

Appendix 15

Summary of main issues raised to the Proposed Submission Plan (Regulation 19) consultation and the council's response

Contents

Appendix 15.....	5
The Local Plan Update: Proposed Submission Plan	6
Chapter 1: Introduction	15
Chapter 2: Context and Challenges	16
Chapter 3: Vision and Objectives.....	18
Chapter 4: The Spatial Strategy: 2023-2040.....	22
Chapter 5: Delivering the Spatial Strategy	26
Policy SS1: Sustainable development principles	27
Policy SS2: Spatial Strategy and Settlement Hierarchy	33
Policy SS3: Development within or adjacent to major and modest settlements....	61
Policy SS4: Development within and adjacent to minor settlements	71
Policy SS5: Development in the countryside	81
Policy SS6: Development in the Green Belt	87
Policy SS7: Development in the vicinity of Atomic Weapons Establishment (AWE)	90
Policy SS8: Meeting employment needs.....	100
Policy SS9: Whiteknights Campus	108
Policy SS10: Meeting our housing needs	110
Policy SS11: Arborfield Green Strategic Development Location	120
Policy SS12: South Wokingham Strategic Development Location	142
Policy SS13: Loddon Valley Garden Village.....	164
Policy SS14: Sites allocated for residential, including residential as part of mixed- use development	193
Policy SS15: Securing infrastructure	236
Policy SS16: Safeguarded routes	240
Policy SS17: Transport improvements	243
Chapter 6: Climate change and energy	245
Policy CE1: Design principles for efficient buildings	245
Policy CE2: Environmental standards for non-residential development	251

Policy CE3: Environmental standards for residential development	256
Policy CE4: Supporting a circular economy	268
Policy CE5: Embodied carbon.....	271
Policy CE6: Reducing energy consumption in existing buildings.....	275
Policy CE7: Low carbon and renewable energy generation.....	276
Policy CE8: Protecting renewable energy infrastructure	278
Chapter 7: Connections	279
Policy C1: Active and sustainable transport and accessibility	280
Policy C2: Mitigation of transport impacts and highways safety and design	282
Policy C3: Active travel	285
Policy C4: Green and blue infrastructure and public rights of way	287
Policy C5: Parking and electric vehicle charging	289
Policy C6: Technology and innovation in transport.....	292
Policy C7: Digital infrastructure and communications technology	293
Policy C8: Utilities	294
Chapter 8: Economy, Employment and Retail	296
Policy ER1: Core Employment Areas	297
Policy ER2: Employment uses outside Core Employment Areas	302
Policy ER3: Supporting the rural economy	305
Policy ER4: Employment and skills plans	307
Policy ER5: The hierarchy of centres.....	308
Policy ER6: Town, district and local centres and shopping parades.....	309
Policy ER7: Strengthening the role of centres	310
Policy ER8: Wokingham town centre	312
Policy ER9: Woodley town centre and Lower Earley district centre	313
Chapter 9: Housing	314
Policy H1: Housing mix, density and standards	315
Policy H2: Presumption against residential losses.....	323
Policy H3: Affordable housing.....	324
Policy H4: Exception sites.....	332
Policy H5: Rural workers' dwellings	334
Policy H6: Self-build and custom build housebuilding.....	335

Policy H7: Specialist accommodation.....	338
Policy H8: Conversion and sub-division of buildings.....	342
Policy H9: Gypsies and Travellers and Travelling Showpeople provision	345
Policy H10: Traveller sites	348
Policy H11: Houseboat moorings.....	349
Policy H12: Residential development of existing private gardens	350
Policy H13: Retention of mobile home parks	352
Chapter 10: Flooding and Drainage.....	353
Policy FD1: Development and flood risk (from all sources)	354
Policy FD2: Sustainable drainage.....	358
Policy FD3: River corridors and watercourses.....	361
Chapter 11: The Natural Environment	363
Policy NE1: Biodiversity and geodiversity	364
Policy NE2: Biodiversity net gain	367
Policy NE3: Thames Basin Heaths Special Protection Area	370
Policy NE4: Trees, woodland, hedges and hedgerows.....	373
Policy NE5: Landscape and design	376
Policy NE6: Valued landscapes.....	381
Policy NE7: Sites of Urban Landscape Value	410
Chapter 12: Design, heritage and the built environment	414
Policy DH1: Place making and quality design	414
Policy DH2: Safeguarding amenity	418
Policy DH3: Shopfronts	419
Policy DH4: Advertisements and signage	420
Policy DH5: The historic environment	421
Policy DH6: Archaeology	424
Policy DH7: Equestrian Development.....	425
Chapter 13: Healthy and Safe Communities	426
Policy HC1: Promoting healthy communities	427
Policy HC2: Community infrastructure.....	431
Policy HC3: Local Green Space	434
Policy HC4: Open space, sport, recreation and play facilities	443

Policy HC5: Environmental protection	448
Policy HC6: Air pollution and air quality	449
Policy HC7: Light pollution	451
Policy HC8: Noise pollution	452
Policy HC9: Contaminated Land and Water	455
Policy HC10: Odour, fumes, and dust	456
Chapter 14: Monitoring Framework.....	457
Appendix A: Arborfield Green SDL Development Guidelines	458
Appendix B: South Wokingham SDL Development Guidelines	459
Appendix C: Loddon Valley Garden Village SDL Development Guidelines	462
Appendix D: Sites allocated for residential: Maps.....	471
Appendix E: Sites allocated for residential: Development Guidelines.....	472
Appendix F: Housing trajectory	474
Appendix G: Safeguarded routes: Maps	477
Appendix H: Core Employment Area: Maps.....	477
Appendix I: Valued Landscapes: Maps.....	477
Appendix J: Sites of Urban Landscape Value: Maps	477
Appendix K: Local Green Space: Maps.....	477
Appendix L: Schedule of policies to be superseded.....	477
Appendix M: Monitoring Framework.....	478
Appendix N: Glossary and abbreviations.....	479
Policies Map.....	480
Late Representations	484
Omission Sites	485
Duty to Co-operate.....	491
Sustainability Appraisal.....	496
Habitat Regulations Assessment	505
Evidence base.....	508
Topic Papers	523
Local Development Scheme.....	526

Appendix 15

Appendix 15 sets out a summary of main issues raised by representations received pursuant to Regulation 20 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). The appendix also sets out a response from the council to the main issues raised.

The Local Plan Update: Proposed Submission Plan

72 respondents

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0014	Barnes, Nick	0156	Coe, Eddie
0015	Barnes, Jenny	0157	Atkinson, Stuart
0016	Phillips, Russell	0158	Steed, Lacey
0022	Sayers, Paul	0159	Madden, James
0023	Robinson, Belinda	0160	Clark, Ray
0032	Transport for London	0161	Taylor, Christine
0037	Woodley Town Council	0163	Dolinski, Jean
0041	Wokingham Without Parish Council	0167	Dolinski, Andrew
0049	Drew, David	0168	Bowman, Christopher
0050	Fisk, Gina	0169	Lockhart, Stephen
0051	Lockhart, Donna	0170	Lade, Jeremy
0052	Thomson, Michael	0172	Kiddie, James
0053	Thomson, Jean	0174	Barnard, Sarah
0054	Walsh, Janet	0175	Bryant, Dennis
0055	Meyer, Alex	0178	Lawrence, Frances
0056	Bishop, Susan	0186	Davies, Eruic
0057	Langham, Nicola	0189	Bradbury, Rosemary
0058	Kendall, Louise	0190	Bradd, Julie
0059	Campbell, Mark	0193	Sheasby, Carol
0062	Wilson, Shannon	0194	West, Robin
0074	Birtles, Derek	0205	Ballentine, Norman
0087	Poulter, William	0212	Jorgensen, Pauline
0089	Prior, Nicholas	0224	Home Builders Federation
0090	Wilson, Philip	0226	Waverley Borough Council
0091	Willson, Nicholas	0236	Arborfield and Newland Parish Council

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0095	Cops, Robin	0255	Buckinghamshire County Council
0097	Fiennes, Ivor	0285	Wicks, Gail
0098	Manning, Geoffrey	0305	University of Reading
0104	Goddard, Russell	0310	Butler, Andrew
0105	Lake, Jessica	0313	Parker, Lorna
0106	Lake, Jamie	0321	AWE plc
0114	Surrey County Council	0328	Percy, Richard
0116	Plume, Aaron	0332	Freeman, Jane
0118	Natural England	0340	Evans, George (Cllr)
0132	Bracknell Forest Council	0349	Kendall, Duncan
0147	Lias, Darrell	0351	Burn-Murdoch, Heather

Support

Respondents 0014, 0015, 0016, 0022, 0023, **0041**, 0049, 0050, 0051, 0052, 0053, 0054, 0055, 0056, 0057, 0058, 0059, 0062, 0074, 0087, 0090, 0091, 0097, 0098, 0104, 0105, 0106, 0156, 0157, 0159, 0160, 0161, 0163, 0167, 0168, 0169, 0170, 0172, 0174, 0175, 0178, 0189, 0193, 0194, 0205, **0255**, 0305, 0310, 0321, 0332, 0349, 0351 consider the plan to be legally compliant.

Respondents 0014, 0015, 0016, 0022, 0023, 0049, 0050, 0051, 0052, 0053, 0054, 0055, 0056, 0057, 0058, 0059, 0062, 0074, 0087, 0090, 0091, 0097, 0098, 0104, 0105, 0106, 0156, 0157, 0159, 0160, 0161, 0163, 0167, 0168, 0169, 0170, 0172, 0174, 0175, 0178, 0189, 0193, 0194, 0205, **0255**, 0310, 0321, 0328, 0332, 0351 consider the plan to comply with the duty to co-operate.

Respondents 0014, 0015, 0016, 0022, 0023, 0049, 0050, 0051, 0052, 0053, 0054, 0055, 0056, 0057, 0058, 0059, 0062, 0074, 0090, 0091, 0097, 0098, 0104, 0105, 0106, 0156, 0157, 0159, 0160, 0161, 0163, 0167, 0168, 0169, 0170, 0172, 0174, 0175, 0178, 0189, 0193, 0194, 0205, **0255**, 0310, 0349, 0351 consider the plan to be sound.

Transport for London (**0032**) reviewed the plan and have no comments.

Natural England (**0118**) welcomes the approach to achieving sustainable development and have no challenge to the soundness of the local plan. They note that they would welcome further information on some elements and related Habitats Regulations Assessment considered in other sections of this report.

Surrey County Council (**0114**) noted that they had previously commented on the draft transport assessment and support the approach to facilitate sustainable travel.

Buckinghamshire County Council (**0255**) support the plan proposing to accommodate the assessed housing and economic needs of the borough and note previous engagement in the preparation of the plan.

Waverley Borough Council (**0226**) have no comments on the plan.

AWE plc (0321) welcomes references to the importance of protecting public safety and the acknowledgement of the AWE sites to the delivery of defence capabilities. AWE plc (0321) has some concerns with proposed straightforward modifications to policies with are dealt with in the relevant policy specific sections.

The following tables set out the issues raised regarding the duty to co-operate, legal compliance, and soundness.

DUTY TO CO-OPERATE

Detail	Respondent numbers	Response
Lack of constructive engagement on strategic issues with neighbouring authorities or statutory bodies	0089, 0340	The Duty to Co-operate Statement sets out the engagement undertaken with other local authorities.
Information was shared online and through drop-in sessions only, with no paper copies and nothing delivered to every household	0041	The consultation was undertaken in accordance with regulations and the council's Statement of Community Involvement. This included paper copies of documents available in two locations. At earlier Regulation 18 stages of consultation information on the local plan and how to respond has been delivered to every household, but this is not considered essential. It is noted that residents are not a specified duty to co-operate body.

Residents could only respond online and if they created an account	0041	Written responses were welcomed in a variety of ways including online via a survey on the engage website, by email, by post, in person.
Confusing / complex language putting off residents from responding	0041	The Regulation 19 consultation is of a specific type that asks for feedback on the legal compliance (including duty to co-operate) and soundness of the plan. The council provided various information on the local plan and how to respond, including guidance notes, the public information events and officers being available to answer questions.

LEGAL COMPLIANCE

Detail	Respondent numbers	Response
Method of consultation feedback is too onerous/difficult to understand	0116, 0190	The Regulation 19 consultation is of a specific type that asks for feedback on the legal compliance (including duty to co-operate) and soundness of the plan. Information was presented and available in a variety of formats and responses could be submitted in a variety of ways. Full details are set out earlier in this report.
Lack of robust Statements of Common Ground to address key strategic issues – e.g. addressing unmet housing need	0340	The Duty to Co-operate Statement of Compliance (2024) (and predecessor documents) sets out in detail the engagement undertaken on the plan and evidence base, including updated Statements of Common Ground at the point of submission. SoCG are have been prepared as part of the submission documents.

