategic allocation, or involving allocation of East of T/R, which is understood to be associated with notably low delivery risk, with a housebuilder in control of the whole site and a need for less significant new road infrastructure upgrades than is the case for either Hall Farm LV or Ashridge (recalling that the site is significantly smaller). Other 'housing' factors to consider include:

- Supporting a good mix of housing types and tenures – there are likely to be opportunities at strategic sites over-and-above non-strategic sites, though any of the sites in question would likely be policy compliant.

- Supporting specialist accommodation – there are currently no firm proposals, but this could be an option to explore, particularly at the large strategic sites (there could be greatest flexibility at Hall Farm).
 - Locally arising housing needs – cannot be quantified with any certainty (unlike borough-wide LHN), but will undoubtedly exist. Twyford is discussed as potentially being associated with locally arising housing need, recognising that the north of the Borough has seen significantly less recent housing growth than the south.
 - Proximity to growth locations – can be a factor leading to delivery risk, due to overlapping housing markets / a risk of market saturation. In this respect, it is noted that Blagrove Lane is quite close to Hall Farm LV.
- **Land soils and resources** – the key consideration here is loss of best and most versatile (BMV) agricultural land, which is that of grade 1, grade 2 or grade 3a quality. There is a nationally available dataset covering the entire Borough, but this is very low accuracy (it does not differentiate between grade 3a and grade 3b) and low resolution (it does not recognise some smaller villages as urban areas). There is also the potential to undertake detailed work, including soil samples, and submit the results to a second nationally available dataset (available at magic.gov.uk); however, this data set covers only a small proportion of the Borough (the work is typically undertaken as part of planning applications). The table below considers each of the variable sites in turn.

In light of the table it is fair to highlight scenarios involving Ashridge and Barkham Square as performing relatively well, as there would be good potential to avoid loss of BMV, and to highlight scenarios involving East of T/R and NW of Twyford (albeit this is a smaller site) as performing relatively poorly.

With regards to effect significance, all scenarios would likely involve significant loss of BMV land, once account is taken of the sites that are a constant across the scenarios, hence 'significant negative effects' must be predicted.

N.B. A further consideration is the need to avoid sterilisation of minerals resources that could potentially be viably extracted, informed by the Central and Eastern Berkshire Joint Minerals and Waste Plan, which is at an advanced stage. The submitted [policies map](#) suggests that all three of the large strategic site options may be associated with winnable minerals, hence the potential for prior extraction would need to be investigated.

Site	Low resolution/accuracy dataset	Detailed survey work?
Hall Farm	Grade 3 (bar river corridor grade 4)	No (but nearby grade 3a and 3b)
Ashridge	Grade 3 (majority) and grade 4	Circa 50% surveyed - mainly grade 3b
East of T/R	Mostly grades 1 and 2 (some grade 3)	No
Barkham Square	Mostly grade 4 (some grade 3)	No
Blagrove Lane	Grade 3	Eastern section surveyed - grades 2 and 3a
NW of Twyford	Grade 1	No (but grade 2 nearby)
Hurst	Grade 3	Grades 3a and 3b
Swallowfield	Grade 3	No (but grade 2 nearby)

- **Landscape** – it is difficult to differentiate between the scenarios on the basis of the available Landscape Character Assessment (2004 and 2020 update), which identifies most if not all of the sites in question as being associated with character areas with 'moderate' sensitivity. However, further evidence comes in the form of the Valued Landscapes (VLs) Topic Paper (2020). This notably identifies: much of the land within Hall Farm LV (specifically the river corridor and land to the north) as falling within the proposed River London VL; the north-eastern part of Ashridge (specifically that part that was Ashridge Wood until the late 20th Century) as falling within the proposed Billingbear VL; and the northern part of Barkham Square (specifically that part closest to the stream confluence) as falling within the proposed Barkham and Bearwood LV.

On the basis of this evidence, it is fair to highlight East of T/R as performing relatively well, of the large strategic site options; however, the site is not without its sensitivities, recognising that this is a relatively open and expansive chalk geology-influenced landscape, and also noting the network of PROWs linking to key destinations, including a bridleway linking to the historic settlements of Wargrave to the north and Waltham St. Lawrence to the east (where it meets an established bridleway circuit).

It is also important to note that East of T/R site falls within the Green Belt, within which there is a need to "safeguard the countryside from encroachment" and maintain "openness". The Growth Scenarios Report (2018) proposed a defensible Green Belt boundary in the form of a boundary road with a large area of publicly accessible open space / green space beyond; however, it is noted that the site promoters stated through their 2018 response that: *"Whilst this would establish a set boundary to the development, it is considered that this would not necessarily result in the most appropriate solution to promote high quality place making. Alternative options to this approach include for example an attractive built edge with high quality landscaping beyond... to form a defensible Green Belt boundary."*

Returning to Hall Farm, a further key consideration is the potential to deliver a major new area of riverside parkland, which would certainly be of strategic value to residents of existing nearby communities, and potentially even more widely, if the outcome is a situation whereby the River Loddon corridor, between Reading and the Thames, is widely known for its accessibility. A long distance path is a possibility, and regional park designation might feasibly be explored, e.g. akin to the Colne Valley Regional Park (albeit the Colne Valley benefits the Grand Union Canal). There is also the simple fact that the site offers an opportunity for growth to be 'contained' within a river valley.

Returning to Ashridge, there is a notably low density PROWs in this area, and the main road corridors are likely to be significant detracting features; however, the LCA does identify a "strong sense of place"; and a further concern is in respect of long term eastwards 'sprawl' over time, along the A329(M) corridor between Reading and Bracknell. Whilst it is recognised that there are arguments in favour of organic settlement expansion over time, from an environmental planning perspective there are arguments for comprehensive long term planning (see NPPF paragraph 22, which suggests the need for a 30 year vision where "larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area").

With regards to Barkham Square and Blagrove Lane, both sites are associated with a range of sensitivities (also potentially certain opportunities), but a primary consideration is potentially the risk of erosion of settlement separation under a scenario whereby both sites come forward in combination. There is a need to take a long term perspective, and avoid any risk of the Wokingham urban area extending beyond the valley of the Emm Brook, such that there is a risk of it spilling southwards into the valley of the Barkham Brook.

Finally, with regards to the three smaller sites, none are thought to be associated with particular landscape sensitivity. All are quite well contained by features in the landscape (transport infrastructure, woodlands, strong hedgerows) and/or a flood risk zone (which does not provide visual containment, but serves to contain further expansion). The site at Hurst would notably alter the built form of the village (which is currently quite dispersed), and the site at Twyford would extend the village north beyond the A4 (Charvil, to the west, already extends north of the A4), but on balance none of the sites are considered to be significantly constrained in landscape terms.

In conclusion, it is not possible to differentiate between the growth scenarios with any certainty, on the basis of the available evidence, other than to highlight Scenario 1 (low growth) as performing well. From a landscape perspective it does appear that the Borough is potentially constrained in the sub-regional context, with no easy choices, and real concerns regarding maintaining settlement separation and landscape character in the long term.

- **Transport** – traffic modelling has explored a number of scenarios that enable consideration to be given to the merits of Hall Farm LV and Ashridge, though not any of the other sites that are a variable across the growth scenarios.

With regards to Hall Farm LV, a key issue is understood to be uncertainties around commuter flows associated with the employment areas, plus there is uncertainty regarding the potential to deliver a new M4 junction (which would certainly be necessary under a scenario where a hospital is delivered onsite). There would be more than 2km between junctions (an important safety consideration), and the effect could be to relieve pressure on existing junctions 10 and 11; however, junctions in relatively close proximity can give rise to an issue whereby the motorway is used by local traffic ("junction hopping"). Furthermore, it is important to consider the strategic value of upgrades or a new road link road between the M4 and the A327, leading to the M3.³² There are a range of other important transport considerations, which would need to be explored further; for example, there would also be the potential to relieve pressure on Mill Lane, where there is a single land bridge over the River Loddon.

With regards to Ashridge, the key consideration is that there would only be the potential for a 'half junction' onto the A329(M), from the A321 (specifically, east bound slips only), because westbound slip roads would be too close to the existing A329(M)/M4 junction. This would lead to trips being forced to use inappropriate links which are already subject to high flows and pass-through local villages to access the strategic network. This is a significant issue; however, again there is a need for further work, both around road infrastructure and potential for trip internalisation and offsite movements by walking, cycling and shared / public transport. The site does benefit from being located on an existing strategic public transport corridor, more so than Hall Farm LV, and it could be that development here delivers or facilitates strategic enhancements to this corridor, linking Bracknell and Reading.

³² The [Transport Strategy for the South East](#) (2020) identifies the following priority initiative: "Improve orbital links between the M3 and M4, ideally in a way that avoids directing heavy traffic through urban areas such as Bracknell."

With regards to East of T/R, the potential to deliver a new village centre relief road (or at least partial relief road) has already been discussed above. Another key consideration is proximity to Twyford station, which already benefits from a good rail service to London Paddington and Reading/Oxford (also the branch line to Henley), and which is set to see an enhanced service in 2022 upon arrival of Crossrail/Elizabeth line services that will link directly to key destinations within London. The scheme could also potentially facilitate delivery of a new multi-storey car park for the rail station (although this is uncertain, with the site comprising part of a well-used recreation ground) and could also potentially support strategic enhancements to the A4 as a 'sustainable transport' corridor.

With regards to the other site options in question, transport-related matters have already been discussed above, for example with Blagrove Lane highlighted as having some merit, on account of its links to Wokingham, and the option of higher growth at Swallowfield not supported from an accessibility / connectivity / transport perspective.

In conclusion: there is support for strategic schemes able to deliver new road / transport infrastructure upgrades; there is support for Hall Farm and East of T/R over Ashridge (albeit this conclusion is somewhat uncertain); and there is a significant concern over a high growth strategy involving allocation of both Hall Farm LV and Ashridge, including because an imbalance between jobs and homes locally could lead to problematic commuting, with implications for traffic and also per capita greenhouse gas emissions.

- Water** – limited concerns were raised through the Water Cycle Study completed in 2019, or through the consultation in 2020. However, water quality is high on the agenda nationally, in particular the matter of avoiding capacity breaches at wastewater treatment works (WwTWs), hence it is appropriate to flag a risk of negative effects at the current time, subject to consultation responses being received from the Environment Agency. It is recognised that the Ashridge site promoters have proposed a network of four 'living machines' within the site to deal with up to 95% of wastewater arising onsite (see figure below); however, there is a need for further evidence of deliverability.

As well as WwTW capacity, an important consideration is pollution of water courses from agricultural and other land uses. In this respect, there is a need to carefully consider the merits of Hall Farm LV, given its close association with the River Loddon. Much of the land here is currently used for dairy farming (the UoR Centre for Dairy Research), such that it could be that development (with integration of high quality SuDS), plus extensive areas of new riverside parkland, leads to a 'net gain' in terms of water quality, but this is uncertain at the current time.

Overall, it is considered appropriate to flag a risk at this current stage, ahead of further evidence-gathering (including further evidence provided by site promoters), and to flag a particular concern with Scenario 12, which would involve a high growth strategy and one whereby there could be a degree of in-combination effect, as there would be allocation of two large scale strategic sites that are potentially quite closely linked in water environment terms.

ASHRIDGE WORKING

2.5 SUSTAINABILITY OBJECTIVE 4

RESILIENCE AND GREATER SELF-SUFFICIENCY

WATER

Building resilience at Ashridge goes beyond energy. Living Machines are compressed wetland systems and use plants/natural filtration to process wastewater to good quality water. Based on data on past projects, manufacturers claim that it generates EU bathing standard of water using several layers of filtration, all done within a greenhouse type installation. Four Living Machines are proposed.

The use of Living Machines for the Ashridge site creates a new source of water for non-potable uses and subsurface irrigation. The wastewater to the utilities could be reduced by up to 95%, minimising the impact of the development on existing infrastructure. The site-wide water strategy is illustrated on the adjacent diagram, integrating Sustainable drainage measures and Living machines as the key components for building water resilience at Ashridge.

Used gardens naturally drain to (pg LM) locations

The diagram showing the key land parcels and phases associated with each Living Machine / EMC Hub. The location of the Living Machine follows the site levels and ensures a natural flow of water.

ASHRIDGE

Living Machines: A compressed wetland system using natural filters for processing wastewater.

Use of solar PV to offset the pumping demand

Grey + Black WATER

Wastewater Grey with Black water

Back-flush (for filter cleaning) Run to sewer

NEW SOURCE OF WATER

Use of solar PV to offset the pumping demand

SAVED

PONDS

WETLANDS

WATER USED FOR MAINTAINING SPORTS PITCHES

POSSIBLE USE OF PROCESSED WATER FOR URBAN FARMING IN FORM OF VERTICAL FARMING, ALLOTMENTS AND AQUAPONICS

NON-POTABLE USES

NON-POTABLE water is used for toilet flushing but only in areas of high density and high consumption. This ensures embodied carbon savings from pipework.

URBAN FOOD PRODUCTION

COMPOST

GREENS

ALLOTMENTS

WATER USED FOR MAINTAINING SPORTS PITCHES

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NON-POTABLE USES

NON-POTABLE water is used for toilet flushing but only in areas of high density and high consumption. This ensures embodied carbon savings from pipework.

URBAN FOOD PRODUCTION

Information on water management submitted by the Ashridge site promoters

7 The preferred growth scenario

Introduction

- 7.1.1 As discussed, it is not the role of the appraisal to arrive at a conclusion on which of the reasonable growth scenarios is best, or 'most sustainable' overall. Rather, it is the role of the plan-making authority to arrive at that conclusion, informed by the appraisal. This section presents the response of WBC Officers to the appraisal.

Officers reasons for selecting the preferred scenario

- 7.1.2 The following statement explains Officers' reasons for supporting **Growth Scenario 8**, in-light of the appraisal. It is important to be very clear that this statement is a response to the appraisal; it is not an appraisal:

The appraisal shows Scenario 8 to perform well in a number of respects. Only Scenario 12 has more predicted significant positive effects, and this scenario also has more predicted negative effects. Indeed, Scenario 8 has only one predicted significant negative effect, which relates to loss of best and most versatile agricultural land.

Scenario 1 also stands out as performing relatively well in a number of respects, and is predicted to give rise to fewest negative effects (or 'tensions'). However, under Scenario 1 there is a predicted significant negative effect in terms of housing objectives, which the Council gives particular weight too. Also, there would be opportunities missed on account of a spatial strategy without a large strategic allocation, as would also be the case under Scenarios 2 and 3. As explained within the Revised Growth Strategy consultation document:

"Large scale developments are often the best solution to meeting development needs in a way that responds to the challenges of climate change. They offer an opportunity to design in sustainability from the outset including measures to lessen the need to travel by private car, so reducing our carbon footprint and impact on the environment and air quality, as well as planning for accessible green space, drainage management, biodiversity enhancements and renewable energy.

Our current Core Strategy local plan identified four Strategic Development Locations (SDLs), where new sustainable communities would be created... The SDLs are at different stages of delivery, but all have delivered new schools, roads, community facilities and open spaces.

In considering the new approach for the Revised Growth Strategy, our view is that our strategy for future growth should continue to be predominantly focussed on larger sites..."

With regards to the Scenarios 4, 5, 6 and 7, which would involve an alternative large strategic allocation in place of Hall Farm / Loddon Valley, the Revised Growth Strategic consultation document explains:

"The Hall Farm / Loddon Valley opportunity is considered the most deliverable and sustainable strategic option [of the three appraised]. It offers the opportunity to provide homes alongside jobs with the area in proximity to the Thames Valley Science and Innovation Park, Shinfield being proposed for a potential mixture of science and technology, film studios, educational and health uses. This potentially includes the full or partial relocation of the Royal Berkshire Hospital. The council's planning committee resolved to grant planning permission for a creative media hub including film stages and associated workshops and office space... on 13 October 2021.

The Hall Farm / Loddon Valley opportunity also allows the creation of a large publicly accessible green space or park along the River Loddon Valley, an area currently without public access. The river corridor provides a significant opportunity for comprehensive habitat management, restoration and enhancement...

The new community would be supported by a comprehensive package of infrastructure to incentivise sustainable behaviours and travel choices. This would include a framework to maximise opportunities for walking and cycling both within the new community and between the surrounding places (including a new connection over the M4 to Earley), primary schools and a secondary school, and neighbourhood centres."

Finally, with regards to higher growth Scenarios 11 and 12 the primary consideration is that these scenarios would likely involve a quantum of housing growth over-and-above that which is need to meet Local Housing Need (LHN). Furthermore, there a range of community, infrastructure and environmental concerns.

Part 2: What are the appraisal findings at this stage?

8 Introduction to Part 2

- 8.1.1 The aim of this part of the report is to present an appraisal the Revised Growth Strategy as a whole.
- 8.1.2 In practice, this means revisiting the appraisal of Growth Scenario 8, as presented in Section 6, but with added attention given to the proposed allocations that are held constant across the growth scenarios.
- 8.1.3 Appraisal conclusions from the 2020 Interim SA Report, in respect of the Draft LPU as a whole, are also presented for context. However, the aim of this section is not to present an updated appraisal of the LPU as a whole, as to do so would necessitate making assumptions regarding development management (DM) policies, which are not a focus of the current Revised Growth Scenario consultation document. The SA Report published at the next stage will present and up-to-date appraisal of the LPU as a whole.

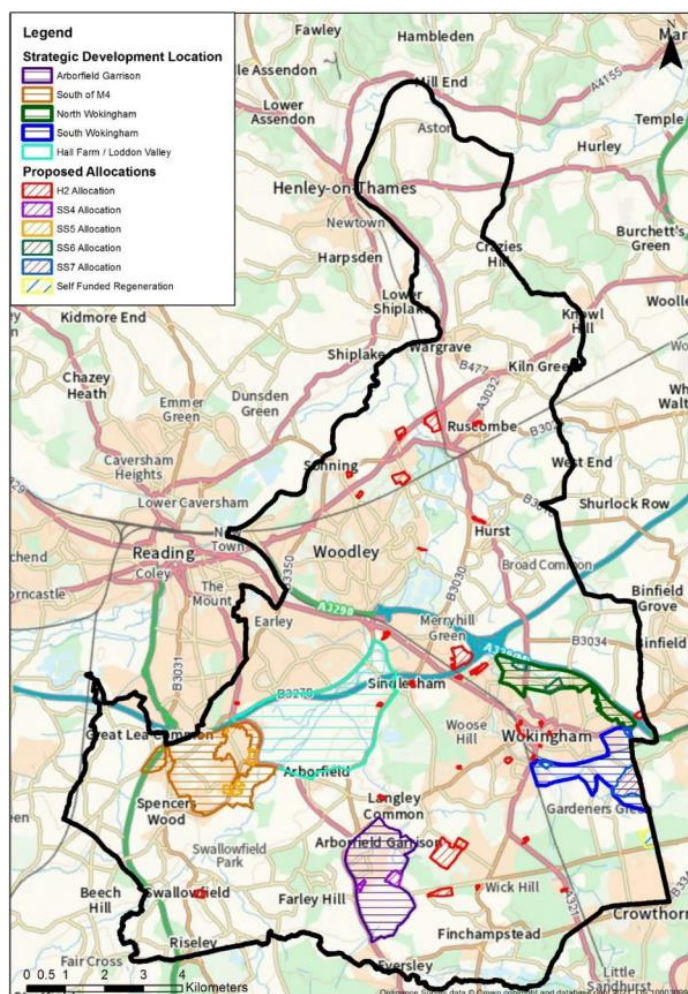
8.2 Overview of the Revised Growth Strategy

- 8.2.1 The Revised Growth Strategy consultation document explains:

“The main differences in the Revised Growth Strategy from the Draft Local Plan (2020) are:

- *The removal of the Grazeley garden town;*
- *The identification of a new Strategic Development Location [SDL] on land to the south of the M4 between Shinfield, Arborfield and Sindlesham, known as Hall Farm / Loddon Valley;*
- *The identification of a substantial opportunity within the South Wokingham SDL;*
- *The identification of smaller scale new development within and on the edge of towns and villages...;*
- *The extension of the plan period to 2018/19-2037/38, and an associated updated to [needs].”*

Figure 8.1: The Revised Growth Strategy



9 Appraisal of the Revised Growth Strategy

9.1 Introduction

9.1.1 The aim of this section is to present an appraisal of the Revised Growth Strategy under the 13 SA topics.

9.2 Accessibility

9.2.1 Sustainability objectives:

- Improve accessibility to services, amenities and facilities in particular by safe walking and cycling routes
- Raise educational attainment, skills and training opportunities

9.2.2 The Draft Plan appraisal (2020) concluded:

The proposed concentration of growth at Grazeley enables a conclusion to be reached that the proposed spatial strategy would lead to significant positive effects, and the proposed development management policies are supportive of this conclusion, albeit there remains the potential to further strengthen the requirements that will apply to Grazeley and other proposed sites, taking account of development viability. Aside from Grazeley, the proposed package of smaller allocations is broadly supported, although a recommendation is made in respect of ensuring that the strategy for Charvil, which can be described as relatively high growth, is in-line with objectives relating to accessibility to community infrastructure.

9.2.3 Whilst the scale of Grazeley meant that it represented a major opportunity, the new proposed SDL at Hall Farm Loddon Valley (LV) also represents a considerable opportunity. With regards to Charvil, the proposed allocations are unchanged, although the capacity of both the proposed allocations is decreased.

9.2.4 Focusing on **Hall Farm LV**, the proposal is to deliver a range of strategic community infrastructure, most notably a secondary school and three primary schools, plus there is potentially the option of supporting a major new hospital facility (subject to further investigations, including around road infrastructure). The following is a notable proposed place-shaping principle:

“A coordinated approach to the development of the allocation will be required to deliver necessary infrastructure, facilities, and services to meet the needs of the new community.”

9.2.5 The second most significant allocation is **South of Wokingham SDL extension** (835 homes), the proposal is to deliver a small local centre and central square at the heart of the development, though not a primary school. The larger neighbourhood centre within the committed adjacent part of the SDL, which will include a primary school, will be within 1.5km (less for neighbourhoods at the northwest extent of the site) and good connectivity by high quality walking and cycling infrastructure is anticipated. The Strategic Sites Report (2021) anticipates that the local centre can act as a ‘community transport hub’ and support a bus route, although there is a need for further work to clarify the nature of the bus service, and the precise nature of links to Wokingham and Bracknell town centres by public and active transport.

9.2.6 The other key stand-out proposed addition to the growth strategy, in order to address the shortfall created by the loss of Grazeley, is the allocation of three new sites at the western extent of the **Nine Mile Ride** sub-area (as discussed in Section 5.4), for a total of 436 homes. The largest of these sites (Rooks Nest Farm and 24 Barkham Ride; 270 homes) is circa 1.5 km from Finchampstead Cross Roads local centre. Community infrastructure within the Arborfield SDL to the west will be a similar distance or closer ‘as the crow flies’, and potentially quite easily accessed via a bridleway, which could potentially be a focus of enhancements to ensure connectivity, at least during daylight hours.

9.2.7 Further new proposed allocations of note are:

- Land west of Trowes Lane at **Swallowfield** (70 homes), given no primary school at Swallowfield, although there is a GP surgery and a pre-school at the village hall.
- There is also a need to note the proposal to target additional growth to the **existing SDLs**, most notably the South of the M4 SDL, where the proposal is to allocate two sites for a total of 366 homes. Both sites should link well to Shinfield centre, and the eastern site should also link well to Hall Farm LV.

- Three new proposed allocations to the **west of Wokingham**, for a total of 65 homes. All of these sites are relatively well connected to Wokingham and/or Winnersh.

9.2.8 With regards to **proposed allocations from the Draft Plan**, the ISA Report (2020) explained:

“... it is not clear that any will support delivery of significant new or upgraded community infrastructure, but none of the proposed sites stand-out as highly problematic. The following are three notable considerations:

- **Charvil** – a relatively high growth strategy is proposed, involving 85 homes on the northern edge of the village (Land East of Park View Drive North) and 75 homes at the southern edge of the village (Land West of Park Lane, Charvil), which would extend an existing committed site. Charvil is a tier three settlement in the settlement hierarchy, with a primary school and two secondary schools in good proximity; however, there are limited facilities in that part of the village to the north of the A4 (where there is only a community hall and recreation ground). The northern site would benefit from good access to a convenience store / post office immediately to the south of the A4, via a pedestrian crossing with central island, but would be over 800m from the primary school at the southern extent of the village (which is adjacent to the southern proposed allocation). Charvil also benefits from excellent access to the string of country parks associated with the River Loddon; however, access from the northern proposed allocation involves crossing the A4 at a location without a pedestrian crossing. It is recommended that further consideration be given to facilitating improved access to community and green infrastructure at Charvil.
- **Twyford** - Land at Bridge Farm is proposed to deliver 150 homes in a location that should prove to be within reasonable walking distance (under c.800m) of Twyford town centre to the south, on the assumption that it will be possible for pedestrians and cyclists to make use of the existing bridge over the railway. The site is also well located in terms of accessing a regular bus service to Reading town centre.
- **Winnersh** - Winnersh Farms is proposed to deliver 250 homes at the eastern extent of Winnersh in a location that is further (relative to the Twyford site discussed above) from the bulk of the district centre, but at a distance that should still prove walkable for many residents. Also, the site is within walking/cycling distance of Winnersh train station and Winnersh Triangle Business Park. However, this scheme would extend an existing area characterised by numerous residential roads, and so there will be a need to give careful consideration to ensuring direct and safe pedestrian and cycle travel.”

9.2.9 The latest proposal is to decrease capacity at the two Charvil sites and increase capacity at the Twyford and Winnersh sites, which is broadly supported from an accessibility perspective.

9.2.10 Also, the proposal is to adjust capacity at the following **sites within settlement boundaries**, in light of the work presented in the Non-strategic Sites Report (2021):

- Winnersh Plant Hire, Reading Road, Winnersh - the proposal is to increase the capacity from 20 homes to 85 homes, which has clear merit from an accessibility perspective, given nearby Winnersh Triangle Station; however, the site is located within flood risk zone 2.
- Station Industrial Estate, Oxford Road, Wokingham - the proposal is to decrease the capacity from 92 homes to 40 homes, despite the adjacent rail station, to reflect design considerations, with the Non-strategic Sites Report describing a complex site, a low density character and privacy issues.
- 54-58 Reading Road, Wokingham- the proposal is to increase the capacity from 9 homes to 31 homes, with the Non-strategic Sites Report categorising this as a ‘highly accessible’ location.

9.2.11 In **conclusion**, it is fair to adjust down the conclusion from the Draft Plan stage. Whilst the ISA Report published at that time predicted ‘significant positive effects’, it is now considered appropriate to predict more **moderate positive effects**, mindful that the strategy now involves a notably lower proportion of growth directed to a large strategic allocation, and a notably increased proportion of growth directed to non-strategic allocations in locations with relatively low accessibility / connectivity. However, the new proposed allocation at Hall Farm / Loddon Valley is strongly supported, from an accessibility perspective, as are a number of other changes to the proposed growth strategy. It will be appropriate to undertake further work to understanding the potential to set site-specific policy in support of accessibility.

9.3 Air and wider environmental quality

9.3.1 Sustainability objective:

- Minimise impacts arising from pollution and improve and prevent where possible

9.3.2 The Draft Plan appraisal (2020) concluded:

The appraisal raises certain concerns regarding the proposal to allocate seven sites for a total of 345 homes in proximity to the Twyford [crossroads] AQMA, and also the proposal to allocate four sites in proximity to a motorway grade road or a railway line; however, on balance it is not clear that there is the potential to conclude the likelihood of 'significant' negative effects, taking account of proposed development management policy. There will be a need for further detailed work ahead of plan finalisation. Significant effects are not predicted at the current time, either positive or negative.

9.3.3 With regards to the Twyford crossroads AQMA, the latest proposal is to increase the growth strategy within the A4 corridor sub-area (as discussed in Section 5.4) and maintain the (low) growth strategy at Hurst. Focusing on the A4 corridor, the latest proposal is to allocate one additional site at Sonning (the site is well connected to Reading, serving to limit any Twyford AQMA concerns), increase the capacity at three existing allocations (at Twyford and Ruscombe) and decrease capacity at the two Charvil sites. In total, the proposal is to deliver 400 homes within the A4 sub-area, breaking down as follows: 180 at Twyford; 32 at Ruscombe; 139 at Charvil; and 49 at Sonning (where there is also a consented site for 13 homes).

9.3.4 Focusing on the new proposed SDL at **Hall Farm LV**, the site is notably adjacent to the M4, with an AQMA designated along this stretch of the motorway; however, the proposal is to deliver employment within this part of the site. Transport modelling completed to date does not serve to highlight any particular concerns regarding impacts to either the Reading or Wokingham town centre AQMA, but there will be a need for further detailed investigations, taking account of detailed proposals for road infrastructure upgrades and other measures aimed at securing strong accessibility and connectivity.

9.3.5 The second most significant allocation is **South of Wokingham SDL extension**, which does not give rise to any particular concerns regarding air or wider environmental quality. The site is circa 2km from the Wokingham town centre AQMA, and there will be the potential to support a degree of trip internalisation within the wider SDL (as discussed above, under Accessibility), plus high quality EV charging infrastructure can be assumed (this is identified as an opportunity within the Strategic Sites Report, 2021).

9.3.6 Other key aspects of the Revised Growth Strategy are:

- Increased growth along the **A4 corridor** – as discussed above.
- Significantly increased growth in the **Nine Mile Ride** sub-area – as discussed above, under Accessibility. Increased traffic along the A321, towards the Wokingham town centre AQMA, can be anticipated.
- Three new proposed allocations a short distance to the south of the M4, to the **west of Wokingham**, for a total of 65 homes. These sites will likely be affected by noise pollution from the motorway to some extent, and a stand-out site is Land to the rear of Bulldog Garage, Reading Road (25 homes), given proximity to the railway, M4, A329, distributor road and adjacent retail, including a motorbike showroom.
- Increased growth directed to the **South of the M4 and Arborfield SDLs**, recognising that Reading-bound traffic will pass through the A327 section of the Reading AQMA, and given that the A327 corridor is a 'quality bus corridor', as opposed to a 'fast track public transport corridor' (see Figure 9.5, below).
- Notably increased growth within **Wokingham urban area**, although it is difficult to conclude that this leads to any AQMA concerns, as all should be associated with relatively low car dependency. The two proposed allocations that are adjacent to, or marginally intersect the AQMA (Former M&S, 26-36 Peach Street, 15 homes; and Wokingham Library, Denmark Street, 15 homes) are both new sites.
- A new proposed allocation at **Land North of London Road and East of A329** (45 homes). The site is located adjacent to the A239M/A329/B3408 junction.

9.3.7 With regards to **proposed allocations from the Draft Plan**, the ISA Report (2020) notably explained:

"... with regards to other 'environmental quality' matters, it is important to note the proposal to allocate four sites in proximity to either a main road or a railway line, could potentially give rise to air quality issues (although in practice air pollution decreases rapidly as distance from source increases) but, potentially more significantly, could give rise to concerns in respect of noise pollution. In all cases, there should be the potential to ensure a suitable landscape buffer and/or deliver other noise mitigation measures; however, some residual concerns remain. Specifically:

- *Winnersh Farms, Winnersh is proposed to deliver 250 homes adjacent to the M4;*

- *[Land east of] Toutley Depot, Wokingham is proposed to deliver [100] homes adjacent to the A329(M), with that part of the site furthest from the road constrained by flood risk;*
- *Land on North West Side of Old Forest Road, Winnersh is proposed to deliver 35 homes in fairly close proximity to the M4; and*
- *Land south of Gipsy Lane is proposed to deliver 17 homes adjacent to the railway line, with that part of the site furthest from the railway constrained by flood risk."*

- 9.3.8 The latest proposal is to: increase the capacity at Winnersh Farms to 287 homes; increase capacity at Toutley Depot to 130 homes plus a 70 bed care home; and maintain the capacity at the other two sites.
- 9.3.9 Also, a further notable Draft Plan proposed allocation is Lane End House, Shinfield Road (5 homes), which is proximity to the M4. The Revised Growth Strategy consultation document sets out the need to: *"Investigate potential noise and air quality impacts from the M4 and provide suitable mitigation measures, such as a suitable buffer."* However, there is a need to consider whether this could affect viability.
- 9.3.10 As a final point, it is noted that the Revised Growth Strategy consultation document identifies air and/or noise pollution as a site specific issue to avoid or mitigate at a total of ten of the proposed allocations.
- 9.3.11 In **conclusion**, there is a degree of added concern, over-and-above that reported in the ISA Report published at the Draft Plan stage; however, this is of limited significance. Taking a precautionary approach, it is appropriate to predict risk of **moderate negative effects** at this stage, but there will be the potential to alleviate concerns through further work prior to plan finalisation, to include preparation/finalisation of site specific and borough-wide development management policy. A stand-out concern is potentially in respect of Twyford crossroads AQMA, hence it could be appropriate to undertake work to confirm no significant adverse impact on air quality here as a result of increased traffic. A second headline concern is in respect of growth locations in proximity to a major source of air and/or noise pollution, including the M4.

9.4 Biodiversity

- 9.4.1 Sustainability objective:
- Conserve and enhance biodiversity, including wildlife and river corridors and networks and to maximise opportunities for building-in features for biodiversity including limiting the impact of climate change
- 9.4.2 The Draft Plan appraisal (2020) concluded:
- The proposed spatial strategy seeks to direct the majority of growth to areas with limited sensitivity, from a biodiversity perspective, although the appraisal identifies a degree of concern in respect of the proposed strategy at Charvil/Twyford and in the Arborfield/Nine Mile Ride area. A focus of growth at Grazeley is tentatively supported; however, that is not to suggest that the site is without its sensitivities, recognising that a defining feature of the site is the floodplain of the Foudry Brook and also noting a large area of priority habitat. There will be a need for detailed work to confirm that the spatial strategy is conducive to achieving a suitable gain in biodiversity at the Wokingham scale or (ideally) all affected functional landscape scales. Significant effects are not predicted at the current time, either positive or negative.*
- 9.4.3 The Revised Growth Strategy reduces the capacity at the two Charvil sites, increases the capacity at the Twyford site and proposes a notably increased growth strategy for the Nine Mile Ride sub-area. Also, of course, the proposal is to remove Grazeley, but instead allocate a new SDL at Hall Farm LV, which does give rise to a range of biodiversity considerations (issues and opportunities), as discussed below.
- 9.4.4 Focusing on the new proposed SDL at **Hall Farm LV**, this area is inherently sensitive on account of a close association with the River Loddon corridor, as well as the Barkham Brook and its confluence with the Loddon. A high proportion of the site comprises floodplain grazing marsh priority habitat, although this land is subject to flood risk and so would not be at risk of direct impacts, plus there is a high density of small woodland patches, including two small patches of ancient woodland. The site is strongly associated with a BOA, and there are several LWSs within the site. There would be good potential to avoid and buffer habitat patches and corridors between habitat patches, and detailed work has been completed suggesting the potential to achieve a biodiversity net gain, plus there would be an opportunity to increase access to and appreciation of the river corridor; however, concerns do remain at this early stage. It is recognised that the site could alternatively be viewed as two (or even three) separate development locations either side of (i.e. adjacent to but not intersecting) a natural capital and ecosystem services enhancement zone. Figure 9.1 shows the current proposed green and blue framework plan for the site.

Figure 9.1: Hall Farm LV green and blue framework plan



9.4.5 The second most significant allocation is **South of Wokingham SDL extension**, which is relatively unconstrained in biodiversity terms, with very limited onsite priority habitat. The fact that the stream corridor within/adjacent to the site is not associated with any wetland priority habitat potentially suggests an opportunity; and there are significant concentrations of habitat associated with higher ground to the south and east, which could potentially be a focus of investment and enhancement. The potential for development to support a biodiversity net gain at a functional landscape scale can certainly be envisaged.

9.4.6 The other headline consideration is the proposed increased growth strategy for the **Nine Mile Ride** sub-area (as discussed in Section 5.4), specifically the following new proposed allocations:

- Land at Rooks Nest Farm and 24 Barkham Ride (270 homes) – is adjacent to Longmoor Bog SSSI, and potentially slightly uphill from the SSSI, hence there will be a need to carefully consider the risk of both recreational and hydrological ‘impact pathways’. In addition to the SSSI, this part of the Borough is associated with a high density of priority habitat, and there is a small amount of priority woodland habitat onsite (at the north east extent). However, the proposed capacity amounts to a gross density of just 6.5 dwellings per hectare, suggesting good potential to design-in greenspace to buffer the SSSI and ensure net biodiversity benefits. One established opportunity relates to improving pedestrian and cycle connectivity to areas of open space through the site and the surrounding area, including Rooks Nest Wood Country Park and California Country Park (which is associated with the Longmoor Bog SSSI).
- 31 and 33 Barkham Ride (66 homes) – is adjacent to the site discussed above, and does contain significant woodland priority habitat around its edge; however, again the proposed capacity amounts to a relatively low gross density (12 dwellings per hectare), such that it should be possible to mostly avoid impacts to priority habitat, and potentially provide some space for new habitat creation. The site abuts Rooks Nest Wood Country Park, which is designated Suitable Alternative Natural Greenspace (SANG).
- Greenacres Farm, Nine Mile Ride (100 homes) – contains a small amount of priority woodland habitat onsite, as well as quite extensive areas with TPO designation, and there is extensive woodland priority habitat adjacent and nearby, including a LWS adjacent to the west. Again the proposed capacity amounts to a relatively low gross density (11 dwellings per hectare), serving to reduce concerns. The site is currently subject to [consultation](#) as a potential allocation through the Finchampstead NDP.
- Pinewood, Nine Mile Ride – also warrants consideration, albeit the proposal is only to support the site for self-funded regeneration, without any assumption made regarding the number of homes that will come forward, if any. Almost one third of the site comprises priority habitat.

9.4.7 Another highly notable proposed new allocation is **Land East and West of Hyde End Road** (175 homes), which was one of the omission sites explored very closely through the SA process at the Draft Plan stage. It was then examined closely through the Non-strategic Sites Report (2021), before a decision was made to propose the site for allocation. The site integrates closely with a cluster of small ancient woodland patches, and so it will be very important to ensure that the woodlands are suitability buffered, that access is well managed and that land for habitat creation is provided onsite, with a view to supporting the functioning of the woodlands. The Non-strategic Sites report explains that whilst the theoretical capacity of the site is up to 312 homes, the capacity reduces to 175 homes due to masterplanning considerations.

9.4.8 Other **proposed new allocations** of note are:

- Land at St Anne's Drive (54 homes) - is located within the South Wokingham SDL and is the subject of a current planning application (ref. 203544). There appears to be limited priority habitat onsite, but extensive TPOs and priority habitat around the edge of the site, and the South of Wokingham SDL SPD (2014) identified land here as a "potential green open space location". The proposed capacity is notably lower than that suggested by the Non-strategic Sites Report (up to 106 homes), reducing any concerns.
- Westward Cottage, Sheerlands Road (10 homes; within the Arborfield Garrison SDL) – includes area TPOs, including one area shown as woodland priority habitat by the nationally available dataset.
- Land to the rear of Toutley Hall, north west of Old Forest Road (15 homes) - access will presumably necessitate some loss of mature hedgerow (shown on the 1888-1913 OS map). Cumulative impacts here are a consideration, noting concentrations of woodland to the north and south, and the impacts to hedgerows and the millennium arboretum following construction of the distributor road. It is noted that the part of the millennium arboretum to the south of the distributor road is identified by the HELAA as potentially suitable for leisure uses "subject to there being no unacceptable harm to the arboretum".
- Land to the rear of Sandford Pumping Station, Mohawk Way, Woodley (15 homes) – does not contain any priority habitat, but contains notable onsite vegetation, and the River Loddon is adjacent, with Lodge Wood & Sandford Mill SSSI circa 280m downstream.
- Land north of Arborfield Road, Shinfield (191 homes) – is within the South of the M4 SDL. Adjacent wetland priority habitat is a consideration, but there is an intervening road, namely the A327.
- Bridge Retail Park, Finchampstead Road, Wokingham (59 homes) – comprises previously developed land, and there is no priority habitat onsite or adjacent, but is very closely associated with the Emm Brook corridor, and something of a 'green/blue wedge' at the point where the two railway corridors meet the Wokingham urban area. There is also a need to consider the nearby South of Wokingham SDL, including the proposed South of Gipsy Lane allocation from the Draft Plan stage (17 homes).