Detail	Respondent numbers	Response
Insufficient consultation – lack of meaningful Reg 18 consultation / lack of feedback on responses / lack of guidance on how to comment	0190, 0236, 0340	Public consultations on the LPU have taken place at every stage of the plan process in line with regulations and the councils Statement of Community Involvement.
Sustainability Appraisal does not adequately evaluate reasonable alternatives	0340	The SA appropriately considers various growth scenarios across the borough and is not intended to appraise every development option. Several interim SA have been prepared to support plan making, which considers growth across multiple areas and sites. The Sustainability Appraisal section of this document sets out further information.
Non-compliance with Habitats Regulations and a lack of detail of mitigation for development near TBH SPA	0340	Habitat Regulations Assessments have been undertaken at each stage of the plan process. A Statement of Common Ground has been agreed with Natural England, who agree any likely significant effects on important nature conservation sites can be fully mitigated.
Failure to align with the council’s climate emergency	0340	The spatial strategy appropriately addresses climate change, in the context of meeting housing need. The LPU includes a dedicated suite of climate change and energy policies support the local target set of achieving a carbon neutral borough by 2030. Consideration of the climate emergency is also included throughout the policies in the Plan.
Lack of demonstration of how 10% BNG will be achieved	0340	The council is satisfied the 10% biodiversity net gain sought in the policy can be delivered.

Detail	Respondent numbers	Response
		Viability of the development, including the requirement for 10% biodiversity net gain, has been tested through the 'Local Plan and Community Infrastructure Levy Viability Study'.
Lack of transparency of evidence base – site selection/HELAA and IDP	0340	The full evidence base, alongside other supporting documentation such as explanatory topic papers, was published as part of the consultation.
Councillors had insufficient time to review the documentation prior to the full council vote	0212	Councillors were provided with key documentation prior to the full council meeting to be able to make a decision. Other evidence documents were available publicly on the website.
HELAA report contains inaccurate information	0089	The site assessments undertaken as part of the Housing and Economic Land Availability Assessment (HELAA) used the most up-to-date information available. The council welcomes any more current information or suggested corrections to consider.
Concerns with the Finchampstead Neighbourhood Plan process	0089	The Finchampstead Neighbourhood Development Plan has been made following independent examination, which found the plan to meet the basic conditions and requirements of legislation. No legal challenge was made to the making of the Plan.

MAIN ISSUES

Detail	Respondent numbers	Response
Method of responding to consultation is too onerous/ difficult to understand	0116, 0190, 0285	The Regulation 19 consultation is of a specific type that asks for feedback on the legal compliance (including duty to co-operate) and soundness of the plan. Information was presented and send out in a variety of formats and responses could be submitted in a variety of ways – full details are set out in the main body of this report.
Lack of clarity of information / maps	0087	The Regulation 19 consultation is of a specific type that asks for feedback on the legal compliance (including duty to co-operate) and soundness of the plan. Information was presented and send out in a variety of formats and responses could be submitted in a variety of ways – full details are set out in the main body of this report.
Lack of public art / lack of mechanisms to ensure public art	0095	Mechanisms for the delivery of public art are included throughout the LPU: Policy SS13 Loddon Valley Garden Village requires a strategy for integrating and including arts and cultural activities including public art as part of the masterplanning; Policy ER8 Wokingham town centre seeks development proposals to improve the public realm including through public art; Policy DH1 Place making and quality design seeks features of visual interest in public spaces as part of high quality design principles.
Lack of consideration of the NPPF consultation / do not propose new housing need figure	0147	The plan has been submitted under the transitional arrangements set out in the 2024 NPPF and accordingly will be examined against the 2023 NPPF

Detail	Respondent numbers	Response
Disproportionate distribution of growth across the borough / inappropriate spatial strategy	0089, 0147	The council considers the plan sets out an appropriate strategy for the development of the borough, including considering constraints and opportunities of available land.
Contradiction of policies in the plan	0147	The council is satisfied that, when read as a whole, the policies in the LPU are not contradictory.
Lack of detail regarding timescales and funding of infrastructure	0147	The council is satisfied the infrastructure projects set out in the IDP will help to mitigate the impacts of development. Further work to define the costs and timing of delivery is ongoing, which will inform further updates to the IDP.
References to other plans and strategies not being examined may be better located in supporting text	0132	Noted.
Suggest a review policy is necessary – to ensure a review of the LPU as soon as possible in response to the new NPPF	0224, 0252	A policy specifically relating to the review of the plan is not considered necessary.
Lack of site visits to all sites promoted for development	0089	As part of the site assessment process the council visited the majority of sites promoted for development, but a very small number of cases a visit was not possible. The council is satisfied that any site visits not undertaken would not have fundamentally altered the assessment outcomes within the HELAA.
Lack of affordability of housing	0089	Housing affordability is factored into the formula for calculating housing local housing need, which is set by the government. Policy H3: Affordable housing, sets out an ambitious approach to affordable housing that seeks to maximise the delivery.

Detail	Respondent numbers	Response
The Local Transport Plan must cover the period of the Local Plan Update, and is silent on connectivity to Crowthorne train station and railway crossing through the South Wokingham SDL	0116	The Local Transport Plan is a separate but related document, and the council works with key stakeholders to help provide consistency as the plans are implemented.

OTHER ISSUES:

- Members felt unable to comment on legal compliance and soundness (0037)

Chapter 1: Introduction

One respondent.

Respondent number	Name/Organisation
0147	Lias, Darrell

Support

There were no comments received by respondents in support of this chapter.

MAIN ISSUES

Detail	Respondent number	Response
Missing references to national policy in supporting text, e.g. paragraphs 8, 16 and 20 of the NPPF	0147	<p>The purpose of this consultation was to seek views from individuals, organisations and key stakeholders on the soundness of the Proposed Submission Plan as required by Regulation 19 of the Town and Country Planning (Local Planning) Regulations and paragraph 35 of the National Planning Policy Framework.</p> <p>The local plan has taken into account national planning policy and guidance in its preparation.</p>

Chapter 2: Context and Challenges

Four respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0108	Sport England	0256	Historic England
0147	Lias, Darrell	0303	Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board

Support

Sport England (**0108**), Historic England (**0256**) and Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board (**0303**) supported the plan’s approach in this chapter. Sport England sought the addition of built sports facilities in the supporting text.

Historic England sought acknowledgement of energy and carbon efficiency in the adaptation of existing buildings.

The Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board (**0303**) supported the Wokingham Vision 2035 with respect to making it easier for residents to access local services.

MAIN ISSUES

Detail	Respondent number	Response
Modify the supporting text to refer to built sports facilities with regard to infrastructure provision	0108	Agreed. A modification to the supporting text to refer to built sports facilities would provide useful clarity and align clearer with the typologies specified in Policy HC4 (Open space, sports, recreation and play facilities). The proposed modification is set out in the council’s Schedule of proposed modifications.
Modify the climate change section acknowledge energy and carbon	0256	The council is minded accepting a modification to the context and challenges that recognises the opportunities and

Detail	Respondent number	Response
efficiency in the adaptation of existing buildings		<p>challenges of achieving energy and carbon efficiencies in the adaptation of existing buildings. Existing buildings make up a large part of the borough's carbon emissions.</p> <p>Ongoing engagement has led to the signing of a Statement of Common Ground with Historic England where a modification is agreed to this effect.</p> <p>The proposed modification is also set out in the council's Schedule of proposed modifications.</p>
Concerns expressed regarding housing numbers	0147	<p>The plan has been submitted under the transitional arrangements set out in the 2024 NPPF and accordingly will be examined against the 2023 NPPF and associated housing expectations.</p>

Chapter 3: Vision and Objectives

10 respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0147	Lias, Darrell	0256	Historic England
0148	Gleeson	0303	Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board
0199	Thames Valley Police	0305	University of Reading
0221	Mac Mic Group	0311	Berkeley Strategic Land Limited
0245	Crest Nicholson Partnerships and Strategic Land	0317	Hatch Farm Land Limited

Support

Historic England (**0256**) indicated their support for this section of the plan.

Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board (**0303**) supported in principle the plan’s vision and objectives, in particular providing new and existing residents with access to adequate primary care.

Respondents 0148, 0221 and 0305 supported the plan’s vision and objectives.

MAIN ISSUES

Detail	Respondent number	Response
Loddon Valley Garden Village proposal is contrary to vision and objectives with respect to sustainable transport	0147	The council is satisfied that the proposed Loddon Valley Garden Village is fully consistent with the plan’s vision and objectives.

Detail	Respondent number	Response
		Significant on and off-site infrastructure will be delivered, to encourage residents to use services and facilities on site and reduce the need to travel. New and upgraded highways, public transport and active travel measures set out in the Infrastructure Delivery Plan facilitate access to other services and facilities off site.
The vision statement for the 'right kind of growth' does not refer to the Loddon Valley Garden Village	0317	Policy SS2 recognises that the proposed Loddon Valley Garden Village is a key component of the plan's spatial strategy. Further detail and requirements for the Loddon Valley Garden Village are set out in Chapter 5 (Delivering the spatial strategy), Policy SS13 and Appendix A.
Limited reference to safe and secure design of buildings and public spaces	0199	Objective 8 recognises the need to create inclusive and safe communities.
The plan does not provide sufficient employment land	0245	The plan sets out a strategy that meets employment needs over the plan period.
Objective 9 does not align with national planning policies on housing	0317	Policy SS10 sets out clearly the housing requirement for the borough, with the council meeting its local housing need, as identified by the standard method, in full.
The plan's spatial strategy will not achieve the vision	0311	The council is satisfied that the plan's spatial strategy will achieve the vision.
Objectives should also refer to active travel and public transport as clean modes of transport	0317	Active travel and public transport opportunities are adequately covered in paragraph 3.8 of the supporting text, with additional evidence provided in the IDP, LCWIP and Local Transport Plan.

REQUESTED MODIFICATIONS

Detail	Respondent number	Response
Amend paragraph 3.20 of the supporting text to recognise the safe and secure design of buildings and public spaces	0199	Not agreed. Objective 8 recognises the need to create inclusive and safe communities. There are a number of policies in the local plan that address matters such as safety and security, notably Policy DH1 (Place making and quality design).
An alternative spatial strategy should be prepared	0311	Not agreed. The council is satisfied that the local plan sets out an appropriate strategy, taking into account reasonable alternatives and a proportionate evidence base. The spatial strategy includes consideration of the constraints and opportunities of available land.
Amend paragraph 3.1 of supporting text to 'A borough that focuses on meeting the needs of our community'	0317	Not agreed. The council is satisfied the vision appropriately focusses on the needs of the borough's communities.
Amend paragraph 3.11 of supporting text to refer to active travel modes and public transport	0317	Not agreed. Active travel and public transport opportunities are adequately covered in paragraph 3.8 of the supporting text. The local plan provides a suitable policy framework to address matters such as active travel and public transport, notably through a suite of policies in the Connections chapter (Chapter 7).
Amend the 'right kind of growth' vision statement to refer to Loddon Valley Garden Village	0317	Not agreed. This vision statement relates to the spatial strategy of the local plan in its entirety. Policy SS2 recognises

Detail	Respondent number	Response
		that the proposed Loddon Valley Garden Village is a key component of the plan's spatial strategy. Further detail and requirements for the Loddon Valley Garden Village are set out in Chapter 5 (Delivering the spatial strategy), Policy SS13 and Appendix A.
Amend Objective 9 to 'meeting our identified need in full...' to reflect Government's housing and planning reforms.	0317	<p>Not agreed. The plan has been submitted under the transitional arrangements set out in the 2024 NPPF and accordingly will be examined against the 2023 NPPF and associated housing expectations.</p> <p>Policy SS10 sets out clearly the housing requirement for the borough, with the council meeting its local housing need, as identified by the standard method, in full</p>

Chapter 4: The Spatial Strategy: 2023-2040

Nine respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0131	Smith, Catherine	0299	West Berkshire Council
0145	South Oxfordshire and Vale of White Horse District Councils	0300	Network Rail
0147	Lias, Darrell	0305	University of Reading
0245	Crest Nicholson Partnerships and Strategic Land	0317	Hatch Farm Land Limited
0256	Historic England		

Support

South Oxfordshire and Vale of White Horse District Councils (**0145**) sought clarification on the supply of employment land and floorspace for office and industrial uses to reflect the position in the Statement of Common Ground.

West Berkshire Council (**0299**) supported the plan's approach by not allocating sites in the Detailed Emergency Planning Zone (DEPZ) around AWE Burghfield.

Network Rail (**0300**) supported the planned delivery of infrastructure at larger sites. Reference was sought to improved connectivity and access to public transport. The spatial strategy should also recognise the role and opportunities that public transport can play in reducing, as far as possible, carbon emissions and the reliance on private cars.

Respondent 0305 and 0317 supported the allocation of Loddon Valley Garden Village.

Respondent 0305 supported the plan's spatial strategy, approach to strategic development and the expansion of the Thames Valley Science and Innovation Park.

MAIN ISSUES: APPROACH TO THE SPATIAL STRATEGY

Detail	Respondent number	Response
The plan does not provide sufficient industrial land and is not planning positively for growth	0245	The plan identifies the need for industrial uses over the plan period and sets out how employment needs will be met in full.
Lack of a strategic policy on the historic environment, as per paragraph 20 of the NPPF	0256	The council considers that the local plan provides a suitable policy framework for heritage matters, including through several strategic policies, such as SS1, SS5, SS9, SS11, SS12 and SS13.
Whether the plan period should start at the most recent monitoring year (1 April 2024)	0317	The plan is based at 1 April 2023 to reflect the practical position of the most recent year for which monitoring data was available at the time of preparation, and the preparation of relevant evidence.
The proposed Loddon Valley Garden Village is not included in the base supply	0317	Paragraph 4.10 of the supporting text is clear the housing requirement and housing supply set out in Tables 1 and 2 do not include the new allocations over the plan period.
A disproportionate amount of development is proposed in the borough. Most growth has been directed to the south of the borough	0131, 0147	The council is satisfied the plan sets out an appropriate strategy for the development of the borough, including considering constraints and opportunities of available land. The council's approach is set out in the Housing Site Allocations Topic Paper (September 2024).
Conflicting housing numbers compared to the Government's target of 20,800 homes by 2040	0147	The plan has been submitted under the transitional arrangements set out in the 2024 NPPF and accordingly will be examined against the 2023 NPPF and associated housing expectations.

Detail	Respondent number	Response
		Policy SS10 sets out clearly the housing requirement for Wokingham Borough.

REQUESTED MODIFICATIONS

Detail	Respondent number	Response
Clarify the supply of employment land and floorspace for office and industrial uses in Table 3 of the plan	0145	Not agreed. Additional information regarding future employment supply is set out in the Employment Topic Paper.
Modify third bullet point in paragraph 4.2 of the plan to also recognise that public transport can assist in reducing need to travel and vehicle emissions	0300	<p>Not agreed. The key points listed in paragraph 4.2 are matters which were raised by individuals/organisations through earlier consultations and have informed the spatial strategy.</p> <p>The local plan provides a suitable policy framework for addressing public transport matters, through several strategic policies, including Policy SS1 1b) which states: <i>'Be located so as to offer the choice of active means of travel and/or public transport, reducing the need to travel by private car for day-to-day activities'</i></p>
Reclassify DH5 and DH6 as strategic policies	0256	Ongoing engagement has led to the signing of a Statement of Common Ground with Historic England, where it is agreed by both parties that the local plan provides a suitable policy framework for addressing heritage matters, through several strategic policies and therefore it is not necessary to re-classify DH5 and DH6 as strategic policies.

Detail	Respondent number	Response
Amend the starting base date of the plan to 1 April 2024	0317	Not agreed. The plan is based at 1 April 2023 to reflect the practical position of this being the most recent year for which monitoring data was available at the time of preparation, and to reflect the preparing of evidence base documents.
Paragraphs 4.30 to 4.36 of the plan should be moved to immediately follow Table 2. Amend Table 2 to include new allocations, or for a new Table to be introduced to identify the effect of new allocations proposed in the plan to meeting housing need.	0317	Not agreed. This information is provided in the Housing Trajectory (Appendix F).

Chapter 5: Delivering the Spatial Strategy

No respondents commented on this chapter.

Policy SS1: Sustainable development principles

29 respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0068	National Gas	0256	Historic England
0069	National Grid	0261	Moss, Stephen (representing multiple landowners)
0124	Joyner, Ross	0265	Shinfield Studios
0143	Singh, Raphael	0266	Haines Hill Estate
0144	John, James	0267	Stanlake Park
0148	Gleeson	0268	Wates Developments Ltd
0222	Richborough	0269	Cirrus Land Ltd
0228	Ladds Garden Centre	0280	Bewley Homes
0231	Willson Developments Ltd	0286	Mac Mic Group
0232	Shorewood Homes Ltd	0300	Network Rail
0235	The Old Redingensians Association	0305	University of Reading
0244	Wolf Bond Planning	0314	Vistry Group
0252	Gladman	0317	Hatch Farm Land Limited
0254	Croudace Homes	0318	Bloor Homes
		0320	King, Robert

Support

Respondents 0143, 0148, 0280, **0300** and 0314 supported the policy.

Historic England (**0256**) supported the policy but suggested the phrasing 'wider' was not necessary.

MAIN ISSUE: POLICY WORDING

Detail	Respondent numbers	Response
Meeting identified needs is an additional test, not consistent with national policy.	0124, 0144,	<p>The use of ‘as appropriate to their nature’ enables development proposals to be assessed on a case-by-case basis.</p> <p>The policy is consistent with paragraph 11 of the NPPF which states that for plan-making, plans should seek to meet the development needs of their area.</p>
Part 1 (l) is not consistent with national planning policy or the statutory tests in the Planning (Listed Buildings and Conservation Areas) Act 1990	0222, 0231, 0235, 0265, 0269, 0305, 0318	<p>The council is satisfied that this requirement is consistent with national planning policy and relevant legislation, e.g. the Planning (Listed Buildings and Conservation Areas) Act 1990. The plan should be read as a whole. Policy DH5 provides further guidance for assessing harm to heritage assets.</p> <p>Paragraph 20 of the NPPF requires strategic policies to set out an overall strategy for the conservation and enhancement of the natural, built and historic environment.</p> <p>No objection was received from Historic England on this matter.</p>
Part 1(m) and (j) are inconsistent with paragraphs 180 and 205 of the NPPF with respect to agricultural land and landscape character	0222, 0231, 0235, 0252, 0254, 0265, 0266, 0267, 0269, 0305, 0318, 0320	The council is satisfied this requirement is consistent with national planning policy. Paragraph 20 of the NPPF requires strategic policies to set out an overall strategy for the conservation and enhancement of the natural, built and historic environment, including landscapes.

Detail	Respondent numbers	Response
		<p>The plan should be read as a whole. Policy NE5 and Policy NE6 provide further guidance on landscape character and valued landscapes.</p> <p>With respect to criteria j) the policy is clear that, where appropriate to their nature, development proposals will be expected to avoid the unplanned loss of best and most versatile agricultural land, which provides some flexibility to reflect local circumstances.</p>
Part 1(b) is not recognised in paragraph 109 of the NPPF as sustainable transport opportunities differ between urban and rural areas.	0228, 0244, 0268	The council considers the phrasing ' <i>as appropriate to their nature</i> ' enables development proposals to be determined on a case-by-case basis and is satisfied the policy is consistent with paragraph 109 of the NPPF.
Policy is not positively prepared as it restricts the ability to meet the borough's needs.	0244, 0268	The council considers the policy is appropriate and consistent with national policy, in setting out an appropriate strategy to meet development needs.

MAIN ISSUE: POLICIES, DECISION TAKING AND IMPLEMENTATION

Detail	Respondent numbers	Response
Need to take into account existing utilities constraints on development sites.	0068, 0069	<p>Noted. Paragraph 3 of Policy C8 (Utilities) ensures the careful design of development proposals to take account of existing infrastructure and minimise any disruption from maintenance or upgrading of infrastructure.</p> <p>The council’s Housing and Economic Land Availability (HELAA) also considers physical constraints in the site assessment process, such as the presence of overhead electricity pylons and gas pipelines. The IDP further sets out infrastructure projects to be delivered.</p>
Lack of clarity over the definition of ‘exceptional circumstances’ which is not justified or consistent with national policy.	0266, 0267	<p>The council is satisfied this approach reflects the recognition in national planning policy of the benefits of best and most versatile agricultural land in the natural and local environment. Natural England’s <i>‘Guide to assessing development proposals on agricultural land’</i> (February 2021) provides further guidance for applicants.</p>
Provisions for housing and affordable housing are inconsistent with NPPF.	0286	<p>The standard method for calculating local housing need includes a specific adjustment to reflect affordability locally. Within this context, the size, type and tenure of housing needed by different groups should be assessed and reflected, including affordable housing.</p> <p>The Local Housing Needs Assessment (LHNA) calculates a need for 352 affordable dwellings a year. Policy H3 sets out the proposed policy approach to affordable housing. The council is satisfied the approach is justified for Wokingham borough.</p>

Detail	Respondent numbers	Response
Clarity as to whether the policy applies to development sites not covered by site-specific policies.	0317	The plan should be read as whole and therefore any development proposal would be assessed against the relevant policies in the development plan.

REQUESTED MODIFICATIONS

Detail	Respondent number	Response
Seek an additional requirement to take a comprehensive and co-ordinated approach to development that respects existing constraints, including utilities situated within sites.	0068, 0069	Not agreed. This matter is appropriate addressed in Part 3 of Policy C8.
Modify criteria a) to refer to ' <i>contribute to meeting development needs</i> '	0124, 0144,	Not agreed. The policy is consistent with paragraph 11 of the NPPF which states that in plan-making, plans should seek to meet the development needs of their area.
Modify criteria (j), (l) and (m) to reflect national planning policy, including by referring to ' <i>taking account</i> ' of heritage, and landscape matters.	0231, 0235, 0254, 0265, 0266, 0267, 0269, 0305, 0318	Not agreed. The council is satisfied that the requirements are consistent with national planning policy.
Modify criteria b) to acknowledge differences in travel opportunities between urban and rural areas.	0232, 0244, 0268	Not agreed. The phraseology ' <i>appropriate to their nature</i> ' enables development proposals to be determined on a case-by-case basis, depending on scale and location.
Modify criteria l) to remove reference to 'wider' settings of heritage assets	0256	Agreed. The proposed modification is set out in the Schedule of proposed modifications and reflected in the Statement of Common Ground with Historic England.

Detail	Respondent number	Response
Increase the level of housing in the plan to meet affordable housing needs	0286	Not agreed. The council is satisfied there is an appropriate balance between the delivery of affordable housing and the scale of development proposed in the local plan.

Policy SS2: Spatial Strategy and Settlement Hierarchy

93 respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0002	Chapman, Simon	0240	Hallam Land and Wilson Enterprises Ltd
0003	Sawyer, Andy	0244	Woolf Bond Planning
0004	Sawyer, Marina	0246	Hurst Neighbourhood Plan Group
0009	Hatherell, Karl	0250	Barkham Parish Council
0017	Brayne, Kevin	0252	Gladman
0024	Yadavalli, Harika	0254	Croudace Homes
0026	Buckley, Ivor	0256	Historic England
0030	Hudnott, Stephen	0261	Moss, Stephen (representing multiple landowners)
0038	Arundale, Alex	0263	Lightwood Strategic
0041	Wokingham Without Parish Council	0264	Miller Homes and Kier Ventures
0045	Turner, Mandy	0265	Shinfield Studios
0060	Macdonald, Craig	0266	Haines Hill Estate
0061	Macdonald, Jessica	0267	Stanlake Park
0065	Shashank, Garg	0268	Wates Developments Ltd
0076	Walsh, Luke	0276	David Wilson Homes Southern
0096	Marks, Karen	0277	Croudace Homes, Vortal Homes Ltd and Falcon Developments (SE) Limited
0115	Baskerville, Joanna	0278	Hill Residential Ltd
0120	Cox, Mr A and Mr C	0280	Bewley Homes
0124	Joyner, Ross	0282	Taylor Wimpey Strategic Land
0132	Bracknell Forest Council	0283	Office for Nuclear Regulation
0143	Singh, Raphael	0286	Mac Mic Group
0144	John, James	0287	Englefield Estate
0148	Gleeson	0290	Monopro Ltd
0150	Broadbent, Jo	0295	Grandison, Guy

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0153	Van de Velde, Michelle	0298	Nicholas King Homes
0184	O'Connor Properties Ltd	0299	West Berkshire Council
0187	Watts, Colin	0301	City & Country
0190	Bradd, Julie	0302	Dandara Southern Ltd and Elstree Land
0195	Powley, Andrew	0303	Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board
0203	Clarke, Laura	0305	University of Reading
0204	ACER The Whitegates Residents Association	0311	Berkeley Strategic Land Limited
0206	Cunningham, Mr and Mrs	0314	Vistry Group
0207	Frankham, John	0317	Hatch Farm Land Limited
0212	Jorgensen, Pauline	0319	Barley, Joseph (Cllr)
0215	Maverick Property Investments Ltd	0320	King, Robert
0217	McCurry, Jenny	0321	AWE plc
0221	Mac Mic Group	0325	Beaulieu Land Ltd
0222	Richborough	0337	McCarthy, Maya
0225	Catesby Estates	0339	Osborne, William
0227	Oxfordshire County Council	0340	Evans, George (Cllr)
0228	Ladds Garden Centre	0341	Watt, Suzanne
0232	Shorewood Homes Ltd	0344	Glenister, Alan
0233	Dutton, Chris and Shirley Gallagher, Karen and Brian Dutton, Lucas Geering, Wendy, Timothy and Laura	0345	Scales, Elizabeth
0234	Thakeham Homes Ltd	0346	Bhushan, Rahul
0235	The Old Redingensians Association	0353	Abbeymill Homes
0236	Arborfield and Newland Parish Council	0354	Ashridge Wokingham Ltd
0238	Reading Blue Coat School	0360	South East Water

Support

Respondents 0017, 0038, 0045, 0120, 0124, 0144, 0148, 0195, 0204, 0221, **0227**, 0235, 0238, 0246, **0256**, 0261, 0263, 0265, 0278, 0282, **0283**, 0290, 0298, 0305, 0317, 0321, 0325, 0337, 0339, 0341, 0345 and 0353 consider the policy to be legally compliant.