9.4.9 With regards to the **proposed allocations from the Draft Plan**, the ISA Report (2020) notably explained:

- ***"Charvil/Twyford - one of the proposed allocations stands out as notably constrained, namely Land West of Park Lane, Charvil (75 homes), which falls within a Biodiversity Opportunity Area (BOA) and would extend an existing permitted site as far as a small ancient woodland, which is designated as a [LWS]. It is also noted that nearby Land East of Park View Drive North, Charvil (85 homes) and Land at Bridge Farm, Twyford (150 homes) would extend the built form of Charvil and Twyford respectively as far as the floodplain grazing marsh priority habitat associated with the River Loddon (also forms part of the BOA), which is one of just two significant areas of this habitat in the Borough. It is recommended that the scale of the scheme be examined in order to ensure no adverse impact to the woodland, and ideally deliver an enhancement to the functioning of the woodland and the wider BOA.***
- ***Arborfield / Nine mile ride area – the proposed allocation at the Reading FC Training Ground site (140 homes) is c.400m from Longmoor Bog SSSI and, as such, development could lead to a degree of recreational pressure on the site; however, given that the development will be adjacent to the existing SDL there will be very good access to a network of green infrastructure including an extensive area of Suitable Alternative Natural Greenspace (SANG) nearby to the south. It is also noted that the SSSI is closely associated with California Country Park. Also, two of the three proposed allocations in the Nine Mile Ride area (Land to the rear of 166 Nine Mile Ride, Finchampstead; Tintagel Farm, Sandhurst Road, Finchampstead) comprise priority woodland habitat, although both are very small sites."***

9.4.10 The key point to note here is that the capacity of the two proposed Charvil sites has been reduced, although the capacity of Twyford site has been increased.

- 9.4.11 With regards to the site at Twyford – Bridge Farm (180 homes), there is currently a pending planning application for 200 homes, with the scheme website (<https://www.bridgefarmtwyford.co.uk/>) stating the following in respect of proposals for biodiversity: *“The proposals present the opportunity to secure significant biodiversity benefits, focused on a proposed riverside park along the banks of the River Loddon, which will compliment conservation efforts focused on the river. These will include enhancements to the floodplain grassland, the provision of wader scrapes (shallow ponds for wading birds), and new willow planting. New roosting opportunities for bats will be provided, and more diverse nesting habitats for birds.”* The figure below shows the proposed open space and landscaping proposals.

Figure 9.2: Bridge Farm Twyford: the site promoter's open space and landscaping proposal



- 9.4.12 A further proposed allocation from the Draft Plan stage is 54-58 Reading Road, Wokingham, where the latest proposal is to increase the capacity from 9 to 31 homes. This gives rise to a degree of concern, from a biodiversity perspective, as the southern circa 1/3 of the site is recorded as comprising priority habitat. It is noted that the proposal is to: *“Retain, where possible, onsite mature and protected trees.”*
- 9.4.13 In **conclusion**, there is a degree of added concern, over-and-above that reported in the ISA Report published at the Draft Plan stage, most notably associated with a new proposed allocation adjacent to a SSSI, albeit it is recognised that there will be very good potential to buffer the SSSI with open/greenspace within the site boundary, and take other steps to ensure a biodiversity net gain. On this basis, it is appropriate to ‘flag’ the **risk of negative effects** at this stage. With regards to Hall Farm / Loddon Valley, as a large strategic site there will be excellent potential to design-in green/blue infrastructure, so as to avoid sensitive areas and ensure well-targeted habitat creation/enhancement; however, on balance, at this early stage, it is appropriate to flag a biodiversity risk, given the inherent sensitivity of the river corridor.

9.5 Climate change adaptation

9.5.1 Sustainability objective:

- Reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment by ensuring no inappropriate development in areas at risk of flooding and use of SuDS and other solutions in line with advice from the Environment Agency where necessary.

9.5.2 The Draft Plan appraisal (2020) concluded:

Grazeley is strongly associated with the valley of the Foudry Brook, and hence there is a degree of concern ahead of detailed work to confirm the potential to deliver a successful new town whilst avoiding flood risk from all sources; however, initial work has been undertaken, and the findings are reflected in the proposed site specific policy, which serves to reduce concerns. Nevertheless, there is a need to flag the risk of an uncertain significant negative effect associated with the Local Plan as a whole, given that a significant proportion of the package of smaller allocations intersect a flood risk zone. There will be good potential to avoid and mitigate risk through development management, and policies are proposed through the plan to ensure that this is the case; however, an element of residual risk remains at the current time.

9.5.3 The key point to note, in response to this appraisal conclusion from the Draft Plan stage, is that Grazeley has now been removed from the growth strategy; however, there are certain other proposed allocations that do give rise to a degree of concern, from a flood risk perspective.

9.5.4 Focusing on the new proposed SDL at **Hall Farm LV**, this area obviously strongly associated with a river corridor. Specifically, the River Loddon crosses the site north-eastwards, whilst Barkham Brook also flows through the east of the site. There is also a network of drains across the site which are tributaries of the River Loddon and Barkham Brook and are largely designated as Ordinary Watercourses. It should be possible to avoid sensitive uses in the fluvial flood zone, but there is also a need to be mindful of downstream flood risk affecting Earley and Winnersh. It is fair to assume high quality Sustainable Drainage Systems (SuDS), and there could be the potential for 'betterment' (e.g. development could fund new strategic flood water attenuation onsite, leading to reduced flood risk affecting the A3290/b3270 and other areas downstream; a study was completed in 2018, as discussed within the Level 2 Strategic Flood Risk Assessment, 2021), but there is a need for caution at this stage.

9.5.5 The second most significant allocation is **South of Wokingham SDL extension**, where the proposal is to locate built form to the north of the Emm Brook, with land to the south delivered as strategic greenspace. It will be important to ensure that sensitive built form avoids the fluvial flood zone, plus there is an argument for a buffer to account for climate change; and there could also be merit in exploring strategic flood water attenuation options, given downstream flood risk affecting Wokingham. There is also a notable area of surface water flood risk at the north east extent of the site.

9.5.6 Aside from these two stand-out large proposed allocations, the key consideration is the following two sites located wholly or mostly within **flood risk zone 2**:

- Winnersh Plant Hire, Reading Road, Winnersh - was a proposed allocation for 20 homes in the Draft Plan (2020), with the latest proposal involving a capacity increase to 85 homes, in light of the analysis presented within the Non-strategic Sites Report (2021). This is previously developed land in highly accessible location; however, the site is located within flood risk zone 2.
- Land to the rear of Sandford Pumping Station, Mohawk Way, Woodley – is a new proposed allocation for 15 homes. The site benefits from good containment and links to Woodley, which is a Tier 1 settlement, but is located mostly within flood risk zone 2.

9.5.7 Other new proposed allocations that significantly intersect flood risk zone 2, but where it should be possible to avoid new homes in the flood risk zone are:

- Land at Bridge Retail Park – 32%;
- Land to the rear of Toutley Hall, north west of Old Forest Road – 23%;
- Land north of Arborfield Road, Shinfield – 10%; and
- Millars Business Park, Molly Millars Lane – 9%.

9.5.8 Other proposed allocations from the Draft Plan stage that significantly intersect flood risk zone 2, but where it should be possible to avoid new homes in the flood risk zone are:

- Land south of Gipsy Lane – 49%;
- Land at Bridge Farm, Twyford – 25% (the proposal is now to increase the capacity);
- Land East of Park View Drive North, Charvil – 19% (the proposal is now to reduce the capacity);
- Winnersh Farms, Winnersh – under 20% (the proposal is now to increase the capacity); and
- Land east of Toutley Depot – 18% (the proposal is now to increase the capacity).

- 9.5.9 Finally, it is noted that one site proposed for Gypsy and Traveller pitches (Land to the rear of 166 Nine Mile Ride; now consented) falls almost entirely within a surface water flood zone. It is the low risk zone that covers most of the site (1 in 1000 year); however, over 1/3 of the site falls within the 1 in 100 year risk zone and a narrow band of land subject to high risk (1 in 30 year) passes through the centre of the site.
- 9.5.10 In **conclusion**, Hall Farm / Loddon Valley is strongly associated with River Loddon corridor, and hence there is a degree of concern ahead of detailed work to confirm the potential to deliver a successful new community whilst avoiding flood risk from all sources and any worsening of down-stream flood risk (noting that there could be the potential for a betterment of the current situation). It is also the case that a significant proportion of the package of smaller allocations intersect a flood risk zone. On this basis, there is a need to flag the **risk of a negative effect** at this stage. There will be good potential to avoid and mitigate risk through masterplanning and development management policies.

9.6 Climate change mitigation

- 9.6.1 Sustainability objective:
- Increase energy efficiency and the proportion of energy generated from renewable sources in the Borough
- 9.6.2 The Draft Plan appraisal (2020) concluded:
- In conclusion, the proposal to focus growth at Grazeley is strongly supported, as the economies of scale associated with a scheme of this scale should lead to an excellent opportunity to deliver decentralised heat and/or power generation from renewable or low carbon sources and deliver development to high standards of 'sustainable design and construction'; however, there is a need for further details regarding the particular constraints/opportunities associated with the site. With regards to effect significance, there is inherently no potential to conclude highly significant effects as climate change mitigation is a global issue, such that local actions can have only a very limited effect; however, on the other hand, a national climate emergency has been declared, which serves to highlight the urgency of departing from the status quo. Having made these points, it is fair to conclude moderate/uncertain significant positive effects.*
- 9.6.3 Grazeley represented a unique opportunity, on account of its scale. However, there remains the potential to direct a high proportion of new housing to strategic growth locations.
- N.B. the nature of the opportunities that can tend to exist at large strategic sites, over-and-above smaller sites, is a focus of discussion elsewhere in this report, including Section 5.2 and Appendix III, and is not repeated here for conciseness. Another point to note is that understanding of "decentralised heat and/or power generation" opportunities has evolved since the time of the Draft Plan consultation, due to decarbonisation of the national grid, which largely rules out combined heat and power (CHP) as an option.
- 9.6.4 Focusing on the new proposed SDL at **Hall Farm LV**, and also focusing on per capita emissions from the **built environment**, rather than transport-related (which are appropriately discussed under other headings), it is fair to highlight a considerable opportunity, in light of the detailed work reported within the Renewable Energy Provision Statement (2021).
- 9.6.5 The report explains that building level decarbonisation options typically associated with large scale strategic schemes will be feasible (e.g. passive and active measures to reduce energy demand for heating and cooling; roof top PV; air source heat pumps). It is also noted that the Strategic Sites Report (2021) states that "Passivhaus standards should be the goal" (which is a strong ambition). In light of these points, it is fair to assume that a best practice approach to achieving net zero emissions can be achieved, namely an approach within maximum reliance on on-site measures (including a efficiency / fabric-first approach) and minimal reliance on offsetting. It is also noted that the Wokingham Climate Emergency Action Plan (2021) explains: "A *Supplementary Planning Document (SPD)* will support the new Local Plan by providing additional detail on how development of all types is expected to demonstrate the achievement of the policy requirements, including carbon neutrality...".
- 9.6.6 However, it is perhaps more important to focus on location/site/scheme-specific opportunities associated with Hall Farm / LV over-and-above other competing strategic site options. The Renewable Energy Provision Statement explains, amongst other things:
- "On a strategic scale, several opportunities should continue to be explored with stakeholders. The first of these is how large-scale renewable systems can be integrated as part of any proposed valued landscape area or flood alleviation works on the Hall Farm/Four Valleys site."*

Secondly, the suitability of battery storage, balancing technologies and active network management systems... This should also consider any strategic energy scheme...

Unconstrained electrical utilities have been identified in vicinity... However, reinforcements costs and upgrade works are anticipated [given the pressures of EV charging, electrification of heating etc.]”

- 9.6.7 The second most significant allocation is **South of Wokingham SDL extension**, for which options are also explored within the Energy Provision Statement (2021). There is seemingly no potential to comprehensively plan for this site in conjunction with land within the SDL to the north, which is now consented; however, the Energy Provision Statement serves to highlight that most of the decentralised heat/power options potentially achievable and viable at Hall Farm are also potentially achievable and viable at South of Wokingham SDL extension, bar ground and water-sourced heat pump options. Further work to understand the variance in built environment decarbonisation opportunity across these two sites could be helpful, and provide a useful case-study to inform further thinking on site selection / strategy.
- 9.6.8 With regards to **other proposed allocations**, little evidence is available to highlight any particular built environment issues/opportunities. Several sites are the focus of current planning applications (as set out clearly in the Revised Growth Strategy consultation document), and so there is the potential to scrutinise planning application materials to understand the nature of what is being proposed, e.g. the proposed percentage increase on Building Regulations emissions standards and/or the approach that is being taken to whole life emissions / circular economy principles (e.g. embodied emissions within construction materials and other non-operational emissions that fall outside the scope of Building Regulations). It is noted that several sites are proposed for allocation that would see demolition of existing buildings, but no particular opportunities for alternatively repurposing the existing building have been identified (this could warrant further investigation). It is also noted that two proposed allocations have a capacity below ten homes, such that the emerging policy requirement to ensure net zero emissions may not apply. A final consideration is the proposed increased emphasis on growth within the Wokingham urban area, including Wokingham town centre, but the sites are somewhat dispersed, and all are of a fairly modest scale, hence there is little reason to suggest a district heat network opportunity.
- 9.6.9 In **conclusion**, Hall Farm / Loddon Valley certainly represents a good opportunity to minimise per capita built environment emissions; however, it is difficult to conclude that it represents a particular opportunity, over-and-above other competing large strategic site options, and there is also a need to factor in other proposed allocations, as well as emissions from transport. On balance, at this stage, it is appropriate to flag the **risk of a negative effect**, albeit it is recognised that the baseline situation is one whereby growth likely comes forward in a less planned way, with decarbonisation opportunities missed. This conclusion reflects the stretching nature of the Borough's 2030 net zero target, which necessitates a high level of ambition, and means that decarbonisation must be a key issue 'driving' spatial strategy and site selection.

9.7 Communities

9.7.1 Sustainability objectives:

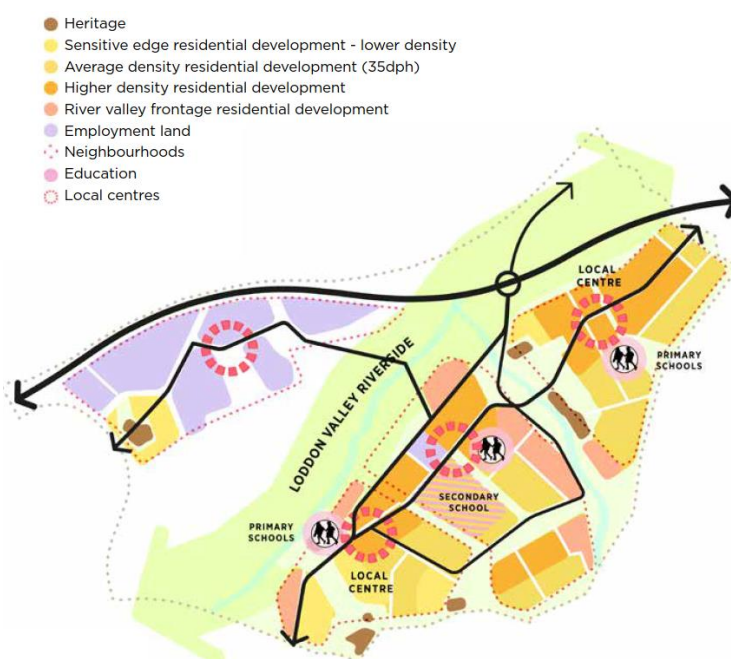
- Create and sustain vibrant and locally distinctive communities
- Reduce poverty and social exclusion
- Safe and secure environment
- Improve the health and wellbeing of the population

9.7.2 The Draft Plan appraisal (2020) concluded:

The proposal to focus growth at Grazeley is broadly supported, as there would be the potential to deliver a thriving new community and also minimise impacts on existing communities (although it is important to recall that the site is constrained by proximity to AWE Burghfield). The proposed package of smaller site allocations is also broadly supported, in particular noting that these sites were identified as suitable for allocation following engagement with town and parish councils. It is fair to conclude uncertain significant positive effects overall, recognising that detailed site-specific proposals are emerging at this stage. Ahead of consultation there also remains a degree of uncertainty regarding the suitability of the proposed strategy for meeting Gypsy and Traveller accommodation needs.

- 9.7.3 Grazeley represented a unique opportunity, on account of its scale. However, there remains the potential to direct a high proportion of new housing to strategic growth locations, associated with an inherent place-making opportunity. On the matter of AWE Burghfield there is now complete clarity on the extent of the Detailed Emergency Planning Zone (DEPZ); and, on the matter of the strategy for meeting Gypsy and Traveller accommodation needs, there is now confidence in the appropriateness of the strategy.
- 9.7.4 Focusing on the new proposed SDL at **Hall Farm LV**, there is a particular place-making opportunity – with the river corridors and woodlands providing a structural framework for masterplanning, and the potential for new communities to integrate with a regionally significant employment cluster, itself with a clear masterplanning vision (the four valleys) – and enhancing the river corridor as a strategic green/blue infrastructure asset represents a significant opportunity, with the potential to benefit existing as well as new communities, e.g. residents of Lower Earley. There is an issue around impacts to the existing communities within Shinfield and Arborfield parishes, both of which have seen, and continue to see, very significant growth through the Shinfield Parish (South of the M4) and Arborfield Garrison SDLs; however, in both cases the historic cores of these settlements are set back from the Hall Farm LV site, and there is good potential to mitigate impacts through masterplanning (e.g. use of land north of the river for employment will be supportive of ensuring Shinfield's distinct sense of place; with regards to Arborfield, south of the river, this could benefit from further investigation (see discussion under Historic Environment). Figure 9.3 shows the neighbourhood framework plan set out in the Strategic Sites Report (2021).

Figure 9.3: Hall Farm LV neighbourhood framework plan



- 9.7.5 The second most significant allocation is **South of Wokingham SDL extension**. As an initial point, it is important to note that the South of Wokingham SDL SPD (2014) identified land here as a “potential green open space location”; however, on balance, development is supported from a ‘communities’ perspective. There is something of a place-making opportunity – e.g. with a ‘green spine’ linking to the committed part of the SDL to the north – and there are limited concerns regarding impacts to existing nearby communities. It is also important to note that the proposal to extend the SDL aligns with the proposal to extend the SDL to incorporate Gray’s Farm, which has been bought by WBC to establish a sports hub, providing for both outdoor and indoor sports and community uses.
- 9.7.6 Another key consideration is in respect of the **South of M4 (Shinfield Parish) SDL**, where the proposal is to allocate two large new sites - namely Land north of Arborfield Road, Shinfield (191 homes) and Land east and west of Hyde End Road (175 homes) - plus Hall Farm LV is nearby to the east, hence there is a need to consider the impact of construction over a very extended period of time on nearby communities. Also, with regards to Land East and West of Hyde End Road (175 homes), there is a need to note that whilst the site falls outside of the AWE Burghfield DEPZ, it is within the wider 5km consultation zone.
- 9.7.7 Other sites of note are as follows:

- Pinewood, Nine Mile Ride – the proposal is only to support the site for self-funded regeneration, without any assumption made regarding the number of homes that will come forward, if any. There are also uncertainties about the feasibility of re-providing on-site community facilities elsewhere if necessary.
- Land at St Anne's Drive (54 homes) – is a new proposed allocation located within the South Wokingham SDL and the subject of a current planning application (ref. 203544). The South of Wokingham SDL SPD (2014) identified land here as a “potential green open space location”, and it also appears that the new homes here will be slightly separated from the rest of the SDL by areas of woodland and greenspace.
- Nine Mile Ride – the potential for the two adjacent allocations to the west of this sub-area to increase pedestrian and cycle connectivity between two country parks has already been discussed. With regards to the other new proposed allocation here - Greenacres Farm, Nine Mile Ride (100 homes) – the site promoter has notably proposed a circular walk around the perimeter of the site, which is associated with TPOs and priority habitat, and the Revised Growth Strategy consultation document identifies an opportunity to: *“provide pedestrian and cycle connectivity to the local countryside... through the site.”*

9.7.8 Opportunities for development to deliver upgrades to **pedestrian and cycle links** have been identified at numerous other sites, although there is a need for further work to understand instances where the benefit would be felt by the existing neighbouring communities. Examples include:

- Westward Cottage, Sheerlands Road - *“... improve pedestrian and cycle links, including... crossings”;*
- Land north of Arborfield Road, Shinfield – *“... improve pedestrian and cycle access through the site”;*
- Land West of Park Lane, Charvil – *“... provide pedestrian and cycle connectivity to areas of open space through the site and the surrounding area, including Charvil Country Park...”;*
- Winnersh Plant Hire, Reading Road, Winnersh – *“... provide pedestrian and cycle connectivity to areas of open space through the site and the surrounding area, including Hatch Farm Country Park...”;*
- Land off Wheatsheaf Close, Sindlesham – *“... improve pedestrian links along Mole Road so residents can access existing services and facilities in Winnersh centre”;* and
- Land east of Pound Lane, Sonning (Sonning Golf Club) – *“... improve pedestrian and cycle links, including pedestrian crossings (e.g., A4) where necessary”.*

9.7.9 A further key consideration here (which might alternatively be considered below, under ‘housing’) relates to the matter of supporting **Gypsy and Traveller** communities within the Borough. The proposed response to the Gypsy and Traveller Accommodation Assessment (GTAA), as per the Draft Plan stage, is to allocate three small sites for pitches in a similar broad area within the south of the Borough. Additionally, the proposed site specific policy for Hall Farm LV states that the scheme should include Gypsy and Travellers accommodation. Another change from the Draft Plan stage is identification of the need to ensure access arrangements *“appropriate for vehicles towing a caravan or a mobile home”* at the two sites without planning consent. With regards to the third site that does now have planning consent, namely Land to the rear of 166 Nine Mile Ride, the ISA Report in 2020 highlighted that this site is seemingly subject to certain constraints in biodiversity and surface water flood risk terms, but that it benefits from good proximity to California Crossroads local centre.

9.7.10 In **conclusion**, as per the Draft Plan stage it is judged appropriate to predict the likelihood of the LPU leading to **positive effects**, in respect of ‘communities’ objectives (recalling that objectives relating to community infrastructure and environmental health are discussed above under other headings), albeit there remains a degree of uncertainty at this stage ahead of further work, e.g. to understand in detail the potential to avoid impacts to the existing communities and Shinfield and Arborfield, and the potential for upgrades to walking and cycling infrastructure to benefit existing communities.

9.8 Economy

9.8.1 Sustainability objectives:

- Ensure high and stable levels of employment
- Encourage ‘smart’ economic growth
- Maintaining a buoyant and competitive economy with a range of jobs without adversely affecting the quality of life

9.8.2 The Draft Plan appraisal (2020) concluded:

The proposal to focus growth at Grazeley performs well as the scheme would deliver targeted new employment floorspace, and there is also support for expansion of Thames Valley Science Park. These proposals are in line with the economic evidence-base, which suggests limited need for new employment space in the Borough, given the pipeline of committed supply. The proposed suite of development management policies is also strongly supported, with these policies having an important role to play in a number of respects, e.g. ensuring protection of existing employment land and supporting thriving town centres. Taking the plan as a whole, i.e. spatial strategy and development management policy, it is possible to conclude the likelihood of significant positive effects.

9.8.3 Grazeley represented a considerable opportunity to deliver new strategy employment land along a major transport corridor; however, there is also a major opportunity associated with Hall Farm LV.

9.8.4 The overriding consideration here is the potential for housing growth directed to **Hall Farm LV** to support, indeed enable, the University of Reading's aspiration to create an International Employment Hub based around the Four Valleys of Cinema, Heritage, Medical and Nano. Progress has already been made towards achievement of the vision (most notably Thames Valley Science Park), and is set to continue regardless of strategic housing growth (most notably in the form of Shinfield Studios), but realising the vision in full is likely to require strategic housing growth to the south, on land also owned by University, including so as to fund and deliver major new road infrastructure. Furthermore, bringing forward an aspirational major new community adjacent (or near adjacent, given the intervening river valley) will be supportive of the Four Valleys vision. In summary, there is certainly a significant opportunity, although there is still a need to consider the option of achieving a version of the Four Valleys vision without strategic housing growth. Delivering a major new medical facility, potentially in the form of a new hospital, would certainly represent a highly significant opportunity, and one that could probably only be realised alongside strategic housing growth, because there would be a need to fund and deliver M4 Junction 10a, but there is no certainty, at the current time, in respect of what type of medical facility, if any, would come forward.

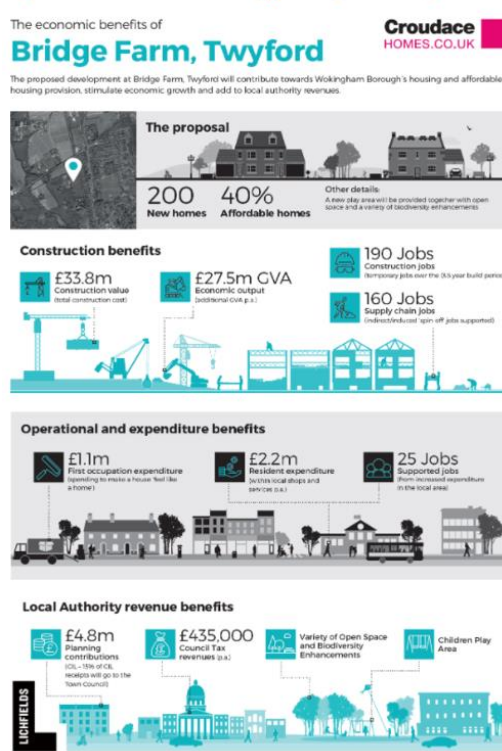
9.8.5 None of the **other proposed allocations** would deliver significant new employment land, hence it will be important to ensure that quantitative and qualitative employment land needs are being met borough-wide and locally (e.g. along strategic transport corridors), mindful of changing needs for employment land, e.g. in light of homeworking trends (N.B. Wokingham is not discussed as a location particularly well suited for warehousing/distribution uses, which is a key employment land issue regionally and nationally).

9.8.6 Other than enabling or facilitating delivery of new strategic employment land, a further, less significant consideration is delivering new homes in locations well-linked to existing centres of employment, with a view to supporting those centres to thrive and potentially grow. A number of proposed allocations are associated with merit in this respect, including sites along the A4 road (and rail) corridor.

9.8.7 A further consideration is redevelopment of employment sites for higher value uses including housing, and in this respect it is important to note new proposed allocation Millars Business Park, Molly Millars Lane (90 homes). However, it is difficult to assume that employment uses would be maintained on site in the absence of a Local Plan allocation, mindful of the new class E to residential permitted development rights.

9.8.8 Finally, there is a need to note the construction, expenditure and other revenue benefits of development schemes; however, this is not a factor that enables differentiation between competing sites. The figure below is provided by the promoters of Land at Bridge Farm, Twyford (which is a proposed allocation for 180 homes (having previously been a proposed allocation for 150 homes) and is currently the subject of a pending planning application for 200 homes – see www.bridgefarmtwyford.co.uk).

Figure 9.4: Economic benefits suggested by a scheme promoter



- 9.8.9 In **conclusion**, **significant positive effects** are predicted, as per the Draft Plan stage, although there could be a need for further work to confirm that quantitative and qualitative employment land needs will be met in full through the LPU, mindful of the shifting national and sub-regional context.

9.9 Historic environment

- 9.9.1 Sustainability objective:

- Protect and enhance the historic environment, ensuring new development makes a positive contribution, or leads to no material harm, taking into account the setting of assets and links with the wider landscape

- 9.9.2 The Draft Plan appraisal (2020) concluded:

In conclusion, whilst the proposed focus of growth at Grazeley is broadly supported (subject to policy being formulated in respect of appropriately integrating historic environment considerations), other elements of the proposed strategy give rise to a degree of concern, perhaps most notably the proposed allocation of Ashridge Farm within the North Wokingham SDL. A robust framework of development management policies is proposed, but a degree of residual concern remains, hence it is appropriate to flag uncertain/moderate significant negative effects at this stage.

- 9.9.3 Grazeley potentially represented a considerable opportunity to direct growth in such a way that impacts to the historic environment are minimised. The new proposed strategic allocation at Hall Farm / LV also represents something of an opportunity, in this respect, but it is a smaller site, and able to deliver fewer homes in the plan period, so it is the case that the loss of Grazeley necessitates an increased emphasis on smaller allocations on the edge of settlements, including locations with historic environment sensitivity. Finally, with regards to the Ashridge site within the North Wokingham SDL, this site now has full planning permission, and so is not a focus of the appraisal below.

- 9.9.4 Focusing on the new proposed SDL at **Hall Farm LV**, the primary concentration of assets is considered likely to be at Hall Farm itself, where there is a grade 2 listed farmhouse and an adjacent ruined church, which is a scheduled monument, and where there is a listed tomb. This is a historic river crossing, and there remains a public footbridge over the river, hence the assets may be quite well appreciated; however, there will be good potential to conserve the assets as part of a green/blue infrastructure strategy. A final consideration is the remnant parkland landscape adjacent to the west of Hall Farm / the ruined church, associated with Arborfield Hall (demolished 1955), its lodge houses (still present), Arborfield Grange (not listed) and a grade 2 listed rectory. The proposal is to develop this land for residential, which potentially gives rise to a cause for concern, but significance is unclear, given few nationally listed buildings. It is noted that there is currently no proposed 'place-shaping principle' relating to the historic environment, which is a matter that might be explored further prior to plan finalisation.

- 9.9.5 The second most significant allocation is **South of Wokingham SDL extension**. The key issue here is Lock's Farm, where there is grade 2* listed farmhouse and a grade 2 listed barn. Without the SDL extension the farm – along with a historic lane (now a bridleway) linking to the hamlet of Holme Green (with its historic school and four other grade 2 listed buildings) - would represent the southern extent of the SDL built form, whilst with the extension these historic assets will be largely enveloped within the SDL's built form. There is potentially a need for further work to understand the significance of the assets and the extent to which harm can be avoided and mitigated through masterplanning, design etc.

- 9.9.6 With regards to the **other proposed allocations**, numerous are in proximity to one or more designated assets (see the outcomes of distance analysis in Appendix V of this report), and it is noted that Appendix J of the Revised Growth Strategy consultation document identifies relationship with one or more listed buildings is listed as an issue to be address for nine of the proposed allocations. The following is a selection of some of the issues to be explored further and addressed:

- 69 King Street Lane, Winnersh (25 homes) – is a new proposed allocation, having been judged potentially suitable by the previous HELAA but not proposed for allocation on balance (nor was it progressed to the growth scenarios in 2019/20, with the ISA Report explaining: "... on balance, ruled out as not suitable for allocation for strategic reasons [including] development could set a precedent for expansion of Sindlesham to the east towards Wokingham, thereby impacting on the landscape setting of the Sindlesham Conservation Area." The adjacent conservation area is a clear constraint; however, it is not clear that growth would impact on the setting of any listed building, and the site is potentially quite well contained and visually screened, and contains an element of PDL. The proposed capacity is below the 38 homes previously proposed through a planning application (ref. [171497](#)).

- Westward Cottage, Sheerlands Road (10 homes; within the Arborfield SDL) – was identified as potentially suitable in the previous HELAA, noting that it includes an element of PDL, but was not proposed for allocation on balance, noting constraints in the form of a grade 2 listed building and TPOs.
- 54-58 Reading Road, Wokingham (31 homes) – the proposal is to increase the capacity on the site, from 9 homes at the Draft Plan stage. This gives rise to degree of concern given the close proximity to several listed buildings including two that are grade 2* listed (including a prominent church), and it is also noted that the site includes two or three existing homes with a degree of historic character (shown on the pre-1913 OS map) that will presumably be demolished as part of the development scheme. However, on the other hand, it is recognised that this is a highly accessible location on the A329.
- Hurst – the two proposed allocations for 15 and 3 homes are in close proximity to a cluster of grade 2 listed buildings associated with Whistley Green, plus there is a designated Area of Special Character.
- Wheatsheaf Close (24 homes) - was an allocation in the MDD Local Plan and included in the Draft Plan (2020). The possibility of a lower capacity could warrant consideration, in light of the Non-strategic Sites Report, and noting the adjacent historic lane (bridleway) and nearby listed building.

9.9.7 It is also worth highlighting that certain other of the proposed new allocations at this stage, relative to the Draft Plan stage, are quite notably unconstrained in historic environment terms. In particular, the proposed new focus of growth at the western extent of Nine Mile Ride / Barkham Ride gives rise to limited concerns, as this was a rural location at the edge of the extensive Barkham Common prior to 20th century urban expansion. The two new allocations at the eastern extent of the Wokingham urban area are also distant from a listed building, although Land to the west of St Anne's Drive and south of London Road, Wokingham (54 homes) is associated with the edge of Buckhurst Estate, which is shown as being associated with extensive landscaped grounds on early maps. Finally, the proposed new allocation at Swallowfield (70 homes) is considered to be quite unconstrained, in that it is separated from the village Conservation Area (which is closely associated with Swallowfield Park) by modern development, and is quite well contained in the landscape, such that there are limited concerns regarding village 'creep'.

9.9.8 As a final point, the proposal to reduce the capacity of the Land east of Park View Drive North, Charvil, from 85 to 78 homes, is supported from a historic environment perspective. Expansion to the north of Charvil is constrained by a river valley landscape associated with a high density of scheduled monuments, likely reflecting soils that supported early settlement (N.B. the extent of the proposed allocation has been reduced from the extent of the HELAA site to reflect this very constraint).

9.9.9 In **conclusion**, there are clear historic environment sensitivities, but this is unavoidable in the context of most Local Plans, and there is a need to consider that a baseline scenario, whereby the Local Plan is not progressed (by the Council), would in all likelihood see development coming forward in locations that are problematic from a historic environment perspective. On balance, it is considered appropriate to flag a **risk of minor or moderate negative effects** at this stage, noting several allocations with onsite or adjacent (or near adjacent) listed buildings, including grade 2* listed, and given a cluster of historic assets at Hall Farm / Loddon Valley. It is noted that Historic England raised fairly limited concerns through the Draft Plan consultation in 2020 (see discussion in Section 5.2, above), but did emphasise the importance of detailed site specific policy and an enhanced historic environment evidence base.

9.10 Housing

9.10.1 Sustainability objective:

- Make provision for local housing needs by ensuring that everyone has the opportunity to live in a decent sustainably constructed and affordable home

9.10.2 The Draft Plan appraisal (2020) concluded: *"An overriding consideration is the need to allocate sites with a total yield that suitably exceeds ('buffers') the established... LHN figure, and to allocate a good mix of sites conducive to ensuring a steady trajectory of housing supply across the plan period. In this respect the proposed spatial strategy is broadly supported, although there is inherently a degree of risk associated with a focus of growth at... Grazeley. [D]evelopment management policies [are] also broadly supported, including Policy H5 which relates to the crucial matter of requiring provision of affordable housing alongside market housing. [I]t is appropriate to predict uncertain significant positive effects at this relatively early stage in the plan-making process, recognising that further evidence regarding housing delivery timescales and plan viability may come to light through consultation."*

- 9.10.3 At the current time, the proposal is still to allocate sites sufficient to ensure a land supply that exceeds ('buffers') LHN, to ensure a robust housing trajectory (i.e. recognising that unforeseen delivery issues are inevitable) and mitigate against the risk of the plan base date being brought forward (see discussion in Section 6). The other immediate point to note is that there is now less focus on a single large strategic site (i.e. there is increased focus on smaller sites, which tend to be associated with relatively low delivery risk) and the new proposed large scale strategic site allocation at Hall Farm LV is considered to be associated with relatively low delivery risk (see discussion of competing large strategic site options in Appendix III, and also the appraisal of Borough-wide growth scenarios in Section 6).
- 9.10.4 Focusing on the new proposed SDL at **Hall Farm LV**, as discussed the scheme is thought to be associated with relatively low delivery risk, given one major land-owner (University of Reading) and a second major land-owner, with developer involvement, for a part of the site that is understood to be relatively straightforward to deliver. However, it is clearly the case that an element of delivery risk remains, e.g. given further work to explore road infrastructure upgrades.
- 9.10.5 Other 'housing' factors to consider include:
- Supporting a good mix of housing types and tenures as well as specialist accommodation – the proposed site specific policy for Hall Farm notably requires: *“Development should provide a mix of adaptable housing sizes, types and tenures including (but not limited to): affordable homes, specialist accommodation, first homes, key worker housing and Gypsy and Travellers accommodation to ensure balanced, inclusive and accessible communities.”*
 - Locally arising housing needs – cannot be quantified with any certainty (unlike borough-wide LHN), but will undoubtedly exist. Twyford is discussed as potentially being associated with locally arising housing need, recognising that the north of the Borough has seen significantly less recent housing growth than the south. In this light, it is noted that the proposal is to increase the number of homes allocated to Twyford and the wider A4 corridor relative to the Draft Plan stage.
 - Proximity of growth locations – can be a factor leading to delivery risk, due to overlapping housing markets. There are a number of concentrations of committed and proposed growth locations within the Borough, but it is not possible to suggest any significant risk in practice.
- 9.10.6 In **conclusion**, changes made since the Draft Plan stage are very positive, from a housing perspective, and so it is possible to predict the likelihood of **significant positive effects**. There remain a range of uncertainties around viability and delivery risks, but this is invariably the case for Local Plans, and the proposal is to mitigate against these risks by putting in place a diverse housing land supply and a supply buffer (over-and-above the housing requirement, which will be set at LHN) of around 19%.

9.11 Land, soils and natural resources

- 9.11.1 Sustainability objectives:
- Improve efficiency in land use through the re-use of previously developed land, existing buildings, including the re-use of resources and remediation of previously developed land
 - Sustainably use resources (including renewable and non-renewable resources)
 - Maintain and where appropriate improve soil quality, and to ensure land affected by contamination is remediated to a condition suitable for use
 - Address waste by reducing and minimising waste as a priority and then managing waste in accordance with the waste hierarchy
- 9.11.2 The Draft Plan appraisal (2020) concluded:
- A primary consideration relates to the performance of the proposed spatial strategy in respect of avoiding the loss of best and most versatile agricultural land. In this respect, there is a degree of concern associated with the focus of growth at Grazeley and also at Charvil/Twyford. It seems likely that there will be a significant loss of best and most versatile [BMV] agricultural land, hence there is a need to predict significant negative effects.*
- 9.11.3 In short, it remains the case that there could well be a significant loss BMV agricultural land.

- 9.11.4 Focusing on the new proposed SDL at **Hall Farm LV**, the low resolution/accuracy nationally available dataset (see discussion in Section 6) shows the site to mostly comprise 'grade 3' land (bar the river corridor, which is grade 4), which may or may not be BMV, and detailed survey work has not been undertaken (or, at least, is not shown at magic.gov.uk).

N.B. A further consideration is the need to avoid sterilisation of minerals resources that could potentially be viably extracted. It is noted that the proposed site specific policy states: *"The potential for on-site mineral resources which may be winnable through prior extraction should be considered through a Minerals Resource Assessment. Where viable extraction should be implemented"*

- 9.11.5 The second most significant allocation is **South of Wokingham SDL extension**, the national dataset shows the site to mostly comprise grade 3 quality land, and it is notable that land nearby to the north has been surveyed in detail and found to comprise a mixture of grade 2 and grade 3b quality land.
- 9.11.6 With regards to other proposed allocations, the GIS analysis presented in Appendix II serves to highlight that most of the proposed allocations in the **A4 corridor** area are shown to intersect grade 1 or grade 2 quality land, as understood from the nationally available dataset.
- 9.11.7 With regards to detailed survey findings, it is noted that Land north of London Road and East of A329(M), Hurst (45 homes) has been surveyed and found to comprise grade 2 quality land.
- 9.11.8 Finally, there is a need to consider use of **previously developed land**. Points to note include:
- There is an increased emphasis on site allocations within the Wokingham urban area.
 - Winnersh Plant Hire, Reading Road, Winnersh – is a stand out PDL allocation from the Draft Plan stage where the latest proposal is to increase the capacity of the site, from 20 to 85 homes.
 - Several of the new proposed allocations include a strong element of PDL, including:
 - 31-33 Barkham Ride, Finchampstead;
 - Greenacres Farm, Nine Mile Ride, Finchampstead;
 - 69 King Street Lane, Winnersh; and
 - Westward Cottage, Sheerlands Road (within the Arborfield SDL).
- 9.11.9 In **conclusion**, a primary consideration relates to the performance of the proposed spatial strategy in respect of avoiding the loss of best and most versatile (BMV) agricultural land. In this respect: there is a concern associated with the focus of growth along the A4 corridor; at least one of the proposed allocations elsewhere is known to comprise BMV land; and the likelihood is that other proposed allocations (potentially to include Hall Farm / Loddon Valley) comprise BMV land. As such, as per the Draft Plan stage, there is a need to predict **significant negative effects**.

9.12 Landscape

- 9.12.1 Sustainability objective:

- Protect and enhance valued landscapes and the integrity of established character areas, ensuring new development makes a positive contribution, or leads to no material harm, also recalling links with the historic environment

- 9.12.2 The Draft Plan appraisal (2020) concluded:

The proposed spatial strategy seeks to direct the great majority of growth to areas with limited sensitivity, from a landscape perspective, noting that sites have been selected following engagement with town and parish councils, although the appraisal identifies a degree of concern in respect of the proposed expansion to the north of Charvil (85 homes). A focus of growth at Grazeley is tentatively supported; however, that is not to suggest that the site is without its sensitivities, given the description of a "highly rural landscape" presented within the Landscape Character Assessment. On balance, at this relatively early stage in the plan-making process, uncertain significant negative effects are predicted given the potential to avoid and mitigate impacts through masterplanning and design.

- 9.12.3 The loss of Grazeley means that there is a need to disperse growth to a greater extent, which leads to tensions with landscape objectives. It is also fair to say that the new proposed strategic growth location (Hall Farm LV) is associated with landscape sensitivities over-and-above Grazeley, as discussed below.

- 9.12.4 Focusing on the new proposed SDL at **Hall Farm LV**, key evidence comes in the form of the Valued Landscapes Topic Paper (2020), which identifies much of the land within the site, specifically the river corridor and land to the north, as falling within the River London Valued Landscape. A further key consideration is the potential to deliver a major new area of riverside parkland, which would certainly be of strategic value to residents existing nearby communities, and potentially more widely, if the outcome is a situation whereby the River Loddon corridor, between Reading and the Thames, is widely known for its accessibility (the possibility of a regional park might be explored, e.g. akin to the Colne Valley Regional Park, albeit the Colne Valley area is more extensive and associated with the Grand Union Canal). There is also the simple fact that the site offers an opportunity for growth to be 'contained' within a river valley.
- 9.12.5 The second most significant allocation is **South of Wokingham SDL extension**. Evidence is available in the form of the Landscape Character Assessment (LCA 2004 and 2019 update), which highlights the need to *"protect the individual identity of settlements by conserving the rural character of the landscape between adjacent towns and village centres and avoiding amalgamation of these settlements."* A key issue is settlement separation between Wokingham and Bracknell; however, land to the east of the site, within Bracknell Forest, is proposed for designation as a Strategic Gap through the emerging Bracknell Forest Local Plan (and is mostly associated with Easthampstead Park / a golf course which, whilst not a nationally registered historic park, comprises extensive wood pasture priority habitat), which serves to reduce concerns. It is also important to recognise that the proposal is for built development to extend south only as far as the Emm Brook, with land to the south of the brook used to deliver a large new area of parkland. Land further to the south is then associated with the more wooded/forested landscape of the Nine Mile Ride area. In this light, it seems fair to conclude that there is a logic in extending the Wokingham urban area south through South of Wokingham SDL extension, and there is limited risk of future problematic 'sprawl'.
- 9.12.6 With regards to other new proposed allocations, it is difficult to identify any that stand-out as giving rise to a particular concern from a landscape perspective, and most of the sites are strongly **contained by robust landscape features** (e.g. roads, a railway, woodland, mature hedgerows) or a flood risk zone (which, whilst not providing visual containment, reduces concerns regarding further development creep, or sprawl). Having said this:
- A site that stands out as less well contained is Rooks Nest Farm and 24 Barkham Ride, Finchampstead (270 homes). This site (also the adjacent site to the north) abuts the Forest and Rides Valued Landscape, but potentially of greater concern is a risk of problematic future westwards creep of the Nine Mile Ride sub-area towards the Arborfield Garrison SDL. There is a strong argument for planning comprehensively for this part of the Borough with a long-term perspective, so as to avoid piecemeal growth which can give rise to issues and missed opportunities.
 - On a much smaller scale, another new allocation that is less well contained is Land east of Pound Lane, Sonning (Sonning Golf Club) (24 homes). The site will extend a recently permitted site, and there seems to be a clear risk of further development creep across the golf course.
- 9.12.7 With regards to **proposed allocations from the Draft Plan**, the previous ISA Report (2020) stated:
- *"Land East of Park View Drive North, Charvil (85 homes) – land surrounding Charvil, to the north of the A4, is associated with a distinctive wide river valley landscape where the River Loddon braids before reaching the River Thames, and there is a nearby (although not adjacent) circular footpath that that is likely to be well used by walkers and anglers (this area is popular for fishing). The LCA states: "In some parts such as around Charvil, access to the floodplain is limited, creating a locally strong sense of remoteness. Views of parklands and manor houses associated with the adjoining valley sides also create an impression of settlement and are important features of the landscape." The LCA concludes that the 'Loddon Valley with Open Water' character area has only 'moderate' value and sensitivity; however, it is noted that this conclusion is reached on the basis that the area has been affected by extraction activities, which is thought not to apply to the Charvil area.*
 - *Land at Bridge Farm, Twyford – there is no evidence available to suggest that this site is associated with any particular landscape sensitivity (although one consideration may relate to views across the site from the adjacent railway line); however, there is potentially a need to consider the possibility of an alternative green infrastructure use for this land, noting proximity to the River Loddon to the west, beyond which is Charvil Country Park."*
- 9.12.8 The proposal is now to decrease capacity at the Charvil site, but increase capacity at the Twyford site.

9.12.9 Finally, it is noted that the Revised Growth Strategy consultation document sets out a range of draft site specific requirements focused on addressing landscape issues, for example:

- Land West of Park Lane, Charvil – “*Retain onsite mature trees, in particular on the western boundary to maintain separation from Charvil and Sonning.*”
- 69 King Street Lane, Winnersh – “*Landscape buffer to ensure appropriate transition from the residential area to the open countryside.*”

9.12.10 In **conclusion**, there are a wide range of landscape sensitivities, including concerns regarding impacts to locally designated Valued Landscape, and concerns around maintaining long term settlement separation and character / distinctiveness. However, on the other hand, there is a major opportunity associated with Hall Farm / Loddon Valley, around increasing access to the River Loddon corridor/valley, and delivering targeted enhancements. Also, the great majority of proposed allocations give rise to limited concerns from a landscape perspective, including because they are well-contained by robust landscape features (e.g. roads, woodland, mature hedgerows) or a flood risk zone, which serves to reduce concerns around future development creep or ‘sprawl’ of the urban areas. On balance, at this relatively early stage in the plan-making process, and as per the Draft Plan stage, there is the need to flag the **risk of negative effects**. There will be good potential to avoid and mitigate impacts through masterplanning and design.

9.13 Transportation

9.13.1 Sustainability objective:

- Reduce road congestion on the local and strategic road network (SRN), and minimise air pollution and greenhouse gas emissions from transport, by improving carefully locating new development, minimising the need to travel and supporting ‘sustainable transport’ modes including safe walking and cycling routes and public transport

9.13.2 The Draft Plan appraisal (2020) concluded:

A focus of growth at Grazeley is supported as a major new settlement in this location, representing a significant opportunity to deliver growth in such a way that minimises need to travel and car dependency, and hence ultimately minimises per capita greenhouse gas emissions from transport and also traffic congestion; however, there is much uncertainty ahead of further detailed work. Significant effects are not predicted at the current time, either positive or negative.

9.13.3 Grazeley represented a major opportunity, from a transport perspective, and whilst the new proposed SDL at Hall Farm LV also represents a major opportunity it is potentially a more limited opportunity relative to Grazeley, given a smaller scale of growth and a location between strategic transport corridors (including rail). Also, the loss of Grazeley has resulted in a need for increased growth at smaller sites spread quite widely across the Borough, which is not ideal from a transport planning perspective.

9.13.4 Focusing on the new proposed SDL at **Hall Farm LV**, a key issue is understood, on the basis of transport modelling completed to date, to be uncertainties around commuter flows associated with the employment areas, plus there is uncertainty regarding the potential to deliver a new M4 junction (which would certainly be necessary under a scenario where a hospital is delivered onsite). There would be more than 2km between junctions (an important safety consideration), and the effect could be to relieve pressure on existing junctions 10 and 11; however, junctions in relatively close proximity can give rise to an issue whereby the motorway is used by local traffic (“junction hopping”). Furthermore, it is important to consider the strategic value of a new road link road between the M4 and the A327, leading to the M3.³³ There are a range of other important transport considerations, which would need to be explored further; for example, there would also be the potential to relieve pressure on Mill Lane, where there is a single land bridge over the River Loddon. The current proposed site specific policy requires:

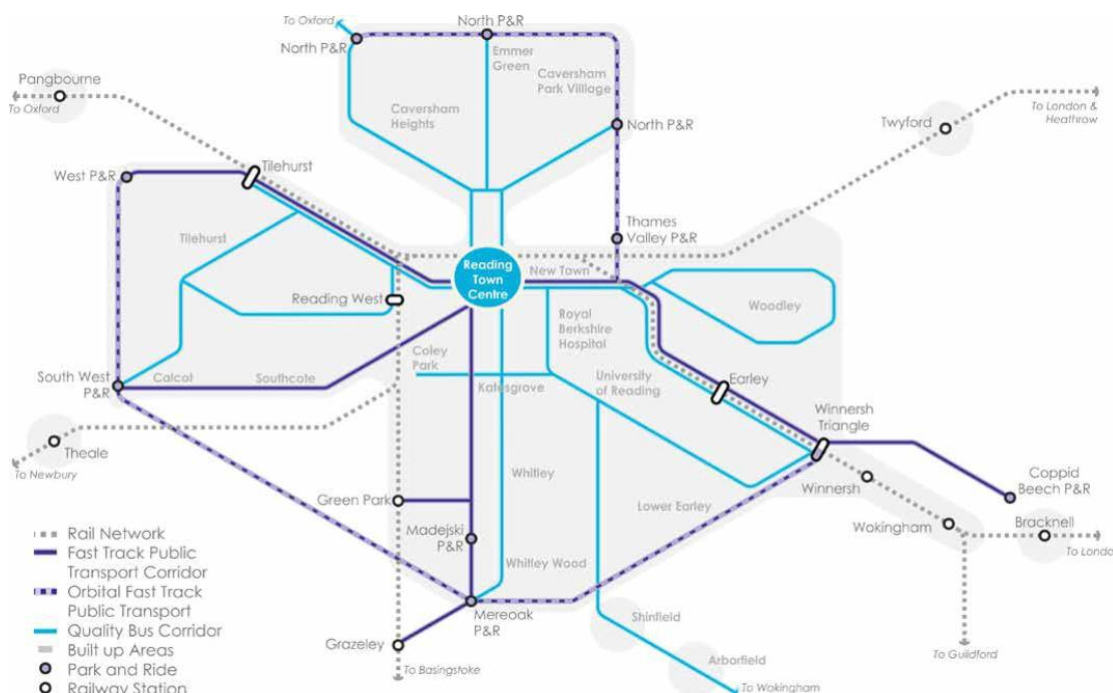
- A new link over the M4 to Lower Earley Way, improvements to transport capacity along Lower Earley Way and other neighbouring roads, a new link to Hatch Farm Way and the partial closure of Mill Lane.
- Pedestrian, cycleway, greenway infrastructure, and public transport priority routes.

³³ The [Transport Strategy for the South East](#) (2020) identifies the following priority initiative: “*Improve orbital links between the M3 and M4, ideally in a way that avoids directing heavy traffic through urban areas such as Bracknell.*”

- Development and each neighbourhood should be designed to prioritise and promote active and sustainable method of travel both within and beyond the allocation, including the prioritisation of walking and cycling and the integration of high-quality public transport. Key links include those to Reading and Wokingham railway stations, Thames Valley Science and Innovation Park, Green Park and Winnersh Triangle Core Employment Areas.

9.13.5 With regards to public transport connectivity, there is a need to work closely with Reading Borough, whose Draft Local Transport Strategy 2036 was published in 2020. Figure 9.5 shows the public transport strategy, serving to highlight the importance of Hall Farm LV supporting Orbital Fast Track Public Transport and also connecting to the eastern Fast Track Public Transport Corridor at Winnersh Triangle.

Figure 9.5: Draft Reading Transport Strategy 2036: Public transport strategy



9.13.6 The second most significant allocation is **South of Wokingham SDL extension**. The site is currently accessed by minor roads; however, there is the potential for a physical connection to the consented SDL, and together with other planned upgrades, it is considered possible that safe and suitable access to the site could be achieved, and there should also be an opportunity to address some existing road safety issues in the area. In terms of access to public transport, a shared boundary with the SDL indicates that a direct connection can be made from the site, supporting good access to high quality public transport. The site is also relatively close to Wokingham town centre, which can also be reached by active travel modes. Furthermore, masterplanning for the site suggests potential for a network of paths and cycleways that follow Emm Brook (i.e. a flat route) and connect into Wokingham's wider active travel network.

9.13.7 With regards to **other proposed allocations**, points to note include:

- A4 corridor – accessibility and connectivity here is quite strong, hence there is support for an increased focus of growth here through the Revised Growth Strategy;
- Nine Mile Ride – this is not one of the more accessible / well connected parts of the Borough, hence the proposed significantly increased focus of growth here leads to tensions with transport objectives;
- Swallowfield – is a location thought likely to be associated with a high rate of car dependency; and
- Proposed densities – at a number of allocations have been increased, since the Draft Plan stage, on the basis of the Pattern Book work presented in the Non-strategic Sites Report (2021), which took close account of the accessibility level at each of the sites.

9.13.8 With regards to emerging site specific policy, a number of proposed requirements have already been discussed under other headings, for example there is a discussion of required upgrades to walking and cycling infrastructure under 'Communities'. Numerous other requirements are set out regarding expected access arrangements, which is a matter that will warrant closer scrutiny ahead of plan finalisation.

- 9.13.9 In **conclusion**, there is a clear opportunity associated with Hall Farm / Loddon Valley, albeit also some locational challenges, given that the site falls between transport road corridors. With regards to other proposed locations, it is not clear that any give rise to a particular concern, but it is important to consider the in-combination effect of numerous smaller allocations spread quite widely across the Borough. At this stage **positive effects** are tentatively predicted, but there will be a need for further scrutiny.

9.14 Water

- 9.14.1 Sustainability objective:

- Maintain, and, where appropriate improve water quality (including groundwater and surface water) and to achieve sustainable water resource management of both surface and groundwater flows

- 9.14.2 The Draft Plan appraisal (2020) concluded:

The Water Cycle Study does not serve to highlight any major constraints to growth; however, there remains considerable uncertainty, in respect of risks to the water environment, ahead of further work, perhaps most notably in respect of waste water treatment capacity to serve Grazeley garden town. Having said this, concerns are reduced by the proposal to (paraphrasing) “champion climate resilience and adaptation through design and construction methods and deliver high standards of water efficiency with the aim of being water neutral in areas of serious water stress.” Significant effects are not predicted at the current time, either positive or negative, recognising good potential to address water environment issues/impacts at the development management stage; however, there is some uncertainty.

- 9.14.3 Grazeley represented an opportunity to ensure an ambitious approach to planning for water resources and water quality, but there could be a similar opportunity at Hall Farm LV. As for the need to now direct a higher proportion of growth to smaller allocations, relative to the Draft Plan stage, this is potentially not ideal, from a ‘water’ perspective, but does not necessarily give rise to significant concerns, assuming such things as hydrological capacity at receiving Waste Water Treatment Works (and environmental capacity within receiving water courses) and high quality Sustainable Drainage Systems (SuDS).
- 9.14.4 Focusing on the new proposed SDL at **Hall Farm LV**, there is no reason to suggest that waste water treatment capacity will be an issue, but there is a need for further investigations, and there is a need to recognise that this matter is high on the agenda nationally at the current time, with a focus on both reducing untreated wastewater entering the water environment and ensuring that treated wastewater does not lead to water bodies failing their chemical, biological and ecological Water Framework Directive objectives. As well as WwTW capacity, an important consideration is pollution of water courses from agricultural and other land uses. In this respect, there is a need to carefully consider the merits of Hall Farm LV, given its close association the River Loddon. Much of the land here is currently used for dairy farming (the University of Reading Centre for Dairy Research), such that it could be that development (with integration of high quality SuDS), plus extensive areas of new riverside parkland, leads to a ‘net gain’ in terms of water quality, but this is uncertain at the current time.
- 9.14.5 It is not possible to comment further on any of the **other proposed allocations**, beyond highlighting that several are closely associated with river corridors, including South of Wokingham SDL extension.
- 9.14.6 In **conclusion**, it is considered appropriate to flag a **risk of negative effects** at this current stage, ahead of further evidence-gathering, including discussions with statutory consultees. Limited concerns were raised through the Water Cycle Study completed in 2019, or through the consultation in 2020; however, water quality is high on the agenda nationally, in particular planning for waste water treatment capacity.

9.15 Overall conclusions on the Revised Growth Strategy

- 9.15.1 In conclusion, the appraisal predicts:

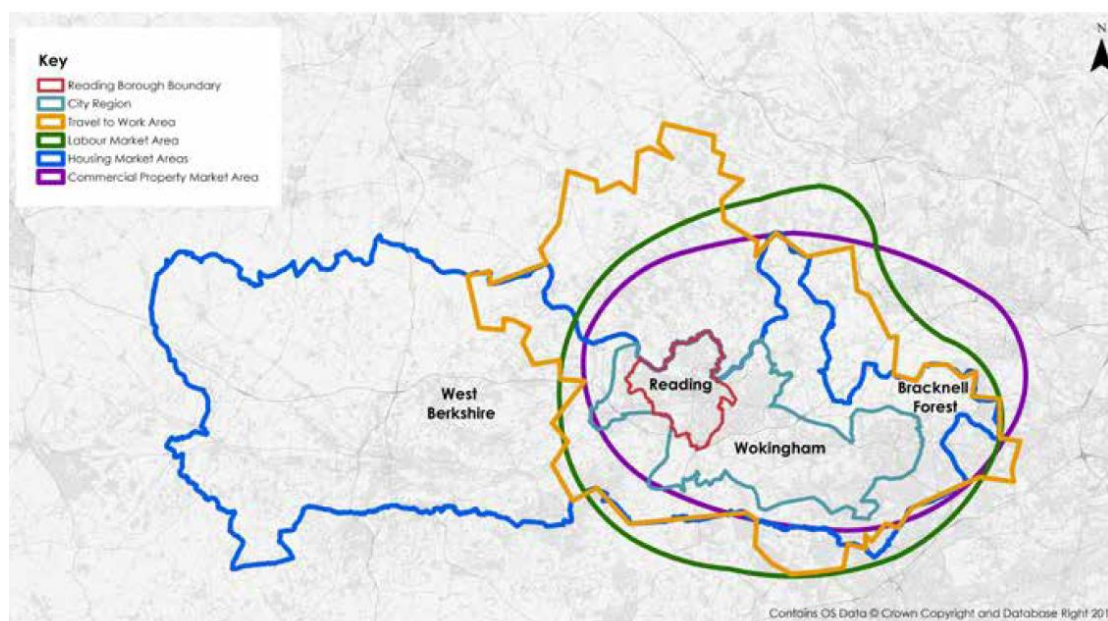
- **Significant positive effects** - in respect of Economy and Housing objectives – because the proposal is to provide for housing needs in full and support the realisation of a strategic economic growth initiative;
- **More moderate or uncertain positive effects** - in respect of Accessibility, Communities and Transport;
- **Notable tensions / risk of negative effects** - in terms of objectives relating to Air quality, Biodiversity, Climate change mitigation and adaptation, Historic environment, Landscape and Water objectives; and
- **Significant negative effects** in respect of loss of best and most versatile agricultural land.

- 9.15.2 There will be much potential to address issues and opportunities discussed within this appraisal prior to plan finalisation, including through development management policies. This appraisal has taken limited account of the suite of development management policies published at the Draft Plan in 2020.

Cumulative effects

- 9.15.3 The SEA Regulations, which underpin the SA process, indicate that stand-alone consideration should be given to 'cumulative effects', i.e. effects of the Local Plan in combination with other plans, programmes and projects that can be reasonably foreseen. In practice, this is an opportunity to discuss potential 'larger than local' effects. The following bullet points cover some key considerations:
- **Reading** – both the new SDL at Hall Farm / LV and the proposed new allocations within the South of the M4 (Shinfield Parish) SDL will 'look towards' Reading for higher order services and facilities, employment and retail, and there is a clear opportunity for new employment land to support Reading as a primary economic hub within the sub-region and more widely, plus there will be the potential to support new transport infrastructure upgrades to the benefit of Reading as a sub-regional hub.
 - **Bracknell** – three new proposed allocations adjacent or close to the boundary with Bracknell, including the proposed extension to the South of Wokingham SDL (835 homes), serve to highlight the importance of close working, including in respect of transport infrastructure (notably the A329(M), A329/B3408 and B3430), economic / employment growth strategy and environmental planning.
 - **Transport infrastructure** – aside from Hall Farm LV, there is a need to ensure that the Revised Growth Strategy is supportive of aspirations for key transport corridors, including the A4, A329 / A329(M) and A33 corridors (as far as possible, given the AWE Burghfield Detailed Emergency Planning Zone).
 - **Employment** – aside from Hall Farm LV, there is a need to ensure that the Revised Growth Strategy is meeting quantitative and qualitative employment land needs, including key strategic locations, guided by discussions with partner organisations including the LEP and neighbouring authorities.
 - **Thames Basin Heath SPA** – the matter of in-combination impacts to the SPA is a focus of a stand-alone Habitats Regulations Assessment (HRA), noting that eleven authorities manage the SPA in partnership.
 - **Landscape scale net gain** – there is a need to focus efforts on achieving conservation and 'net gain' objectives, in respect of biodiversity and wider ecosystem services, at functional landscape scales, including those discussed within the Wokingham LCA (also catchment scales). A Local Nature Recovery Strategy (LNRS) will be forthcoming, under the Environment Act, but steps must be taken in the interim.
- 9.15.4 The figure below is taken from the Draft Reading Local Transport Strategy 2036. It highlights a range of important sub-regional geographies, and others might be added, for example landscape character areas, river catchments and wider functional areas suited to planning for natural capital and ecosystem services.

Figure 9.6: Select sub-regional geographies (Source: Draft Reading Local Transport Strategy 2036)



Part 3: What are the next steps?

10 Plan finalisation

Publication of the Proposed Submission LPU

- 10.1.1 Subsequent to the current consultation it is the intention to prepare the proposed submission version of the LPU for publication in-line with Regulation 19 of the Local Planning Regulations 2012. The Proposed Submission LPU will be that which the Council believes is 'sound' and intends to submit for Examination. Preparation of the Proposed Submission LPU will be informed by the findings of this Interim SA Report, responses to the current consultation, further evidence gathering and further appraisal work.
- 10.1.2 The SA Report will be published alongside the Proposed Submission LPU. It will provide all the information required by the SEA Regulations 2004.

Submission, examination and adoption

- 10.1.3 Once the period for representations on the Proposed Submission LPU / SA Report has finished the main issues raised will be identified and summarised by the Council, who will then consider whether the LPU can still be deemed 'sound'. If this is the case, the LPU will be submitted for Examination, alongside a summary of the main issues raised during the consultation. The Council will also submit the SA Report.
- 10.1.4 At Examination the Inspector will consider representations (alongside the SA Report) before then either reporting back on soundness or identifying the need for modifications. If the Inspector identifies the need for modifications to the LPU these will be prepared (alongside SA if necessary) and then subjected to consultation (with an SA Report Addendum published alongside if necessary).
- 10.1.5 Once found to be 'sound' the LPU will be adopted by the Council. At the time of adoption a 'Statement' must be published that sets out (amongst other things) 'the measures decided concerning monitoring'.

11 Monitoring

- 11.1.1 The SA Report must present 'measures envisaged concerning monitoring'.
- 11.1.2 At the current time, in-light of the appraisal findings presented in Part 2 (i.e. predicted effects and uncertainties), it is suggested that monitoring efforts might focus on:
- Agricultural land – it would be relatively straightforward to monitor loss of agricultural land by grade.
 - Air quality – the Council might review how air quality monitoring efforts are targeted in light of the Local Plan, including with a view to both understanding how air quality is changing over time within AQMAs and identifying problem areas outside of the existing designated AQMAs, including ecology-related.
 - Biodiversity – there will be a need to develop a framework for ensuring that individual developments deliver a biodiversity net gain in combination at landscape / functional scales.
 - Climate change adaptation – the Council might monitor housing in close proximity to a fluvial flood zone (in addition to intersecting) and also homes intersecting the 1 in 30 year surface water flood zone.
 - Climate change mitigation – there is a need to carefully consider how Local Plan monitoring links to wider monitoring of borough-wide emissions. On a specific point, it could be appropriate to monitor the proportion of new homes linked to a heat network (e.g. district-level); also the proportion of homes delivered to standards of sustainable design and construction that exceed building regulations.
 - Employment land requirements – given that the Employment Land Needs Study is now nearly two years old, and the regional and national economic context and baseline situation has evolved since that time;
 - Housing – the Council already monitors numerous housing delivery related matters through the Housing Land Supply Statement and Monitoring Report, and the list of indicators should be kept under review.
 - Transport – at Hall Farm / Loddon Valley there will be merit to monitoring the travel behaviours of residents in detail, in order to test the hypothesis that per capita emissions from transport can be minimised through a focus of growth at major growth locations.
 - Water – ongoing consideration should be given to any risk of capacity breaches at WwTWs and other risks to the status of water courses.

Appendix I: Regulatory requirements

As discussed in Section 1, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report (N.B. this is not the SA Report, but rather an 'interim' report); however, interpretation of Schedule 2 is not straightforward. Table A links the structure of this report to an interpretation of Schedule 2 requirements, whilst Table B explains this interpretation.

Table A: Questions answered by the SA Report, in-line with an interpretation of regulatory requirements

	Questions answered		As per regulations... the SA Report must include...
Introduction	What's the plan seeking to achieve?		<ul style="list-style-type: none"> An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
	What's the SA scope?	What's the sustainability 'context'?	<ul style="list-style-type: none"> Relevant environmental protection objectives, established at international or national level Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What's the sustainability 'baseline'?	<ul style="list-style-type: none"> Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan The environmental characteristics of areas likely to be significantly affected Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What are the key issues and objectives that should be a focus?	<ul style="list-style-type: none"> Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
Part 1	What has plan-making / SA involved up to this point?		<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) The likely significant effects associated with alternatives Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan
Part 2	What are the SA findings at this current stage?		<ul style="list-style-type: none"> The likely significant effects associated with the draft plan The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan
Part 3	What happens next?		<ul style="list-style-type: none"> A description of the monitoring measures envisaged

Table B: Questions answered by the SA Report, in-line with regulatory requirements

Schedule 2	Interpretation of Schedule 2		
The report must include...	The report must include...		
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>	
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>	i.e. answer - <i>What's the scope of the SA?</i>
(c) the environmental characteristics of areas likely to be significantly affected;	The relevant environmental protection objectives, established at international or national level		
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	i.e. answer - <i>What's the 'baseline'?</i>	
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The environmental characteristics of areas likely to be significantly affected		
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What are the key issues & objectives?</i>	
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Key environmental problems / issues and objectives that should be a focus of appraisal		
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach')	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]	
(i) a description of the measures envisaged concerning monitoring.	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.		
	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]	
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan		
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]	

Table C presents a discussion of more precisely how the information within this report reflects the SA Report requirements.

Table C: 'Checklist' of how and where (within this report) regulatory requirements are reflected.

Regulatory requirement	Information presented in this report
Schedule 2 of the regulations lists the information to be provided within the SA Report	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Section 2 ('What's the plan seeking to achieve') presents this information.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report, which was updated post consultation and is now available on the website.
c) The environmental characteristics of areas likely to be significantly affected;	The outcome of scoping was an 'SA framework', and this is presented – in an updated form - within Section 3 ('What's the scope of the SA').
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance...;	Messages highlighted through context and baseline review are also presented within Appendix III.
e) The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	<p>The Scoping Report presents a detailed context review and explains how key messages from the context review (and baseline review) were then refined in order to establish an 'SA framework'.</p> <p>The SA framework is presented within Section 3. Also, messages from context review are presented within Appendix III.</p> <p>With regards to explaining "<i>how... considerations have been taken into account</i>", Section 7 explains the Council's 'reasons for supporting the preferred approach', i.e. explains how/why the preferred approach is justified in-light of alternatives appraisal (and other factors).</p>
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.	<p>Section 6 presents alternatives appraisal findings (in relation to the spatial strategy, which is the 'stand-out' plan issue and hence that which should be the focus of alternatives appraisal/ consultation), whilst Section 9 presents an appraisal of the Revised Growth Strategy.</p> <p>All appraisal work naturally involved giving consideration to the SA scope, and the need to consider the potential for various effect characteristics/dimensions.</p>

Regulatory requirement	Information presented in this report
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	A range of recommendations are made as part of the appraisal presented in Section 9.
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Sections 4 and 5 deal with 'reasons for selecting the alternatives dealt with', with an explanation of reasons for focusing on certain issues / options. Also, Section 7 explains the Council's 'reasons for selecting the preferred option'. Methodology is discussed at various places, ahead of presenting appraisal findings.
i) description of measures envisaged concerning monitoring in accordance with Art. 10;	Section 11 presents measures envisaged concerning monitoring.
j) a non-technical summary of the information provided under the above headings	The NTS is a separate document.
The SA Report must be published alongside the draft plan, in-line with the following regulations	
authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)	This Interim SA Report is published alongside the Revised Growth Strategy, in order to inform the current consultation and next steps.
The SA Report must be taken into account, alongside consultation responses, when finalising the plan.	
The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.	This Interim SA Report will be taken into account when preparing the Proposed Submission Plan, alongside consultation responses received on the Revised Growth Strategy and this report.

Appendix II: The SA Scope

This appendix supplements Section 3 by presenting a high-level discussion of key issues and opportunities under each of the SA topic headings that comprise the back-bone of the SA framework.

N.B. only limited updates have been made to this section since the 2020 ISA Report. A full update will be undertaken after the current consultation (including taking account of any comments received on the SA scope).

Accessibility

Community infrastructure

Community facilities provide an important service to the local community. The ability to access meeting places, healthcare, libraries, local shops, cultural buildings, public houses, places of worship, sports venues and youth provision, forms a vital part of the quality of life for residents. There are a variety of community facilities across the Borough, that form an essential part of local settlements and centres to meet day to day needs and support sustainable, cohesive and integrated communities. For example, Finchampstead Baptist Church Centre is used by the church, youth groups, and a variety of other classes, with facilities including a sports hall, library and café.

National policy provides strong protection for community facilities, and local planning policies will have an important role to play ensuring that community facilities are provided in an effective and accessible way. Existing services must be protected as much as possible, whilst making sure that they are 'fit for purpose'. It is important that facilities keep pace with new development so that both existing and new communities have good access to community facilities. New development can put additional pressure on infrastructure and may create the need for new facilities and local services, so appropriate developer contributions will be important to fund delivery.

Although the retention of existing community uses is strongly supported, there may be situations where the community use is no longer required/viable. The nomination of a facility as an Asset of Community Value (ACV) is one way of identifying a building or land use that is important to the social wellbeing or interests of the local community. Once listed as an ACV the local community will be informed if listed for sale within a five-year period, allowing the community to enact a Community Right to Bid, and a period of six months to determine whether they can raise the finance to purchase the asset. A list of ACVs is available on the council website.

Open space, sports, recreation and play facilities

National policy recognises the importance of access to high quality open spaces and opportunities for sports and recreation, to the health and well-being of all. Wokingham Borough has a wealth of open space and outdoor recreation facilities, including additional provision delivered through new developments. New developments can provide opportunities to provide, protect and enhance new and existing public open, indoor and outdoor play, sport and recreational facilities, either through on-site measures or by contributing to off-site facilities.

Outdoor play space has a valuable role to enliven, inspire and educate our children and young people. The Play Space Design Guide (2018) supports the Borough Design Guide and Open Space, Sport and Recreation Strategy by providing guidance and specific requirements for the design of play spaces within the Borough, to help raise the quality of playable space.

Air and wider environmental quality

The planning system has an important role in directing the location of development that may give rise to pollution or other hazards. Pollution can be anything that affects the quality of land (including soils and the subsurface), air or water and that may have an adverse impact on human health, the natural environment or public amenity. Examples of pollution may include but are not limited to; noise, vibration, light, air quality, radiation, gas emission or the degradation of soil and water resources from their natural state.

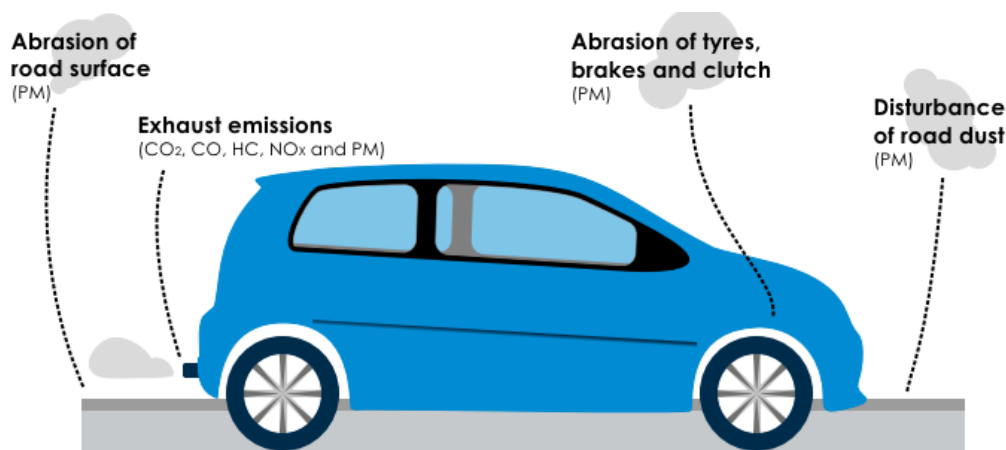
Pollution, both new and historic, can have a considerable impact on the local environment and on the health, well-being and quality of life enjoyed by individuals and communities within the Borough. The impact of both new and existing sources of pollution must be taken into consideration when locating new development.

Air pollution

National policy highlights the importance of planning policies in helping to sustain and contribute towards compliance with air quality objectives. Pollution in Wokingham primarily relates to pollutants emitted from road transport vehicles, along with other pollutants as specified within the UK Air Quality Strategy. Local Authorities have a duty to declare Air Quality Management Areas (AQMAs) and work towards achieving national air quality objectives in areas where residents are exposed to pollutants in excess of the objectives.

There are three declared AQMAs in the Borough. The Wokingham AQMA covers an area along the M4, as it transects Wokingham encompassing adjacent properties and part of the A329 where it passes under the M4. The two other AQMAs relate to two specific urban areas, the crossroads in Twyford and Wokingham town centre. There is also a need to be mindful of the extensive Reading AQMA, and AQMAs affecting Bracknell and Crowthorne.

Figure A: Vehicle emissions (Source: Draft Reading Local Transport Strategy 2036)



Noise pollution

Excess noise and vibration can have a harmful impact on sensitive receptors and lead to a loss of amenity in the immediate area of the source of noise pollution. Noise pollution must be a consideration where development sites are affected by a non-steady noise source, commercial or industrial noise, or noise that does not follow a typical diurnal pattern. The Institute of Acoustics has prepared Professional Practice Guidance on Planning and Noise here: www.ioa.org.uk/publications/propg. The guidance draws a distinction between indoor and outdoor noise levels, and discusses the importance of being able to open windows. A recent planning [appeal](#) also highlighted the importance of avoiding excessive noise in gardens in light of the experience of the Covid-19 pandemic.

Light pollution

Artificial lighting is capable of providing a safe secure environment where it is used appropriately; however, it is critical that there is no significant adverse impact on the amenity of the surrounding location. National planning policy states that that planning policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

Excessive light levels, ill-considered design schemes or poorly located light sources can all result in significant issues to sensitive receptors. These issues associated with light pollution include but are not limited to sky glow, glare and light spill/trespass. As an authority with a significant rural areas Wokingham Borough is highly sensitive to this form of pollution, which can affect the perceptual landscape of the countryside including its tranquillity and dark skies. Light pollution can disturb residents resulting in sleep deprivation and associated health problems.

Biodiversity

Wokingham Borough has a range of landscapes, as outlined in the Landscape Character Assessment (LCA), ranging from elevated chalk plateaus and open and settled clay farmlands, to coniferous plantations and heathland. Three notable watercourses flow through the Borough with the River Thames defining the northern boundary and the River Blackwater the southern boundary. The Blackwater is a tributary of the River Loddon which flows through the Borough to its confluence with the River Thames near Wargrave.

During the medieval period much of the Borough was part of the Windsor Forest, one of the great royal hunting grounds of England. The historically forested nature of the Borough is reflected in the place names with many of the principle settlements names such as Woodley, Whistley Green and Riseley containing the 'leah' sound associated with woodland clearings.

The Borough contains 7 Biodiversity Opportunity Areas, which have been identified as areas with the highest density of existing assets where there is the greatest opportunity to deliver strategic benefits through habitat creation and restoration.

There are a four nationally designated Sites of Special Scientific Interest (SSSIs), Stanford End Mill and River Loddon SSSI, Longmoor Bog SSSI, Heath Lake SSSI and the Lodge Wood & Sandford Mill SSSI. At a local level there are over 100 Local Wildlife Sites (LWS) with a further seven sites currently proposed for LWS status. The Borough is home to a large number of important species including European designated 'Notable and Protected' species such as European Otters.

Green infrastructure is a network of multi-functional green space and other green features, both urban and rural, which are essential for providing quality of life, wellbeing and environmental benefits for communities. Green infrastructure networks include, but are not limited to: countryside; open spaces; river valleys, corridors and wetlands; Sites of Urban Landscape Value (SULVs); Sustainable Drainage Systems (SuDS); landscape features; 'green' corridors, including ecological corridors; Suitable Alternative Natural Greenspace (SANG); allotments; amenity areas within developments; informal recreation areas; green routes and green route enhancement areas; country parks and public rights of way. Blue infrastructure is more specifically linked to water, including main rivers, pools, ponds, ordinary watercourses and SuDs, which often work in tandem with green infrastructure.