Respondents 0017, 0038, 0045, 0120, 0148, 0195, 0204, 0221, **0227**, 0228, 0232, 0235, 0238, 0240, 0244, **0256**, 0263, 0265, 0268, 0278, 0282, **0283**, 0290, 0298, **0299**, 0301, 0302, 0305, 0317, 0321, 0325, 0337, 0339, 0341, 0345, 0353 consider the policy to comply with the duty to co-operate.

Respondents 0017, 0148, **0227**, **0256**, 0283, 0287, 0299, 0303, 0321 consider the policy to be sound.

Respondents 0143, 0254, 0263, 0264, 0276, 0280, 0298, 0305, 0314, 0317 express broad support for the strategy in principle.

Oxfordshire County Council (**0227**) acknowledge that the spatial strategy will not have significant cross-boundary implications for functions that OCC is responsible for.

West Berkshire Council (**0299**), Office for Nuclear Regulation (**0283**) and AWE plc (0321) support the proposal that the DEPZ is not a location where additional development is planned for.

Historic England (**0256**) supports the spatial strategy.

Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board (**0303**) supports a dedicated policy to set out a spatial strategy and settlement hierarchy.

South East Water (**0360**) stated they are confident the Water Resources Management Plan (WRMP) 2024 can accommodate the level of growth proposed in Wokingham Borough. They would be happy to receive further site allocation information going forwards and will work with authorities and developers through the process ahead of occupation of developments. There are no planned schemes for new water supplies or infrastructure development in Wokingham Borough – localised level work will be carried out in line with any further information.

The following tables set out the issues raised regarding the duty to co-operate, legal compliance, and soundness.

Some respondents did not set out the details of why the plan fails to comply with the duty to co-operate, and/or is not legally compliant.

DUTY TO CO-OPERATE

Detail	Respondent numbers	Response
The council has not listened to or addressed the concerns of residents.	0009	Residents are not a specified duty to co-operate body, but significant engagement has been undertaken across several local plan consultations with the issues raised taken into consideration.
The impact on local highways has not been fully considered.	0060	The impact on local highways has been assessed, and discussed with relevant bodies, including neighbouring councils responsible for highways and transport.
The impact on the existing population has not been fully considered.	0060	The council considers the plan sets out an appropriate strategy for the development of the borough, including considering constraints and opportunities of available land.
The option of building north of the M4 has not been fully considered.	0030	The council considers the plan sets out an appropriate strategy for the development of the borough, including considering constraints and opportunities of available land.
Residents have been unable to comment on the increased density/new sites in Barkham.	0188	Residents had the opportunity to comment on any proposed allocations and indicative capacities during the Proposed Submission Plan consultation, as well as earlier stage of plan preparation.
Proximity to AWE should not prevent new homes being planned – emergency planning teams should work across authorities to facilities development.	0144	Information is provided within the Housing and Economic Land Availability Assessment (2024) and within the Plan. The DEPZ is considered to be a major constraint affecting land to the west of Shinfield, with the Office for Nuclear Regulation advising their judgement of the Off-Site Emergency Plan to be stretched, which poses a challenge for accommodating new development.

Detail	Respondent numbers	Response
Councillors had insufficient time to review the documentation prior to the full council vote.	0217	Councillors were provided with key documentation prior to the full council meeting to be able to make a decision. Other evidence documents were available publicly on the website. Evidence from previous plan-making stages has remained available.
Residents had insufficient time to review the documentation.	0217	Key documentation for the full council meeting was published on the website a week prior to the meeting. Other evidence documents were available publicly on the website. The Proposed Submission Plan consultation ran for 6 weeks in accordance with regulations.
Housing need data relied upon is based on a 2021 SoCG which must be updated.	0234	<p>Incorrect. The 2021 statement represented an important point in time agreement, with matters having been progressed since as evidenced within the Duty to Cooperate Statement.</p> <p>As outlined in the Proposed Submission Plan, the housing need and requirement is based on the national standard method.</p> <p>The council is satisfied that the Duty to Cooperate has been discharged, as evidenced in the representations of relevant bodies and the agreement of Statements of Common Ground to support the Submission Plan.</p>
Housing needs should be considered wider than the HMA and the council needs to show evidence of meetings with neighbouring authorities.	0234, 0340	The Duty to Co-operate Statement sets out the engagement undertaken with other local authorities.

LEGAL COMPLIANCE

Detail	Respondent numbers	Response
Classifying Ruscombe as a modest settlement in the hierarchy when comparatively it should be classified as a minor settlement.	0002	The Settlement Hierarchy Assessment (2024) followed a step-by-step methodology to assess the settlements in the borough, considering provision of key and higher-order services and facilities and accessibility. The council is satisfied with the assessment of Ruscombe to retain the position as a modest settlement.
Over development of the Shinfield area with additional pressure on infrastructure and services/over-populated/housing should be distributed more evenly across the borough/alternative options in the north of the borough.	0009, 0026, 0030, 0061, 0344	The council considers the plan sets out an appropriate strategy for the development of the borough, including considering constraints and opportunities of available land.
Shortfall in waste water treatment capacity leading to adverse impacts on the River Loddon and on the environment/ability to tackle climate change – against the Habitats Regs.	0344	<p>The Water Cycle Studies consider the impact of development on the sewage and sewerage network and were prepared in consultation with Thames Water. Engagement with Thames Water will continue on an ongoing basis.</p> <p>Habitat Regulations Assessments have been undertaken at each stage of the plan process.</p>
Consultations were not undertaken with all of the affected area.	0188	Public consultations on the LPU have taken place at every stage of the plan process in line with regulations and the councils Statement of Community Involvement. Representations have been received from addresses across the borough and have been taken into account.

Detail	Respondent numbers	Response
Traffic surveys were undertaken during covid and are out of date.	0188	The traffic surveys were undertaken at the earliest opportunity after furlough ended. The transport evidence published to support the plan uses traffic modelling calibrated and validated to 2021 as the model base year.
Sustainability Appraisal fails to consider reasonable alternatives – no higher growth option and not considering more accessible locations around Reading.	0240, 0244, 0268, 0302	The SA appropriately considers various growth scenarios across the borough and is not intended to appraise every development option. Several interim SA have been prepared to support plan making, which considers growth across multiple areas and sites.

MAIN ISSUE: SPATIAL STRATEGY

Detail	Respondent number	Response
Lack of distribution of proposed housing across the borough / overdevelopment of the same area / majority of housing planned for the south of the borough / lack of consideration of alternative options.	0003, 0004, 0009, 0026, 0030, 0038, 0061, 0096, 0124, 0144, 0153, 0187, 0212, 0217, 0236, 0244, 0250, 0276, 0295, 0311, 0319, 0340, 0344, 0354	<p>The council considers the plan sets out an appropriate strategy for the development of the borough, including considering constraints and opportunities of available land. By focusing development in Strategic Development Locations the council has been able to support more sustainable lifestyles.</p> <p>All development opportunities – strategic and non-strategic scale – have been considered as part of plan making, including through technical work and the sustainability appraisal. The council has reviewed the representations and remains of the opinion that the strategy proposed is the most suitable and sustainable option.</p>
Need to further consider PDL opportunities (including inconsistency with NPPF para 154).	0045, 0203, 0228, 0319, 0340	All PDL sites promoted to the council as available for development were assessed. A high proportion that were

Detail	Respondent number	Response
		assessed as suitable/deliverable have been included as part of the spatial strategy.
Likely coalescence of settlements.	0153, 0319	One aim of designating settlements and countryside, alongside associated policies such as SS5: Development in the countryside, is to ensure appropriate growth and development which will not lead to the coalescence of settlements.
Spatial strategy does not respond to the settlement hierarchy in the most appropriate way e.g. lack of focus on major settlements, lack of support for village growth (including inconsistency with NPPF para 83).	0222, 0225, 0232, 0244, 0252, 0268, 0301, 0302, 0311	<p>The council is satisfied the plan sets out an appropriate approach to the settlement hierarchy, informed by the Settlement Hierarchy Assessment.</p> <p>The majority of growth is planned as part of new or existing strategic development locations, alongside sites close to services and facilities at major settlements. Proportionate levels of growth are planned at smaller settlements, where access to services and facilities is more limited, but where appropriate scale development helps to support the continued vitality of villages.</p>
Inconsistency between the LPU vision and objectives and the spatial strategy – where more sustainable options for growth have not been chosen.	0311	The spatial strategy directs the majority of growth to locations that are already sustainable or that can be made sustainable. This includes three Strategic Development Locations (SDLs) and a proportion of small and medium sites. The council is satisfied that the spatial strategy meets a balance of the vision and objectives set out in the LPU.
Reliance on large sites.	0184, 0215, 0233, 0236, 0276, 0280, 0314, 0340, 0353	The spatial strategy largely follows the successful approach in the Core Strategy of large-scale mixed-use developments, which can build a cohesive community with the necessary

Detail	Respondent number	Response
		<p>infrastructure alongside. This includes a new SDL at Loddon Valley and extensions to Arborfield Green and South Wokingham SDLs. This is supported by small and medium sites, which are expected to deliver earlier in the plan period.</p> <p>The council is satisfied that continuing the approach of delivering larger scale sites facilitates the delivery of new development in a timely and coordinated manner. The delivery of development is ultimately in the control of the developer.</p>
Lack of consideration of Green Belt land (including inconsistency with NPPF paras 147 and 154).	0003, 0004, 0124, 0311	The council has considered the constraints and opportunities of all land promoted and is satisfied that no exceptional circumstances can be demonstrated to enable the proposed allocation of land within the Green Belt.
Lack of flexibility to address housing (or other identified) needs / restricting development (including inconsistency with NPPF para 22).	0228, 0238, 0240, 0254, 0261, 0268, 0290, 0302,	The plan proposes a strategy which is capable of meeting the development needs identified in full, whilst seeking to protect important aspects of the borough, including the natural environment. Flexibility is provided in several policies to allow appropriate proposals to come forward, including in policies SS3, SS4, SS5 and ER3.
Unjustified limitations of growth in the DEPZ.	0144, 0222, 0240, 0301	The council is satisfied the proposed approach is proportionate. The DEPZ is considered to be a major constraint affecting land to the west of Shinfield, with the Office for Nuclear Regulation advising their judgement of the Off-Site Emergency Plan to be stretched, which poses a challenge for accommodating new development.