The Borough has a wide variety of green corridors, mainly associated with the three low land river valleys in the Borough: Thames Valley, Loddon Valley and the Blackwater Valley. They make a significant contribution to the character of the landscape and form an important part of the Borough's network of green and blue infrastructure, connected by a series of Greenways and Green Routes. In addition, the Borough also contains a wealth of parks and gardens, riverside paths, woodlands, allotments, common land and designated sites of nature importance, which provide vital ecosystem services and provide green spaces for informal / formal recreation.

The council's Greenways Strategy sets out the network of traffic free commuting and leisure routes connecting existing and new settlements, with a particular focus on the four existing Strategic Development Locations. Wherever possible, Greenways will have a hard, permeable surface which ensures accessibility for all users, including people with visual and physical impairments. A number of these routes have been delivered, which consist of existing public footpaths, byways and bridleways, with the aim of creating a network of connected traffic-free routes across the Borough.

This network of routes will be further expanded to ensure future development is well integrated and connected across the Borough. The establishment of the River Loddon Long Distance Path (LDP) will provide informal recreation links in the form of a footpath and bridleway to link the Thames Valley Path at Wargrave to the Blackwater Valley Path at Swallowfield. The River Loddon LDP will also link between many Greenway routes, in particular those greenways connecting to the SDLs at Arborfield Garrison and South of the M4. The establishment of the riverside footpath and cycleway along the Emm Brook will also provide for informal recreation links to connect in with Wokingham Town and Dinton Pastures Country Park at Winnersh.

Biodiversity net gain

Net gains in biodiversity means improvement through habitat creation and enhancement, with the aim of leaving biodiversity in a better state than before. This helps to deliver high quality sustainable development through the plan led system. The mitigation hierarchy must be applied as part of any biodiversity accounting process to ensure any potential harm is avoided. If harm cannot be avoided it must be reduced through appropriate mitigation measures. If any residual harm still remains after avoidance and mitigation then compensation can be sought through biodiversity offsetting on-site, or if necessary off-site. Biodiversity net gain does not apply to statutory designated or irreplaceable habitats, where any adverse impacts should be avoided as a general principle.

See further discussion in Section 5.2.

Habitat and biodiversity networks

National policy is clear that establishing coherent ecological networks that are resilient to current and future pressures can play an active role in enhancing the natural and local environment. Biodiversity cannot be preserved in nature reserves and wildlife sites alone. It is fundamentally reliant on the matrices of habitats across the wider landscape that provide stepping stones and wildlife corridors between them.

A coherent ecological network relies on protection of both key wildlife sites and habitat that provides functional connectivity. A network can be based on general ecological permeability and wildlife corridor principles but can also include a strategic landscape level approach to an individual species or habitat of principal importance.

Networks may be associated with BOAs or Living Landscapes with specific objectives for the creation, restoration, or reconnection of key habitats of principal importance. Wildlife corridors within a network can be in the form of open spaces, residential gardens, grass verges, retained hedgerows, ditches, rivers, or streams.

Thames Basin Heaths SPA

The Thames Basin Heaths Special Protection Area (SPA) is a network of heathland sites that provides a habitat for important species of ground nesting birds. The SPA is designated under law and provides a network of heathland sites that provide a habitat for important species of ground nesting birds, including the Dartford Warbler, Nightjar and Woodlark. The SPA sites do not fall or extend into Wokingham Borough, but the five kilometre 'zone of influence' covers a large part of the south of the Borough, alongside a wider 5-7km area.

Natural England has advised the Council, along with the other ten local authorities surrounding the SPA that the integrity of the SPA has the potential to be adversely affected by new development, through urbanisation, recreational activity and air pollution. The provision of Suitable Alternative Natural Greenspace (SANG) together with contributions towards Strategic Access Management and Monitoring (SAMM) would address the recreational disturbance issue to the Thames Basin Heaths SPA. These measures are unlikely to be acceptable unless agreed with Natural England in accordance with saved South East Plan policy NRM6.

The council has successfully established a network of SANGs across the Borough through previous development strategies, including through the four Strategic Development Locations (SDLs) identified in the Wokingham Borough Core Strategy. The council maintains a live list of SANGs, including their location and capacity.

SPA issues and impacts are considered through a stand-alone Habitats Regulations Assessment (HRA).

Climate change adaptation

Adaptation is about making sure future communities can live, work, rest and play in a comfortable and secure environment in the face of inevitable climate change. Taking action now to help successfully achieve adaptation measures would help to reduce vulnerability for people, businesses, services and infrastructure to climate change. Adaptation measures need to be built into all new developments to ensure the sustainable development of housing, businesses and the economy.

The impacts of climate change are predicted to increase over time, with winters getting warmer and wetter, while summers become hotter and drier. It is expected that there will be more extreme weather leading to impacts including intense rainfall and floods, heatwaves, droughts and increased risk of subsidence. These impacts will affect people's lives, homes and businesses as well as essential services and supplies such as transport, hospitals, water supply and energy. There will also be significant impacts on biodiversity and the natural environment.

Given the anticipated level of growth of the Wokingham Borough over the coming years, it is imperative that this growth takes place in a sustainable manner incorporating climate change adaptation technologies. Buildings, services and infrastructure need to be able to easily cope with the impacts of climate change. Part of this ability to cope relates to ensuring that new development is designed to adapt to more intense rainfall, the possibility of flooding, plus heat waves and droughts. The design of developments, including the use of materials, therefore needs to more carefully consider matters such as shading, insulation and ventilation, surface water runoff and storage and the use of appropriate tree and other planting.

Flood Zones

Flood Zones are the starting point for determining how to consider the implications of flood risk, and the sequential test. The Flood Zones refer to the probability of fluvial (river) flooding only. Flood Zone 2 (Medium Probability) and Flood Zone 3 (High Probability) are shown in Figure B. The Strategic Flood Risk Assessment (SFRA) (2019) sub-delineates Flood Zone 3 into 'high probability' (Zone 3a) and the 'functional flood plain' (Zone 3b).

There is also a need to take into account the impact of surface water flooding and drainage, ground water and other sources of flood risk. National policy is clear that local planning authorities should ensure that when determining planning applications, flood risk is not increased elsewhere.

On and off-site measures can help to reduce flood risk or even improve existing conditions. This can include showing how the proposal retains overland flow routes.

Figure B: Fluvial flood zones affecting Wokingham Borough and surrounding areas³⁴



Sustainable drainage

The use of well designed, constructed and maintained Sustainable Drainage Systems (SuDS) ensures a more efficient and resilient drainage system, and also helps to manage flood risk, improve the wider water catchment and improve resilience to the effects of climate change. Sustainable drainage is therefore integral to a development scheme. SuDS should be designed to meet national standards introduced through the Flood and Water Management Act 2010 to ensure the future sustainability of the drainage system.

SuDS can help to reduce the overall amount of rainfall being discharged to the drainage system from new development and help to reduce the Borough's susceptibility to surface water flooding. The approach is consistent with the Strategic Flood Risk Assessment and the Environment Agency Catchment Flood Management Plans. The Water Cycle Study – Phase 1 Scoping Study further supports the use of SuDS to manage water run off effectively.

The adoption and maintenance of SuDS is the responsibility of Wokingham Borough Council as the Lead Local Flood Authority (LLFA) and SuDS approving body. The council's SuDS Strategy (2016) contains guidance for the design and application of SuDS in the Borough, to assist developers designing schemes across varying scales. The Strategy is supported by the SuDS Technical Guide (2016) which sets out the technical requirements and expectations for SuDS in the Borough. Importantly, SuDS can support recreational opportunities and open space/green infrastructure, support climate change resilience through adaptation and mitigation, in addition to environmental benefits, such as water quality and biodiversity enhancements.

Climate change mitigation

Wokingham Borough Council declared a climate emergency on 18th July 2019, committing to playing as full a role as possible – leading by example as well as through encouragement – in achieving a carbon neutral Wokingham Borough by 2030. A [Climate Emergency action plan](https://www.wokingham.gov.uk/council-and-meetings/open-data/climate-emergency/) was published in January 2020, followed by an update in 2021, see: <https://www.wokingham.gov.uk/council-and-meetings/open-data/climate-emergency/>.

A discussion of key issues and opportunities for the Local Plan is presented in Section 5.2.

³⁴ Figure sourced from <https://flood-warning-information.service.gov.uk/long-term-flood-risk/map>

Further key context comes from the UK Net Zero Strategy (October 2021), and particularly the [section](#) on decarbonising heat. Within this section there are notable sub-sections covering:

- Heat networks –
 - *“We will also pass new legislation to regulate the sector for consumers, give heat networks the statutory powers they need to build, and regulate the carbon emissions of projects from the early 2030s.”*
 - *“We will also deliver new heat networks zones in England by 2025 where heat networks are the default solution for decarbonising heating.”*
- New buildings –
 - *“We will introduce regulations from 2025 through the Future Homes Standard to ensure all new homes in England are ready for net zero by having a high standard of energy efficiency and low carbon heating installed as standard. This should mean that all new homes will be fitted with a low carbon heat source such as a heat pump or connected to a low carbon heat network. To reinforce this, we will consult on whether it is appropriate to end new gas grid connections, or whether to remove the duty to connect from the Gas Distribution Networks. As an interim measure to the Future Homes Standard, we plan to introduce an uplift in standards, effective from June 2022, for England that would result in a 31% reduction in carbon emissions from new homes compared to current standards. We will also respond to our consultation for the Future Buildings Standard for new non-domestic buildings.”*

Communities

Vulnerable people

A key issue nationally is the ageing population. As the population of the Borough increases and ages, the level of disabilities, health issues and mobility problems amongst the older population and vulnerable communities is projected to increase, along with the specialist housing to address their needs.

There is a need to recognise specific and complex housing needs by providing the opportunity for people to remain in their own homes, with the tools to live independently. Whilst some of this need will derive from an ageing population, they also emerge from the fact that many ‘vulnerable people’ with other existing needs.

Vulnerable people require the assistance of others for a range of reasons, including mental health problems, learning disabilities, physical and sensory needs, drug or alcohol problems, vulnerability due to age (either younger or older people) and domestic abuse. The council’s Housing Strategy supports self-reliance and independent living for residents, which can help reduce the likelihood of vulnerable people living in institutional settings, reducing the need for expensive care services and unnecessary admissions to hospital.

Housing in Multiple Occupation

The conversion and sub-division of buildings into dwellings or multiple occupation can provide additional residential accommodation that makes more efficient use of existing properties. Within Wokingham Borough, HMOs comprise only a small portion of the housing stock and are not generally common. Nonetheless, they can, due to being a relatively low cost housing option, make a positive contribution by meeting a particular type of accommodation need e.g. for students, people on low incomes, or for single young professionals.

Whilst the conversion and sub-division of buildings can make a positive contribution, this can only be achieved where the original property is suitable, and where the cumulative impacts on the wider area and its communities are acceptable. An overconcentration of HMOs in has the potential to lead to fundamental and unacceptable changes to an area’s established character.

Permitted development allows the conversion of dwellings to smaller HMOs (i.e. to C4 planning use class) and therefore planning permission is not usually required. However, planning permission is necessary to create HMOs of greater than 6 bedrooms or when permitted development rights have been removed.

In addition to setting planning policy, the council reserves the right to use Article 4 directions for specific areas if sufficient evidence emerges that greater controls on HMO conversions are required.

Licensed nuclear installations

Whilst there are no Atomic Weapons Establishments in Wokingham Borough, there are two licensed nuclear installations located in the adjoining local authority West Berkshire District Council. These are the Atomic Weapons

Establishment sites in Aldermaston and in Burghfield. The activities within the AWE Burghfield include final assembly, maintenance and decommissioning of warheads.

Regulation of the AWE Burghfield requires the delineation of detailed and outline emergency planning zones to reduce the potential impact on the public of any accident arising from site operations. Planning Practice Guidance (PPG) provides general advice about the need for consultation regarding development proposals in the vicinity of licensed nuclear installations. This is a requirement of longstanding government policy which is administered by the ONR. The consultation thresholds and zones are agreed locally between the local emergency planning authorities (which is West Berkshire Council) and the ONR and are kept under review. The Detailed Emergency Planning Zone (DEPZ) around AWE Burghfield has recently been extended, to now include areas around Three Mile Cross and Spencers Wood in the south west of the borough.

The ONR's decision to advise against a particular development will be based on the extent to which the Off-Site Emergency Plan can accommodate the additional population.

Economy

See dedicated discussion of matters relating to employment land in Section 5.2.

A further consideration is the matter of supporting the hierarchy of centres within the Borough (also within neighbouring local authority areas), mindful of shifting retail and wider societal trends, including following the experience of the Covid-19 pandemic and national lockdowns.

National policy encourages local planning authorities to pursue policies which support the vitality and viability of town centres. This recognises that town centres are at the heart of communities, with policies seeking to manage and facilitate growth. However, the retail sector and the role of town centres is changing and facing challenges more recently. Successful town centres are places which are activity based places where the community can gather; places, where not only shops but complementary uses draw people into the centre. As a result, there is reduced emphasis on protecting all A1 retail uses and a shift towards providing complementary mixed use centres. This has been reflected in the removal of primary and secondary frontages from policy and guidance and through changes to the Use Class Order allowing for certain changes away from retail without planning permission.

To better understand the retail and commercial needs of western Berkshire, the four authorities of Reading, Bracknell Forest, West Berkshire and Wokingham commissioned a study to look into the specific needs of each authority. The Western Berkshire Retail and Commercial Leisure Assessment (2016) sets out the need for comparison and convenience floorspace over the period 2016 – 2036 across the four authorities. The assessment was based on qualitative and quantitative methods, including telephone surveys and the impact of recent development. The assessment calculated the 'need' for 5,000m² of comparison goods (non-food stores such as clothing and electronics) and 12,000 m² of convenience goods (food stores) by 2036.

Since the publication of the assessment, there has been significant progress in the rejuvenation of Wokingham Town Centre, which has provided additional floorspace for retail, leisure and entertainment uses. This has diversified the type of uses available in Wokingham Town Centre, and has increased footfall. However, the Covid pandemic has had impacts from high streets and centres across the country. Although the impact of the pandemic is as yet unclear, it is likely that it will have accelerated the shift to online retailing and resulted in store closures. A flexible approach to meeting retail needs will therefore need to be taken moving forward

Historic environment

Wokingham Borough and its settlements have an expansive history dating back through the modern era into the ancient with settlements occupied for over a thousand years. The settlements of Barkham, Earley, Finchampstead, Hartley (Hartley Court Road), Remenham, Shinfield, Sonning, Swallowfield, Warfield, Wargrave and Whitley are all recorded in the Domesday Book.

There are currently 16 designated conservation areas spread across 12 of the Borough's Parishes. These areas are of special historic or architectural interest where additional efforts are in place to preserve their unique characteristics. The Borough is also peppered with listed buildings ranging in size and prominence, all of which have been given protection because of their special architectural or historic interest. Wokingham Borough also contains many nationally and locally designated historic parks and gardens.

It is important to recognise the close links between objectives relating to landscape and the historic environment. The Borough's Landscape Character Assessment (LCA) includes a discussion on the historic environment for each of the defined landscape character areas.

Housing

Affordability

The 2011 census recorded Wokingham Borough as having 62,474 dwellings, with the predominant housing type detached or semi-detached. Since the 2011 census, the total number of dwellings is predicted to have risen to 67,180³⁵ with the majority of this housing being delivered within the four strategic development locations (SDLs) located at North Wokingham, South Wokingham, South of the M4 and on the site of the former Arborfield garrison.

According to the Land Registry³⁶ the average price of a home in the Borough is £444,320 substantially higher than the England average of £287,895. As a result, the affordability of housing remains an important issue, particularly for younger residents.

Housing mix

National Policy requires local authorities to ensure that their forecast housing needs are met through the provision of a range of housing types and sizes. The 2016 Berkshire SHMA distinguishes between the size mix that may be suitable for new market homes and the size mix for new affordable homes. Households who are able to afford market homes are more likely to buy or rent larger properties, to satisfy a preference for more space and this is supported by Census data from 2011 when 70% of households in the market sector had three or more bedrooms, compared to 35% of households in the affordable sector. These differences mean that it is appropriate to deal with issues of housing mix separately for market and affordable homes. The Local Housing Needs Assessment (LHNA) (2019) further considered the housing needs of different groups in Wokingham Borough.

Housing standards

The government has sought to consolidate a wide range of standards required for new housing across the country. The approach relies on minimum requirements in the Building Regulations for most matters, but to set a small number of 'optional' national standards over and above Building Regulations minimums, which local planning authorities can choose to apply. These cover internal space and accessibility.

These 'optional' standards can only apply where a policy is included in a Local Plan. This policy therefore applies those standards in Reading Borough. It should be noted that the standards are only 'optional' for the local planning authority to apply in their areas, but that once applied, compliance in line with the policy is compulsory. Conditions will be applied to relevant planning permissions to ensure compliance with the policy.

Housing standards help to ensure the health and well-being of our residents. Providing the appropriate types of housing can reduce unhealthy living conditions, injuries in the home and social isolation.

There are two levels of options standards for accessibility:

1. M4(2) of the Building Regulations is for accessible and adaptable dwellings.
2. M4(3) relates more specifically to wheelchair user dwellings.

Internal Space Standards

Ensuring sufficient levels of internal space is essential to the quality of life of residents of the Borough, which is a key element of the vision for the Borough. The Council is concerned that a great deal of development has now taken place under permitted development rights that provides inadequate internal space. This cannot be controlled, but, where it is possible to do so, it is important to ensure that there is as much housing with adequate internal space as possible.

All new housing should have sufficient internal space to cater for a variety of different household needs with the aim of promoting high standards of liveability, accessibility and comfort. Sufficient internal space also supports independent living as live circumstances change and support home working to help minimise the need to travel.

³⁵ ONS Live tables on dwelling stock (14 November 2019) www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants

³⁶ See <https://landregistry.data.gov.uk/app/ukhpi/browse?from=2020-09-01&location=http%3A%2F%2Flandregistry.data.gov.uk%2Fid%2Fregion%2FEngland&to=2021-09-01&lang=en>

Affordable housing

Affordable housing is subsidised housing, which enabled the asking price or rent to be set at a lower level than the prevailing market cost. This allows people on lower incomes to access housing, with mechanisms ensuring that the housing remains available to others that might need it in the future.

The Local Housing Need Assessment (LHNA) has identified an overall need for affordable housing of 7,255 dwellings over the period 2018-2036, equivalent to 403 dwellings per annum. This figure includes households currently in the private rental sector, but aspiring to become owner-occupiers, and who may be able to afford housing as their income increases over time; alongside those unable to afford housing.

Government planning policy expects developments of 10 or more dwellings to contribute towards meeting the need for affordable housing through a proportion of the new dwellings being affordable housing, or as an exception off site provision or a financial contribution in lieu. Policy H5 of the Draft Local Plan consultation (2020) proposed to lower this threshold to 5 or more dwellings.

Several tenures of housing fall within the definition of affordable housing set out in national policy. This includes affordable housing for social rent and shared ownership, alongside other tenures including affordable rent, starter homes and discounted market sales housing. The council has a shared ownership model designed to ensure that homes remain affordable for our residents. Further information is contained in the council's Affordable Housing SPD.

There is demand for a variety of unit types and sizes across the Borough. The Local Housing Needs Assessment (2019) has highlighted the need for affordable one bedroom flats and two bedroom houses in particular.

Gypsies and travellers

National policy, set out in the Planning Policy for Traveller Sites (PPTS), is aimed at ensuring *“fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community.”* It requires local planning authorities to assess the accommodation needs of Gypsies and Travellers and Travelling Showpeople, and to set targets to address this.

National policy, set out in the Planning Policy for Traveller Sites (PPTS), sets out the definition of Gypsies and Travellers for the purposes of planning policy. This definition has created a split in policy definition between those who travel, and those who have permanently ceased to travel.

Local planning authorities are required to identify the types of homes required by Travellers who do not meet the PPTS definition. This is consistent with duties under the Housing Act 1985 (as amended by the Housing and Planning Act 2016). This requires consideration of the needs of people living on sites on which caravans can be stationed. This will include Gypsies and Travellers who, though they may have ceased to travel and therefore no longer meet the PPTS definition, nevertheless continue to have a cultural aversion to bricks and mortar accommodation and therefore require specific, culturally relevant accommodation.

For this reason, the Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessment (GTAA), which was published in September 2017, established a range of need based on 'Cultural Gypsies and Travellers' – i.e. those with a cultural aversion to living in bricks and mortar accommodation – and the subset of those who fall under the PPTS definition.

The council considers that, in reality, the housing needs of both 'cultural' and 'PPTS' travellers will be met through the same provision and there is likely to be a mix on certain sites of those Gypsies and Travellers who meet the PPTS definition and those that do not.

The GTAA found:

- Need for 26 – 90 permanent pitches for Gypsies and Travellers 2017/18 - 2035/36.
- Need for a transit site comprising 5 pitches (each capable of accommodating 2 caravans).
- No need for Travelling Showpeople plots.

Since the GTAA was published, 7 additional pitches have been approved and delivered and a further 11 pitches have been granted planning permission as at 31 March 2021. The remaining need is therefore 8-72 pitches.

Land, soils and natural resources

Agricultural land

A foremost consideration is the need to avoid the loss of agricultural land classed as ‘best and most versatile’ (BMV), which the NPPF defines as that which is grade 1 (highest quality), grade 2 or grade 3a. The nationally available agricultural land quality dataset shows variation in agricultural land quality across the Borough; however, this dataset has low accuracy (indeed, it does not differentiate between grades 3a and 3b) and low spatial resolution (e.g. to the extent that smaller villages are not recognised as urban land) such that it must be used with caution.

Another dataset is available showing agricultural land quality with a much higher degree of resolution and accuracy, on the basis that it reflects the findings of field surveys, namely the “Post 1988” dataset; however, this dataset is very patchy, and covers only a small part of the Borough.

Figure C: Agricultural land quality to the west of London including Wokingham Borough (highlighted) according to the nationally available dataset (grade 1 = dark blue; grade 2 = light blue; grade 3 = green)³⁷

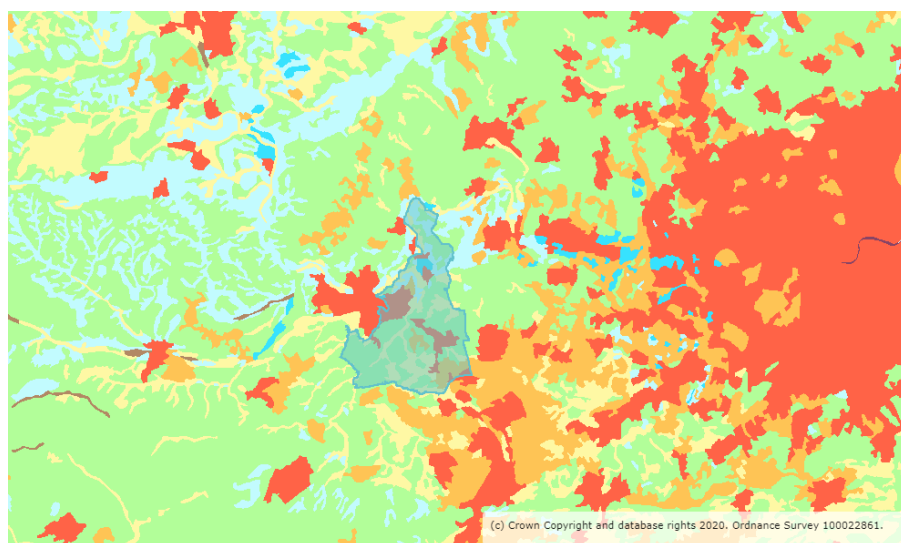
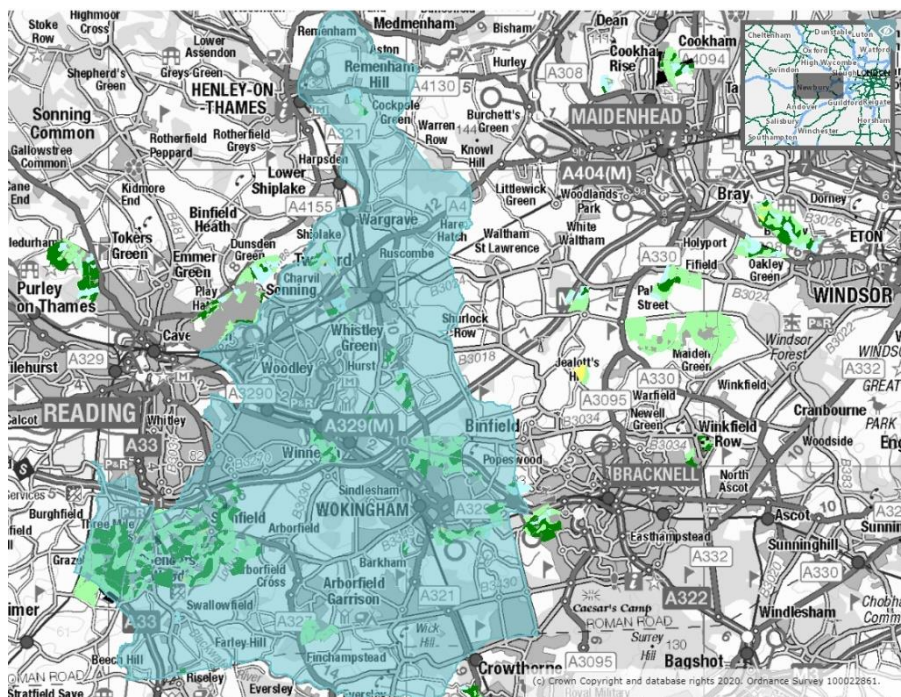


Figure D: Areas of land in Wokingham Borough for which detailed data is available (grade 2 = blue; grade 3a = dark green; grade 3b = light green)



³⁷ Figures sourced from www.magic.gov.uk

Waste and minerals

Wokingham Borough Council is working together with Bracknell Forest Council, Reading Borough Council and the Royal Borough of Windsor and Maidenhead to prepare the Joint Central and Eastern Berkshire Minerals and Waste Plan, which will set out the long-term strategy for minerals extraction and waste management across the four authorities. Development proposals relating to aggregate or waste management should therefore meet the requirements of both the Local Plan Update and the Joint Central and Eastern Berkshire Minerals and Waste Plan.

The Joint Minerals and Waste Plan and the Local Plan reflects the government's ambition of zero avoidable waste by 2050. It also aims to support minimisation of waste and management of waste in accordance with the waste hierarchy, which contributes towards the national policy goal of net self-sufficiency within each waste planning authority. New waste facilities delivered as part of new strategic scale development can contribute towards this. New waste facilities may also be suitable on land currently in use for general industry (B2), and storage and distribution (B8). Further information is included in the Joint Minerals and Waste Plan.

Wokingham has a history of mineral extraction with historic aggregate quarries and brick clay works. The principle geological deposits in the Borough are sharp sand and gravel aggregate that are widely used in the construction industry. Minerals are a finite resource that can only be worked where they occur naturally. As a result, to preserve mineral resources it is important to ensure the sterilisation of mineral bearing land through non-mineral developments is avoided. The finite nature of mineral resources is an important consideration when planning for growth, given quantity of materials needed to construct new buildings and infrastructure. Where aggregate is extracted locally, including on development sites, it can reduce vehicle movements.

The Joint Central and Eastern Berkshire Minerals and Waste Plan sets out the position of Mineral Safeguarding Areas (MSAs), as part of Minerals and Waste Safeguarding Areas (MSWA). The location of MSAs are based on data provided by the British Geological Survey (BGS). MSAs indicate the presence of aggregate resources that be taken into consideration from the earliest stage in the planning process. There is no presumption in favour of development proposals for mineral extraction in an MSA, and nor will other development types be precluded providing specific justification is provided and accepted.

There is currently no minerals infrastructure in the Borough.

Contaminated Land

National planning policy supports the use of previously developed land, which can enable development in sustainable locations. However, in the presence of contaminated land it is important that the future health and quality of life of existing and future occupiers is not put at risk.

Although Wokingham has never been a heavily industrialised area, there are parts of the Borough with potentially contaminated land. The Wokingham Borough Council Contaminated Land Strategy (2015) sets out how the council intends to manage those sites and the potential risks arising. Following remediation, as a minimum, land should not be capable of being determined as contaminated land under the Environmental Protection Act (1990).

Landscape

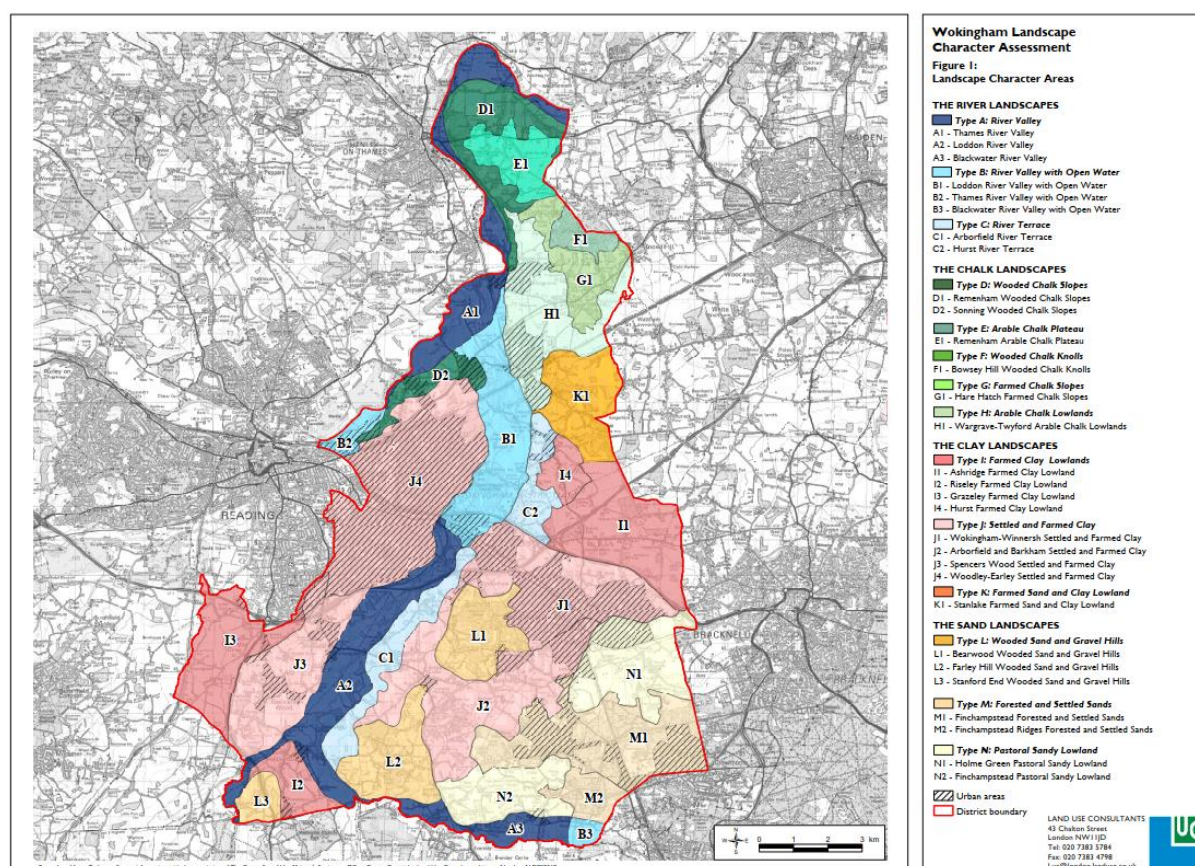
Landscape character

The Landscape Character Assessment (LCA) forms the primary document in relation to the character and valued attributes of the landscape of the Borough, by identifying and describing variations in landscape. The LCA acts as a positive tool to guide land uses and planning, including the management of future change. Figure D presents landscape character areas, highlighting a broad distinction between the following broad landscape types:

- River landscapes
- Clay landscapes
- Chalk landscapes
- Sand landscapes

All landscapes are important, but some will have particular value and exhibit the specific attributes and characteristic landscape features of a specific landscape character area. These landscapes are considered representative of the landscape type or have characteristics that create a strong sense of place. National policy highlights the importance of protecting and enhancing valued landscapes.

Figure E: Landscape character areas in Wokingham Borough



Sites of Urban Landscape Value

Across the Borough, there are a number of open and undeveloped areas within the urban areas of settlements that provide an important contribution to local character, amenity and landscape. Some of these areas also provide an essential role by supporting biodiversity for habitats and species, as well as providing communities with opportunities for informal/formal recreation. These are known as Sites of Urban Landscape Value (SULV). Four SULVs were designated in the Managing Development Delivery Document (MDD) local plan (2014).

As part of the Draft Local Plan consultation the council reviewed the existing SULVs and considered whether the designation of additional SULVs is justified. The review recommended retaining the existing SULVs. In addition, two other areas of land at Woollahill Meadows and at Cantley Park are recommended for designation.

The SULVs form part of the setting and identity of the settlements of Earley, Wokingham and Woodley. They are primarily open spaces interspersed with and bounded by, mature trees. They also include individual landscape features such as ponds, woodlands and hedgerows. The treed nature of the SULVs provides a softer and semi-rural fringe, which results in some of the built-up areas being barely discernible at both close and distant views.

Locally Valued Landscapes

See discussion in Section 5.2.

Watercourses

There are three low land river valleys across the Borough: the Thames, Loddon and Blackwater. They make a significant contribution towards the character of the landscape and form an important part of the Borough's network of green and blue infrastructure, connected by a series of Greenways and Green Routes. They provide vital ecosystem services including in respect of natural flood management and recreation.

The River Thames in particular makes a valuable contribution to the setting and landscape of the Borough, stretching from north east from Thames Valley Park, via Henley-on-Thames towards Remenham. The Thames is a popular location for tourism, recreation and sporting activities, including boating activities, and walkers using the popular Thames Path. The Thames Waterway Plan, and Thames River Basin Management Plan, alongside other relevant documents together play an important role in maintaining and enhancing such a valuable natural asset.

The health of all watercourses are under pressure from a variety of issues including abstraction, pollution originating from development, and increased human associated disturbance. The council's latest SuDS Strategy indicates that the assessed surface water bodies and groundwater bodies in the Borough are currently achieving either 'poor' or 'moderate' overall status in line with the WFD (with the exception of Farnborough Bagshot Beds), and none are achieving a 'good' status.

Trees and vegetation

The Borough is fortunate to benefit from areas of mature woodland, including ancient woodland, in addition to trees, ancient or veteran, near veteran trees and hedgerows. This includes several important tree lined routes, a number of which are important historically. Imposing tree lined roads like Wellingtonia Avenue in Finchampstead are an excellent example of the important contribution trees can make to the character of the area. Ancient woodlands, ancient or veteran and near veteran trees cannot be recreated once lost.

Development pressures around areas of woodland have served to highlight the importance of protecting the Borough's existing woodland. Tree Preservation Orders (TPOs) are used to protect specific trees, groups of trees or areas of woodland. Where development may have an impact upon ancient woodland or veteran trees, the Natural England and the Forestry Commission's Standing Advice on Ancient Woodland and Veteran Trees and its associated Assessment Guide applies.

Existing trees and hedgerows can play a vital role in mitigating the impact of climate change, including through shading, carbon storage and a reduction in pollutants. These features can also help to define the landscape and character of the Borough and provide multiple benefits to the urban environment including maintaining and enhancing biodiversity. Trees are an important component of the character of many parts of the Borough, particularly within Conservation Areas and help to achieve a landscape structure within new developments.

Transportation

Benefiting from a large number of desirable transport connections, Wokingham Borough is well connected at both a regional and national level. Train stations in the Borough provide direct services to both London Waterloo and London Paddington via the Reading-Waterloo Line (via Bracknell) and the Great Western Main Line (via Maidenhead and Slough) respectively. Twyford Station will also be a stop for Crossrail, with the Elizabeth Line further linking Wokingham Borough to central London and beyond. Gatwick Airport is also easily accessible via a direct train from Wokingham Station on the North Downs line (via Guildford), and Heathrow Airport is nearby.

The M4 corridor, connecting London with Wales and South West England, runs the width of the Borough, the M3 lies to the south of the Borough and can be reached via the A33, which itself connects Wokingham Borough to Basingstoke. The A4 runs through the Borough connecting it to other centres, such as Reading, Newbury and Maidenhead. The A329M/A3290 also connects Wokingham with both Bracknell and Greater Reading.

As part of the existing developments strategy, the council has been actively investing in strategic infrastructure, including new roads. Infrastructure improvements across the Borough will support development currently underway, or which is expected to be delivered over the longer term. The provision of new roads and transport links will add flexibility to the capacity of our transport network and improve our highways connectivity. Recently delivered and forthcoming improvements to the transport network include:

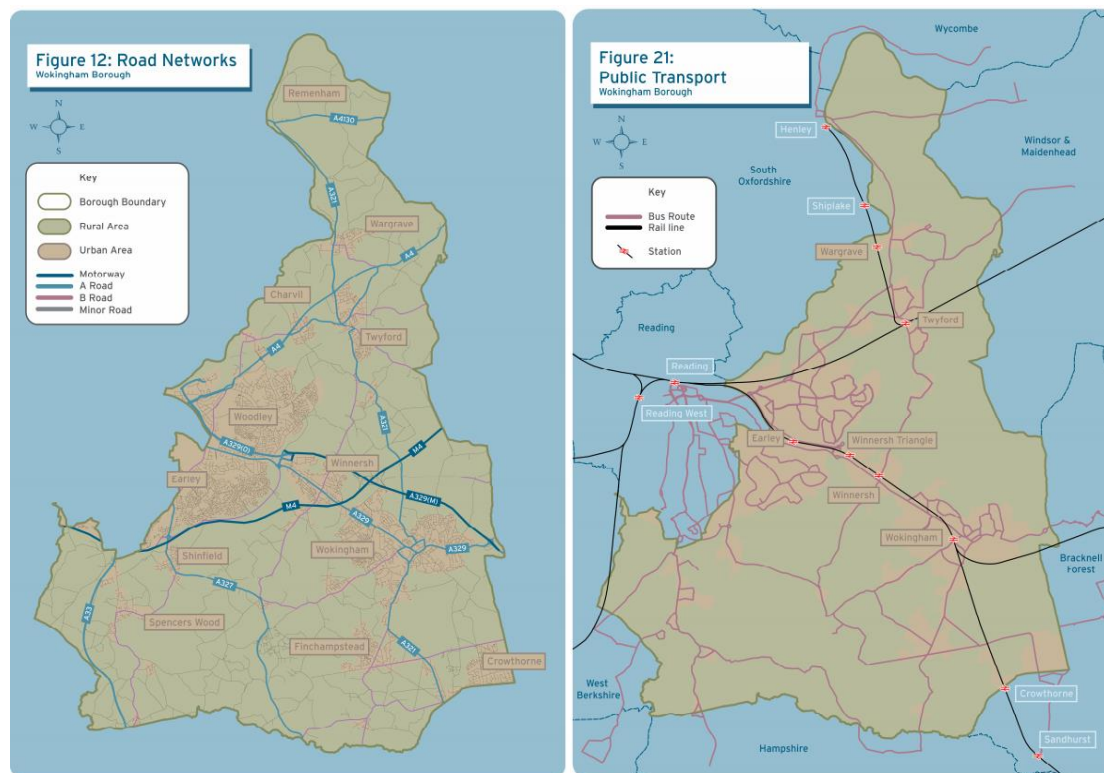
- The Arborfield Cross Relief Road;
- Barkham Bridge Improvements
- Winnersh Relief Road Phase 2
- South Wokingham Distributor Road
- North Wokingham Distributor Road

Additionally the Borough is traversed by a number of Public Rights of Way and both National and Local Cycle Routes furthering the opportunity for active travel, and providing wider health and wellbeing benefits.

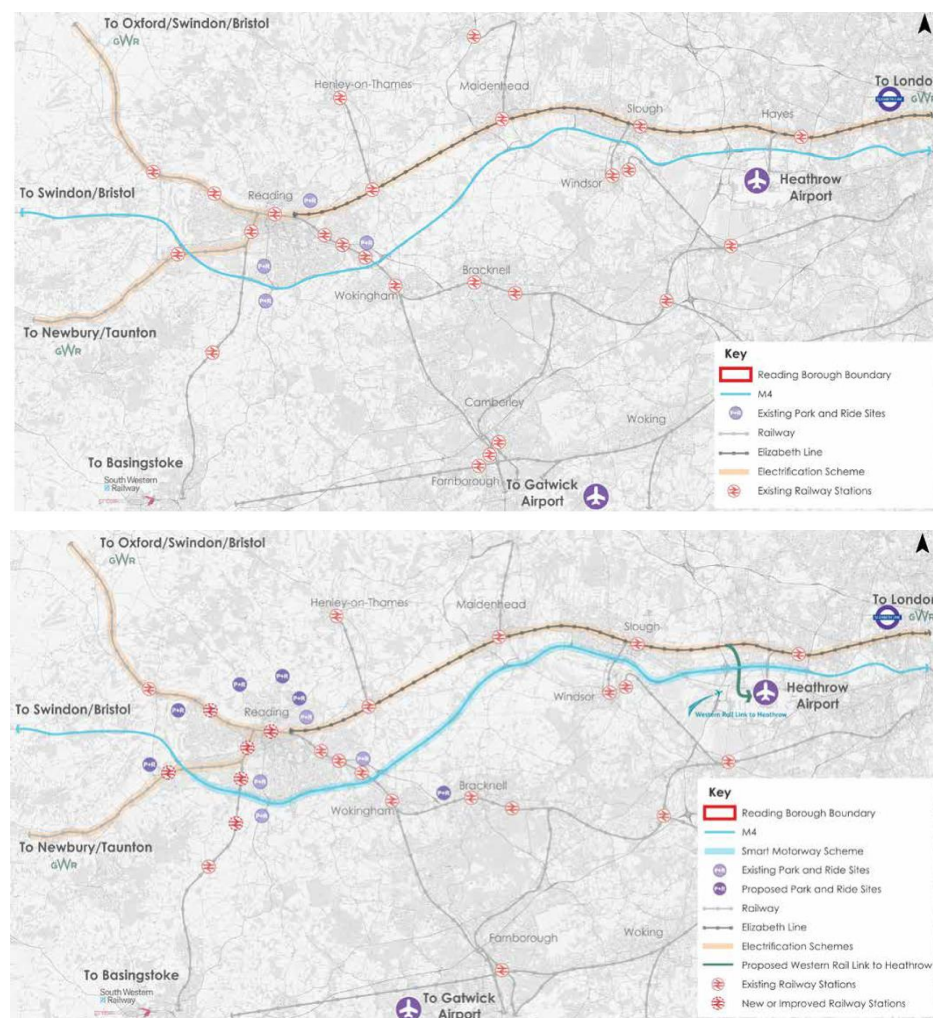
Figure F shows key transport infrastructure at the time of LTP3 in 2011, but is now somewhat out-of-date, for example it does not show the correct route of the A327 following the opening of the Arborfield Cross Relief Road.

Figure G and H are then taken from the Draft Reading Local Transport Strategy 2036 (2020), notably highlighting new proposed/planned Park and Rides.

Figure F: Strategic transport infrastructure (source: LTP3, 2011)



Figures G and H: Existing and planning strategic transports connections (source: Draft Reading LTS 2036)



Bus travel

The sub-national transport body – Transport for the South East - recently [responded](#) to the Government's Net Zero Strategy stating that:

“... investment is needed across the whole transport network. Looking not only at increasing the availability, affordability and convenience of electric vehicles, but also working towards improving other modes of transport and reducing car-dependency. The additional investment in local transport systems and bus networks cited in the strategy will be essential to support this modal shift.”

Focusing on bus networks, the following statement from the National Bus Strategy: Bus Back Better is also of note:

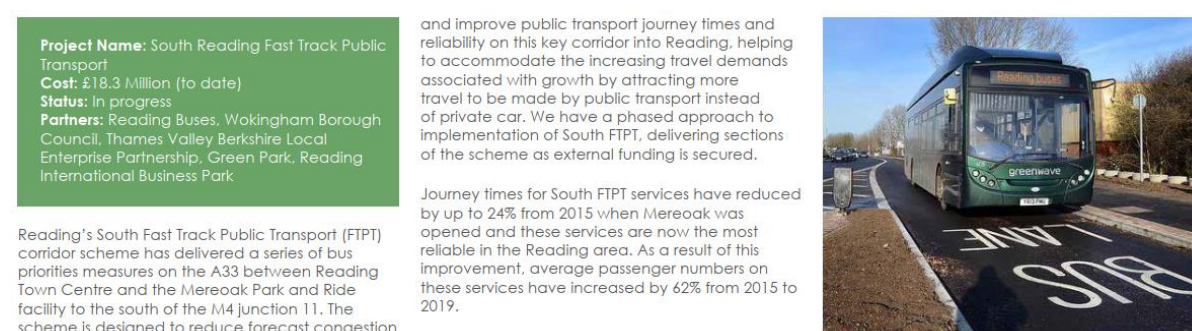
“To avoid the worst effects of a car-led recovery – cities and towns grinding to a halt; pollution, road injuries, respiratory illness and carbon emissions all rising – we need to shift back quickly, by making radical improvements to local public transport as normal life returns. Buses are the quickest, easiest and cheapest way to do that.” Bus Back Better encourages integration of transport and land use planning at the strategic level, and this is also a key message within the Transport for the South East Transport Strategy (2020) - see Figure 5.13.

It is also important to note that Reading is a national success story in respect of use of public busses in place of the private car – see Figures I. Also, Figure J presents a specific case study of a recently delivered upgrade.

Figure I: Case-study from the National Bus Strategy: Bus Back Better (2021)



Figure J: Case-study from the Draft Reading Transport Strategy 2036 (2020)



Walking and cycling

The Town and Country Planning Association (TCPA) recently published: “20-Minute Neighbourhoods: Creating Healthier, Active, Prosperous Communities; an Introduction for Council Planners in England” – see www.tcpa.org.uk/guide-the-20-minute-neighbourhood. The report explains:

“Societies around the world are facing a number of urgent, interconnected problems, including how to reduce carbon emissions; how to help people become more active to improve health and wellbeing; how to reduce loneliness; and how to improve high streets and neighbourhoods that have declined.”

Further context comes from Manual for Streets (DfT, 2007c) and Manual for Streets 2 (CIHT, 2010) and the Living Streets: A Highways Guide for Developers in Wokingham.

In addition to the consideration of distance to services, the quality of the route to these services is equally important. Walking and cycling routes should be coherent, direct, safe, comfortable and attractive routes otherwise residents will be deterred from walking to these facilities.

Figure K: Features of a 20-minute neighbourhood (TCPA, 2021)



Electric vehicles

Wokingham Borough has one of the highest car ownership rates in England, which serves to highlight the importance not only of reducing the need to travel and car dependency, but also supporting the switch-over to EVs, and also supporting wider innovations such as car and bike sharing, delivery hubs, autonomous vehicles etc.

Electric and hybrid vehicle ownership is increasing, and petrol powered cars will no longer be sold from 2030.³⁸ One of the principal barriers to increased use of low-emissions vehicles is the lack of supporting infrastructure and in particular, charging facilities at residential properties. It is therefore important that provision of adequate electric vehicle charging facilities is designed into development proposals from the outset. As well as slower speed charging at home, there is also a need for fast charging infrastructure at employment sites in a variety of public locations, including rapid charging on main transport routes. A number of charging facilities have been installed across the Borough, notably following the regeneration of Wokingham Town Centre.

The council's Local Validation List requires proposals for all major development to submit an Electric Vehicle Charging Strategy. This should include details relating to on-site infrastructure, installation of charging points and consider the future proofing of the site. This will be considered on a case-by-cases basis, with agreement from the council prior to commencement of development. It is much more cost effective if provision is made from the outset of new development, thereby avoiding costly retrofitting.

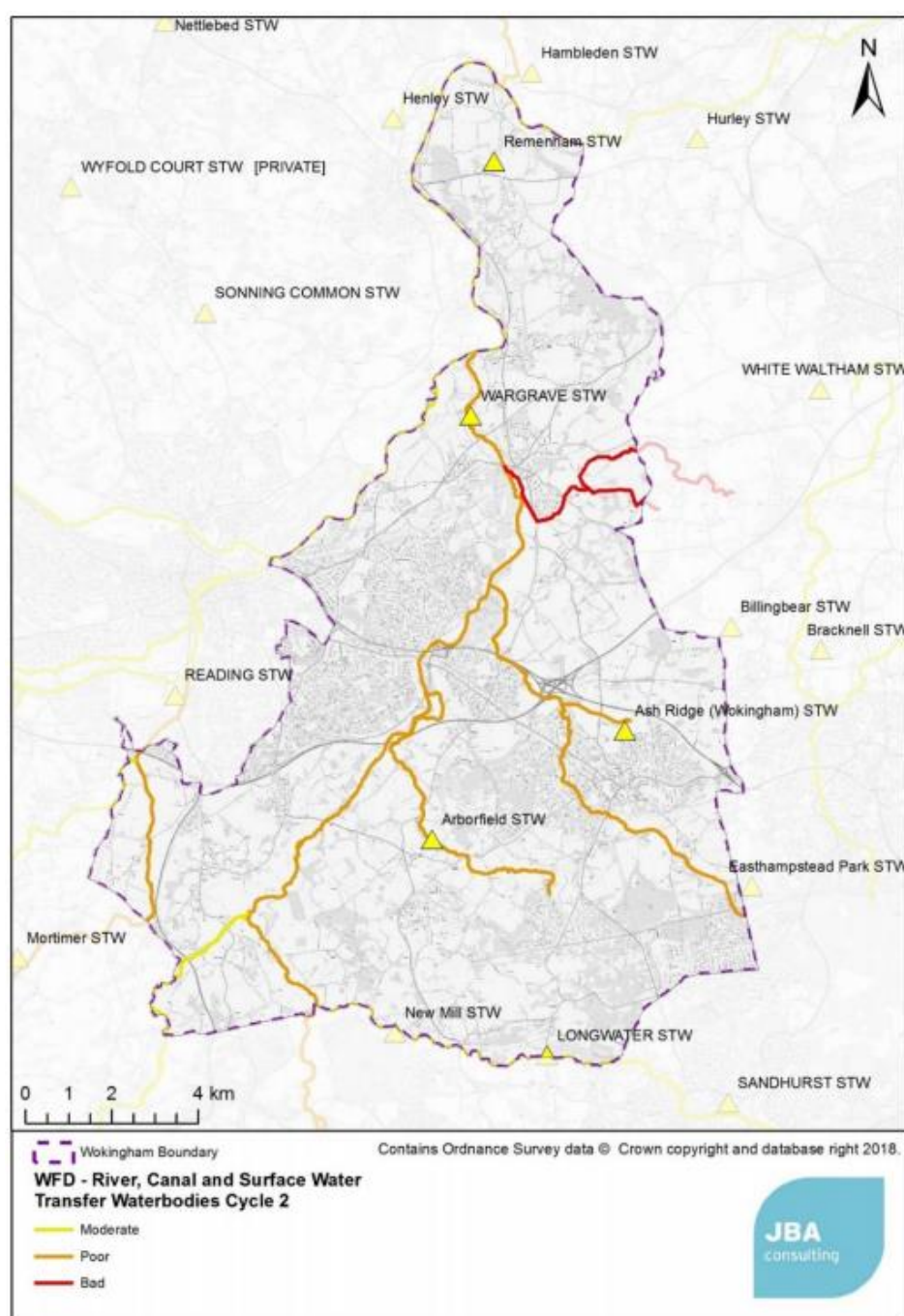
³⁸ See www.gov.uk/government/news/government-takes-historic-step-towards-net-zero-with-end-of-sale-of-new-petrol-and-diesel-cars-by-2030

Water

Issues are explored in detail through the Wokingham Borough Water Cycle Study (WCS) Scoping Report (January 2019) under the following headings: water resources; water supply infrastructure; wastewater collection infrastructure; wastewater treatment capacity; water quality; flood risk from additional foul flow; odour from WwTW; and environmental constraints.

Two primary considerations for the Local Plan relate to enabling and requiring standards of water efficiency in new developments and ensuring that growth is directed to locations where there is waste water treatment capacity, or the potential to deliver upgrades to capacity, such that there is a low risk of capacity breaches, i.e. water pollution events. In respect of water efficiency, the WCS discusses the justification for achieving standards designed to ensure 110 litres of water use per person per day. In respect of wastewater treatment, the WCS discusses the existing capacity and potential for upgrade at all of the wastewater treatment works that serve the Borough – see Figure F, which also identifies one water course within the Borough as failing to meet WFD quality standards. The Draft Local Plan consultation (2020) supported the higher optional standard of 110 litres per person per day.

Figure F: Wastewater treatment works and achievement of WFD water quality standards



Appendix III: Large strategic sites

Introduction

The aim of this appendix is to present an appraisal of the three competing large strategic site options discussed in Section 5.3, as part of the wider discussion of establishing reasonable growth scenarios for appraisal.

The three options are introduced in Section 5.3 as follows (north to south):

Name	Area (ha)	Capacity (homes)	Notes
Twyford / Ruscombe	154 / 232 ³⁹	2,000 - 2,500	Three options were examined closely over the period 2018-20, before the ISA Report (2020) focused attention on a shortlist of two (2,000 and 3,000 homes; see Table A in Appendix IV) before further focusing on the 2,000 home option (see paragraph 5.52). The scheme promoter is proposing 2,500 homes, and recent reports in the local press suggest the potential for a new (potentially relocated) rail station; however, this was not mentioned as an option in the consultation response received in 2020, and nothing has been submitted to the Council in the time since the consultation. 1,500 homes to be delivered in the plan period (i.e. a relatively slow rate, because Berkeley propose to deliver the scheme as the sole house-builder).
Ashridge	226	3,000	Was ruled out early in the process in 2019 (para 5.49 of the ISA Report), but a detailed scheme proposal and supporting evidence was then submitted in August 2021. The promoters suggest 3,000 homes in the plan period, but there are potential delivery issues given the number of landowner interests, so 2,000 in the plan period is a cautious assumption.
Hall Farm / Loddon Valley	527	4,500	A 1,000 homes scheme was ruled out relatively early in the process in 2019 (para 5.52 of the 2020 ISA Report). The Strategic Masterplan Report (2021) then identified the potential for a much larger and more holistic scheme, stretching across the Loddon Valley, with housing focused to the east and employment to the west, associated with the expanding Thames Valley Science Park (TVSP; see Box 5.1) and another headline issue is strategic planning for green and blue infrastructure along the Loddon Valley. 2,200 homes to be delivered in the plan period.

The following high-level concept masterplans serve to inform the appraisal, although there is also a need to recognise that scheme proposals have not necessarily been agreed with WBC, would require more detailed masterplanning in the form of an SPD, and are subject to change.

³⁹ The smaller area assumes no land south of the railway. There are sensitivities here, and so the assumption in 2019/20 was that a c.2,000 home scheme would focus to the north only; however, at the current time there is some uncertainty regarding whether there could be a need for homes and/or new infrastructure south of the railway under a '2,000-2,500 home' scenario.

Figure A: East of Twyford/ Ruscombe
Scenario 2 from the 2018 Strategic Growth Locations Report)

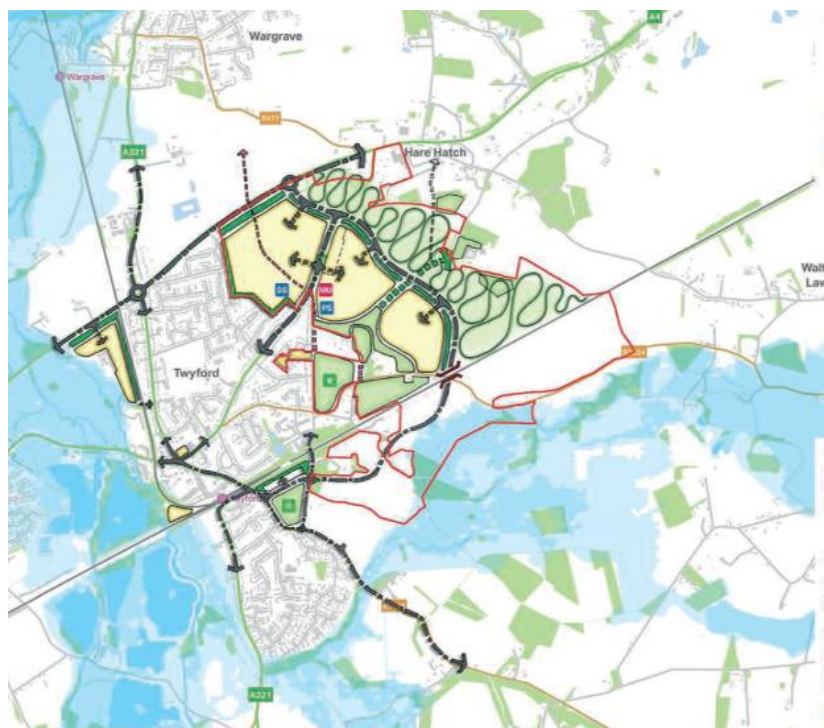
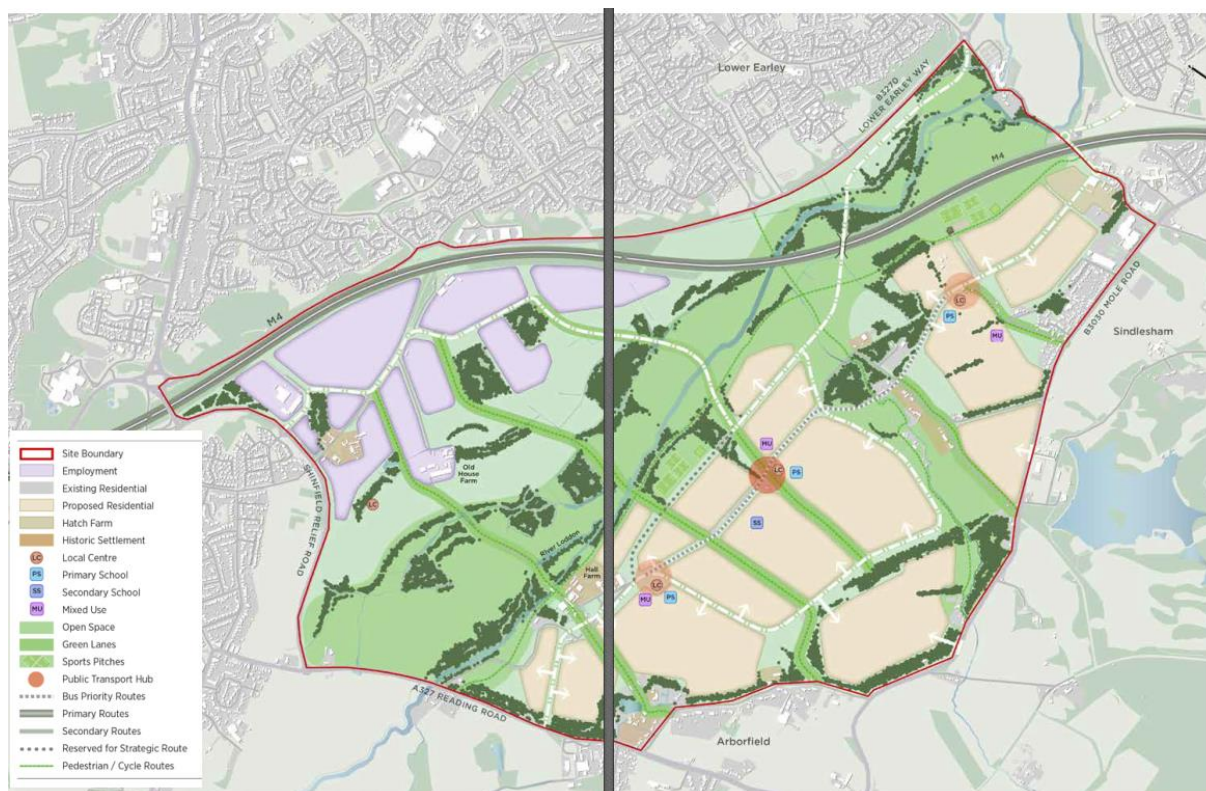


Figure B: Ashridge
Concept masterplan prepared by the site promoter in 2021



Figure C: Hall Farm
Concept masterplan from the Strategic Sites Report (2021)



Appraisal methodology

Appraisal findings are presented below across 13 tables, with each table dealing with a thematic sustainability topic (see Section 3). Within each table the performance of each of the options is categorised in terms of significant effects (using **red** / **amber** / **light green** / **green**)⁴⁰ and the options are also ranked in order of preference. Where there is no colour assigned, this indicates effects that are broadly neutral.

Further points on methodology are as follows:

- Significant effects – in accordance with the SEA Regulations, the primary aim is to “identify, describe and evaluate” significant effects in respect of each element of the established appraisal framework in turn. Equally, the aim is to differentiate effectively, regardless of significant effects.
- Systematic appraisal – conclusions on significant effects and relative performance are reached on the basis of available evidence and understanding of key issues and opportunities, mindful of the guidance presented within the Schedules 1 and 2 of the SEA Regulations, and the Planning Practice Guidance.
- Overall conclusions - a final concluding section considers significant effects ‘in the round’, but does not aim to reach an overall conclusion on the sustainability of each of the options, or place them in an overall order of preference. Any attempt to do so necessitates assigning weight to each element of the appraisal framework, which is outside of the scope of SA (it is a task for the decision-maker, *informed by* SA findings).
- Evidence – a key consideration is the extent to which it is appropriate to take account of materials submitted by site promoters, in respect of proposals for bringing forward sites (e.g. mix of uses, areas of greenspace) and directing limited funds to measures aimed at mitigation (e.g. infrastructure upgrades) and ‘planning gain’ (e.g. affordable housing). There is certainly a need to take site specific proposals into consideration; however, there is a need to apply caution, as site specific proposals are subject to change, and there is a need to avoid unduly biasing in favour of development schemes for which more work has been undertaken.

⁴⁰ **Red** indicates a significant negative effect; **amber** a negative effect that is of note but with limited or uncertain significance; **light green** a positive that is of note but with limited or uncertain significance; and **green** a significant positive effect.

Appraisal findings

The tables below present appraisal findings in relation to the large strategic site options.

Accessibility

East of T/R	Ashridge	Hall Farm LV
2	2	

Discussion

As strategic developments all three schemes would benefit from economies of scale that lead to funds being made available to deliver, or make land available for, community infrastructure. It is anticipated that the largest of the schemes, **Hall Farm LV** will deliver three distinct neighbourhoods, each containing a local centre / community facilities and a 2/3FE primary school. The central neighbourhood additionally includes a 12 FE Secondary school; and the scheme would also deliver a comprehensive network of green spaces (over 65 hectares). Furthermore, there is the options of potentially supporting a major new healthcare facility (see discussion here: <https://www.wokingham.today/trust-plans-new-royal-berkshire-hospital/>).

Of similar scale, the **Ashridge** scheme is anticipated to deliver two Local Centres and a District Centre, along with two primary schools, other community facilities and open / greenspace, including a parkland at the western extent. The effect of delivering new community infrastructure alongside new homes will be that new residents in the area benefit from good 'accessibility,' and also that additional pressure on existing facilities in the Borough and neighbouring centres will be reduced. No secondary school is proposed.


It is also fair to say that residents of any new settlement at either Hall Farm or Ashridge would have good access to higher order community services and facilities via road and sustainable travel links, as discussed below (for Ashridge the site promoters notably suggest that "*one of its biggest advantage is the mesh of this existing social infrastructure*"). In terms of Hall Farm, proposals for the site include a 'strategic route reserve corridor', utilising sustainable movement opportunities to connect with Reading, Winnersh and Wokingham.

While smaller than the other two strategic site options, the **East of T/R** option also performs relatively well in respect of access to community infrastructure, with the representation received from the site promoters in 2020 stating: "*The development can provide a new primary school with nursery and a second campus for the Piggott School [and] new local facilities such as a community facility, healthcare facility, touch down facility for Thames Valley Police, café, gym and co-working space [and] Twyford Parish Council and Ruscombe Parish Council have no permanent office and meeting place; the development could provide them with new purpose built facilities for the local Parish Councils.*"

With regards to access to existing community infrastructure, it is important to note that that Twyford is a Tier 1 settlement with a range of services and facilities. A secondary school would be nearby to the northern part of the site; however, the town centre would be beyond 1,200m distant from most parts of the site, and some parts could be beyond 2km under a scenario whereby development stretches to the east. Another consideration is good accessibility to higher order services and facilities in Reading by train, with potential locations for housing to the south of the railway line within 800m of the station. Good bus connectivity to Reading along the A4 is another benefit, as discussed below.

In **conclusion**, all of the options perform well; however, there is a stand-out opportunity at Hall Farm LV, particularly noting the possibility of supporting objectives relating to the future of the Royal Berkshire Hospital, albeit there is much uncertainty regarding the nature of the opportunity at the current time. East of T/R is a smaller scheme, leading to more limited potential to deliver strategic community infrastructure alongside new housing, but the proposal to support a second campus for the Piggott School is significant. At Ashridge the proposal is not to deliver a new secondary school, but the site could be well-linked to Wokingham.

Air and wider environmental quality

East of T/R	Ashridge	Hall Farm LV
	3	2

Discussion

A key consideration here is the need to avoid worsening of air quality - and ideally achieve improvements to air quality - within the three key air pollution hotspots locally, namely Reading (where an AQMA covers the town centre and beyond), Wokingham (where an AQMA follows the main roads through the town centre) and Twyford (where an AQMA is associated with the town centre crossroads). There is also a need to account for the M4 AQMA, and recognise noise pollution issues associated with both the M4 and the A329M.


It follows that all three of the option are associated with significant issues.

At **Hall Farm LV** and **Ashridge** the key issue is the M4 AQMA; however, there will be good potential to avoid and mitigate air and noise pollution through masterplanning and potentially engineering measures (e.g. potentially noise bunds). The concept masterplan for Hall Farm LV notably proposes employment adjacent to the motorway, whilst at Ashridge the proposal is for a large area of greenspace adjacent to the M4/A329M junction (although elsewhere housing is proposed in relatively close proximity to all the three of the main road corridors, namely the M4, A329M and A321) as well as 'noise and carbon sequestration bunds' (although this requires clarification, as matters relating to air quality and decarbonisation should not be unduly conflated).

With regards to **East of T/R**, the key issue is the nearby AQMA at Twyford crossroads. It is also a concern that traffic congestion in Twyford could worsen as a result of increased commuter traffic following the arrival of Crossrail services (to and across central London) in 2022. An assumption central to consideration of strategic growth here is that any scheme would deliver a new relief road, which would enable some traffic (specifically traffic approaching Twyford from the east, along the A4, and heading towards Wokingham to the south) to bypass the town centre cross-roads AQMA. There is considerable support for a relief road, which would also be in accordance with wider urban realm objectives for the town centre. Other considerations relate to noise and air pollution from the rail and A3032 corridors (albeit noting that the rail corridor is electrified).

In **conclusion**, strategic expansion of East of T/R and the associated delivery of a town centre relief road represents a significant opportunity, on the assumption that this would prove deliverable in practice; however, there is also a note of caution in that there could be a relatively high rate of car trips to access the town centre. With regards to the other two sites, these are both constrained by proximity to one or more major road corridors, and there is a particular concern in respect of Ashridge. Also, as larger sites there is a need for further traffic modelling work to explore offsite impacts on the road network (taking account of deliverable infrastructure upgrades), with potential air quality implications.

Biodiversity

East of T/R	Ashridge	Hall Farm LV
	2	2

Discussion

Beginning with the strategic site option that is subject to the least constraint - **East of T/R** – the site is located in close proximity to two Biodiversity Opportunity Areas (BOAs), but does not intersect either, and the Wokingham Landscape Character Assessment (2004) suggests limited functional linkages between the site and the more wooded landscapes to the northeast and south. Development would, however, envelop the Ruscombe and Vale Woods Local Wildlife Site (LWS), which is a c.2.8 ha non-ancient woodland.

In contrast, the other two large strategic site options are notably constrained in biodiversity terms:

- **Ashridge** – comprises a part of the Borough associated with a notably high density of woodland and, indeed, the north-eastern part of the site comprised a large ancient woodland – Ashridge wood – until late in the 20th Century. There is also a need to consider the remnant parkland habitats associated with the Billhill Estate, at the western extent of the site, which was bisected by the M4 in the late 20th Century. The proposal is to avoid



loss of ancient woodland within the site, but there could still be a risk of indirect impacts, for example recreational impacts and loss of functionally linked hedgerows, copses and trees. The site does not contain any LWSs, but much falls within the Berkshire BOA. Masterplanning for the site shows housing development within the BOA, however the proposal is also to give over 45% of the site area to green infrastructure.

- **Hall Farm LV** – is inherently sensitive on account of its close association with the River Loddon corridor, as well as the Barkham Brook and its confluence with the Loddon. A high proportion of the site comprises floodplain grazing marsh priority habitat, although this land is subject to flood risk and so would not be at risk of direct impacts, plus there is a high density of small woodland patches, including two small patches of ancient woodland. The site is strongly associated with a BOA, and there are several LWSs within the site. There would be good potential to avoid and buffer habitat patches and corridors between habitat patches, and detailed work has been completed suggesting the potential to achieve a biodiversity net gain, through strategically targeted habitat creation and enhancement, plus there would be an opportunity to increase access to and appreciation of the river corridor; however, concerns do remain at this early stage. It is recognised that the site could alternatively be viewed as two separate development locations either side of (i.e. adjacent to but not intersecting) a natural capital and ecosystem services enhancement zone.

In **conclusion**, Twyford/ Ruscombe performs relatively well. Focusing on Hall Farm LV, on one hand onsite and adjacent habitats could constrain the ability to achieve a biodiversity net gain (as measured at an appropriate functional scale); however, on the other hand, compensatory habitat enhancement and/or creation within, adjacent or nearby to the site could prove well targeted, i.e. could prove well aligned with strategic biodiversity objectives.

With regards to significant effects it is difficult to draw strong conclusions, recognising the likelihood of biodiversity net gain being a policy and likely legal requirement; however, on balance it is appropriate to flag the risk of a negative effect for the two worst performing options.

Climate change adaptation

East of T/R	Ashridge	Hall Farm LV
		2

Discussion

The key consideration here is the need to avoid development - in particular residential - encroaching on fluvial flood risk zones, noting the possibility of expanded flood risk zones under climate change scenarios. A secondary consideration is the need to avoid surface water flood risk zones, noting that it is often possible to deal effectively with surface water flood risk through masterplanning and design measures, namely sustainable drainage systems (SuDS). Another consideration is development impacts (either positive or negative) to water flows and, in turn, down-hill / down-stream flood risk; however, it is difficult to identify issues at the strategic level.

Beginning with the strategic site options that are subject to the least constraint - **East of T/R** and **Ashridge** sites are not constrained by flood risk, with both sites falling entirely within Flood Zone 1. With regards to East of T/R, a stream corridor and associated flood zone is located to the south of the railway; however the assumption here is that little or no development would be directed to this area. With regards to surface water flood risk, it appears that this could be an issue for East of T/R more so than Ashridge, but it seems unlikely that surface water flood risk would be a constraint to effective masterplanning at either site.

Hall Farm LV is constrained by the flood zone of the River Loddon, which crosses the site north-eastwards, whilst Barkham Brook also flows through the east of the site. There is a network of drains across the site which are tributaries of the River Loddon and Barkham Brook and are largely designated as Ordinary Watercourses. It should be possible to avoid sensitive uses in the fluvial flood zone, but there is also a need to be mindful of downstream flood risk affecting Earley and Winnersh. It is fair to assume high quality Sustainable Drainage Systems (SuDS), and there could be the potential for 'betterment' (e.g. development could fund new strategic flood water attenuation onsite, leading to reduced flood risk affecting the A3290/B3270 and other areas downstream; a study was completed in 2018, as discussed within the Level 2 Strategic Flood Risk Assessment, 2021), but there is a need for caution at this stage.

In **conclusion**, there is a need to flag a degree of risk associated with Hall Farm LV, albeit work completed to date envisages developing directed to flood risk zone 1. As well as flood risk affecting the site, there is also a need to consider the risk of surface water run-off and, in turn, downstream flood risk affecting Earley and Winnersh. In

practice there will be much potential to complete detailed work to avoid and mitigate flood risk, and potentially achieve a betterment. There will be a need to work closely with the Environment Agency.

Climate change mitigation

East of T/R	Ashridge	Hall Farm LV
2	1	1

Discussion

With regards to **built environment emissions**, there are strong arguments for supporting a focus of growth at a strategic site where viability is highest, with a view to facilitating:

- low and zero carbon (LZC) infrastructure, including heat networks (which require strategic planning and typically necessitate higher densities and a fine grained mix of uses);
- buildings designed to achieve net zero or otherwise ambitious levels of regulated (operational) emissions;⁴¹
- an ambitious approach to unregulated emissions, including embodied and other non-operational emissions, including by supporting modern methods of construction (e.g. offsite construction of modular homes); and
- ‘smart energy systems’ – seen as a priority within the Energy South 2 East Local Energy Strategy (2020) and the recent Energy White Paper (2020), which includes a major focus on delivering a ‘Smart Electricity System’.

Another consideration, in respect of built environment emissions, is the need to consider the possibility of locating growth in proximity to strategic heat sources (also locations with strategic heat demand, e.g. leisure centres), with a view to facilitating delivery of heat networks; however, no particular opportunities are known to exist at the current time. There could feasibly be opportunities associated with the proposed/potential use mix at **Hall Farm LV**; however, on the other hand, uses are likely to be highly segregated within the site, separated by the river corridor.

A further consideration, in respect of built environment emissions, is the possibility of strategic growth locations supporting the use of hydrogen, including potentially for heating. Hydrogen is a major focus of the Ten Point Plan for a Green Industrial Revolution (2020) and the Energy White Paper (2020), and the recent Hydrogen Strategy (2021) proposes a new ‘hydrogen town’ by the end of the decade (also, a consultation is due on the case for enabling, or requiring, new natural gas boilers to be easily convertible to use hydrogen (‘hydrogen-ready’) by 2026).

Further site-specific consideration are as follows:

- **East of T/R** – benefits from a proposed nucleated (as opposed to polycentric) form, which could feasibly be supportive of heat networks; however, the scheme is not expected to include significant employment floorspace, and few if any detailed proposals have been received from the site promoter.
- **Ashridge** – offers the advantage of both scale and a nucleated form, and detailed proposals have been received from the site promoter, although there is naturally a need for a note of caution regarding viability and deliverability at this early stage. Amongst other things, the submitted materials propose: *“Ashridge will consist of 6 neighbourhoods grouped such that each neighbourhood is served by a [Energy, Mobility and Community (EMC) Hub... In relation to energy, the Hubs will act as local sources of both incoming and outgoing utilities, achieving a balance between distribution losses and efficiencies achieved through community sharing.”*
- **Hall Farm LV** – work to identify site and scheme specific opportunities has been undertaken for both Hall Farm LV (Renewable Energy Provision Statement, 2021). The report explains that building level decarbonisation options typically associated with large scale strategic schemes will be feasible (e.g. passive and active measures to reduce energy demand for heating and cooling; roof top PV; air source heat pumps). It is also noted that the Strategic Sites Report (2021) states that “Passivhaus standards should be the goal” (which is a strong ambition).

With regards to **transport emissions**, matters are a focus of discussion below, under ‘Transport’, where the overall conclusion is that it is very difficult to differentiate between the three options at this stage, in respect of the potential to support trip internalisation and modal shift towards walking, cycling, public transport, electric vehicles and other

⁴¹ Regulated emissions are those covered by the building regulations. It is common for Local Plan policies to require levels of emissions below the Building Regulations requirement, and potentially even to require net zero regulated emissions for major schemes (which invariably necessitates offsetting).

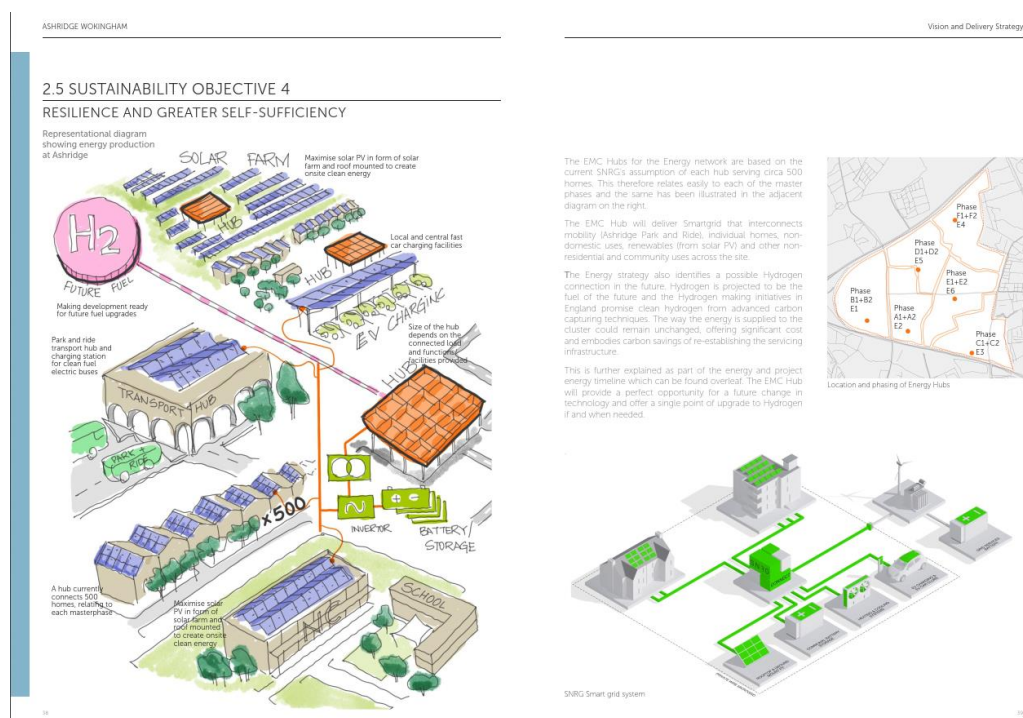
low carbon modes of travel. There is potentially a concern regarding Ashridge, given uncertainties regarding costly infrastructure upgrades (e.g. to support high quality bus services), but this is uncertain.

In **conclusion**, it is difficult to conclude that any of the large strategic sites in question are associated with a *particular* opportunity, on the basis of the available evidence. There is a need for further work by all site promoters to demonstrate why the site in question is an appropriate location to focus strategic growth, from a decarbonisation perspective, and explain how decarbonisation objectives fit with the scheme vision, masterplanning principles etc. There is also a need for further work on viability to understand tensions between decarbonisation objectives and wider objectives, e.g. infrastructure, affordable housing.

However, work to identify site and scheme specific opportunities has been undertaken for both Hall Farm LV (Renewable Energy Provision Statement, 2021) and Ashridge (submitted promoter materials, 2021), and it is also the case that these sites are notably larger than East of T/R, so it is appropriate to highlight Hall Farm LV and Ashridge as the preferable sites. Comparing the two, it is fair to highlight that Ashridge could benefit from being a more nucleated scheme, although Hall Farm LV could be associated with an opportunity due to its mixed use nature and/or drawing ambient heat from the River Loddon.