Detail	Respondent number	Response
Unambitious approach to the spatial strategy (including inconsistency with NPPF paras 16b and 60).	0144	The council considers the plan sets out an appropriate strategy for the development of the borough to meet needs, including considering constraints and opportunities of available land.
Affordable housing / affordability not a factor in determination of the spatial strategy.	0203, 0252, 0340	Housing affordability is factored into the formula for calculating housing local housing need, which is set by the government. Policy SS10 confirmed that provision will be made to meet the local housing need. Policy H3: Affordable housing, sets out an ambitious approach to affordable housing that seeks to maximise the delivery.
Housing trajectory – skewed delivery of SDLs in second half of plan period / insufficient small and medium sites / optimistic delivery profile for LVGV.	0184, 0215, 0233, 0280, 0353, 0354	The council is satisfied that the housing delivery rates set out in the policies and the housing trajectory are realistic. The landowners similarly agree the delivery rates are achievable.
Too restrictive in terms of development in the countryside.	0144, 0238, 0266, 0267	The plan strikes a balance between meeting development needs and seeking to protect the attributes of the borough which make it a popular place to live, and therefore to deliver housing. Policy SS5: Development in the countryside sets out the approach to different types of development proposals in the countryside.
Not robust enough to protect countryside from inappropriate development.	0246	The council is satisfied that policy SS2 in conjunction with other policies in the plan provide an effective framework for enabling appropriate development proposals to come forward.
Lack of consideration of employment growth.	0240, 0265	Employment growth forms part of the spatial strategy (see Chapter 4 The Spatial Strategy 2023-2040). The plan sets out a strategy that meets employment needs over the plan period.

Detail	Respondent number	Response
		The council is satisfied the employment policies set out an appropriate economic strategy for the borough.
Lack of identification of local/area housing needs.	0232	The Local Housing Needs Assessment sets out the anticipated needs of housing for different groups, which has helped to inform the plan. Housing needs at the parish scale have increasingly been assessed by local communities to inform the preparation of neighbourhood plans.
Lack of consideration of potential higher housing need.	0144, 0278	At the time of the Proposed Submission Plan consultation the latest NPPF had not been published and the standard method and OAN a draft/unconfirmed position. The LPU is to be examined against the 2023 NPPF as per transitional arrangements enabled by the latest NPPF.
Failure to effectively meet the housing needs of the borough – including an aging population and a mix of housing types.	0340	<p>The council considers the plan sets out an appropriate strategy for the development of the borough, including considering constraints and opportunities of available land.</p> <p>A variety of policies throughout the LPU seek to support the needs of an aging population and other people in the borough. Specific policies include H7: Specialist accommodations, H10: Traveller sites and H1: Housing mix, density and standards.</p>

MAIN ISSUE: SETTLEMENT HIERARCHY

Detail	Respondent number	Response
<p>Unjustified/ineffective settlement hierarchy assessment informing the hierarchy, and a rigid/incorrect categorisation of settlements as minor, modest or major, which can constrain housing delivery.</p>	<p>0002, 0144, 0225, 0232, 0235, 0286, 0301, 0320</p>	<p>The Settlement Hierarchy Assessment (2024) included a quantitative assessment of services and facilities and accessibility, alongside a qualitative assessment and commentary considering aspects such as the relationship of a settlement to the wider local area/neighbouring settlements. This informed the settlement hierarchy proposed in the Proposed Submission Plan and included two new settlements.</p> <p>Based on the assessment the council is satisfied that existing settlements should retain their positions in the hierarchy. It is accepted that no two settlements in the borough, and indeed within the same tier, are the same and a level of judgement must be applied. Each tier in the hierarchy will have settlements that have different attributes.</p>
<p>Insufficient support for further appropriate sites to meet demand through the settlement hierarchy.</p>	<p>0206, 0207, 0225, 0244, 0268, 0277</p>	<p>The council is satisfied that appropriate development proposals can come forward within settlements or in other locations, in accordance with other policies within the plan.</p>
<p>Lack of consideration of settlements outside Wokingham Borough e.g. Reading, Bracknell, Binfield and their relationship to Wokingham Borough settlements.</p>	<p>0120, 0234, 0244, 0268, 0301, 0302</p>	<p>It is acknowledged that some settlements within Wokingham Borough form part of a wider settlement across authority boundaries or look towards a settlement outside of the borough for some services and facilities.</p> <p>The Settlement Hierarchy Assessment (2024) considered cross-boundary issues where necessary, including services and facilities outside the borough where appropriate.</p>

Detail	Respondent number	Response
Lack of reflection of variation in access to services from different areas/other settlements.	0235, 0244, 0276	The Settlement Hierarchy Assessment (2024) methodology considered services and facilities available within each settlement, where they may be accessed in nearby settlements and the level of accessibility.
It is misleading to refer to the bus service at Arborfield Green as 'regular'.	0250	The audit of accessibility within the Settlement Hierarchy Assessment (2024) has produced an accessibility rating of 'fair' for Arborfield Green. This is in accordance with the parameters outlined in Table 4: Audit of accessibility (for the ratings of 'good', 'fair', 'limited' and 'none'). With the information available at the time of the assessment, the council is satisfied with the settlement assessment for Arborfield Green.
Arborfield Green is largely dependent on infrastructure not yet delivered.	0250	The council acknowledges that there are further planned services as well as homes to be delivered at Arborfield Green. However, it is an existing settlement, with existing services and facilities available with further under construction.

MAIN ISSUE: SETTLEMENT BOUNDARIES

Detail	Respondent number	Response
Settlement boundaries are too rigid / need to allow flexibility.	0184, 0206, 0207, 0215, 0233, 0261, 0353	Settlement boundaries identify the main built-up area of a settlement within which development is considered acceptable in principle. Settlement boundaries allow development whilst protecting the character of a settlement.

Detail	Respondent number	Response
		<p>The Settlement Boundary Review topic paper (2024) reviewed the boundaries with regard to a number of guiding principles, completed developments and extant planning permissions and proposed allocations in the LPU.</p> <p>The council is satisfied that the settlement boundaries are appropriate to allow development whilst preventing unrestricted growth in the countryside. Policies SS3 and SS4 provide a framework for appropriate growth within and adjacent to settlements.</p>
<p>Suitable areas on the edge of settlements not proposed for inclusion within settlement boundaries / inconsistency of boundaries.</p>	<p>0184, 0232, 0233, 0261, 0265, 0290, 0337, 0341, 0345</p>	<p>Settlement boundaries identify the main built-up area of a settlement within which development is considered acceptable in principle. Settlement boundaries allow development whilst protecting the character of a settlement.</p> <p>The Settlement Boundary Review topic paper (2024) reviewed the boundaries with regard to a number of guiding principles, completed developments and extant planning permissions and proposed allocations in the LPU.</p> <p>The council is satisfied that the settlement boundaries proposed are appropriate in the case of each settlement accounting for a level of uniqueness/local character, whilst remaining consistent with the guiding principles and approach taken.</p> <p>Policies SS3 and SS4 set out circumstances where appropriate development may be supported adjacent to major, modest and minor settlements. The council is satisfied that this gives</p>

Detail	Respondent number	Response
		an appropriate level of flexibility to support suitable sites which are unallocated in the plan to come forward.
Lack of consultation regarding settlement boundaries.	0246	The Settlement Boundaries Review topic paper (2024) was published and available for review and comment on as part of the Proposed Submission Plan consultation, which was undertaken in line with the regulations and the councils Statement of Community Involvement.

MAIN ISSUE: IMPACT ON INFRASTRUCTURE

Detail	Respondent number	Response
Impact on highways network which will lead to further congestion – including impact on local junction e.g. Mole Road, Mill Lane, Lower Earley Way, Black Boy roundabout.	0009, 0024, 0038, 0060, 0065, 0150, 0153, 0190, 0195, 0203, 0212, 0295, 0346	<p>Transport modelling and assessments have been undertaken throughout the preparation of the plan.</p> <p>The transport evidence published to support the plan uses traffic modelling calibrated and validated to 2021 as the model base year. This approach is considered robust.</p> <p>The modelling acknowledges levels of congestion and delay will increase but these will not be severe. Other improvements are identified in the IDP to support the use of alternative modes of transport.</p>
Impact on health and community facilities.	0045, 0115, 0150, 0190, 0203, 0217, 0250, 0295, 0319, 0346	The IDP identifies upgrades to the primary care network, including GP provision is required to help mitigate the impact of the development proposed. The council will work with the ICB to help identify and define relevant projects, for example as part of the Loddon Valley Garden Village SDL.

Detail	Respondent number	Response
Impact of public transport / lack of existing and proposed provision / integration with existing infrastructure.	0009, 0038, 0041, 0153, 0195, 0250, 0295, 0340	<p>The council is satisfied that the public transport provision proposed as part of the developments across the borough is appropriate. The IDP identifies various public projects to help mitigate the impact of the development proposed.</p> <p>Significant investment in public transport is planned to support sustainable travel, notably as part of the SDLs that are proposed to be delivered, where new and extended public transport routes will support journeys to nearby services and facilities. This will also provide benefits to some existing communities, in terms of routes and frequency.</p>
Impact on schools and education.	0009, 0024, 0045, 0115, 0190, 0150, 0295, 0319, 0346	<p>The council is satisfied that the education provision proposed as part of the developments across the borough is appropriate. The IDP identifies various education projects to help mitigate the impact of the development proposed.</p>
Lack of planned infrastructure / reliance on major infrastructure / timing of infrastructure.	0038, 0045, 0061, 0076, 0153, 0184, 0215, 0233, 0236, 0250, 0295, 0340, 0353	<p>The council is satisfied the infrastructure projects set out in the IDP will help to mitigate the impacts of development. Further work to define the costs and timing of delivery is ongoing, which will inform further updates to the IDP.</p>
Impact on water supply and sewerage capacity.	0076, 0153, 0295, 0344	<p>The Water Cycle Studies consider the impact of development on the sewage and sewerage network and were prepared in consultation with Thames Water and South East Water.</p> <p>Representations from Thames Water regarding each site allocation set out where development proposed is likely to require upgrades to existing infrastructure.</p>

Detail	Respondent number	Response
		<p>In terms of the proposed LVGV SDL – following consultation with Thames Water, the IDP identifies that an upgrade of the Arborfield STW is planned, which is capable of mitigating the impact of the development proposed. Engagement with Thames Water will continue on an ongoing basis.</p> <p>A Statement of Common Ground with Thames Water agrees that there are no known significant water supply, waste water, or sewage treatment capacity issues that would be likely to prevent, or delay the delivery of the site allocations proposed in the plan.</p>
Traffic surveys were undertaken during covid and are out of date.	0188, 0195, 0203	The traffic surveys were undertaken at the earliest opportunity after furlough ended. The transport evidence published to support the plan uses traffic modelling calibrated and validated to 2021 as the model base year, which is considered robust.

MAIN ISSUE: ENVIRONMENTAL IMPACTS

Detail	Respondent number	Response
Loss of rural amenity / green space.	0041, 0115, 0150, 0203	Whilst a number of greenfield sites have been proposed for allocation for housing and mixed-use development, these will enable the creation of new publicly accessible green spaces and parks.
Loss of biodiversity / habitats / wildlife.	0041, 0065, 0076, 0153, 0190, 0203, 0295, 0344	The Housing and Economic Land Availability Assessment (HELAA) assessed all land promoted as available for development. Sites were assessed with regard to wide ranging

Detail	Respondent number	Response
		<p>topic areas including accessibility, flooding, trees and biodiversity. These aspects were considered as part of an overall planning judgement for suitability.</p> <p>Site specific policies and development guidelines for the proposed allocations, including SDLs, give further detail of how biodiversity within the site boundary and surrounding area will be considered as part of the development. Further policies in the plan also seek to conserve and enhance biodiversity – NE1 Biodiversity and geodiversity and NE2 Biodiversity net gain.</p>
Loss of tree cover / lack of tree protection.	0041, 0150	Although there may be some impact on trees and hedgerows on proposed allocations, this will be minimised as far as possible, and suitable mitigation implemented.
Air quality impacts.	0041, 0190	<p>Environmental impacts, including air quality, have been considered and do not inhibit the delivery of development. If further evidence identifies adverse impacts suitable mitigation measures will be proposed.</p> <p>All proposals will be subject to Policy HC6: Air pollution and air quality.</p>
Impact on heritage/archaeological assets.	0041	The Housing and Economic Land Availability Assessment (HELAA) assessed all land promoted as available for development. Sites were assessed with regard to wide ranging topic areas including landscape, flooding, accessibility and heritage. These aspects were considered as part of an overall planning judgement for suitability.