With regards to effect significance, there is a need to balance an understanding that climate change mitigation is a global consideration, such that local actions can only ever have a limited effect, with the fact that there is a highly ambitious local net zero target in place. On this basis, and on balance, it is considered appropriate to flag a concern with all three of the options.

An example of some of the decarbonisation focused materials submitted for Ashridge



Communities

East of T/R	Ashridge	Hall Farm LV
3	2	1

Discussion

The matter of accessibility to community infrastructure has already been discussed above, under the 'accessibility' heading; however, there remain a range of other community-related matters for discussion.

Hall Farm LV stands out as the largest of the schemes, and it is therefore appropriate to highlight the opportunity to deliver a high quality development that not only includes an excellent range of community infrastructure (as discussed above), but also achieves high standards in respect of the urban realm and built environment. The Strategic Sites Report (2021) proposes "a series of identifiable neighbourhoods which are resilient, compact, safe


and friendly places characterised by active streets, attractive homes for all, and with good access to everyday services and facilities". Furthermore, landscape-led masterplanning will *"shape neighbourhoods within strategic open spaces so that residents have easy access to the wider network of green infrastructure"*. Consideration is also given to the effect of a new settlement on the edge of existing settlements Shinfield and Arborfield, transforming these smaller villages. Key site features highlighted through the Strategic Sites Report (2021) are its 'sensitive edges', which could be avoided through *"a master planned approach which can define a clear stand-off from existing settlements as part of the wider approach to landscape design and strategic planting"*. Strategic growth in this area may also have a degree of merit from a place-making perspective, for example recognising that Arborfield has relatively limited historic character, in the Borough context.

Maintaining a focus on place-making and robust communities in the broadest sense, site promoters for **Ashridge** also describe *"6 unique neighbourhoods with distinct 'place-identity'"*. These each are promoted to *"lead to greater community cohesion and promote sense of ownership. Each neighbourhood will sit in their own distinct landscape setting with spatial and architectural design informed through site wide and neighbourhood codes."* The need for design codes reflects Ashridge's rich historic environment, as discussed further below, under Historic environment. However, there is an element of uncertainty, at the current time, regarding the extent to which Ashridge would function as an urban extension to Wokingham versus a connected new settlement.

This is also a stand-out consideration in respect of **East of T/R**, with there being a potential issue in respect of maintaining the identity of Ruscombe as a distinct historic settlement. Twyford is also an attractive place which is much liked by its residents, with key features recognised by site promoters as *"worthy of careful consideration as part of the masterplanning exercise"*.

In **conclusion**, given its scale it is appropriate to highlight Hall Farm LV as representing the greatest opportunity to deliver a thriving new community, however the potential to impact upon existing communities of Arborfield and Shinfield cannot be overlooked. With regards to East of T/R, a stand-out concern is in respect of impacts to the existing community at Ruscombe.

Economy

East of T/R	Ashridge	Hall Farm LV
2	2	

Discussion

The available evidence indicates that existing and committed employment sites will ensure that there is sufficient employment floorspace in the Borough to meet demand over the plan period, at least in broad quantitative terms (there is also a need to factor-in qualitative considerations relating to various different types of employment floorspace). However, projections of employment land demand/supply balance are inevitably associated with a degree of uncertainty, given uncertainty regarding the national and local economy and changing business needs.

It follows that there is merit to supporting mixed used schemes that deliver targeted new employment floorspace. In this respect **Hall Farm LV** stands out as performing well, as there is the potential for housing growth to support the aspirations to deliver a major new employment and enterprise hub south of the M4 / east of Shinfield, including and closely associated with Thames Valley Science Park (TVSP). However, it is important to recognise that much of the employment land is already committed, so attention must focus on that which would be 'unlocked' or otherwise facilitated by strategic housing growth. The provision of a new strategic junction on the M4 would support land uses which have a more regional distribution such as employment and medical related; however, it is not possible to assume a new junction at this stage.

With regards to **Ashridge**, there is no clear proposal to deliver significant new employment land, though the site promoters suggest that a new local centre will *"complement the [existing] Ashridgewood Business Park"*. It is also recognised that Ashridge is strategically located in the sense of having very good connectivity to Reading, Bracknell and Wokingham, although highways capacity and congestion is a key issue for the site.

East of T/R would likely deliver more limited new employment land, but the site is well connected by road and rail to important employment destinations, including Thames Valley Park and Reading town centre to the west, also Maidenhead to the east.

In **conclusion**, there is a need for further work, but at this stage it is appropriate to highlight that Hall Farm LV could represent a significant opportunity, in respect of supporting the achievement of economic growth objectives.

The Local Enterprise Partnership (LEP) highlighted growth at TVSP as a priority through the previously consultation (2020), and the view of the LEP will be again sought through the current consultation.

Historic environment

East of T/R	Ashridge	Hall Farm LV
3	1	1

Discussion

All three sites are associated with notable constraint, but it is **East of T/R** that stands out as most constrained, as it seems clear that there would be a significant impact to the setting of Ruscombe Conservation Area, where there is a grade 1 listed church and six other listed buildings. Furthermore, there is a need to consider the value of historic links between Ruscombe and assets / clusters of assets in the surrounding countryside, including Hare Hatch to the north east. Also, Stanlake Park is potentially a constraint to the south, in particular as Stanlake Manor House is highly visible in the landscape, although the house is only Grade 2 listed. Also, whilst there are no scheduled monuments within the site boundary, it may be fair to conclude that this part of the Borough may be associated with a high likelihood of archaeology, with the Landscape Character Assessment (2004) stating that: “A low density of late Neolithic, Bronze Age and Iron Age settlement evidence suggests that there may have been early clearance of the woodland and cultivation of the chalk soils, with an expansion of prehistoric settlement from the river valley...” However, on the other hand, it is recognised that the amenity, quality and character of the Conservation Area are currently undermined by the traffic which dominates the village centre. Expansion would deliver a new relief road, to the benefit of Twyford Conservation Area.

With regards to Hall Farm LV and Ashridge, both are associated with one stand-out cluster of assets, but in both cases it is safe to assume that the cluster would be integrated as part of the strategic green infrastructure network.



In the case of **Ashridge**, there is a cluster of five listed buildings associated with Bill Hill Park, plus there is a remnant parkland landscape; however, the firm proposal is for land here to mostly (though not entirely) be used for accessible greenspace, and there could be an opportunity around opening-up access to former parkland west of the M4. Ashridge Manor is another non-designated historic building, which is proposed to be integrated as part of the green infrastructure network within the site (a “green arc”).

With regards to **Hall Farm LV**, the primary concentration of assets is considered likely to be at Hall Farm itself, where there is a grade 2 listed farmhouse and an adjacent ruined church, which is a scheduled monument, and where there is a listed tomb. This is a historic river crossing, and there remains a public footbridge over the river, hence the assets may be quite well appreciated; however, there will be good potential to conserve the assets as part of a green/blue infrastructure strategy. Other considerations include:

- Remnant parkland landscape adjacent to the west of Hall Farm / the ruined church, associated with Arborfield Hall (demolished 1955), its lodge houses (still present), Arborfield Grange (not listed) and a grade 2 listed rectory. The proposal is to develop this land for residential, which potentially gives rise to a cause for concern, but significance is unclear, given few nationally listed buildings.
- Increased traffic arising through the Arborfield Cross Conservation Area to the south of the site.
- The designation of ‘Locally Valued Natural and Heritage Assets’ as set out within the Arborfield and Barkham Neighbourhood Plan (2020) (Policy IRS4).
- Extensive areas of high archaeological potential within the site, as defined in the current Local Plan.
- The Strategic Sites Report 2021 identifies historic farmsteads and listed buildings as key site features that could be ‘focal points’ within a wider placemaking strategy, which may lead to increased access to and understanding of important assets.

In **conclusion**, it is appropriate to highlight the risk of East of T/R leading to a significant negative effect, although it is recognised that there would be good potential to avoid and mitigate impacts through masterplanning and design measures.

Housing

East of T/R	Ashridge	Hall Farm LV
	2	

Discussion

All sites are of the scale to deliver a good mix of required housing types and tenures, including different tenures of affordable housing to help meet the high need that exists locally. Notably promoters for Ashridge state that “a suite of housing typologies with the right size to appeal to the local market will be available at Ashridge. These will be such that they are capable of adaptation over time and will enable the Ashridge housing stock to be variable, cost-effective, of robust construction and buildings for life.”



A second factor is locally arising housing need, with the East of T/R suggesting that there could be a degree of locally arising housing needs at Twyford, given relatively low rates of new housing delivery over recent years, in comparison to other parts of the Borough (to the south).

Thirdly, there is a need to consider housing delivery, and specifically the risk of unanticipated delays to delivery (although it is difficult to suggest that this is a ‘housing’ issue, as the NPPF puts in place measures to remedy unforeseen delivery issues, namely the presumption in favour of sustainable development). In this respect:

- there is a concern regarding delivery risk at Ashridge, given fragmented land ownership and also uncertain infrastructure delivery costs;
- Hall Farm LV is under the control of a small number of land-owners, and it is anticipated that part of the site could come forward in the early years of the plan period (circa 400 homes), although latter phases are inherently associated with a degree of risk given the need for major new and upgraded infrastructure; and
- East of T/R is thought likely to be associated with relatively low delivery risk, including given distance from current Strategic Development Locations (although the proposal is for Berkeley Homes to deliver the whole site, leading to an slow delivery rate).

In **conclusion**, it is difficult to differentiate between the site options with confidence, but on balance the key consideration is judged to be the delivery risk thought to be associated with Ashridge.

Land, soil and natural resources

East of T/R	Ashridge	Hall Farm LV
2		

Discussion

A foremost consideration here is the need to avoid the loss of agricultural land classed as ‘best and most versatile’ (BMV), which the NPPF defines as that which is grade 1 (highest quality), grade 2 or grade 3a. The nationally available agricultural land quality dataset shows variation in agricultural land quality across the Borough; however, this dataset has low accuracy (it does not differentiate between grades 3a and 3b) and low spatial resolution (to the extent that smaller villages are not recognised as comprising urban land) such that it must be used with caution. Another dataset is available showing agricultural land quality with a much higher degree of resolution and accuracy, on the basis that it reflects the findings of field surveys, namely the “Post 1988” dataset; however, this dataset is very patchy, and covers only a small part of the Borough.

The national dataset serves to suggest a likelihood of **East of T/R** being associated with significant areas of grade 2 agricultural land; however, there is no certainty with the land not having been surveyed in detail (or, at least, surveys have not been added to the “Post 1988” dataset available at magic.gov.uk).

As for **Ashridge** and **Hall Farm LV**, the low resolution national dataset shows both sites to comprise mostly grade 3 quality land (which might or might not be best and most versatile). The southern part of Ashridge has been surveyed in detail and been found to mostly comprise grade 3b land (i.e. not BMV), as well as some grade 3a.

In **conclusion**, it is a challenge to differentiate the strategic site options with confidence, but on balance it is considered appropriate to highlight East of T/R as being associated with a higher likelihood of BMV agricultural land and potentially higher quality BMV agricultural land. Any of the options could potentially lead to a significant loss of BMV agricultural land, but this is currently uncertain.

A further consideration is the need to avoid sterilisation of minerals resources that could potentially be viably extracted. This is potentially a matter for consideration at Hall Farm LV, with the Strategic Sites Report (2021) explaining: *“There is an emerging Minerals and Waste Plan for central and eastern Berkshire. The site will be subject to review for mineral deposits and possibly the search for a waste to energy facility by Hampshire County Council who currently act as the waste and mineral planning authority on behalf of WBC and the other central and eastern Berkshire authorities who are jointly preparing [the] Minerals and Waste Plan.”*

Landscape

East of T/R	Ashridge	Hall Farm LV
=	=	=

Discussion

It is a challenge to differentiate confidently between the competing strategic site options on the basis of the Wokingham Landscape Character Assessment (LCA, 2004 and 2019 update). Having made this initial point, the following bullet points consider each site in turn (in scale order):

- **East of T/R** - is associated with the Wargrave-Twyford Arable Chalk Lowlands character area, which has ‘moderate’ quality and sensitivity. This character area is quite distinct from the clayland character areas discussed above and below, with LCA describing: “Farmland with strong sense of openness and homogeneity due to the lack of field divisions or vertical elements across the landscape and maintains separation between and setting of settlements.” The bridleway through the site that links Wargrave to the north with Ruscombe and locations beyond, including the attractive village of Waltham St. Lawrence to the east (where it links to the Knowl Hill Bridleway Circuit) is a significant constraint.
- **Ashridge** - the LCA shows Ashridge falling within the Ashridge Farmed Clay Lowland landscape character type. This landscape is sparsely settled, dominated by large-scale arable and pastoral fields with denuded hedgerows, often set within wooded horizons. Despite the proximity of the area to the major urban centres of Wokingham and Bracknell the settlement of this area retains a rural character being largely unaffected by suburbanising influences. The Ashridge Farmed Clay Lowlands is a landscape of ‘moderate’ quality and sensitivity, with a ‘strong sense of place’. The overall management objective for this LCT is ‘to ensure that the landscape is actively managed to retain the rural character’, recognising that a key issue for the area is ‘Pressure for built development on the skyline leading to loss of wooded ridges which are characteristic of the Wokingham District landscape’. Site promoters put forward a ‘landscape strategy’ for development of the site, which includes 250 acres of public open space, 38 of which will be Bill Hill SANG - a green arc to the west of the site. This is with the intention of ‘retaining the inherent identity of the site’, along with proposed ‘zoning’ of development from farmland and private farmhouse clusters.
- **Hall Farm LV** - the LCA shows the Hall Farm site to cross over several landscape character types. The Four Valleys area is within Spencer’s Wood Settled Farmland and then separated from Hall Farm by Loddon Valley. The main development opportunity area at Hall Farm is partly within Arborfield River Terrace, an agricultural landscape above the Loddon Valley and, further east, Arborfield/Barkham Settled Farmland; both of which have ‘moderate’ quality and sensitivity. There is a relatively high density of public footpaths in this area, which serves to suggest a degree of sensitivity, and there is a clear sensitivity at the western edge of the site, in the form of remnant historic parkland associated with the former Arborfield Hall, with the LCA describing “the presence of mature oaks, which provide a strong silhouette against the open sky.” Similarly to Ashridge, site promoters propose the delivery of a comprehensive network of green spaces, including over 65 hectares of SANG, and open space, creating green corridors across the site, ensuring the avoidance of development in sensitive locations.

Further evidence comes in the form of the proposed Valued Landscapes (VLs) Topic Paper (2020). This notably identifies: much of the land within proposed Hall Farm LV (specifically the river corridor and land to the north) as falling within the proposed River London VL; and the north-eastern part of Ashridge (specifically that part that was Ashridge Wood until the late 20th Century) as falling within the proposed Billingbear VL.



A further consideration, in respect of Hall Farm LV, is the potential to deliver a major new area of riverside parkland, which would certainly be of strategic value to residents existing nearby communities, and potentially even more widely, if the outcome is a situation whereby the River Loddon corridor, between Reading and the Thames, is widely known for its accessibility (the possibility of a regional park might be explored, e.g. akin to the Colne Valley Regional Park, albeit the Colne Valley area is more extensive and associated with the Grand Union Canal).

A further consideration, in respect of Ashridge, is a notably low density PROWs in this area, and the main road corridors are likely to be significant detracting features; and a further concern is in respect of long term eastwards 'sprawl' over time.

A further consideration in respect of East of T/R is that the site falls within the Green Belt, within which there is a need to "safeguard the countryside from encroachment" and ensure permanent "openness". The Growth Scenarios Report (see Figure C above) proposes a new defensible Green Belt boundary in the form of a boundary road (the 'relief road' discussed above) with a large area of publicly accessible open space / green space beyond; however, it is noted that the site promoters stated through their 2018 Homes for the Future consultation response that: *"Whilst this would establish a set boundary to the development, it is considered that this would not necessarily result in the most appropriate solution to promote high quality place making. Alternative options to this approach include for example an attractive built edge with high quality landscaping beyond, including new planting where appropriate to form a defensible Green Belt boundary."* There would be a need for further detailed work to consider the possibility of establishing a robust Green Belt boundary and also offset impacts through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land (the NPPF discusses the importance of accessibility, landscape value and biodiversity).

Overall, on the basis of this evidence, it is not possible to differentiate between the sites with any certainty.

Transportation

East of T/R	Ashridge	Hall Farm LV
	3	

Discussion

As an initial point, it is important to recall that there is merit to favouring large mixed use schemes that will support a degree of self-containment, i.e. a situation whereby residents' need to travel beyond the local area is minimised, thereby serving to encourage walking and cycling. Such schemes can also support good access to high quality transport infrastructure (with capacity), in particular public transport infrastructure, such that longer trips (in particular commuting trips at peak times) can be made in such a way that per capita greenhouse gas emissions and traffic congestion (with associated pollution and impacts to economic productivity) are both minimised.

Detailed evidence comes from available transport modelling, which has explored a number of scenarios that enable consideration to be given to the merits of Hall Farm LV and Ashridge, but not East of T/R.

With regards to Hall Farm LV, a key issue is understood to be uncertainties around commuter flows associated with the employment areas, plus there is uncertainty regarding the potential to deliver a new M4 junction (which would certainly be necessary under a scenario where a hospital is delivered onsite). There would be more than 2km between junctions (an important safety consideration), and the effect could be to relieve pressure on existing junctions 10 and 11; however, junctions in relatively close proximity can give rise to an issue whereby the motorway is used by local traffic ("junction hopping"). Furthermore, it is important to consider the strategic value of a new road link road between the M4 and the A327, leading to the M3.⁴² There are a range of other important transport considerations, which would need to be explored further; for example, there would also be the potential to relieve pressure on Mill Lane, where there is a single land bridge over the River Loddon.

⁴² The "Transport Strategy for the South East (2020), prepared by Transport for the South East, which is the Sub-national Transport Body for the South East of England (although without statutory powers) identifies the following priority initiative: *"Improve orbital links between the M3 and M4, ideally in a way that avoids directing heavy traffic through urban areas such as Bracknell."*

With regards to Ashridge, the key consideration is that there would only be the potential for a 'half junction' onto the A329(m), from the A321 (specifically, east bound slips only), because westbound slip roads would be too close to the existing A329(M)/M4 junction. This would lead to trips being forced to use inappropriate links which are already subject to high flows and pass-through local villages to access the strategic network. This is a significant issue; however, again there is a need for further work, both around road infrastructure and potential for trip internalisation and offsite movements by walking, cycling and shared / public transport. The site does benefit from being located on an existing strategic public transport corridor, more so than Hall Farm LV, and it could be that development here delivers or facilitates strategic enhancements to this corridor, linking Bracknell and Reading. Also, the site is well linked to the Crossrail station at Twyford.

With regards to East of T/R, the potential to deliver a new town centre relief road (or at least partial relief road) has already been discussed above. Another key consideration is proximity to Twyford station, which already benefits from a good rail service to London Paddington and Reading/Oxford (also the branch line to Henley), and which is set to see a significantly enhanced service in 2022 upon arrival of Crossrail/Elizabeth line services that will link directly to key destinations within London. The scheme could also potentially facilitate delivery of a new multi-storey car park for the rail station (although this is uncertain, with the site comprising part of a well-used recreation ground) and could also potentially support strategic enhancements to the A4 as a 'sustainable transport' corridor.

In **conclusion**, Hall Farm (in particular) and East of T/R are both associated with opportunities to deliver new strategic transport infrastructure, and it is not clear that an equivalent opportunity exists in respect of Ashridge. There is also a need to take into account the potential for trip internalisation, which lends support for Hall Farm LV, although East of T/R does benefit from good access to a rail station with a good service.

Water

East of T/R	Ashridge	Hall Farm LV
?	?	?

Discussion

With flooding already having been a focus of discussion above, there is a remaining need to consider:

- Water resources - the Wokingham Borough Water Cycle Study (WCS) Scoping Report (January 2019) concluded: *"As there is a water surplus predicted across all three water resource zones until 2050, and there is sufficient time to adjust the long- term plan to include emerging trends in population, no further assessment of water resources is required in a phase two outline study."*
- Water supply infrastructure - the WCS Scoping Study (2019) concludes: *"Early developer engagement with SEW and TW is essential to ensure that, where necessary, network reinforcement is delivered prior to developments becoming occupied. Further modelling of the water supply network is required..."*
- Wastewater collection infrastructure - Thames Water provide wastewater services to the whole of the Wokingham study area. The WCS Scoping Study (2019) concludes: *"Areas with the least capacity include the north east and west of Woodley CP, Wargrave, Twyford south of the railway line, Hurst, northern Winnersh CP, Three Mile Cross, Arborfield, the western part of Finchampstead CP, and Riseley. Areas with the most capacity include central Woodley, and Early, Wokingham and Barkham..."*
- Wastewater treatment capacity - as part of the WCS Scoping Study (2019) flow permit assessments were carried out at all of the WwTW that are expected to serve growth in the Local Plan period. The study concluded: *"Bracknell, Reading, and Sandhurst WwTWs have sufficient capacity to serve all of the sites identified in those catchments in the call for sites process. Easthampstead Park has capacity but is very close to its DWF permit limit and could exceed this should additional sites be identified. Wargrave WwTW can accommodate up to 80% of the sites identified but would exceed its permit level should growth exceed this. Arborfield WwTW has the capacity to accommodate the 20% growth scenario, but growth above this level would require an increase to the DWF permit and a capacity upgrade... no further assessment of wastewater treatment infrastructure is required as part of a phase 2 study; however, the flow permit assessment should be re-visited..."*

The WCS Scoping Study (2019) also explained: *“In the case of Bracknell, Easthampstead Park and Sandhurst WwTWs an assessment has been completed as part of the Bracknell Forest Phase 2 WCS (2018) and concluded that the proposed growth could be accommodated with a tighter permit and treatment at the Technically Achievable Limit. This level of growth assessed was comparable or higher than currently forecast so this assessment does not need to be repeated. For Easthampstead Park and Sandhurst WwTWs they would be included in a catchment scale model of the River Loddon. Detailed water quality modelling has not been conducted at Arborfield or Wargrave, and the level of growth currently forecast at Reading and Ashridge WwTW has not been assessed. A water quality assessment is therefore required at these WwTW. Further assessment of water quality from increased wastewater discharges at Arborfield, Ashridge, Reading and Wargrave WwTW should be undertaken as part of a Phase 2 Water Cycle Study.”*

N.B. the Ashridge site promoters have proposed a network of four 'living machines' within the site to deal with up to 95% of wastewater arising onsite; however, there is a need for further evidence of deliverability.

A further water quality consideration relates to surface water run-off, both from developed and undeveloped agricultural land. In this respect, an importance consideration is the close association of Hall Farm with the River Loddon, with much of land that would be taken out of agricultural use currently use for dairy farming.

- Environmental constraints - The WCS Scoping Study concludes: *“A number of SSSIs exist within Wokingham Borough, and there is a possibility of point source pollution (from WwTW) or diffuse pollution (for example from surface runoff from development) to impact these sites. Opportunities exist to mitigate this through implementation of SuDS... The impact of WwTW on water quality should be assessed in a Phase 2 Study.”*

In **conclusion**, the available evidence does not enable confident differentiation between the competing site options. Growth loading pressure on Wargrave WwTW and (in particular) Arborfield WwTW potentially leads to a degree of concern, and it is also noted that the Twyford Brook stands-out as the only watercourse in the Borough that is assigned 'poor' status under the Water Framework Directive; however, there will be good potential to deliver upgrades to WwTWs and also high quality SuDS.

Conclusions on the large strategic site options

Scenario	East of Twyford/ Ruscombe	Ashridge	Hall Farm
Topic			
Accessibility	2	2	1
Air quality	1	3	2
Biodiversity	1	2	2
CC adaptation	1	1	2
CC mitigation	2	1	1
Communities	3	2	1
Economy	2	2	1
Historic environment	3	1	1
Housing	1	2	1
Land, soil and natural resources	2	1	1
Landscape	=	=	=
Transport	1	3	1
Water	?	?	?

Concluding discussion

The appraisal serves to highlight a mixed picture, with all options associated with pros and cons. It is certainly not possible to place the options in an overall order of preference purely on the basis of this appraisal, recognising that the sustainability topics are not assumed to have equal weight.

East of Twyford/Ruscombe performs well in respect of a number of topics, both in an absolute and relative sense, and stands out as performing particularly well in terms of air quality and biodiversity objectives. However, there is a concern regarding impacts to Ruscombe, particularly from a historic environment perspective, and strategic growth targeted here would likely lead to opportunities missed in respect of delivering new employment land, and potentially other objectives besides (transport infrastructure, community infrastructure, decarbonisation).

Ashridge is relatively unconstrained in a number of respects, including flood risk and historic environment, but the adjacent major road corridors are a constraint and a barrier to masterplanning and delivery, and fragmented land ownership is understood to also lead to a delivery risk. There would also be opportunities missed in respect of securing new employment land, road infrastructure and community infrastructure, although a proactive approach to decarbonisation is proposed, which is an important consideration given the Borough's 2030 net zero target.

Hall Farm / Loddon Valley would deliver new strategic transport and community infrastructure alongside new housing, and housing growth here would also strongly support the achievement of economic growth objectives, by supporting the TVSP Four Valleys vision. However, this is an inherently sensitive river valley, leading to concerns in respect of biodiversity, flood risk and potentially wider water environment objectives. On the other hand, there could be the potential for development to secure betterment / net gain in respect of all of these objectives.

Appendix IV: Smaller strategic sites

Introduction

The aim of this appendix is to present an appraisal of the shortlist of four competing smaller strategic site options discussed in Section 5.3, as part of the wider discussion of establishing reasonable growth scenarios for appraisal.

The four options are introduced in Section 5.3 as follows (north to south):

Name	Area (ha)	Capacity (homes)	Notes
Blagrove Lane	57	400	Ruled out relatively early in the process in 2019 (para 5.84 of the ISA Report), but a detailed consultation response was then received in 2020, proposing a 500 home scheme. The site was then examined through the Non-strategic Sites Report (2021), which identified two options: 336 homes and 455 homes.
South Wokingham SDL ext.	59	800	Was unavailable in 2019/20. Examined through the Strategic Masterplan Report (2021). The land falls within the SDL boundary, but is shown as 'potential green open space' within the SDL SPD (2011). Land within the SDL to the north (south of the railway) has a resolution to grant planning permission for 1,600 homes.
Barkham Square	58	500	Three options were examined closely over the period 2018-20, before the ISA Report focused attention on a shortlist of two (500 and 750 homes; see Appendix IV) before further focusing on the 500 home option (see paragraph 5.52). A consultation response was received proposing at least 750 homes, but officers maintain that a 500 homes scheme is a more appropriate assumption. Would form an extension to the Arborfield Garrison SDL.
Arborfield Cross	55	500	Ruled out early in the process in 2019 (para 5.113 of the ISA Report), but subsequently identified as a comparator to Barkham Square. A cluster of four sites would comprise most (but not all) land between the SDL and Arborfield Cross, with a stand-out large site (Duck's Nest Farm) west of the B3030, in respect of which a detailed consultation response was received in 2020 (275 homes). Proposals for land east of the B3030 are less clear. Total capacity is unknown, and so 500 is assumed as a rough estimate. It is important to emphasise that there is no current evidence of landowner intention to bring this cluster forward together.

The following high-level concept masterplans serve to inform the appraisal, although there is also a need to recognise that scheme proposals have not necessarily been agreed with WBC, would require more detailed masterplanning in the form of an SPD, and are subject to change.

N.B. for Arborfield Cross a concept masterplan is available for only part of the site.

Figure A: Blagrove Lane
Illustrative masterplan prepared by the site promoter in 2020



Figure B: South of Wokingham SDL Extension
Concept masterplan from the Strategic Sites Report (2021)

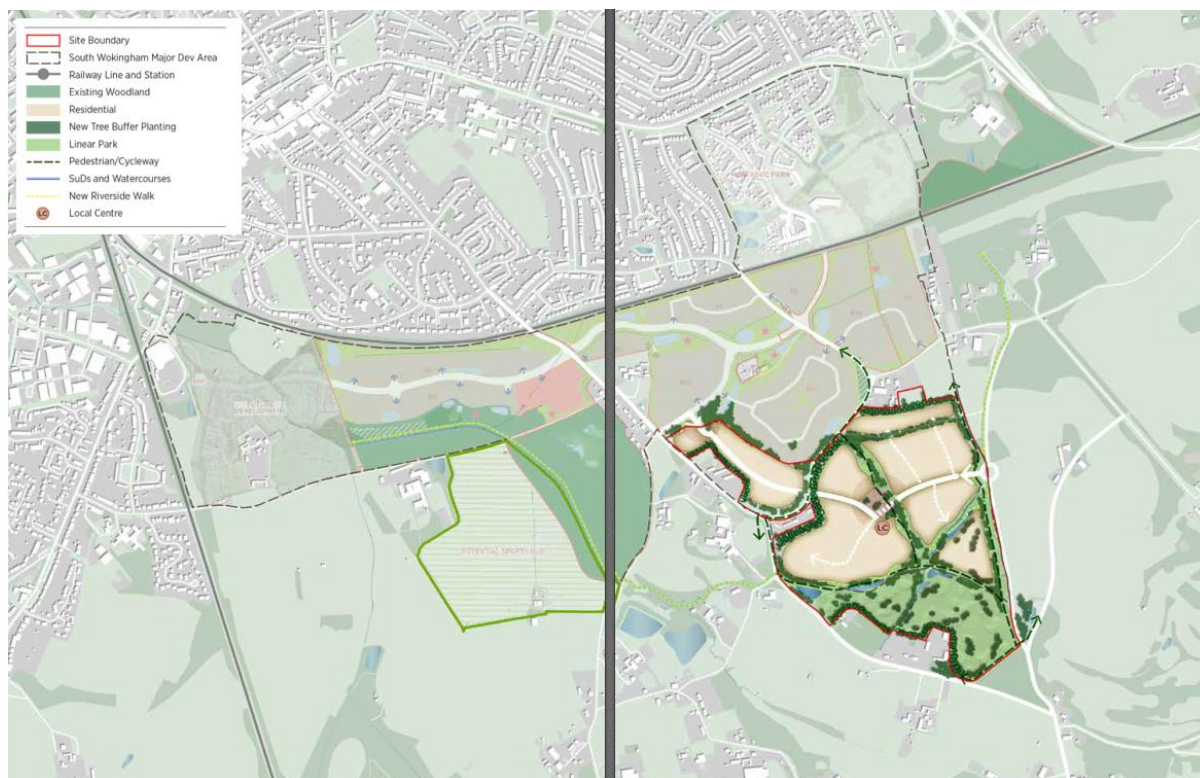


Figure C: Barkham Square

Illustrative masterplan prepared by the site promoter in 2020

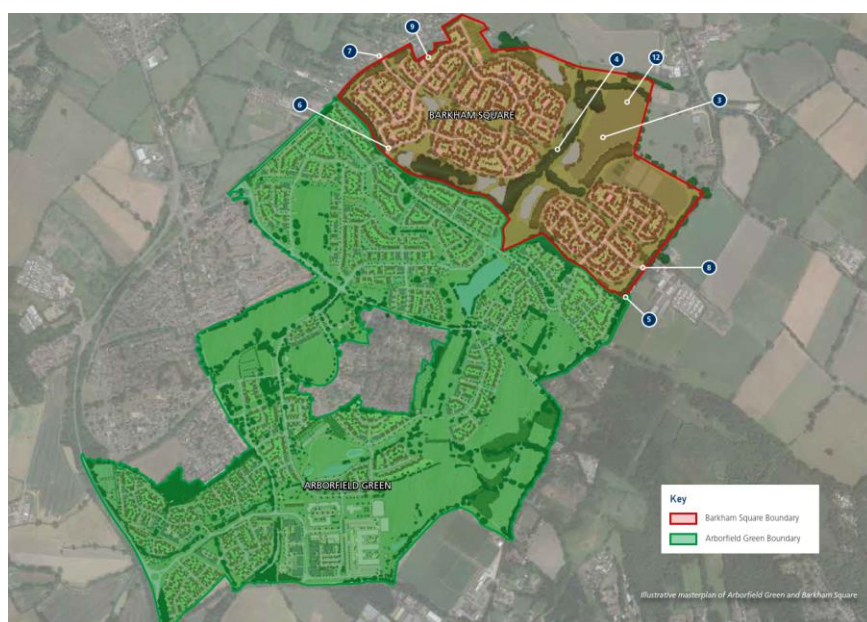


Figure D: Ducks Nest Farm – western part of the Arborfield Cross cluster

Illustrative masterplan prepared by the site promoter in 2020



Appraisal methodology

Appraisal findings are presented below across 13 tables, with each table dealing with a thematic sustainability topic (see Section 3). Within each table the performance of each of the options is categorised in terms of significant effects (using **red** / **amber** / **light green** / **green**)⁴³ and the options are also ranked in order of preference. Where there is no colour assigned, this indicates effects that are broadly neutral.

Further points on methodology are set out in Appendix III.

Appraisal findings

The tables below presents appraisal findings in relation to the large strategic site options.

Accessibility

Blagrove Lane	South Wokingham SDL extension	Barkham Square	Arborfield Cross cluster
	2	3	4

Discussion

The South of Wokingham SDL extension stands out as the largest of the options, in terms of quantum, and would also form an extension to the committed southern part of the South of Wokingham SDL. There is the potential to deliver a new local centre and strategic greenspace, although there is no proposal for a new primary school.

Blagrove Lane is a smaller site, but the proposal is to make land available for a primary school as well as other community/sports/recreational facilities and significant greenspace. However, there is considerable uncertainty at this stage, given uncertainty around the number of homes that could be delivered, e.g. given access issues. The site is also well located on the edge of Wokingham, such that residents would be able to access community infrastructure and employment in the Borough's principal settlement.

With regards to Barkham Square, the proposal at this scale of housing growth is to deliver strategic greenspace, but limited further community infrastructure. The Growth Scenarios Report (2018) stated: *"No provision is made for a primary school; it is assumed demand for primary school places would be met through the expansion to 3FE of the proposed primary school at Arborfield SDL."* Indeed, within the SDL a new local centre would be located c.400m from the edge of the site and a new district centre c.1,200m distant.

Finally, Arborfield Cross there is considerable uncertainty regarding the economies of scale that could be achieved and, in turn, the community infrastructure that could be delivered alongside housing. With regards to the land west of the B3030 (Ducks Nest Farm), the proposal is to deliver 275 homes alongside a (proportionally) very large area of strategic greenspace, as well as play space and community gardens (which are invariably delivered as part of development at this scale). Residents would also have relatively good access to the Arborfield SDL, although the site would not integrate as well with the SDL as would be the case for Barkham Square.

In **conclusion**, Blagrove Lane potentially stands-out as performing well, albeit this is somewhat marginal, and there is uncertainty regarding what is viable and deliverable at this stage. South of Wokingham SDL also performs well, given the proposed local centre and its location within, and good potential to compliment, the existing SDL. There is little certainty regarding the potential for significant positive effects – in respect of ensuring that new homes come forward alongside strategic community infrastructure – under any of the options.

⁴³ **Red** indicates a significant negative effect; **amber** a negative effect that is of note but with limited or uncertain significance; **light green** a positive that is of note but with limited or uncertain significance; and **green** a significant positive effect.

Air and wider env quality

Blagrove Lane	South Wokingham SDL extension	Barkham Square	Arborfield Cross cluster
2	1	2	2

Discussion

None of the sites in question are thought likely to give rise to a major concern in respect of increased traffic through an AQMA, with South of Wokingham SDL extension in closest proximity, at circa 2.km distance from the Wokingham town centre AQMA, plus the southern distributor road is being delivered as part of the committed SDL, which will direct traffic away from the town centre AQMA.

Maintaining a focus on South of Wokingham SDL extension, there would be quite good potential to support trip internalisation within the wider South of Wokingham SDL, with the Strategic Sites Report (2021) proposing a focus on strong walking and cycling links, including via a green infrastructure spine. There is also a focus on supporting EV charging, although it is not clear that there is any particular locational or site specific opportunity.

A further consideration is localised impacts to air quality or other aspects of 'environmental quality' outside of AQMAs. In this respect a primary consideration is potentially the fact that all sites other than South of Wokingham SDL extension would feed traffic onto B-road corridors that pass through existing settlements, and which are all associated with existing concerns around traffic congestion (and associated environmental quality impacts) to a greater or lesser extent most notably, the B3349 meets the A329 within the Wokingham town centre AQMA). In contrast, South of Wokingham SDL extension would link relatively well to the strategic road network.

In **conclusion**, whilst there is considerable uncertainty in the absence of traffic modelling for all sites, it is considered appropriate to tentatively highlight South of Wokingham SDL extension as preferable on the basis that it is relatively well linked to the strategic road network or, at least, would lead to minimal increased traffic on known problematic road corridors relative to the other three options. Other considerations relate to the potential to support trip internalisation and modal shift (away from private cars, particularly petrol and diesel); however, these matters are a focus of discussion above (under 'accessibility') and below (under 'climate change mitigation' and 'transportation'), and so it is considered to rank the three other competing sites broadly on a par under this heading.

Biodiversity

Blagrove Lane	South Wokingham SDL extension	Barkham Square	Arborfield Cross cluster
2	1	2	1

Discussion

The sites are all more-or-less associated with land between the sensitive River Loddon Corridor and wooded raised land, with two of the sites – Barkham Square and South of Wokingham SDL extension – associated with stream corridors draining to the Loddon, namely the Barkham Brook and Emm Brook respectively.

Barkham Square is constrained on account of its association with the stream corridor and onsite ancient woodland (associated with the stream corridor), plus Longmoor Bog SSSI is in relatively close proximity (c.500m), albeit upstream of the site. Blagrove Lane also gives rise to a degree of concern, as there is an expectation that an access road would need to pass through an area of woodland priority habitat. This is not ancient woodland, and is not accessible, but is designated as a Local Wildlife Site (LWS; possibly due to adjacent ancient woodland).

The final two sites are relatively unconstrained, with very limited onsite priority habitat, but there are notable concentrations of priority habitat adjacent and nearby, potentially serving to suggest a particular opportunity for onsite habitat creation to support a biodiversity net gain at a functional landscape scale. With regards to South of Wokingham SDL extension, the stream corridor within/adjacent to the site is not associated with any priority habitat, potentially suggesting an opportunity, and there are significant concentrations of habitat associated with higher ground to the south and east. With regards to 'Arborfield Cross', a key consideration is the proposal for the Ducks Nest Farm part of the wider site (which comprises land west of the B3030) to deliver a new 'hill top parkland', which

could link very well to the major cluster of ancient woodlands associated with the Farley Hill area, potentially serving to effectively delineate this rural wooded landscape from the more urban landscapes of the Barkham Brook corridor.

In **conclusion**, it is appropriate to highlight Barkham Square and Blagrove Lane as performing relatively poorly, as they are subject to a degree of constraint and not associated with a clear opportunity to the same extent as the other two sites, although quite detailed proposals for strategic green (and, in the case of Barkham Square, blue infrastructure) have been proposed for both sites, which would serve to mitigate impacts and secure benefits.

Climate change adaptation

Blagrove Lane	South Wokingham SDL extension	Barkham Square	Arborfield Cross cluster
 1	2	2	 1

Discussion

Blagrove Lane and Arborfield Cross sites are located outside of fluvial flood risk zones. There is a notable surface water flood risk channel passing through the Arborfield Cross site (shown as a stream or drainage channel on the OS map); however, this could presumably be incorporated within green/blue infrastructure through masterplanning.