Detail	Respondent number	Response
		<p>Site specific policies and development guidelines for the proposed allocations, including SDLs, give further detail of how heritage assets within the site boundary/surrounding area will be considered as part of the development.</p> <p>A Statement of Common Ground has been agreed with Historic England that recognises there are no heritage constraints that would prevent the delivery of the strategy promoted in the plan.</p>
Adverse impacts from building in areas of flood risk.	0041, 0060, 0096, 0115, 0190, 0295, 0319	<p>The council has published a Strategic Flood Risk Assessment (SFRA), Water Cycle Study and Sequential & Exception Tests which have been produced with input from the Environment Agency.</p> <p>Site specific policies for the proposed allocations along with development guidelines outline that no development will be in areas of flood risk.</p> <p>The council is confident that the risk of flooding on sites and elsewhere will not be increased.</p> <p>The council will shortly have a signed Statement of Common Ground with the Environment Agency which endorses the evidence base and supports the principle of the spatial strategy.</p>
Loss of BMV agricultural land.	0319	<p>The Housing and Economic Land Availability Assessment (HELAA) assessed all land promoted as available for development. Sites were assessed with regard to wide ranging topic areas including landscape, biodiversity, flooding, accessibility and BMV agricultural land. These aspects were considered as part of an overall planning judgement for</p>

Detail	Respondent number	Response
		<p>suitability, where impact on one area may be outweighed by a benefit in other areas.</p> <p>In determining the sites to be taken forward as housing allocations the council had regard to a wide ranging, proportionate suite of evidence base studies. The council is satisfied that this is an appropriate and robust process.</p>
Impact on ability to reduce carbon footprint / climate change.	0250, 0340, 0344	<p>The spatial strategy directs the majority of growth to locations that are already sustainable or that can be made sustainable. The council is satisfied that the strategy chosen is best able to address climate change than other potential alternatives, in the context of meeting development needs.</p>

MAIN ISSUE: PROCESS, DECISION TAKING, IMPLEMENTATION

Detail	Respondent number	Response
Not supported by up-to-date evidence base (including inconsistency with NPPF para 31).	0124, 0244, 0268, 0301, 0302	<p>A full suite of technical evidence base has been undertaken and published as part of the LPU, including the Green Belt Study (jointly prepared and published in 2016). The council is satisfied that this is appropriate and robust the plan as a whole is supported by an up-to-date evidence base.</p>
The planned adoption date is unrealistic.	0184, 0233	<p>Adoption of the plan within the published Local Development Scheme is May 2026. The council is confident that this is achievable.</p>

Detail	Respondent number	Response
Site selection process should have been based on scoring rather than planning judgement.	0236	<p>The Housing and Economic Land Availability Assessment (HELAA) identifies a future supply of land which is broadly suitable, available and achievable for housing – a pool of land that might reasonably form part of potential strategies.</p> <p>Sites were assessed by applying planning judgement and not through a point scoring exercise. A point scoring approach can often lead to misleading or unrepresentative assessments where significant impact on a single or a few issues can be masked by other considerations, or where a large number of less significant impacts are similarly masked.</p> <p>In determining the sites to be taken forward as housing allocations the council had regard to a wide ranging, proportionate suite of evidence base studies. The council is satisfied that this is an appropriate and robust process.</p>
Lack of evidence for the 10 dwelling threshold for site assessment/allocation – should have followed the NPPF.	0236	As outlined in the Housing and Economic Land Availability Assessment (HELAA) – this threshold is considered to appropriately respond to the character of Wokingham Borough and the nature of development. This threshold is also considered to be appropriate in response to the scale of affordable housing need locally and the NPPF advice that affordable housing should not be sought from residential developments that are not major, that is developments of nine or fewer dwellings.
Inadequate consultation process.	0188, 0217	Public consultations on the LPU have taken place at every stage of the plan process in line with regulations and the councils Statement of Community Involvement.

Detail	Respondent number	Response
Inappropriate political decision making.	0187, 0217	An appropriate spatial strategy was proposed as part of the LPU Proposed Submission Plan, which was voted on by full Council to be published for a Regulation 19 public consultation.
Element of pre-determination choosing LVGV against the SA outcomes.	0295	<p>Loddon Valley Garden Village was first proposed by the council as a potential strategic allocation in the Revised Growth Strategy consultation (2021). Following the consultation, the consultation responses were reviewed and analysed, and further technical work was undertaken.</p> <p>This included engagement with the landowners to help understand the constraints and opportunities of the site and how it can be delivered sustainably.</p> <p>There has been no predetermination regarding the inclusion of the site in the plan.</p>
Impact on quality of life of existing residents.	0024, 0190, 0212	The council recognises that new development can have an impact on existing residents. However, the council is required by national policy to plan to meet future needs. The council considers the plan sets out an appropriate strategy for the development of the borough, including considering constraints and opportunities of available land.
Clear construction management plan will be necessary.	0041	Where appropriate the council imposes planning conditions, requiring Construction Environmental Management Plans to explain how construction will be monitored and managed through the planning process.
Lack of clarity for ensuring inappropriate unplanned sites do not receive planning permission with an up-to-date plan.	0204	The local plan sets out the council's long term development strategy to 2040, but similar to all local plan it does not, and cannot identify every development proposal that may come

Detail	Respondent number	Response
		forward during this time. The plan sets out a framework for decision takers to determine such applications, including on land which is not proposed for development.
Lack of transparency of the site selection process.	0340	The Housing and Economic Land Availability Assessment (HELAA) (2024) and Housing Site Allocations topic paper (2024) outline the site assessment and selection process. In determining the sites to be taken forward as housing allocations the council had regard to a wide ranging, proportionate suite of evidence base studies. The council is satisfied that this is an appropriate and robust process.

MAIN ISSUE: REQUESTED MODIFICATIONS

Detail	Respondent number	Response
Modify Sindlesham settlement boundary – extend to include ‘Land East of Mill Lane’.	0325	Not agreed. Land east of Mill Lane is not planned for development as part of the Loddon Valley Garden Village. The council is satisfied with the approach to not extend the Sindlesham settlement boundary to include this area of land.
Modify Hurst settlement boundary – remove Hurst Village Hall from within the settlement.	0246	Not agreed. The council is satisfied with the approach to include this existing built community facility closely related to the built-up area into the settlement boundary of Hurst.
Modify Hurst settlement boundary – extend to include Land adjacent to Whistley Green Cottage.	0337, 0345	Not agreed. Land adjacent to Whistley Green Cottage is not proposed for allocation. Policy SS4 sets out circumstances where appropriate development may be supported adjacent to minor settlements. Whilst previously proposed for allocation, the council is satisfied that Policy SS4 provides an

Detail	Respondent number	Response
		appropriate level of support for suitable unallocated sites on the edge of defined minor settlements to come forward through the planning application process.
Modify Hurst settlement boundary – extend to include Land north-west of Hogmoor Lane.	0232	Not agreed. Land north-west of Hogmoor Lane is not proposed for allocation. The council is satisfied with the approach not to extend the Hurst settlement boundary to include this area of land.
Modify Shinfield settlement to include Shinfield, Shinfield (north) and Thames Valley Science Park (TVSP) and reclassify as a major settlement.	0265, 0305	Not agreed. The Settlement Hierarchy Assessment (2024) included a quantitative assessment of services and facilities and accessibility, alongside a qualitative assessment. Based on the assessment the council is satisfied with the position of these three settlements in the hierarchy and that they are separate settlements.
Modify TVSP settlement boundary – extend to include all areas of Shinfield Studios i.e. Phase 3 and the temporary permission backlot area.	0265, 0305	Not agreed. Due to the expansion of the Thames Valley Science and Innovation Park and its inclusion in the wider LVGV SDL a separate settlement has been created. The boundary has been drawn using latest information on planning commitments, masterplans and constraints such as flood zones and woodland and as such the council is satisfied that the boundary is appropriate.
Modify Winnersh settlement boundary – extend to include Winnersh Farms site area (with an allocation for 87 dwellings).	0282	Not agreed. The Winnersh Farms site is not allocated for development and does not benefit from the planning permission of the adjacent site. The site was withdrawn from the plan process and is therefore unavailable for development. The council is satisfied with the approach to not extend the Winnersh settlement boundary to include this area of land.

Detail	Respondent number	Response
Modify Finchampstead North settlement boundary – extend to include Tintagel Farm and Heartwood Lodge.	0233	Not agreed. Tintagel Farm and Heartwood Lodge are not allocated for development. The council is satisfied with the approach to not extend the Finchampstead North settlement boundary to include these areas of land.
Modify settlement boundary – extend either Arborfield Cross or Arborfield Green to include Langley Common.	0184	Not agreed. Langley common is a separate small hamlet/built up area that is detached from other nearby designated settlements. It is not allocated for development. The council is satisfied with the approach to not extend the either the Arborfield Cross or Arborfield Green settlement boundaries to include this area.
Modify settlement boundary – extend Pinewood (Crowthorne) along Nine Mile Ride up to and including Land adjacent to Sulby Croft Heathlands Road.	0215	Not agreed. Land adjacent to Sulby Croft Heathlands Road is not allocated for development. The site lies detached from the settlement within the countryside. The dwellings on Nine Mile Ride are separated from the settlement boundary by the railway line. The council is satisfied with the approach to not extend the Pinewood (Crowthorne) settlement boundary to include these areas of land.
Modify settlement hierarchy (and boundary) – create settlement at Carter’s Hill.	0206	Not agreed. The Loddon Valley Garden Village concept plan identifies Carters Hill as a historic settlement. Policy SS13 and the corresponding development guidelines set out in Appendix C seek to conserve the separate identity of Carter’s Hill and the heritage assets. The council is satisfied that the settlement hierarchy identifies the locations which are appropriate to be designated as settlements within the hierarchy.
Modify settlement hierarchy (and boundary) – designate a settlement at Arborfield village.	0286	Not agreed. It is unclear which specific area is being referred to. However, the council is satisfied that the settlement

Detail	Respondent number	Response
		hierarchy identifies the locations which are appropriate to be designated as settlements within the hierarchy.
Modify settlement hierarchy – include Ryeish Green as a new settlement.	0144	Not agreed. It is acknowledged that the Ryeish Green area includes a secondary school and a sports centre accessed by the surrounding settlements. However, the council is satisfied that the settlement hierarchy identifies the locations which are appropriate to be designated as settlements within the hierarchy.
Modify settlement hierarchy – reclassify Ruscombe as a minor settlement.	0002	Not agreed. The Settlement Hierarchy Assessment (2024) included a quantitative assessment of services and facilities and accessibility, alongside a qualitative assessment. Based on the assessment the council is satisfied with the position of Ruscombe as a modest settlement in the settlement hierarchy.
Modify settlement hierarchy – reclassify Sonning as a modest settlement.	0235, 0244	Not agreed. The Settlement Hierarchy Assessment (2024) included a quantitative assessment of services and facilities and accessibility, alongside a qualitative assessment. Based on the assessment the council is satisfied with the position of Sonning as a minor settlement in the settlement hierarchy.
Modify settlement hierarchy – reclassify Shinfield, Spencers Wood and Three Mile Cross together as a major settlement.	0268	Not agreed. The council acknowledges there is a level of connection between these three settlements. However, the council is satisfied with the approach of three separate settlement designations in the settlement hierarchy as modest settlements.
Modify settlement hierarchy – remove Arborfield Green as a modest settlement and include as a	0250	Not agreed. The council acknowledges that there are further planned services as well as homes to be delivered at Arborfield Green. However, it is an existing settlement, with

Detail	Respondent number	Response
'future' settlement along with LVGV until infrastructure has successfully been delivered.		existing services and facilities available with further under construction. The council is satisfied with its position in the settlement hierarchy as a modest settlement.
Modify settlement hierarchy – include Reading and Bracknell as major settlements.	0244, 0268, 0301, 0302	Not agreed. The settlements of Reading and Bracknell lie outside of Wokingham Borough. The LPU (and policies map) can only define and designate land uses within the authority boundary. Connections and relationships to neighbouring towns and villages have been considered through the assessment of settlements and through the plan as a whole.
Modify part 10 of policy to remove reference to policies H4 and H5/ not limit to only accord with policies H4 and H5.	0238, 0246, 0266, 0267	Agreed. A modification is set out within the Schedule of proposed modifications.
Modify part 9 of policy to not limit development to only exceptions sites which accord with policy H4.	0301, 0302	Agreed. A modification is set out within the Schedule of proposed modifications.
Modify Policies Map D1 to include missing areas of the borough – south of Swallowfield and north-west by Green Park.	0268	Agreed. A modification is set out within the Schedule of proposed modifications. It is noted that during the public consultation these areas could be viewed on the interactive map on the website where all layers were available to view in full.
Modify to include housing numbers for the plan period at the start of Policy SS2.	0102	Not agreed. Housing numbers are outlined in Chapter 4 The Spatial Strategy 2023-2040 and the provision in the LPU set out in Policy SS10: Meeting our housing needs.