The two site options are closely associated with stream corridors, as discussed above:

- Barkham Square - is bisected by a fluvial flood risk zone associated with a small stream; however, this is a very narrow flood risk zone, and the firm proposal from the site promoter is that there would be a SANG parkland delivered that is centred on this stream and buffers it to a considerable extent. Masterplanning put forward by developers shows development set back from flood risk areas, with SuDs ponds located at strategic points.
- South of Wokingham SDL extension – the proposal is to locate built form to the north of the Emm Brook, with land to the south delivered as strategic greenspace. It will be important to ensure that sensitive built form avoids the fluvial flood zone, plus there is an argument for a buffer to account for climate change; and there could also be merit to exploring strategic flood water attenuation options, given downstream flood risk affecting Wokingham. There is also a notable area of surface water flood risk at the north east extent of the site.

In **conclusion**, there is a need to flag South of Wokingham SDL extension and Barkham Square as associated with a degree of constraint; however, in practice, there will be good potential to complete detailed work to understand the precise nature of flood risk within the sites and then masterplan in order to avoid risk accordingly.

Climate change mitigation

Blagrove Lane	South Wokingham SDL extension	Barkham Square	Arborfield Cross cluster
=	=	=	=

Discussion

As discussed above, within Appendix III, strategic growth locations can give rise to opportunities to minimise per capita emissions from the built environment over-and-above a strategy involving dispersal of housing growth across smaller sites. However, opportunities are largely (or, at least, partly) associated with economies of scale, such that the nature of the opportunity is likely to be =less at these four smaller strategic sites, relative to three large strategic sites discussed in Appendix III. On this basis, it is difficult to suggest that any of the four competing sites under consideration here give rise to a particular opportunity, and none of the materials submitted by site promoters serve to suggest a particular locational opportunity, nor serve to suggest that built environment decarbonisation will feature particularly strongly in the masterplanning and design ethos etc. With regards to South Wokingham SDL extension, the Strategic Sites Report (2021) sets out that Passivhaus Standard is “a goal”, and it is recognised that this is a highly respected and ambitious standard; however, there is no evidence to suggest that achieving this standard is more likely at this site than any other. It could well be that there is a particular locational opportunity (e.g. because of strong viability, or on the basis of a particular proposed design ethos), but this is currently unclear.

With regards to emissions from transport, matters have already been discussed above, and are also considered below, under the ‘transportation’ heading. The ultimate conclusion is that it is very challenging to confidently

differentiate between the four sites in respect of minimising the need to travel and supporting a shift away from higher emission modes of travel. Arborfield Cluster does stand out as being relatively distant from a higher order centre and not being as well linked to the Arborfield SDL as is the case for Barkham Square; however, there is understood to be good bus connectivity, recognising with the SDL and the new A327 relief road.

In **conclusion**, it is not possible to differentiate between the options with any confidence, and it is appropriate to flag a risk of significant negative effects, for reasons as per those explained under the equivalent heading in Appendix III. Moving forward, site promoters are encouraged to present evidence to demonstrate particular locational / site specific opportunities in respect of minimising per capita built environment and transport emissions.

Communities

Blagrove Lane	South Wokingham SDL extension	Barkham Square	Arborfield Cross cluster
2	1	1	2

Discussion

The matter of accessibility to community infrastructure has already been discussed above, under the 'accessibility' heading; however, there remain a range of other community-related matters for discussion.

Beginning with South of Wokingham SDL extension, as an initial point, it is important to note that the South of Wokingham SDL SPD (2014) identified land here as a "potential green open space location"; however, on balance, development is supported from a 'communities' perspective. There is something of a place-making opportunity – e.g. with a 'green spine' linking to the committed part of the SDL to the north – and there are limited concerns regarding impacts to existing nearby communities. It is also important to note that the proposal to extend the SDL aligns with the proposal to extend the SDL to incorporate Gray's Farm which has been bought by WBC to establish a sports hub, providing for both outdoor and indoor sports and community uses.

Blagrove Lane, as highlighted above, is also well located on the edge of Wokingham, with new residents likely have reasonable access to facilities/services/employment in the borough's principal settlement, as well as provision coming forward delivered through the Wokingham SDL. However it is recognised that the Wokingham Non-Strategic Site Report (2021) raises issues for the site in terms of coalescence with neighbouring settlements, which has the potential to impact upon the identity of any new and existing communities in the area. The Report (2021) does however later highlight the opportunity associated with local heritage assets present within the area to 'provide identity and quality'.

There is a level of concern in respect of Arborfield Cross, where development could compromise the separation of settlements. Specifically, the WBC HELAA (2019) highlights that: "*Development south of School Road would compromise the separation of settlements, leading to potential coalescence.*" There is also a need to consider the proximity of the South of the M4 (Shinfield Parish) SDL and also the Hall Farm LV large strategic site option.

Finally, Barkham Square would integrate relatively well with the Arborfield SDL, and does not give rise to any 'headline' concerns from a communities perspective.

In **conclusion**, the South of Wokingham SDL extension and Barkham Square are judged to perform relatively well, primarily on the basis of limited concerns regarding impacts to existing communities. This conclusion is, however, somewhat marginal and uncertain.

Economy

Blagrove Lane	South Wokingham SDL extension	Barkham Square	Arborfield Cross cluster
=	=	=	=

Discussion

None of the sites in question are expected to deliver or facilitate the delivery of significant new employment land, hence there is limited potential to meaningfully differentiate between the options. Blagrove Lane is located in very close proximity to a strategic employment location, in the form of the extensive Molly Millars industrial estate, but it

is difficult to suggest any particular issue or opportunity. There could feasibly be an issue associated with increased road traffic in the area creating challenges for HGVs and light goods vehicles accessing the industrial estate, but there is no specific evidence to support this argument.

A further consideration is construction jobs aiding the economy; however, there is no potential to differentiate between the options in this respect, and so it is something of moot point.

In **conclusion**, the options are judged to perform broadly on a par and significant effects are not predicted.

Historic environment

Blagrove Lane	South Wokingham SDL extension	Barkham Square	Arborfield Cross cluster
	2		2

Discussion

In terms of designated historic assets, Barkham Square is notably free from constraint, with only one Grade II listed building in the vicinity (c.100m from the site boundary). However, a key consideration for the site is the risk of loss of the landscape gap between the Arborfield SDL / Barkham Square and the historic village of Barkham. The historic settlement stretches along Barkham Street with historic cores at either end (the southern core being the original location of the village). Development at the site would also give rise to concern regarding impact on the nearby Arborfield Cross Conservation Area.




Blagrove Lane is also considered to be relatively unconstrained. However, there are two adjacent small historic farmsteads - one comprising a cluster of three grade 2 listed buildings and the other four - which are likely associated with a rural/agricultural setting, and which may contribute to a sense of historic settlement separation / historic landscape character. A further consideration is a known 'archaeological site' that intersects the site.

A key issue for the Arborfield Cross cluster of sites is the Arborfield Cross Conservation Area, with the potential for impacts to landscape setting as well as increased traffic through the conservation area, although the conservation area is buffered by more modern development.

Finally, with regards to South of Wokingham SDL extension, the key issue is Lock's Farm, where there is grade 2* listed farmhouse and a grade 2 listed barn. Without the SDL extension the farm – along with a historic lane (now a bridleway) linking to the hamlet of Holme Green (with its historic school and four other grade 2 listed buildings) - would represent the southern extent of the SDL built form, whilst with the extension these historic assets will be largely enveloped within the SDL's built form.

In **conclusion**, it is fair to highlight that Arborfield Cross and South of Wokingham SDL extension as constrained to a greater extent than the other two sites. The situation in respect of Arborfield appears relatively clear but, whilst with regards to South of Wokingham SDL extension there is a need for further work to understand the significance of the assets and the extent to which harm can be avoided and mitigated through masterplanning, design etc. It is judged appropriate to flag a risk of significant negative effects, pending further investigations / evidence.

Housing

Blagrove Lane	South Wokingham SDL extension	Barkham Square	Arborfield Cross cluster
			2

Discussion

There are quite strong arguments for supporting one or more smaller strategic sites, from a 'housing' perspective, given relatively low delivery risk combined with potential to deliver a good mix of housing types and tenures (also potentially specialist accommodation, although this is not a proposal for any of the current four sites).

Having said this, a clear issue with regards to the Arborfield Cross option (assuming the desire to deliver a strategic site, as opposed to just a circa 275 home scheme to the west of the B3030) is fragmented land ownership and the current lack of a coordinated scheme proposal.

A further consideration is that Blagrove Lane has the benefit of not being located in close proximity to an existing SDL (it is also not overly close to the Hall Farm / Loddon Valley large strategic site option discussed in Appendix III), which potentially serves to reduce concerns regarding market saturation leading to delivery risk; however, there is little reason to suggest that a significant risk exists at any of the other three sites.

In **conclusion**, all options potentially perform well, but it is appropriate to highlight a potential issue with the Arborfield Cross cluster.

Land, soil and natural resources

Blagrove Lane	South Wokingham SDL extension	Barkham Square	Arborfield Cross cluster
2	2	1	2

Discussion

Issues around protecting BMV agricultural land are introduced in Appendix III. Detailed agricultural land quality data is not available for any of the sites in question; however, on the basis of the low resolution national dataset:

- Barkham Square - the low resolution national dataset shows the site to comprise mostly grade 4 (non-BMV, and overall relatively low quality) agricultural land.
- South of Wokingham SDL extension, Blagrove Lane and the Arborfield Cross cluster to comprise mostly Grade 3 quality land (which might or might not be BMV). With regards to South of Wokingham SDL extension, it is potentially notable that land nearby to the north has been surveyed in detail and found to comprise a mixture of grade 2 and grade 3b quality land.

In **conclusion**, it is fair to highlight Barkham Square as being associated with the least constraint, and it is fair to conclude that there would not be a significant loss of BMV agricultural land.

Landscape

Blagrove Lane	South Wokingham SDL extension	Barkham Square	Arborfield Cross cluster
=	=	=	=

Discussion

It is a challenge to differentiate confidently between the competing strategic site options on the basis of the Wokingham Landscape Character Assessment (LCA, 2004 and 2019 update). Having made this initial point, the following bullet points consider each site in turn (in scale order):

- Blagrove Lane - falls within the Arborfield Cross and Barkham Settled and Farmed Clay character area, which is of moderate quality and sensitivity. It is considered that loss of this area of land could lead to coalescence with neighbouring villages and surrounding development, impacting upon existing settlement pattern and village identity. Indicative masterplanning put forward by site promoters suggests a large buffer would be delivered to the south-west of the site to maintain the settlement gap between Wokingham and Barkham. In terms of potential impact on views, significant area of land to the north, adjoining Barkham Road, is protected by TPO designation which may provide a level of screening (and will be afforded protection from development).
- Arborfield Cross - comprises a cluster of sites which cover two character areas, and subsequently range in their potential impact on the landscape. The west of the A327 is the largest of the strategic site cluster (Ducks Nest Farm), which predominately falls within the Farley Hill Wooded Sand and Gravey Hills character area, which is a small, discrete, elevated landscape area. This character area is of high quality and moderate sensitivity, with the site well contained by the distinctive hilly landform and topography of the area, and the adjacent A327. The remaining small area of Ducks Nest Farm, and all other sites within the cluster, fall within the Arborfield Cross and Barkham Settled and Farmed Claylands character area. As set out above for Barkham Square, this area is of moderate quality and sensitivity. These piecemeal sites west of the B3030 are considerably smaller in size, fragmented and less well connected, and it would likely be difficult to achieve a suitable relationship with the existing settlement pattern, which may present challenges in terms of bringing

forward a single, landscape-led scheme. It is therefore considered that growth may impact on the existing settlement pattern of Arborfield Cross and Barkham to the east, particularly if development cannot be holistically planned. Development south of School Road could compromise the separation of settlements, while development to the north of School Lane would link poorly to the existing built-up area.

- **Barkham Square** - is associated with the Arborfield and Barkham Settled and Farmed Claylands character area, which has a moderate quality and sensitivity. The site mostly descends from the minor roads to the east and west, potentially suggesting limited visibility across the site; however, it is strongly associated with the intersection of two stream corridors, and the LCA describes “subtle wooded shallow ‘valleys’ around the Barkham Brook known as ‘the Coombes’” as contributing significantly to local character. The site benefits from a high degree of visual enclosure, and it is noted that masterplanning for the site proposes new woodland planting for the higher ground and at the site’s periphery. A key consideration is the risk of loss of the landscape gap between the Arborfield SDL / Barkham Square and the village of Barkham, however it is noted that masterplanning seeks to build on the ‘Garden Village’ approach adopted for the Arborfield SDL. Indicative design principles include the ‘creation of a green grid surrounding the development parcels’, and ‘green corridors east-west and north-south’. However there is clearly a level of uncertainty at this stage.
- **South Wokingham SDL extension** - is associated with the Holme Green Pastoral Sandy Lowland character area, which is of moderate quality and sensitivity. The LCA highlights for this area the need to ‘protect the individual identity of settlements by conserving the rural character of the landscape between adjacent towns and village centres and avoiding amalgamation of these settlements.’ The LCA further identifies landscape features that contribute towards the physical and visual separation from Wokingham to Binfield/ Bracknell and Winnersh. It is recognised that the site itself is open farmland with a well-established landscape features including mature trees (notably TPOs) in place along the northern boundary and in small pockets at the western and eastern edge) and the Emm Brook, which enhance the attractive rural character of the site. These have been taken into account by site promoters (see Wokingham Strategic Sites Report (2021)), informing the character and type of development which might occur here.

In **conclusion**, significant sensitivities have been highlighted for all of the options, and it is not possible to differentiate between them with any confidence on the basis of the available evidence. Arguably Arborfield Cross could be identified as least well performing given it is the only option which contains an area of ‘high’ landscape quality at Ducks Nest Farm, however landscape sensitivity remains ‘moderate’ as is the case for all options.

Transportation

Blagrove Lane	South Wokingham SDL extension	Barkham Square	Arborfield Cross cluster
2	1	3	4

Discussion

As an initial point, Barkham Square and Arborfield Cross are relatively poorly located in respect of accessing public transport and also the strategic road network, hence there would be a concern regarding car dependency and traffic congestion, including along the B3349 into Wokingham. There is also a need to consider uncertain in combination impacts with committed growth at the nearby SDLs, although it is recognised that Arborfield Cross Relief Road (ACRR) is a new road to the east of Ducks Nest Farm (Arborfield Cross site). The route is designed to provide traffic relief to the Arborfield Cross roundabout and reduce traffic flow at the A327 / Langley Common Road roundabout, thereby freeing up spare capacity at that junction to accommodate potential strategic growth.

Having made these points, it is recognised that Barkham Square’s location adjacent to the Arborfield Garrison SDL can be seen as an opportunity for the site, with residents likely to benefit from being directly adjacent to community facilities and services (such as the secondary school), supporting active/ sustainable travel uptake. Additionally, Wokingham town centre is c.5km distant from the site to the northeast, although connected only via the B3349, which could lead to congestion issues without appropriate supporting infrastructure. New residents at Arborfield Cross would have to cross relatively main roads to access the existing SDL and its facilities, and it is noted that sustainable / active travel opportunities are limited in the area. Furthermore given the piecemeal nature of the sites within the option, improvements to the local transport network are unlikely to be delivered when compared with other options. Albeit taken with a level of uncertainty, it is noted that representations received for Barkham Square set out clear pedestrian/ green links to support development across the site.

The South of Wokingham SDL is currently accessed by minor roads; however, there is the potential for a physical connection to the consented SDL, and together with other planned upgrades, it is considered possible that safe and suitable access to the site could be achieved, and there should also be an opportunity to address some existing road safety issues in the area. In terms of access to public transport, a shared boundary with the SDL indicates that a direct connection can be made from the site, supporting good access to high quality public transport. The site is also relatively close to Wokingham town centre, which can also be reached by active travel modes. Furthermore, masterplanning for the site suggests a network of paths and cycleways will be delivered, that follow Emm Brook and connect into Wokingham's wider active travel network.

Finally in terms of Blagrove Lane, the site is well connected to Wokingham to the east, and masterplanning for the site suggests new infrastructure and local facilities (including a primary school) will be delivered to support a level of self-containment and uptake of active travel for shorter, local journeys. However a key issue for the site is access, with a long proposed access road extending through TPO woodland or third party land.

In **conclusion**, all options have the potential to place pressure on the existing highways network, however the scale of the South of Wokingham SDL extension, proposed accompanying infrastructure, and connectivity with the SDL, may present an opportunity to deliver growth in such a way that reduces the need to travel and car dependency. Active and public transport opportunities are potentially more limited for the other three options, with Arborfield Cross performing least positively in this respect.

Water

Blagrove Lane	South Wokingham SDL extension	Barkham Square	Arborfield Cross cluster
=	=	=	=

Discussion

There is little potential to add to the discussion presented in Appendix III. It is noted that South of Wokingham SDL extension is closely associated with the corridor of the Emm Brook Water Framework Directive (WFD) waterbody, which is currently in 'poor' ecological condition; however, it is difficult to suggest that development (in place of agricultural land uses) gives rise to a risk of increased pollution to the water body, assuming high quality SuDS.

Conclusions on the smaller strategic site options

Topic	Scenario	Blagrove Lane	South Wokingham SDL extension	Barkham Square	Arborfield Cross cluster
Accessibility		★1	2	3	4
Air quality		2	★1	2	2
Biodiversity		2	★1	2	★1
CC adaptation		★1	2	2	★1
CC mitigation		=	=	=	=
Communities		2	★1	★1	2
Economy		=	=	=	=
Historic environment		★1	2	★1	2
Housing		★1	★1	★1	2
Land, soil and natural resources		2	2	★1	2
Landscape		=	=	=	=
Transport		2	★1	3	4
Water		=	=	=	=

Concluding discussion

As an initial point, it is notable that the appraisal predicts relatively little in the way of significant positive effects, in comparison to the appraisal of large strategic site options presented in Appendix III. This is on the basis of relatively little potential to fund and deliver strategic infrastructure upgrades. However, all of the sites are of a scale whereby there would be the potential to deliver a good mix of new homes, and all of the proposed schemes could deliver strategic green (also blue) infrastructure. The predicted effects under the 'housing' heading also reflect a view that smaller strategic sites have the benefit of tending to be associated with relatively low delivery risk.

Having made these initial points, the following bullet points conclude on each of the sites in turn:

- Blagrove Lane – has the benefit of being well-linked to the Borough's main urban area, and the scheme proposal notably includes a primary school, as well as other community infrastructure and significant greenspace. However, there is a concern regarding access arrangements, including because of the likelihood of needing to achieve access through a woodland that is designated as a LWS. There is also a need to think carefully, and with a long term perspective, about expansion of the urban area into landscape that is potentially sensitive and associated with historic character. The urban area should not extend beyond the valley of the Emm Brook.
- South of Wokingham SDL extension – performs best, or equal best, in respect of five topics, which is more than any of the other options. Benefits primarily relate to a view that the site links effectively to the committed part of the SDL to the north, and in many ways would form a logical extension to the SDL, ensuring that the SDL as whole is effectively bounded, at its southern extent, by strategic greenspace. The site is relatively unconstrained in a number of respects, including from a biodiversity perspective (there is good biodiversity net gain potential); however, it seems likely that there would be a need to accept a historic environment impact. Also, there is a need to consider the cumulative effect of growth here, along with growth elsewhere, on the Emm Brook.

- Barkham Square – would link well to a local centre and district centre within the SDL to the south. However: there is a degree of flood risk and biodiversity constraint, given the Barkham Brook; the potential for increased traffic through the Arborfield Cross Conservation Area can be envisaged; there is a need to carefully consider the landscape merits, or otherwise, of northwards expansion of the Arborfield SDL, towards Barkham and, beyond that, Wokingham; and there is a concern regarding further growth within a part of the Borough with relatively low accessibility / connectivity (traffic through the Wokingham town centre AQMA is a consideration).
- Arborfield Cross cluster – the proposal is to deliver a significant new ‘hill top parkland’ at the western extent of this site cluster, which could link very well to the major cluster of ancient woodlands associated with the Farley Hill area, and potentially serve to effectively delineate this rural wooded landscape from the more urban landscape of the Barkham Brook corridor. However, the appraisal finds this option to be associated with a number of drawbacks, both in an absolute and a relative sense. Foremost amongst these are concerns regarding impacts to the nearby Arborfield Cross Conservation Area, and delivery risk given the fact that there is fragmented land ownership, with no coordinated scheme proposal for the site cluster / area as a whole.

WBC Officers’ response to the appraisal

It is not the role of SA to conclude on the overall sustainability merits of options. However, in light of the appraisal presented above, WBC Officers were able to place the options in the following order of preference:

1. South Wokingham SDL extension – stands out as performing well.
2. Blagrove Lane and Barkham Square – perform less well, but warrant further consideration through the appraisal of borough-wide growth scenarios.
3. Arborfield Cross cluster – stands out as performing poorly, at least relative to Barkham Square, and there is no reasonable potential to allocate both sites in combination, hence the Arborfield Cross cluster option need not be considered further (in practice there would be a need for considerable work around land assembly).

Appendix V: Site options GIS analysis

Introduction

As discussed in Section 5.3, as a relatively minor step in the process of arriving at reasonable growth scenarios (see Figure 5.1) all site options were subjected to GIS analysis. The outcome of the analysis is in the form of a large spreadsheet of data, with 359 rows – one for each site option – and around 50 columns, where each column presents performance data (e.g. proximity to a school, percentage intersect with a flood zone), supplementary data (e.g. the name of the nearest ancient woodland) or other attribute information (e.g. the proposed use, or uses, for the site option in question). In total the spreadsheet presents data within around 40,000 cells.

The aim of this section is to present summary insights, considering the data both:

- within each column of the spreadsheet – i.e. information on the spread of data for each performance measure, including site options that stand-out as performing notably well and notably poorly; and
- across each row of the spreadsheet – i.e. considering how each site option performs, in respect of various locational metrics, both in absolute terms and relative to other site options.

Limitations

GIS analysis of the spatial relationship between site options and various push (e.g. historic environment designations) and pull (e.g. schools) features cannot be considered sophisticated analysis, in that:

- it will rarely serve to highlight an issue or an opportunity associated with any given site option that would not otherwise be readily apparent; and
- many of the issues and opportunities that the analysis does highlight are only 'theoretical', in that they can be discounted, or assigned limited weight in decision-making, upon closer inspection (e.g. distance to a primary school can be addressed by delivery of a new school onsite).

As such, GIS analysis of site options should not be overly relied upon, at the expense of a focus on qualitative analysis informed by wide ranging evidence, including the views of stakeholders, and professional judgement.

The analysis should certainly not be used as a primary means for arriving at overall conclusions on site options. Any attempt to utilise the analysis in this way would necessitate a process of Multi Criteria Analysis (MCA) whereby a degree of importance is assigned to each of the performance metrics, and this process is fraught with challenges.

Structure of this appendix

Set out below is:

- further discussion of methodology;
- insights into the data for a series of key metrics in turn; and then
- insights into the data for each of the site options in turn.

Methodology

The **first step** was to gather GIS data.

With regards to data for site options, the Council holds collated data of all sites submitted for consideration as part of the Local Plan-making process (including the Council itself). One of the issues/limitations is that land-owners sometimes submit multiple overlapping sites over time, leading to uncertainty regarding whether certain site options have become superseded. Another challenge is that large land-holdings sometimes get submitted, within which might be contained realistic site options.

With regards to data for constraint/push and opportunity/pull features, considerations include:

- Much data is available nationally, including data for air quality management areas, national biodiversity and historic environment designations and the nationally defined flood risk zones.
- There is no regional or sub-regional data repository (or 'observatory', e.g. as per that currently [under development](#) for the Oxford to Cambridge Arc) and, in the Wokingham context, there is no county council to engage with in respect of gathering GIS data.

- Much data is held by the Council, including that shown on the Wokingham Borough [Planning Constraints Map](#). There is naturally a need to focus on data that is held for the Borough as a whole, as opposed to data that covers only part of the Borough.

The **second step** was then to review and adjust the data. For example:

- Schools fall into a large number of categories, and so there was a need to go through a process to place each school into one of the following four categories - secondary, primary, early years, other (including fee paying schools) – with a view to running the analysis for each category.
- Similarly, listed buildings fall into three categories according to grade (grade 1, 2* and 2). Again, there was a need to split listed buildings according to these categories so that the analysis could be run for each category (i.e. query the distance between each site option and each category of listed building).
- Index of Multiple Deprivation – the simplest way to account for variation across the Borough is to rank each Lower Super Output Area (LSOA) in the Borough according to IMD score. Once this has been done, it is possible to record the rank of the most deprived LSOA that each site option intersects.

The **third step** was then to run the analysis, i.e. query the spatial relationship between each site option and each push/pull feature (e.g. distance to a primary school, distance to a grade 2* listed building, percentage intersect with grade 3 agricultural land). This involved using a GIS tool developed by AECOM, and there are two points to note:

- Distance was measured “as the crow flies” (it can also be possible to calculate distance by road, footpath etc).
- Distance was calculated from the nearest point of each site option (there can also be arguments to calculate distance from the centre point, or from known or likely access points).

Having generated the spreadsheet of data, the **fourth and final step** was then to interrogate, utilise and report the data – see discussion below.

Analysis outcomes by metric

The aim here is to present concise insights into trends across the data for a range of key metrics.

Agricultural land

41 sites intersect land that is shown to be of grade 1 or grade 2 quality by the nationally available ‘provisional’ agricultural land dataset, albeit it is recognised that this dataset is very low resolution. These sites stand-out as performing **poorly**. A further 206 sites are shown to significantly (>20%) intersect grade 3 quality land, and so are judged to perform **relatively poorly**.

The table below summarises the performance of the various categories of HELAA site, serving to suggest that agricultural land quality was not a major factor influencing the process.

	Average % intersect with agricultural land by grade		
	Grade 1	Grade 1 or 2	Grade 1, 2 or 3
Suitable	0.1	3.3	30.5
Potentially suitable	4.7	11.7	71.9
Unsuitable or unknown	3.7	12.6	56.6
Excluded	0	2.9	68.4

Air quality management area (AQMA)

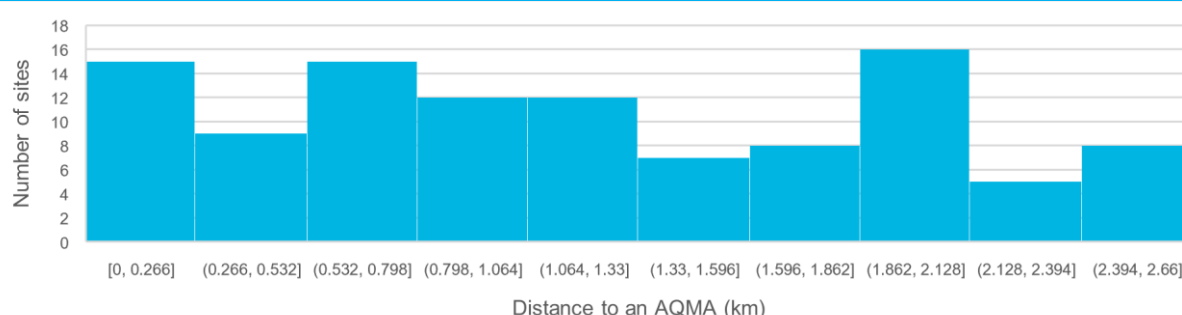
27 sites are within or adjacent to an AQMA, and in 22 of these cases the AQMA in question is that associated with the M4 motorway. A further 85 sites are then within 1km of an AQMA, and are judged to also stand-out as **performing poorly**, albeit it is recognised that distance to an AQMA is a crude indicator of the potential for development to give rise to issues or concerns due to increased traffic through the AQMA.

13 sites are beyond 5km from an AQMA, such that they stand-out as **performing well**. The remaining 234 sites could feasibly give rise to a concern, but there is no way of knowing without detailed traffic modelling. As such, it is appropriate to differentiate these sites on a colour scale on a relative basis according to distance.

The table below summarises the performance of the various categories of HELAA site (focusing only on those under consideration for housing), serving to suggest that distance to an AQMA was not a major factor influencing the process. The subsequent histogram then shows the spread of data, in terms of distance to an AQMA, for the HELAA suitable and potentially suitable sites.

	Average distance to an AQMA (km)
Suitable	0.9
Potentially suitable	1.2
Unsuitable or unknown	2.5
Excluded	2.5

Spread of data for suitable and potentially suitable HELAA sites (housing only)



Biodiversity

There is good availability of data to show areas of varying biodiversity value/sensitivity and, in turn, good potential to highlight site options that potentially give rise to a degree of concern due to intersect (which can suggest a risk of habitat loss) or proximity (e.g. woodlands in proximity to new homes can be at risk of recreational impacts).

Internationally designated sites

The key consideration here is the Thames Basin Heaths Special Protect Area (SPA), which is a complex of linked sites located to the south and southeast of the Borough. Distance between site options and the SPA has not been calculated (as an oversight); however, it is well understood that all virtually all land in the south of the Borough (south of the M4) is constrained to some extent. There are three established buffer zones surrounding the SPA, with the inner zone not suitable for housing growth and homes in the outer zones needing to following well-established protocols for ensuring that recreational impacts on the SPA are avoided or sufficiently mitigated. The buffer zones are mapped within the Habitats Regulations Assessment (HRA) Report published at the current time.

Site of Special Scientific Interest (SSSI)

Six sites intersect or are adjacent to a SSSI, of which two are HELAA potentially suitable, namely: 5WW009 (Ravenswood Village), which is adjacent; and 5BA033 (Land at Rooks Nest Farm), which is near adjacent. A further 65 sites are then within 1km of a SSSI, and are judged to also stand-out as **performing poorly**, albeit it is recognised that there are arguments for using a tighter distance threshold (e.g. 400m, as an easy walking distance) and a looser distance threshold (e.g. Natural England has defined a 2km Impact Risk Zone around most SSSIs within which planning applications for 50 homes or more must assess impact to the SSSI).

81 sites are beyond 3km from a SSSI, such that they stand-out as **performing well**. The remaining 207 sites could feasibly give rise to a concern, but there is judging this with any certainty at this stage. As such, it is appropriate to differentiate these sites on a colour scale on a relative basis according to distance.

The table below summarises the performance of the various categories of HELAA site, serving to suggest that distance to a SSSI was not a major factor influencing the process.

Local Wildlife Sites (LWS)

Six sites intersect or are adjacent to a SSSI, of which two are HELAA suitable or potentially suitable, namely: 5WW009 (Ravenswood Village), which is adjacent and judged potentially suitable for housing; and 5BA033 (Land at Rooks Nest Farm), which is near adjacent and judged potentially suitable for housing.

A further 65 sites are then within 1km of a SSSI, and are judged to also stand-out as **performing poorly**, albeit it is recognised that there are arguments for using alternative distance thresholds (e.g. 400m, as an easy walking distance; or 2km, which is the Impact Risk Zone that Natural England has defined for most SSSIs within which planning applications for 50 homes or more must assess impact to the SSSI).

81 sites are beyond 3km from a SSSI, such that they stand-out as **performing well**. The remaining 207 sites could feasibly give rise to a concern, but there is no way to judge this with any certainty at this stage. As such, it is appropriate to differentiate these sites on a colour scale on a relative basis according to distance.

The table below serves to suggest that distance to a SSSI was a factor influencing the HELAA.

As a further point, it is notable that Longmoor Bog stands-out as potentially the SSSI that is potentially under the greatest pressure, with 17 site options within 1km (including six supported by the HELAA), and five within 100m.

Local Wildlife Site (LWS)

14 sites significantly (>10%) intersect a LWS, of which three are HELAA suitable or potentially suitable (including two that almost entirely comprise a LWS, namely 5WK039 and 5HU052). A further 43 sites modestly intersect or are adjacent to a LWS, and a further 15 are within 50m, making a total of 87 sites that are judged to stand-out as **performing poorly**, albeit it is recognised that there are arguments for using alternative thresholds.

109 sites are beyond 500m from a LWS, such that they stand-out as **performing well**. The remaining 163 sites could feasibly give rise to a concern, but there is no way to judge this with any certainty at this stage. As such, it is appropriate to differentiate these sites on a colour scale on a relative basis according to distance.

The table below serves to suggest that distance to a LWS was not a major factor influencing the HELAA.

Ancient woodland

Six sites significantly (>10%) intersect an ancient woodland, of which three are HELAA suitable or potentially suitable (namely 5HU023, 5HU017 and 5BA018). A further 51 sites modestly intersect or are adjacent to an ancient woodland, and are judged to stand-out as **performing poorly**, albeit it is recognised that there are arguments for using alternative distance thresholds, e.g. 100m as a very easy walking distance (N.B. data is not available to differentiate between ancient woodlands according to accessibility).

149 sites are beyond 500m from an ancient woodland, such that they stand-out as **performing well**. The remaining 153 sites could feasibly give rise to a concern, but there is no way to judge this with any certainty at this stage. As such, it is appropriate to differentiate these sites on a colour scale on a relative basis according to distance.

The table below serves to suggest that distance to an ancient woodland was not a major factor influencing the HELAA.

Priority habitat

47 sites significantly (>20%) intersect priority habitat, and are judged to stand-out as **performing poorly**. Of these sites 15 are HELAA suitable or potentially suitable, and a stand-out site is 5WK039 (Land fronting Barkham Road), which almost entirely comprises priority habitat and is judged potentially suitable by the HELAA. This site is one of several sites that together make up a strategic site option known as Blagrove Lane, and whilst the site would not be used for housing there is an expectation that an access road would be required through the site.

240 sites do not intersect priority habitat, such that they stand-out as **performing well**. The remaining 72 sites could feasibly give rise to a concern, but there is no way to judge this with any certainty at this stage. As such, it is appropriate to differentiate these sites on a colour scale on a relative basis according to intersect.

The table below serves to suggest that intersect with priority habitat was a factor influencing the HELAA.

Tree Preservation Orders

N.B it is recognised that this is not strictly a biodiversity designation, but it warrants consideration nonetheless.

36 sites significantly (>20%) intersect land with TPO designation, and are judged to stand-out as **performing poorly**. Of these sites 11 are supported by the HELAA, including five where the percentage intersect is >50%.

223 sites do not intersect a TPO, such that they stand-out as **performing well**. The remaining 100 sites could feasibly give rise to a concern, but there is no way to judge this with any certainty at this stage. As such, it is appropriate to differentiate these sites on a colour scale on a relative basis according to distance.

National Forest Inventory (NFI)

23 sites significantly (>50%) intersect NFI land, and are judged to stand-out as **performing poorly**. 286 sites do not intersect, or intersect by less than 10%, such that they stand-out as **performing well**. The remaining 46 sites could feasibly give rise to a concern, but there is no way to judge this with any certainty at this stage. As such, it is appropriate to differentiate these sites on a colour scale on a relative basis according to intersect.

	Avg distance to biodiversity designations (km)			Avg % intersect with biodiversity designations		
	SSSI	Local Wildlife Site	Ancient woodland	Priority habitat	TPO	NFI
Suitable	2.9	0.5	0.6	5.7	9	8.4
Potentially suitable	2.4	0.3	0.3	7.9	4.5	9.6
Unsuitable or unknown	1.8	0.4	0.6	9.5	12.3	14
Excluded	1.8	0.3	0.6	7	3.3	6.1

Biodiversity Opportunity Area (BOA)

39 sites intersect a BOA, of which 12 are HELAA suitable or potentially suitable. BOAs are broad areas of constraint, but also potentially opportunity (as the name suggests), hence there is simply a need to highlight the 39 sites in question for further consideration.

Communities

There is good availability of data to show the location of community facilities within the Borough. However, it is important to note that it has not been possible to account for community facilities within neighbouring local authority areas. This is a significant limitation, as residents of the Borough will often travel outside of the Borough to meet their needs, e.g. within Bracknell or Reading.

Town centre

96 sites are more than 5km from a town centre (within Wokingham Borough), and are judged to stand-out as **performing poorly** (albeit it is recognised that town centres outside of the Borough may well be closer). All of these sites bar one (located in Remenham) are located in one of four parishes that make-up the southern part of the Borough (Arborfield, Finchampstead, Shinfield and Swallowfield), which is a part of the Borough that is characterised by relatively poor accessibility to higher order services and facilities. It is also notable that 24 of the 26 worst performing sites are within Swallowfield Parish, which is notably rural.

72 sites are less than 1.5km from a town centre (within Wokingham Borough), and so stand-out as **performing well**. The remaining 191 sites could feasibly give rise to a concern, but there is no way to judge this with any certainty at this stage. As such, it is appropriate to differentiate these sites on a colour scale on a relative basis according to distance.

District centre

59 sites are more than 4km from a district centre (within Wokingham Borough), and are judged to stand-out as **performing poorly**. All of these sites bar one are located in either Swallowfield or Shinfield, although it is important to note that a new district centre is coming forward as part of the Shinfield Strategic Development Location (SDL), and also that Shinfield Road district centre in Reading Borough is quite nearby.

87 sites are less than 1km from a district centre (within Wokingham Borough), and so stand-out as **performing well**. The remaining 213 sites could feasibly give rise to a concern, but there is no way to judge this with any certainty at this stage. As such, it is appropriate to differentiate these sites on a colour scale on a relative basis according to distance.

GP surgery

55 sites are more than 2km from a GP surgery (within Wokingham Borough), and are judged to stand-out as **performing poorly**. The top 26 worst performing sites are all located in one of three parishes (Hurst, Finchampstead and Shinfield) (N.B. there is a GP surgery in Swallowfield). At Shinfield there is a GP surgery, but land within the Parish to the west of the A33 (Grazeley) is distant from a GP surgery.

116 sites are less than 1km from a GP surgery (within Wokingham Borough), and so stand-out as **performing well**. The remaining 188 sites could feasibly give rise to a concern, but there is no way to judge this with any certainty at this stage. As such, it is appropriate to differentiate these sites on a colour scale on a relative basis according to distance.

Secondary school

81 sites are more than 2km from a secondary school (within Wokingham Borough), and are judged to stand-out as **performing poorly**. The top 34 worst performing sites bar one (located in Remenham) are all located in one of four parishes (Hurst, Finchampstead, Shinfield and Swallowfield). Again, in Shinfield there is a secondary school, but land within the Parish to the west of the A33 (Grazeley) is distant from a secondary school.

85 sites are less than 1km from a GP surgery (within Wokingham Borough), and so stand-out as **performing well**. The remaining 193 sites could feasibly give rise to a concern, but there is no way to judge this with any certainty at this stage. As such, it is appropriate to differentiate these sites on a colour scale on a relative basis according to distance.

Primary school

48 sites are more than 1.5km from a primary school, and are judged to stand-out as **performing poorly**. Risely is notable as a village – associated with numerous site options - without a primary school.

105 sites are less than 1km from a primary school, and so stand-out as **performing well**. The remaining 206 sites could feasibly give rise to a concern, but there is no way to judge this with any certainty at this stage. As such, it is appropriate to differentiate these sites on a colour scale on a relative basis according to distance.

Flood zone 2

41 sites intersect flood zone 2 by more than 20% and are judged to stand-out as **performing poorly**. 14 of these sites are HELAA suitable or potentially suitable, including four where the percentage intersect is c.50% or more; this includes one site (5WI008, which is a relatively small site within the urban area of Winnersh) that is HELAA suitable despite falling entirely within flood zone 2 (although intersect with flood zone 3 is only 10%). The average size of sites judged to perform poorly is 29.4 ha (in contrast to 9.4 ha across all site options), a scale at which there will typically be good potential to masterplan so as to avoid and buffer flood zones.

278 sites do not intersect flood zone 2, and so stand-out as **performing well**. The remaining 40 sites could feasibly give rise to a concern, but there is no way to judge this with any certainty at this stage. As such, it is appropriate to differentiate these sites on a colour scale on a relative basis according to distance.

Surface water flood zone (1 in 1000 year)

22 sites intersect the flood zone by more than 20% and are judged to stand-out as **performing poorly**. The average intersect of sites HELAA suitable or potentially suitable for housing uses (or with 'suitability unknown') is 4.1%, in contrast to a figure of 6.5% for sites judged unsuitable, serving to suggest that this was a factor that influenced the HELAA. One site judged suitable for Gypsy and Traveller uses has quite a high intersect (36.3%), although the average intersect across the four sites supported for this use is lower, at 13%.

246 sites do not intersect the flood zone, or intersect by less than 5%, and so stand-out as **performing well**. The remaining 91 sites could feasibly give rise to a concern, but there is no way to judge this with any certainty at this stage. As such, it is appropriate to differentiate these sites on a colour scale on a relative basis according to distance.

Conservation area

51 sites are within 250m of a conservation area and are judged to stand-out as **performing poorly**. Of these sites 18 sites intersect or are adjacent, of which 11 are HELAA suitable or potentially suitable.

140 sites are more than 1.5km distant, and so stand-out as **performing well**. The remaining 172 sites could feasibly give rise to a concern, but there is no way to judge this with any certainty at this stage. As such, it is appropriate to differentiate these sites on a colour scale on a relative basis according to distance.

Grade 1 listed building

29 sites are within 500m of a grade 1 listed building and are judged to stand-out as **performing poorly**. 12 of these sites are HELAA suitable or potentially suitable, including a cluster of three sites at Ruscombe that are the three worst performing sites.

198 sites are more than 1.5km distant, and so stand-out as **performing well**. The remaining 136 sites could feasibly give rise to a concern, but there is no way to judge this with any certainty at this stage. As such, it is appropriate to differentiate these sites on a colour scale on a relative basis according to distance.

Grade 2* listed building

56 sites are within 500m of a grade 2* listed building and are judged to stand-out as **performing poorly**. Lock's House, within Wokingham Without Parish, stands out as a grade 2* listed building where there is a large number of HELAA suitable or potentially suitable (or consented) sites in relative proximity (seven sites within 800m).

127 sites are more than 1.5 km distant, and so stand-out as **performing well**. The remaining 180 sites could feasibly give rise to a concern, but there is no way to judge this with any certainty at this stage. As such, it is appropriate to differentiate these sites on a colour scale on a relative basis according to distance.

Grade 2 listed building

87 sites are within 500m of a grade 2 listed building and are judged to stand-out as **performing poorly**. This includes 28 sites that intersect or are adjacent, of which 14 are HELAA suitable or potentially suitable.

81 sites are more than 1.5 km distant, and so stand-out as **performing well**. The remaining 195 sites could feasibly give rise to a concern, but there is no way to judge this with any certainty at this stage. As such, it is appropriate to differentiate these sites on a colour scale on a relative basis according to distance.

The average distance of sites supported by the HELAA is 250m, which contrasts to an average distance of 360m for sites judged unsuitable by the HELAA.

Grade 2* Registered park or garden (RPG)

56 sites are within 1 km of a grade 2* RPG and are judged to stand-out as **performing poorly**. 20 of these sites are HELAA suitable or potentially suitable, and the great majority are in proximity to Bearwood College.

164 sites are more than 3 km distant, and so stand-out as **performing well**. The remaining 143 sites could feasibly give rise to a concern, but there is no way to judge this with any certainty at this stage. As such, it is appropriate to differentiate these sites on a colour scale on a relative basis according to distance.

N.B. No sites are in close proximity to a grade 1 RPG (eight sites are within 2.5 km of Banisters, but none of these are HELAA suitable or potentially suitable).

Grade 2 Registered park or garden (RPG)

37 sites are within 1 km of a grade 2 RPG and are judged to stand-out as **performing poorly**. Of these just four are HELAA suitable or potentially suitable. It is also notable that 23 of the 37 sites within 1km are located within Swallowfield Parish, although only two of these sites are HELAA suitable or potentially suitable.

216 sites are more than 3 km distant, and so stand-out as **performing well**. The remaining 110 sites could feasibly give rise to a concern, but there is no way to judge this with any certainty at this stage. As such, it is appropriate to differentiate these sites on a colour scale on a relative basis according to distance.

Scheduled monument

Seven sites are within 200m of a scheduled and are judged to stand-out as **performing poorly**. Of these two are HELAA suitable or potentially suitable – one at Charvil and another at Arborfield. It is also notable that 23 of the 37 sites within 1km are located within Swallowfield Parish, although only two of these sites are HELAA suitable or potentially suitable.

330 sites are more than 500m distant, and so stand-out as **performing well**. The remaining 26 sites could feasibly give rise to a concern, but there is no way to judge this with any certainty at this stage. As such, it is appropriate to differentiate these sites on a colour scale on a relative basis according to distance.

Index of Multiple Deprivation

All Super Output Areas (SOAs) nationally are assigned an Index of Multiple Deprivation (IMD) score, and the results can be viewed at: dclgapps.communities.gov.uk/imd/iod_index.html. There can be merit to directing development to areas experiencing relative deprivation, with a view to supporting regeneration.

As such, the approach taken was to firstly place all of the Borough's SOAs into five categories (quintiles) according to IMD score, and then record the 'highest deprivation' quintile that each site option intersects. Where a site intersects an SOA in the most deprived quintile it is assigned **green** and **red** where it only intersects one or more SOAs in the least deprived quintile. Three intermediate colours are also used.

Core employment area

The approach taken is to assume that proximity to a core employment area is a positive, from a perspective of supporting the employment area and also encouraging walking/cycling. However, in practice it is recognised that there is little reason to assume that a significant proportion of residents within any given community will work within the nearest core employment area. Also, there is a need to be mindful that where a site option intersects an employment area it could be an indication of a proposal to redevelop the employment area for housing.

60 sites are more than 2.5km from a core employment area (within Wokingham Borough), and are judged to stand-out as **performing poorly**. Most of the worst performing sites are located in Swallowfield Parish.

115 sites are less than 1km from a core employment area, and so stand-out as **performing well**. The remaining 184 sites are differentiated on a colour scale on a relative basis according to distance.

N.B. sites intersecting a core employment area are highlighted with an asterisk (*)

Landfill site

48 sites intersect, are adjacent to or near adjacent to a current or former landfill site, and are judged to stand-out as **performing poorly**. A further sites are within 200m, and so assigned an **amber** rating. The remaining 263 sites are assigned a **green** rating.

Analysis outcomes by site option

Table A includes a row for each of the site options subjected to GIS analysis.

Sites are firstly grouped by sub-area.

Secondly, within each sub-area, sites are grouped according to their '**SA status**' as follows:

- **Dark green** – are proposed allocations that are held constant across the reasonable growth scenarios that are a focus of Part 1 of this report, but which are a focus of the Revised Growth Strategy appraisal presented in Part 2. Proposed use and HELAA conclusion are also recorded.
- **Light green** – only one site falls into this category, namely Hall Farm / Loddon Valley. It is a proposed allocation and a variable across the reasonable growth scenarios (i.e. it is not feature in all scenarios), such that it is a focus of appraisal in Part 1 of this report, as well as a focus of appraisal in Part 2.
- **Yellow** – are omission sites (i.e. sites not proposed for allocation) that feature within the certain of the reasonable growth scenarios, such that they are a focus of detailed appraisal in Part 1 of this report..
- **Amber** – are omission sites that were considered as potential 'smaller strategic sites', but which were not progressed to the reasonable growth scenarios. They are given stand-alone consideration in Section 5.3 of this report, and one site ('Arborfield Cluster') is a focus of appraisal in Appendix IV.
- **Red** – are the remaining omission sites. Some are a focus of discussion in Section 5.4, including all of the larger sites and all of those judged suitable or potentially suitable by the HELAA.

With regards to the columns on the right-hand side of the table, which deal with **performance metrics**:

The methodology for categorising performance on a red/amber/green scale is set out across the preceding pages within this appendix. In short, the approach taken for most metrics is to highlight sites that stand-out as performing poorly (in an absolute or relative sense) **red**, sites that stand-out as performing well (in an absolute or relative sense) **green** and to apply a light-red to light-green **colour scale** for the middle performing sites (in place of simply assigning an amber score). In addition, no colour is used in one instance (agricultural land), in place of green, because it would not be correct to suggest that the sites in question perform well.

Ref.	Site Address	Sub-area	SA status	Area (ha)	AQMA	Woodland/forest	Tree Preservation Order	Priority habitat	Ancient woodland	Local Wildlife Site	SSSI	Fluvial flood zone	Surface water flood zone	Local centre	Town centre	GP surgery	Early years school	Primary school	Secondary school	Index of multiple deprivation	Core employment area	Scheduled monument	Grade 1 listed building	Grade 2 listed building	Grade 2* listed building	Grade 2 registered park/garden	Grade 2* registered park/garden	Conservation area	Agricultural Land	Landfill site
5TW010	Land at Bridge Farm	A4 corridor	Proposed allocation (HELAA potentially suitable)	12.2																										
5TW005	Land at Bridge Farm			7.2																										
5TW009	Land West of Twyford			5.4																										
5SO001	Land at Sonning Farm		Proposed allocation (HELAA suitable)	1.4																										
5RU008	Land between 39-53 New Road, Ruscombe		Proposed allocation (HELAA suitable)	0.9																										
5RU007	Land to the rear of 9-17 Northbury Lane, Ruscombe		Proposed allocation (HELAA suitable)	0.5																										
5CV001	Land East & West of Park View Drive North		Proposed allocation (HELAA potentially suitable)	13.3																										
5CV002	Land West of Park Lane		Proposed allocation (HELAA potentially suitable)	8.8																										
5SO008	Land east of Pound Lane, Sonning (Sonning Golf Club)		Proposed allocation (HELAA potentially suitable)	1.3																										
5RU006	Land at Ruscombe		Growth scenarios - East of T/R (HELAA potentially suitable)	89.2																										
5RU004	Land at Southbury Lane			43.5																										
5RU001	Land to the west of London Road			42.2																										
5RU005	Land to the East of London Road			37.6																										
5RU002	Land North of Castle End Road			13.3																										
5RU003	Land East of Church Lane			6.6																										
5TW011	Land North of A4 and west of A321 Wargrave Road		Growth scenarios (HELAA unsuitable)	24.0																										
5SO005	Land at Sonning Golf Club, Duffield Road		Consented	0.8																										
5SO012	Berkshire Sports and Social Club		HELAA potentially suitable - leisure	21.7																										
5SO011	Land at Holme Farm		-	25.3																										
5HU043	Land to the west of Hurst Road		-	12.3																										
5SO004	Land West of Milestone Avenue		-	9.1																										
5SO002	Land East of Garde Road		-	6.3																										
5SO010	Old Redingensians Sports Ground		-	4.3																										
5SO003	Land North of Thames Street		-	3.7																										
5SO009	Thatched Cottage		-	3.1																										
5WA004	Land to the South of Bath Road		-	3.1																										
5TW006	Land West of Hurst Road		-	2.6																										
5WA007	Primrose Nursery, London Road		-	2.3																										
5WA005	Land West of Wargrave Road and North of the A4		-	2.3																										
5WA010	Sheeplands Farm, New Bath Road		-	2.3																										
5WA003	Primrose Nursery, London Road		-	2.1																										
5CV005	Land to the rear of Oaktree Cottage		-	1.4																										
5TW012	Loddon Nursery, Twyford, Berkshire		-	0.6																										
5TW008	134 Wargrave Road		-	0.4																										
5CV004	3 Norris Green		-	0.3																										
5SO007	Land Adjacent to Model Farm Cottages Bath Road		-	0.2																										
5WA008	Hare Hatch Garden Centre, Floral Mile, Hare Hatch.		-	3.7																										

Ref.	Site Address	Sub-area	SA status	Area (ha)	AQMA	Woodland/forest	Tree Preservation Order	Priority habitat	Ancient woodland	Local Wildlife Site	SSSI	Fluvial flood zone	Surface water flood zone	Local centre	Town centre	GP surgery	Early years school	Primary school	Secondary school	Index of multiple deprivation	Core employment area	Scheduled monument	Grade 1 listed building	Grade 2 listed building	Grade 2* listed building	Grade 2 registered park/garden	Grade 2* registered park/garden	Conservation area	Agricultural Land	Landfill site
5WA002	Hare Hatch Sheeplands	Woodley	-	3.6																										
5WA006	Land at the Eastern end of 'The Old House'		-	1.4																										
5TW007	Land north of the A4		-	24.0																										
5RE001	Land West of Remenham Hill		-	0.7																										
5SO006	Land at Russell's Field/Ali's Pond, Sonning Lane		-	0.7																										
5WA009	Land adjoining Bear Cottage, Milley Lane, Hare Hatch		-	0.6																										
5WA011	Land at Tag Lane		-	0.3																										
5CV003	Wallys Mobile Home Park		-	0.3																										
5WO004	Land at Sandford Mill Pumping Station		Proposed allocation (HELAA suitable)	0.6																										
5EA002	Gasholders	Hurst	HELAA suitable - employment	2.3																										
5WO002	Western Site, Headley Road East		HELAA suitability unknown	2.6																										
5WO003	Land to rear and adj. to New Addington School, Woodlands Avenue		-	13.7																										
5HU030	Land North-West of Hogmoor Lane		Proposed allocation (HELAA potentially suitable)	4.0																										
5HU002	Land adjacent to Whistley Green Cottage, Whistley Green		Proposed allocation (HELAA potentially suitable)	0.3																										
5HU008	Land off Lodge Road		Growth scenarios (HELAA unsuitable)	0.8																										
5HU006	Land on the North Side of Orchard Road		HELAA potentially suitable	1.1																										
5HU052	Land at the rear of Vine cottage		HELAA potentially suitable	1.1																										
5HU019	Land To The South Of Units 1 To 12 Beech Court, Wokingham Road		HELAA potentially suitable - employment	0.5																										
5HU003	Whistley Meadow St Nicholas, Whistley Green		-	18.3																										
5HU016	Land on the east side of Lodge Road		-	10.6																										
5HU004	Land at Broadcommon Road		-	4.5																										
5HU031	Land South-West Broadwater Lane		-	2.4																										
5HU032	Land southwest of Broadcommon Road		-	2.1																										
5HU005	Land at The Phoenix, Nelson's Lane		-	1.9																										
5HU025	Hedgerley Stables		-	1.6																										
5HU027	Walden Acres, Wokingham Road		-	1.1																										
5HU007	land at St Swithins Cottage, Hinton Road		-	0.4																										
5HU029	Triangle outside Hurst House		-	0.3																										
5HU026	Hedgerley Stables		-	0.3																										
5HU035	Heriots, Wokingham Road		-	4.5																										
5HU028	West Lodge strip of land North and South, Lodge Road		-	1.9																										
5HU048	Hatch Farm Gate		-	1.2																										
5HU038	Wind in the Willows (Land adjacent to Cartef Farm)		-	0.2																										
5HU018	Land on North West side of Nelsons Lane		-	0.2																										

Ref.	Site Address	Sub-area	SA status	Area (ha)	AQMA	Woodland/forest	Tree Preservation Order	Priority habitat	Ancient woodland	Local Wildlife Site	SSSI	Fluvial flood zone	Surface water flood zone	Local centre	Town centre	GP surgery	Early years school	Primary school	Secondary school	Index of multiple deprivation	Core employment area	Scheduled monument	Grade 1 listed building	Grade 2 listed building	Grade 2* listed building	Grade 2 registered park/garden	Grade 2* registered park/garden	Conservation area	Agricultural Land	Landfill site		
5WK002	Ashridge Farm, Warren House Road	North of Wokingham	Proposed allocation (consented)	17.9	Red	Green	Yellow	Green	Yellow	Green	Green	Red	Orange	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Green	Green	Yellow	Yellow	Green		
5WK051	Land east of Toutley Depot		Proposed allocation (HELAA potentially suitable)	7.4	Red	Green	Green	Green	Green	Green	Green	Orange	Orange	Green	Green	Green	Yellow	Green	Green	Green	Red	*	Green	Green	Green	Orange	Green	Green	Yellow	Yellow	Green	
5HU051	Land North of London Road and East of A329		Proposed allocation (HELAA potentially suitable)	3.2	Orange	Green	Green	Green	Orange	Yellow	Orange	Green	Green	Green	Green	Green	Orange	Green	Yellow	Yellow	Green	Red	Green	Green	Green	Green	Orange	Green	Yellow	Yellow	Green	
5HU014	Warren Farm, Forest Road		Growth scenarios – Ashridge (HELAA potentially suitable)	48.6	Red	Green	Green	Green	Red	Red	Green	Green	Green	Green	Yellow	Green	Orange	Yellow	Red	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Green	
5HU022	The Bill Hill Estate, Twyford Road			45.2	Red	Orange	Green	Orange	Red	Red	Red	Yellow	Green	Green	Green	Green	Green	Orange	Yellow	Yellow	Green	Green	Green	Green	Green	Red	Green	Green	Green	Yellow	Orange	
5HU015	Ashridgewood Farm, Warren House Road			38.0	Red	Green	Green	Green	Red	Yellow	Green	Green	Green	Orange	Green	Green	Green	Green	Green	Yellow	Green	Green	Green	Green	Red	Orange	Green	Yellow	Green	Green	Green	
5HU017	Ashridgewood, Forest Road			35.4	Red	Yellow	Orange	Red	Red	Orange	Green	Green	Green	Green	Green	Yellow	Green	Yellow	Green	Red	Yellow	Green	Green	Green	Green	Orange	Green	Green	Green	Green	White	Green
5HU013	Land On The North West Side Of Harp Farm			22.1	Red	Green	Green	Yellow	Orange	Green	Green	Green	Green	Green	Green	Green	Green	Orange	Orange	Orange	Yellow	Green	Green	Green	Green	Red	Green	Green	Green	Green	Orange	Green
5HU011	Pikes Farm, Forest Road			17.2	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Yellow	Green	Green	Green	Green	Green	Green	Red	Yellow	Green	Green	Green	Orange	Green
5HU020	Land on the east side of Twyford Road			9.6	Red	Green	Green	Green	Orange	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Orange	Yellow	Green	Green	Green	Green	Green	Orange	Orange	Green	Green	Green	Green	Green
5HU021	Land On The South Side Of Forest Road			7.5	Red	Yellow	Green	Orange	Orange	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Orange	Orange	Green	Green	Green	Green	Green	Yellow	Yellow	Green	Green	Green	Orange	Green
5HU023	Ashridge Manor Forest Farm			6.9	Red	Orange	Green	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Yellow	Orange	Orange	Yellow	Green	Green	Green	Green	Green	Orange	Green	Green	Green	White	Green
5HU009	Oak View Farm, Forest Road			6.7	Red	Green	Yellow	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Yellow	Orange	Red	Yellow	Green	Green	Green	Green	Green	Orange	Green	Green	Green	White	Green
5HU010	Land North of the A329 (M), Ashridge Farm, Land Off Twyford Road			4.7	Red	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Yellow	Orange	Yellow	Green	Green	Green	Green	Green	Green	Orange	Green	Green	Green	Orange	Green
5HU047	Land to east of Warren House Road			4.6	Orange	Green	Green	Green	Orange	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Green	Orange	Orange	Green	Green	Green	Green	Yellow	Yellow	Green	Green	Green	Orange	Green
5HU012	Ashridgewood Place, Forest Road			3.9	Red	Green	Orange	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Orange	Red	Yellow	Green	Green	Green	Green	Green	Yellow	Green	Green	White	Green	Green
5HU041	The Lodge, Ashridge Manor, Forest Road, Wokingham			1.0	Red	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Orange	Red	Yellow	Green	Green	Green	Green	Green	Yellow	Green	Green	White	Green	Green
5HU033	Land at Stokes Farm, Binfield Road		Smaller strategic site option (HELAA excluded)	80.1	Orange	Green	Yellow	Yellow	Green	Red	Yellow	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Orange	Green	Green	Yellow	Orange	Green	Red	Green	Orange	Green	
5HU037	Dinton Pastures, Sandford Lane, Davis Street, Hurst		HELAA potentially suitable - leisure	18.2	Orange	Green	Green	Green	Green	Red	Green	Red	Yellow	Green	Yellow	Green	Yellow	Green	Green	Green	Green	Green	Orange	Orange	Green	Green	Green	Yellow	Yellow	Orange	Green	
5WK009	Wokingham STW, Bell Foundary Lane		HELAA suitability unknown	4.5	Orange	Green	Yellow	Green	Green	Green	Green	Red	Orange	Green	Green	Green	Green	Yellow	Green	Green	Green	*	Green	Green	Orange	Red	Green	Green	Yellow	Orange	Green	
5WK052	Toutley Depot		HELAA suitability unknown	3.9	Red	Yellow	Red	Red	Green	Green	Green	Red	Orange	Green	Green	Green	Orange	Green	Green	Green	Red	*	Green	Green	Green	Green	Green	Yellow	Green	Orange	Red	
5HU024	Land to the North of London Road and East of the A329M		-	41.9	Yellow	Green	Yellow	Green	Red	Red	Orange	Green	Green	Yellow	Green	Green	Green	Yellow	Red	Orange	Green	Red	Green	Orange	Red	Red	Green	Red	Green	Yellow	Green	
5HU034	Land West of Dunt Lane/ South of Green Lane		-	17.8	Red	Green	Green	Green	Yellow	Orange	Yellow	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Yellow	Green	Orange	Green	
5HU039	White Cottage, Forest Road		-	3.1	Yellow	Green	Green	Green	Orange	Green	Green	Green	Green	Green	Yellow	Green	Green	Green	Red	Orange	Green	Red	Green	Green	Yellow	Green	Red	Green	Green	White	Green	
5HU045	Manor Farm, Binfield Road		-	2.6	Yellow	Green	Green	Green	Yellow	Yellow	Green	Green	Red	Green	Green	Green	Green	Green	Red	Orange	Green	Orange	Green	Green	Yellow	Orange	Green	Green	Green	Orange	Green	
5HU001	Little Hill Road		-	2.0	Red	Green	Green	Green	Green	Green	Orange	Green	Green	Green	Yellow	Green	Red	Green	Green	Green	Green	Green	Green	Green	Yellow	Green	Green	Yellow	Green	Orange	Green	
5HU049	Stokes Cottage		-	1.1	Orange	Green	Green	Red	Orange	Orange	Green	Green	Green	Green	Green	Green	Green	Orange	Orange	Yellow	Green	Orange	Green	Green	Green	Green	Orange	Green	Green	Orange	Green	
5HU044	Land between Davis Way & Little Hill Road		-	0.9	Red	Green	Green	Green	Green	Yellow	Orange	Red	Orange	Yellow	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Yellow	Green	Green	Yellow	Green	Orange	Green	
5HU050	Land adjacent to Old Crown Cottage		-	0.7	Red	Green	Green	Green	Green	Yellow	Green	Green	Green	Yellow	Green	Green	Red	Yellow	Green	Green	Green	Green	Green	Yellow	Green	Green	Green	Yellow	Green	White	Green	
5HU046	Douglas House, Douglas Way		-	0.5	Red	Green	Green	Green	Green	Yellow	Orange	Green	Green	Green	Yellow	Green	Red	Yellow	Green	Green	Green	Green	Green	Green	Yellow	Green	Green	Yellow	Green	White	Green	
5HU040	Galtimore, Dunt Lane, Hurst		-	0.4	Red	Green	Green	Green	Green	Yellow	Green	Green	Green	Green	Yellow	Green	Red	Yellow	Green	Green	Green	Green	Green	Green	Yellow	Green	Green	Yellow	Green	White	Green	
5HU042	Land at Junction of Davis Street and Dunt Lane		-	0.1	Orange	Green	Green	Green	Green	Green	Orange	Green	Green	Green	Yellow	Green	Orange	Orange	Orange	Yellow	Green	Green	Green	Orange	Red	Green	Green	Green	Orange	Orange	Green	

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Ref.	Site Address	Sub-area	SA status	Area (ha)	AQMA	Woodland/forest	Tree Preservation Order	Priority habitat	Ancient woodland	Local Wildlife Site	SSSI	Fluvial flood zone	Surface water flood zone	Local centre	Town centre	GP surgery	Early years school	Primary school	Secondary school	Index of multiple deprivation	Core employment area	Scheduled monument	Grade 1 listed building	Grade 2 listed building	Grade 2* listed building	Grade 2 registered park/garden	Grade 2* registered park/garden	Conservation area	Agricultural Land	Landfill site
5WK037	Land East of Finchampstead Road			24.4																										
5WW015	Land adjoining Bigwood House, Waterloo Road		Consented	6.9																										
5WW016	Land adjacent to Bigwood House, Waterloo Road		Consented	6.9																										
5BA006	Land to the rear of 326-334, Barkham Ride		Consented	0.8																										
5WK026	Land adjoining Berkshire Way		Consented for SANG	9.0																										
5WK023	Rosery Cottage and 171 Evendons Lane		HELAA potentially suitable	0.7																										
5WK042	Woodside Caravan Park, Blagrove Lane		HELAA potentially suitable - Gypsies and Travellers	1.0																										
5BA031	Land at Barkham Manor Farm		-	21.0																										
5BA004	The Bungalow, Edney hill		-	4.7																										
5BA002	Land at Barkham Manor		-	1.1																										
5BA019	Wrens Nest Stables, Barkham Road		-	1.1																										
5BA017	Land adjacent to Coppid Hill House, Barkham Road		-	0.8																										
5BA025	29 Bearwood Road		-	0.8																										
5WK011	Land South of London Road (Western Field)		-	0.8																										
5BA011	Land to the Rear of 370 - 384 Barkham Road		-	0.4																										
5WW025	Land at Newlands Farm Wokingham RG40 3BU		-	25.9																										
5WW024	Southfork, Easthampstead Road, Wokingham		-	8.6																										
5WW028	Land at Brookfield Farm		-	7.5																										
5WW029	Land at Sutton Court Farm		-	4.9																										
5WK040	Ten Acres Farm		-	4.0																										
5BA008	Land off Barkham Street		-	2.1																										
5BA026	Land north of Barkham Road		-	1.1																										
5WK036	Land at the rear of Chapel Green House		-	0.9																										
5WK021	Land at the Bowers		-	0.2																										
5WK033	Land adjacent to 229 Barkham Road		-	0.1																										
5WI004	Land off Poplar Lane and Watmore Lane		Winnersh		32.6																									
5WI006	Land off Maidensfield			Proposed allocation (HELAA potentially suitable)	11.2																									
5WI010	Winnersh Farm, Watmore Lane, Winnersh, Wokingham				6.8																									
5WI008	Winnersh Plant Hire			Proposed allocation (HELAA suitable)	1.6																									
5WI003	498 Reading Road			Consented	0.1																									
5WI005	Winnersh Garden Centre, Reading Road			-	5.3																									
5WI016	9 Winnersh Gate		-	0.1																										

Appendices 177

Ref.	Site Address	Sub-area	SA status	Area (ha)	AQMA	Woodland/forest	Tree Preservation Order	Priority habitat	Ancient woodland	Local Wildlife Site	SSSI	Fluvial flood zone	Surface water flood zone	Local centre	Town centre	GP surgery	Early years school	Primary school	Secondary school	Index of multiple deprivation	Core employment area	Scheduled monument	Grade 1 listed building	Grade 2 listed building	Grade 2* listed building	Grade 2 registered park/garden	Grade 2* registered park/garden	Conservation area	Agricultural Land	Landfill site
5SH024	Land North West side Church Lane	-	-	7.3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5SH015	Land at Stanbury House, Basingstoke Road		-	5.6	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5SH019	Parklands, Basingstoke Road		-	4.7	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5SH002	Land west of Basingstoke Road		-	4.3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5SH042	Land at Basingstoke Road, Spencers Wood		-	4.3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5SH014	Land off Sussex Lane		-	4.2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5SH057	Land west of Hyde End Road		-	4.2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5SH010	Land at Grazeley Road		-	4.1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5SH033	Land at Grazeley Road		-	4.1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5SH054	Land to the rear of 55 Woodcock Court		-	3.9	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5SH006	Land off Winston Close		-	3.7	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5SH001	Land adjacent to North Lodge, Basingstoke Road		-	3.0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5SH044	Dobbies Garden Centres Limited		-	2.6	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5SH039	Land North of Church Lane, Three Mile Cross		-	2.4	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5SH051	Land at Church Lane		-	2.3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5SH005	Derydene, Basingstoke Road		-	1.3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5SH043	Land to the North of Brookers Hill		-	1.1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5SH009	Land Adjacent to East side of Oakbank School		-	0.9	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5SH003	The Paddock, Croft Lane		-	0.8	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5SH007	Land off Sussex Lane		-	0.7	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5SH032	Land to the rear of Diana Close		-	0.7	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5SH059	Land North of Hyde End Lane		-	0.5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5SH053	Oakwood, Croft Road		-	0.5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5SH045	18 Sevenoaks Drive, Spencers Wood		-	0.5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5SH056	Land at Great Lea Dairy Farm		-	0.5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5SH046	Land at Stanbury Park, Spencers Wood		-	0.3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5SH008	Land between Orchard House, Sunways and Greenfields, Croft Road		-	0.3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5SH030	Rose Cottage, Croft Road		-	0.3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5SH012	Land at Cutbush Lane		-	0.2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5SW008	Arkley, Lambs Lane		-	0.1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5SH029	Land at Grazeley		-	227.5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5SH040	Land at Grazeley, south of M4 J11 and west of MereOak Lane		-	213.1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5SH021	Land at Kirtons Farm Road		-	4.2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5SH041	Great Lea Farm, Three Mile Cross		-	3.1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5SH047	Pound Green Fields		-	2.4	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5SH048	Pound Green Yard		-	1.2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Ref.	Site Address	Sub-area	SA status	Area (ha)	AQMA	Woodland/forest	Tree Preservation Order	Priority habitat	Ancient woodland	Local Wildlife Site	SSSI	Fluvial flood zone	Surface water flood zone	Local centre	Town centre	GP surgery	Early years school	Primary school	Secondary school	Index of multiple deprivation	Core employment area	Scheduled monument	Grade 1 listed building	Grade 2 listed building	Grade 2* listed building	Grade 2 registered park/garden	Grade 2* registered park/garden	Conservation area	Agricultural Land	Landfill site
5BA012	Reading Football Club Training Ground, Hogwood Park, Park Lane	Arborfield area	Proposed allocation (consented)	10.3																										
5BA013	Woodlands Farm, Wood Lane		Proposed allocation - Gypsies & Travellers	1.1																										
5FI028	Westwood Cottage, Sheerlands Road		Proposed allocation (HELAA suitable)	2.5																										
5BA010	Barkham Square		Growth scenarios (HELAA potentially suitable)	58.4																										
5AR012	Ducks Nest Farm and Chamberlain's Farm		Smaller strategic site option (HELAA unsuitable)	34.6																										
5AR008	Land to the South of School Road			9.5																										
5AR018	Targetts Farm, Eversley Road			8.0																										
5AR010	Land South of School Road			3.3																										
5BA030	Land off Langley Common Road			2.1																										
5AR024	Land to the south of Bridge Farm Business Park		HELAA potentially suitable - employment	2.7																										
5AR007	Land to the North of School Road		-	9.2																										
5BA014	Oakwood View/ Land between 30 and 32 Langley Common Road		-	3.4																										
5AR009	Land North of School Road		-	3.2																										
5AR013	Land to the rear of The Copse, Eversley Road		-	1.3																										
5BA028	Langley Pond Farm Paddocks		-	1.0																										
5FI030	Bluebell Farm, Commonfield Lane		-	0.7																										
5FI032	Honey Suckle Lodge, Commomfield Lane		-	0.7																										
5BA015	Oakwood View/ Land between 30 and 32 Langley Common Road		-	0.6																										
5AR026	Land at Baird Road		-	0.5																										
5BA003	Land at Suncot, School Road		-	0.4																										
5BA029	Land at Suncot		-	0.4																										
5AR021	Langley Pond Farm Livery Stables		-	0.2																										
5AR020	Lockey Farm, Sindlesham Road		-	13.9																										
5AR028	Land at Highfield Park		-	7.8																										
5BA016	Willow Farm, School Road		-	6.2																										
5AR001	Land to the North of Reading Road		-	4.3																										
5AR002	Cloud Stables, Church Lane		-	3.5																										
5AR006	Land on the south side of Reading Road		-	1.4																										
5AR005	Ridgefield Farm, Reading Road		-	1.2																										
5AR019	Bound Oak Industrial Estate		-	1.0																										
5AR027	Land at Sherbourne		-	0.9																										
5AR003	Land at Church Lane		-	0.9																										
5AR004	Land at Reading Road		-	0.6																										
5AR017	Highview (21 Highfield Park), Eversley Road		-	0.4																										
5AR023	Redwood		-	0.3																										
5SW014	Land at Fairlands, Church Road, Farley Hill		-	0.2																										
5FI033	Meadowside Plot 1, Park Lane		-	0.2																										

Ref.	Site Address	Sub-area	SA status	Area (ha)	AQMA	Woodland/forest	Tree Preservation Order	Priority habitat	Ancient woodland	Local Wildlife Site	SSSI	Fluvial flood zone	Surface water flood zone	Local centre	Town centre	GP surgery	Early years school	Primary school	Secondary school	Index of multiple deprivation	Core employment area	Scheduled monument	Grade 1 listed building	Grade 2 listed building	Grade 2* listed building	Grade 2 registered park/garden	Grade 2* registered park/garden	Conservation area	Agricultural Land	Landfill site
5FI034	Meadowside Plot 2, Park Lane	Nine Mile Ride	-	0.2																										
5FI036	Pine Lode, Land adjacent to the Finches, Commonfield Lane		-	0.1																										
5FI015	Land to the rear of 166 Nine Mile Ride		Proposed allocation - Gypsies and Travellers (consented)	0.6																										
5BA033	Land at Rooks Nest Farm		Proposed allocation (HELAA potentially suitable)	31.2																										
5BA032	24 Barkham Ride		Proposed allocation (HELAA potentially suitable)	2.3																										
5FI004	Greenacres Farm, Nine Mile Ride		Proposed allocation (HELAA potentially suitable)	9.0																										
5FI003	31 and 33 Barkham Ride		Proposed allocation (HELAA potentially suitable)	5.4																										
5FI024	Jovike, Lower Wokingham Road		Proposed allocation (HELAA potentially suitable)	0.8																										
5WW018	Heathlands Farm		Smaller strategic site option (HELAA excluded)	39.7																										
5FI038	Land at Finchampstead Rd Wokingham		Smaller strategic site option (HELAA unsuitable and excluded)	10.7																										
5FI049	Land at Church Farm, Finchampstead		Smaller strategic site option (HELAA unsuitable and excluded)	34.9																										
5WW009	Ravenswood Village		-	47.6																										
5FI018	Land to the rear of No. 6 Johnson Drive		-	1.3																										
5FI046	Land east of Wokingham Road, and south of Duke's Ride (Derby Field)		-	8.9																										
5WW002	Pinewood, Nine Mile Ride		-	10.6																										
5FI009	Land at Sandhurst Road		-	5.2																										
5WW003	Pine Ridge Park, Nine Mile Ride		-	6.5																										
5FI041	Land West of Finchampstead Road		-	5.4																										
5FI010	Land to the East of Finchampstead Road		-	5.1																										
5WW014	Land at Heathlands, Nine Mile Ride		-	4.2																										
5WW011	Heathlands Garden Centre, Heathlands		-	4.0																										
5FI005	Silverstock Manor		-	3.3																										
5WW013	Pinecopse, Nine Mile Ride		-	2.9																										
5FI019	Land to the rear of 267 and 273 Finchampstead Road		-	2.1																										
5FI031	Land at Sandhurst Road		-	2.0																										
5FI045	Land at The Rear of 238-240 Nine Mile Ride		-	1.2																										
5FI002	Heartwood Lodge		-	0.9																										
5WW021	Land adjacent to St Sebastians Memorial Hall		-	0.9																										
5FI027	Land lying to the rear of 115 - 137 Nash Grove Lane		-	0.7																										
5FI007	Land to the rear of 5 Clayside		-	0.6																										
5WW001	Land between Pinewood Villas and St Michael's Cottages, Old Wokingham Rd		-	0.6																										
5FI026	Land Adjacent to 294 Nine Mile Ride		-	0.5																										
5FI025	Land North of Nine Mile Ride		-	16.2																										
5BA009	Model Farm, Barkham Ride		-	5.9																										
5FI017	Paddock Farm, Nine Mile Ride		-	4.5																										
5FI029	The Ridges		-	2.4																										
5WW010	Land Adjacent to Sulby Court, Heathlands Road		-	2.0																										

Ref.	Site Address	Sub-area	SA status	Area (ha)	AQMA	Woodland/forest	Tree Preservation Order	Priority habitat	Ancient woodland	Local Wildlife Site	SSSI	Fluvial flood zone	Surface water flood zone	Local centre	Town centre	GP surgery	Early years school	Primary school	Secondary school	Index of multiple deprivation	Core employment area	Scheduled monument	Grade 1 listed building	Grade 2 listed building	Grade 2* listed building	Grade 2 registered park/garden	Grade 2* registered park/garden	Conservation area	Agricultural Land	Landfill site	
5FI008	Land at Church Lane	Swallowfield and Riseley	-	14.8																											
5FI035	23a Nine Mile Ride		-	0.9																											
5WW022	Land south of Oaklands Lane, Crowthorne		-	0.6																											
5FI020	Land at Warren Lane		-	0.5																											
5FI016	Broughton Farm, Heath Ride		-	0.4																											
5WW012	Heathlands, Land to the East of Heathlands Road		-	0.1																											
5SW019	Land west of Trowes Lane, Swallowfield		-	Proposed allocation (HELAA potentially suitable)	4.2																										
5SW005	Site bounded by Trowes Lane and Oakleigh Farm		-	Growth scenarios (HELAA potentially suitable)	5.7																										
5SW009	Land adjacent to Applegarth Basingstoke Road		-	-	4.7																										
5SW006	Land off Basingstoke Road		-	-	3.8																										
5SW020	Land north of Part Lane, Riseley		-	-	2.9																										
5SW023	Land at Wyvols Court Farm		-	-	2.9																										
5SW011	Land at Bull Lane		-	-	1.9																										
5SW012	Land at Part Lane		-	-	1.7																										
5SW001	Land on the NE side of Part Lane and the SW side of Church Road		-	-	1.7																										
5SW002	Land at Basingstoke Road		-	-	1.4																										
5SW025	Land at Robin Lodge Nursery		-	-	1.3																										
5SW018	Land to the east of Basingstoke Road and south of The Street		-	-	1.3																										
5SW021	Land at Swallowfield		-	-	1.0																										
5SW010	Land South of Part Lane		-	-	3.9																										
5SW016	Land adjacent Oakleigh Farm, Part Lane		-	-	3.4																										
5SW003	Land adjoining The Lodge, Taylors Lane		-	-	1.7																										
5SW007	Land south of The Street and west of Trowes Lane		-	-	1.4																										
5SW026	Land at Sheepbridge Court Farm		-	-	1.0																										
5SW017	Uplands and Land Adjacent to uplands, Basingstoke Road, Swallowfield.		-	-	1.0																										
5SH058	Land at Lambs Lane		-	-	0.8																										
5SW022	Land at Swallowfield Street		-	-	0.2																										
5FI013	Land to the West of Finchampstead, Longwater Lane	Finchampstead	-	10.9																											
5FI012	Land Opposite Hall Farm, Lower Sandhurst Road		-	2.9																											
5FI047	Land at Longwater Road		-	2.3																											
5FI051	Land at Fleet Hill Farm Site A		-	1.5																											
5FI021	Land to the rear of 76 & 80a Reading Road		-	0.9																											
5FI042	Land on North Side of Reading Road		-	0.9																											
5FI022	Land at Horns Farm, Reading Road		-	0.7																											
5FI023	Land to the South of Reading Road		-	0.6																											
5FI039	Land at Bulloways Farm Land, Eversley		-	17.9																											
5FI048	Park Farm		-	12.8																											

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5FI052	Land at Fleet Hill Farm Site B		-	3.9																										
5FI040	Land at Great Oaks, Fleet Hill		-	2.0																										