OTHER ISSUES:

- Confirmation requested that Grays Farm will be used as a sporting facility (0041)
- Regular public consultations requested in Wokingham Without through the plan process and development stages (0041)
- Affordable house prices are needed for young families (0045)
- An alternative scenario including an Ashridge SDL would require additional highways mitigations (**0132**)
- There has been a previous reliance on sites outside settlement boundaries to demonstrate a five year housing land supply (0215, 0233, 0184, 0207, 0206)

Policy SS3: Development within or adjacent to major and modest settlements

30 respondents

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0124	Joyner, Ross	0276	David Wilson Homes Southern
0143	Singh, Raphael	0277	Croudace Homes, Vortal Homes Ltd and Falcon Developments (SE) Limited
0144	John, James	0278	Hill Residential Ltd
0204	ACER The Whitegates Residents Association	0280	Bewley Homes
0219	Anwyl Land Limited	0282	Taylor Wimpey Strategic Land
0225	Catesby Estates	0291	London and Regional
0235	The Old Redingensians Association	0301	City & Country
0239	University College of Estate Management	0302	Dandara Southern Ltd and Elstree Land
0244	Woolf Bond Planning	0303	Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board
0250	Barkham Parish Council	0305	University of Reading
0252	Gladman	0311	Berkeley Strategic Land Limited
0254	Croudace Homes	0314	Vistry Group
0268	Wates Developments Ltd	0318	Bloor Homes
0271	Holdstock, Michael	0321	AWE plc
0272	Helmsley Land Ltd	0329	Waingels College

Support

Respondents 0124, 0144, 0204, 0219, 0235, 0239, 0278, 0282, 0291, 0305, 0318, 0321, and 0329 consider the policy to be legally compliant.

Respondents 0204, 0219, 0235, 0239, 0244, 0268, 0272, 0278, 0282, 0291, 0301, 0302, 0305, 0318, 0321, and 0329 consider the policy to comply with the Duty to Cooperate.

Respondent 0239 supports the policy, in particular the inclusion of their site Shinfield Grange (5SH049) within the modest settlement of Thames Valley Science and Innovation Park.

While respondents 0143, 0225, 0276, 0278, 0280, 0282, 0314 broadly support the policy, including its support for unallocated sites within or adjacent to settlements where specific circumstances are met, they raised specific concerns with aspects of the policy which are covered below.

While respondent 0204 acknowledge the need for existing built up areas, with associated infrastructure, to accommodate future growth, they raised specific concerns with aspects of the policy which are covered below.

Respondent 0276 identified land at Riverways Farm (site reference 5TW007, 011) as an appropriate location for development in compliance with SS3 2b i - vii. This respondent is included in the Omission Sites table.

Respondent 0278 identified Land at Stokes Farm as an appropriate location for 1,500 dwellings, which would support and complement the Ashridge strategic opportunity as a suitable extension to Wokingham town. The respondent considers the site should be allocated to help address uplifted need, and while no soundness concerns were raised with the policy against the current NPPF, the lack of a plan to address future need (and lack of allocation to the site) was deemed to make the policy unsound. This respondent is included in the Omission Sites table.

While respondent 0282 supports the identification of Winnersh as a major settlement, and the incorporation of Land off Poplar Lane and Watmore Lane, Winnersh (SS14.21) into the settlement boundary, they consider the boundary should be further expanded to include land to the south known as Winnersh Farms to allow development to come forward on the site at a suitable time.

LEGAL COMPLIANCE

Detail	Respondent numbers	Response
The sustainability appraisal has not considered all reasonable alternatives	0302	Please refer to Sustainability Appraisal section of this statement.

MAIN ISSUE: CONSISTENCY WITH NATIONAL POLICY AND GUIDANCE

Detail	Respondent numbers	Response
<p>The policy is overly restrictive in its approach to the growth of settlements, which is not consistent with the support in the NPPF (including paragraphs 73 and 89) for development of sites adjacent to settlements / in rural areas. This includes introducing an ‘exceptional circumstances’ test outside of green belt, which has no basis in national policy.</p>	<p>0124, 0144, 0219, 0235, 0268, 0271, 0272, 0282, 0301, 0302, 0305, 0318</p>	<p>NPPF paragraph 73 relates to residential exception sites and paragraph 89 relates to business use. The LPU contains a positive policy framework for these types of development, primarily through policies H4 and ER3 respectively. The Local Plan Update should be read and interpreted as a whole, with all policies being viewed together and not in isolation. Consistency and certainty are fundamentally important principles of the plan-led system. The definition of settlements where development will be directed towards, in addition to the identification of types of development that may be acceptable outside of settlements (i.e. in the countryside), provides the clarity necessary for consistent decision making. The council is satisfied that the identification of settlement boundaries and exceptional development on their edge to address shortfalls in deliverable supply that arise, is consistent with the NPPF requirement for the planning system to be genuinely plan-led.</p>
<p>The policy attempts to restrict the conditions where the presumption in favour of sustainable development applies, which is not supported in national policy and is contrary to the need to significantly boost the supply of housing.</p>	<p>0124, 0144</p>	<p>Consistency and certainty are fundamentally important principles of the plan-led system. The definition of settlements where development will be directed towards, in addition to the identification of types of development that may be acceptable outside of settlements (SS5), provides the clarity necessary for consistent decision making. This does not include unplanned expansions to the existing settlements given allocations, and revisions to settlement boundaries, ensure a plan-led approach to growth of places. In so doing, the plan makes provision to meet needs in full. SS3 part 2 seeks to pragmatically introduce flexibility where housing</p>

Detail	Respondent numbers	Response
		supply cannot be demonstrated and seeks to guide this in a locally specific and positive way to maximise the sustainability of any development required to address any shortfalls in supply. The council considers this approach to be consistent with the NPPF requirement for the planning system to be genuinely plan-led.
The requirement for the plan to be five years old in order for the exceptions at Part 2 to apply is unjustified and not positively prepared. This includes that the consultation version of the NPPF proposes to remove protection from demonstrating a five year land supply for plans which are less than five years old, and the fact that policies which are more than five years old are out of date in any event (with the LPU needing to be removed immediately).	0143, 0235, 0244, 0252, 0254, 0268, 0271, 0272, 0276, 0280, 0301, 0302, 0305, 0311, 0314, 0318	The policy approach accords with the NPPF 2023 against which this plan will be examined, as set out in the transitional arrangements in the NPPF 2024. It is not agreed that policies are out of date when they are five years old, which is contrary to the approach at paragraph 225 of the NPPF. Plans need to be reviewed every five years, but there is no expectation all policies will be found to be out of date as part of a review. It is recognised that the plan will be reviewed shortly after adopted, as required by NPPF 2024 paragraph 236.
The requirement for development to be deliverable within five years is not required by national policy and not practical for many sites. This will prevent sustainable sites coming forward, in some cases quicker than sites allocated which are projected to deliver later in the plan period. This requirement should be deleted.	0235, 0252, 0282, 0311, 0318	Part 2 of the policy establishes that where housing delivery has fallen short of expectations, additional unplanned development may be able to come forward where the defined circumstances are met. The council considers it important where speculative development is proposed on this basis that it demonstrably addresses the land supply shortfall by being deliverable in the short term. Otherwise unplanned development will come forward which does not address the land supply position, which will lead to cumulative unplanned development being required contrary to the plan-led system. It is not considered appropriate to compare allocated sites with speculative sites in terms of delivery. While some allocated sites will not deliver within five years, this is due to a need to maintain supply over the plan period and these sites

Detail	Respondent numbers	Response
		have been selected through the plan-led approach following detailed assessment and sustainability appraisal etc.
It is not appropriate to preserve the provisions of current national policy when the Labour government are looking to update national policy and accelerate housing delivery.	0329	Government has made the decision not to delay advanced plans by introducing a reasonable transitional period where plans can be progressed and examined against the 2023 NPPF. The council is progressing with the plan making process on this basis which will allow the council to grant planning permission for substantial new housing and thereby act to speed up the delivery of housing.

MAIN ISSUE: POLICY WORDING

Detail	Respondent numbers	Response
Part 2 of the policy is not positively worded in stating proposals will generally be refused and its criteria are overly restrictive. This should be phrased positively, including to accept that there may be other circumstances where development may be supported beyond those listed.	0143, 0144, 0235, 0244, 0252, 0268, 0271, 0272, 0280, 0282, 0301, 0302, 0305, 0318	The council is satisfied that the policy is clearly written and unambiguous, consistent with NPPF paragraph 16d). Part 2 of the policy introduces flexibility to react to unforeseen issues with housing delivery. The council is satisfied the criteria are proportionate and justified to ensure that where unplanned development is necessary, it comes forward in a sustainable manner.
The wording 'not unacceptably harm' is subjective and doesn't fully address the need for the character of existing areas to be retained.	0204	The council is satisfied that the policy wording allows for the appropriate use of planning judgement to ensure character is considered. The Local Plan Update should be read and interpreted as a whole, with all policies being viewed together and not in isolation, and therefore policies containing detail in

Detail	Respondent numbers	Response
		relation to design, landscaping etc must also be considered when determining applications.
Objection to the policy applying only to major and modest settlements, for reasons including: that this restricts the ability to meet housing needs (including significant proposed increases in need); it precludes development in sustainable locations at minor settlements; that including minor settlements would allow additional flexibility to counteract periods of low supply.	0225, 0254, 0277	The council is satisfied that the policy approach does not apply to minor settlements, recognising that major and modest settlements are the most sustainable in the identified hierarchy. Unplanned development adjacent to minor settlements is considered to conflict with the spatial strategy and be unsustainable even in the event of unforeseen housing delivery issues.
Lack of clarity on how the provisions of NPPF paragraph 14 would apply to areas with a relevant neighbourhood plan.	0250	Noted. The provisions of Part 2 of the policy would not apply where NPPF paragraph 14 is engaged. It is not considered necessary to repeat NPPF wording in the policy and / or supporting text.
The requirement for development proposals to be relative to the scale of the shortfall at part 2b)i. is not justified as large schemes can play an important role in addressing a smaller shortfall	0276, 0311, 0318	Part 2 of the policy establishes that where housing delivery has fallen short of expectations, additional unplanned development may be able to come forward where the defined circumstances are met. The council considers it important where speculative development is proposed on this basis that it is proportionate to the settlement and the level of the shortfall, given large scale development which is not plan led is unlikely to be sustainable, erodes trust in the plan making system and is contrary to the aim of national policy for the system to be genuinely plan led.
Part 2b)i. needs to be amended to also refer to the scale of the shortfall relative to the land supply requirement as well as the Housing Delivery Test	0276	Noted. The council is minded to accept a modification to clarify that the scale of the shortfall should be relative to the forward looking five year land supply where that is the relevant test in Part 2 a) that is engaged. A related change is

Detail	Respondent numbers	Response
		set out within the Schedule of proposed modifications, in addition to a consequential change to part b) ii for consistency.
The Housing Delivery Test results are published several years in arrears and are therefore not an effective basis on which to meet needs, especially when the council will have monitored its completions.	0311	The policy references to the Housing Delivery Test and lack of five year housing land supply are consistent with NPPF footnote 8 and paragraph 79. As set out above, reference to land supply is required for additional clarity in part 2b) i and part 2b ii) as a consequence which are set out within the Schedule of proposed modifications.
Whilst accepting that a plan must be read as a whole, Policy SS3 should require development supported in principle to also meet the requirements of Policy SS7.	0321	As stated at paragraph 1.30, the Local Plan Update should be read and interpreted as a whole, with all policies being viewed together and not in isolation. Any development proposal within this area would be subject to consideration under Policy SS7: Development in vicinity of AWE requiring full consideration of potential impacts on the operability of the AWE Off-Site Emergency Plan. No modification is considered necessary.

MAIN ISSUE: POLICY ACHIEVABILITY

Detail	Respondent numbers	Response
The plan is silent on windfall development from sites of 10 or more dwellings despite windfall being a substantial part of supply. Therefore, the restrictive approach of SS3 to limit development to within major and modest settlements will inhibit	0219	The plan is not silent on large windfall development and the figures presented at Table 6 contain an allowance for 520 dwellings to be delivered from windfall sites of 10 or more dwellings. The council is satisfied that the spatial strategy approach does not restrict the scale of windfall anticipated in

Detail	Respondent numbers	Response
sustainable windfall delivery from large sites which the plan relies upon.		the plan. Notwithstanding, it is accepted that Table 6 could more clearly identify the windfall allowance from large windfall sites. A related change is set out within the Schedule of proposed modifications.
No allowance in the policy for the event that the strategic sites (SS11, SS12, and SS13) fail to deliver at the anticipated rate.	0219	Incorrect. The spatial strategy identifies a range of sites that can be delivered early in the plan period and allows a land supply in excess of the housing requirement, therefore introducing flexibility. The council is satisfied that the housing delivery rates for the strategic sites set out in policies SS11 – SS13 and the house trajectory are realistic. The landowners similarly agree the delivery rates are achievable. In the event strategic sites deliver slower than anticipated, the effect will be a lack of a five year land supply, and SS3 contains flexibility to facilitate delivery of non-planned sites in this event. The policy therefore does contain allowance for this eventuality.
Policy hinders sustainable development and diverges from the spatial strategy principles.	0235, 0305, 0318	Consistency and certainty are fundamentally important principles of the plan-led system. The council considers it to be justified to restrict unplanned expansions to the existing settlements given the allocations, and revisions to settlement boundaries, ensure a plan-led approach to growth of places. In so doing, the plan makes provision to meet needs in full. SS3 part 2 seeks to pragmatically introduce flexibility where housing supply cannot be demonstrated and seeks to guide this in a locally specific way to maximise the sustainability of any development required to address any shortfalls in supply. The council considers this approach to be consistent with the NPPF requirement for the planning system to be genuinely plan-led.

MAIN ISSUE: POLICY IMPLEMENTATION

Detail	Respondent numbers	Response
That the policy should be extended to take effect immediately (i.e. the requirement of 2a should not need to apply) given the increased housing needs proposed.	0252	Government has made the decision not to delay advanced plans by introducing a reasonable transitional period where plans can be examined against the 2023 NPPF. The council is progressing with the plan making process on this basis.
The plan should include a policy which commits the council to undertake and submit a review of the plan for examination within two years of adoption.	0276	Legislation and guidance require a plan to be reviewed every five years. It is unnecessary to include a policy in the plan to this effect.
Inconsistency between policy SS3 part 2 and SS5, as the latter supports redevelopment of PDL in the countryside whereas SS3 is more qualified. Modification necessary to SS3 to clarify its provisions don't apply where proposals are otherwise specifically supported by policies in the plan.	0291	Incorrect. SS3 part 3 explicitly supports the principle of proposals involving the partial or full redevelopment of previously developed land on the edge of settlements. Relevant developments may therefore be able to come forward, irrespective of whether SS3 part 2 applies. SS5 is more qualified than SS3 part 3, recognising it will apply to proposals in countryside locations more distant from settlements and therefore less sustainable. Part 3 of SS5 requires (among other things) that development is of a scale, nature and location within the countryside that is appropriate with regard to its use. The spatial strategy is predicated on guiding development towards settlements and avoiding unplanned development of the countryside. Residential development of the scale that might be required to address a land supply shortfall under SS3 is not expected to be suitable in most cases against policy SS5. The council is satisfied there is no conflict.
Development within and adjacent to settlements must provide appropriate primary care mitigations	0303	Noted. As stated at paragraph 1.30, the Local Plan Update should be read and interpreted as a whole, with all policies

Detail	Respondent numbers	Response
for their proposals. Modification suggested to ensure applicants engage with the ICB at an early stage.		being viewed together and not in isolation. Policy SS15 relates to securing infrastructure. The recommended modification is unnecessary and not appropriate for policy SS3.

OTHER ISSUES

- Respondents 0143, 0225, 0244, 0254, 0268, 0271, 0272, 0280, 0301, and 0302 consider the policy not to be legally compliant.
- Respondents 0124, 0143, 0144, and 0225 consider the policy not to comply with the Duty to Co-operate.
- Respondent 0225 welcomes the policy introducing a plan-led approach to speculative development where the tilted balance applies.
- Respondent 0277 notes that limited weight would apply to the policy where the tilted balance is engaged.
- Respondent 0329 notes the policy support for exception sites (with reference to policy H4) which is relevant for Land at Waingels College (5WO005)

Policy SS4: Development within and adjacent to minor settlements

24 respondents

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0144	John, James	0276	David Wilson Homes Southern
0221	Mac Mic Group	0277	Croudace Homes, Vortal Homes Ltd and Falcon Developments (SE) Limited
0223	Helmsley Land Ltd and Penelope Clayden	0298	Nicholas King Homes
0225	Catesby Estates	0301	City & Country
0232	Shorewood Homes Ltd	0302	Dandara Southern Ltd and Elstree Land
0235	The Old Redingensians Association	0303	Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board
0244	Woolf Bond Planning	0305	University of Reading
0246	Hurst Neighbourhood Plan Group	0306	Loddon Mill Enterprises Ltd
0254	Croudace Homes	0314	Vistry Group
0266	Haines Hill Estate	0318	Bloor Homes
0267	Stanlake Park	0321	AWE plc
0268	Wates Developments Ltd	0343	Darcliffe Homes Ltd

Support

Respondents 0144, 0221, 0223, 0235, 0246, 0298, 0305, 0306, 0318, 0321, and 0343 consider the policy to be legally compliant.

Respondents 0221, 0223, 0232, 0235, 0244, 0268, 0298, 0301, 0302, 0305, 0318 and 0321 consider the policy to comply with the Duty to Cooperate.

None of the respondents specified that they supported the policy.

While respondents 0276 broadly supports the policy, and respondent **0303** welcomed appropriate levels of growth at minor settlements, they raised specific concerns / comments with aspects of the policy which are covered below.

Respondent 0235 identified Land north-west of Hogmoor Lane (site reference 5HU030) as an appropriate location for residential use, which they consider would comply with policy SS4. The respondent sought the allocation of the site to reinstate its inclusion in previous drafts of the LPU. This respondent is included in the Omission Sites table.

Respondent 0306 identified Land at Swallowfield (5SW021) as representing a natural end point to Swallowfield, which should therefore be incorporated into the settlement boundary. This respondent is included in the Omission Sites table.

Respondent 0314 identified land at Home Farm, Bearwood Road as being adjacent to the minor settlement of Sindlesham as well as major settlements of Winnersh and Wokingham and therefore sustainably located in relation to amenities and public transport. This respondent is included in the Omission Sites table.

LEGAL COMPLIANCE

Detail	Respondent numbers	Response
The sustainability appraisal has not considered all reasonable alternatives	0302	Please refer to Sustainability Appraisal section of this statement.

MAIN ISSUE: CONSISTENCY WITH NATIONAL POLICY AND GUIDANCE

Detail	Respondent numbers	Response
The policy is overly restrictive in its approach to the growth of settlements (including supporting text at paragraph 5.20 and the final sentence of 5.16), which is not consistent with the support in the NPPF (including paragraphs 73, 82 83 and 89) for development of sites adjacent to settlements / in rural areas.	0144, 0235, 0244, 0268, 0301, 0302, 0305, 0306, 0318	NPPF paragraph 73, 82, and 83 relate to residential exception sites and rural housing. Paragraph 89 relates to business use. The LPU contains a positive policy framework for these types of development, primarily through policies H4 and ER3 respectively. Part 2 of SS4 allows flexibility for small scale growth on the edge of minor (largely rural) settlements, to support the growth of rural communities. The Local Plan Update should be read and interpreted as a whole, with all policies being viewed together and not in isolation. The

Detail	Respondent numbers	Response
		<p>council is satisfied that the policy approach to restrict unplanned development adjacent to minor settlements is justified, recognising that major and modest settlements are the most sustainable in the identified hierarchy. Unplanned development adjacent to minor settlements is considered to conflict with the spatial strategy and be unsustainable even in the event of unforeseen housing delivery issues. Consistency and certainty are fundamentally important principles of the plan-led system. The definition of settlements where development will be directed towards, in addition to the identification of types of development that may be acceptable outside of settlements (i.e. in the countryside), provides the clarity necessary for consistent decision making. The council is satisfied that the identification of minor settlement boundaries and development as an exception on their edge to support the growth of rural areas, is consistent with the NPPF requirement for the planning system to be genuinely plan-led.</p>
<p>Part 3 of the policy is contrary to the presumption in favour of sustainable development and therefore inconsistent with national policy and should be deleted.</p>	<p>0144, 0221, 0232, 0235, 0254, 0266, 0267, 0277, 0298, 0305, 0314, 0318</p>	<p>The strategy put forward by the council is to guide development to the edge of major and modest settlements, as inherently the most sustainable locations, in the absence of a five year land supply. Minor settlements are inherently less sustainable and therefore less likely to be suitable for the scale of development that would be appropriate at major and modest settlements. The council is satisfied that the policy approach to resist speculative development adjacent to minor settlements, even where there is a demonstrable shortfall in supply, is justified and appropriate. The council considers this approach to be consistent with the NPPF requirement for the planning system to be genuinely plan-led.</p>

MAIN ISSUE: POLICY WORDING

Detail	Respondent numbers	Response
<p>The policy is not positively worded or prepared in stating proposals will only be supported where defined circumstances are met.</p>	<p>0144, 0244, 0268, 0301, 0302, 0306</p>	<p>The council is satisfied that the policy is clearly written and unambiguous, consistent with NPPF paragraph 16d). Part 2 of the policy introduces flexibility to react to unforeseen issues with housing delivery. The council is satisfied the criteria are proportionate and justified to ensure that where unplanned development is necessary, it comes forward in a sustainable manner.</p>
<p>Land outside of Green Belt should be preferred for development, whereas the policy as worded may lead to harm to the Green Belt purposes.</p>	<p>0221</p>	<p>While the Local Plan Update should be read and interpreted as a whole, including Policy SS6 'Development in the Green Belt', it is agreed that reference to Green Belt in the policy creates ambiguity. A related change is set out within the Schedule of proposed modifications.</p>
<p>The policy is not justified in restricting development within settlements to up to 9 dwellings i.e. minor development only, especially given proposed allocations exceed this figure. This includes a suggestions that the policy should continue the approach from the current plan where schemes of up to 25 dwellings are acceptable at minor settlements, a scale which has been shown to be acceptable through recent appeals; or that they should be of an appropriate scale to their context and relationship with other settlements.</p>	<p>0223, 0232, 0244, 0254, 0268, 0276, 0277, 0298, 0301, 0302, 0314</p>	<p>The settlement hierarchy and spatial strategy have been reviewed as part of the preparation of the Local Plan Update and updated in a way that sustainably enables development needs to be met. In principle support is provided for development of up to 9 dwellings at minor settlements to reflect the comparative lack of services and facilities at minor settlements compared to settlements higher in the settlement hierarchy. Development proposals for 10 or more dwellings within minor settlements may be acceptable, but these will need to be considered on their merits and particular circumstances. Proposed allocations which exceed 9 dwellings are not comparable to future windfall development, as the allocations are predicated on a spatial strategy which has considered comparative sustainability across the borough in the round, and directed growth and revised settlement</p>

Detail	Respondent numbers	Response
		<p>boundaries accordingly in a manner consistent with the aim of the NPPF for the planning system to be genuinely plan led. Recent appeals have been determined in the context of the existing development plan and a current lack of a five year land supply and are therefore of limited relevance to emerging plan making decisions.</p>
<p>Policy hinders sustainable development which may come forward on the edge of minor settlements (similar to allocation SS14.4), including that which may be more sustainably located than developments on the edge of major and modest settlements.</p>	<p>0225</p>	<p>The council is satisfied that the policy approach to restrict unplanned development adjacent to minor settlements is justified, recognising that major and modest settlements are the most sustainable in the identified hierarchy. Unplanned development adjacent to minor settlements is considered to conflict with the spatial strategy and be unsustainable even in the event of unforeseen housing delivery issues. Development of site SS14.4, which has been incorporated into the minor settlement boundary of Charvil, is allocated through a plan led approach having regard to relative sustainability of sites and distribution of development to meet needs. It is not comparable to speculative development sites.</p>
<p>Query how developments of up to 9 dwellings within minor settlements would be tangibly different to development outside of the settlements.</p>	<p>0225</p>	<p>Settlement boundaries have been devised with reference to built form and features on the ground. By virtue of their location, development of sites within settlement boundaries will generally have lesser harm than development of sites outside of settlements, which have not been incorporated into the settlement due to their relating more to countryside. Consistency and certainty are fundamentally important principles of the plan-led system. The definition of settlements where development will be directed towards provides the clarity necessary for consistent decision making and serves the legitimate planning purpose of preventing</p>

Detail	Respondent numbers	Response
		settlement coalescence. The council considers this approach to be consistent with the NPPF requirement for the planning system to be genuinely plan-led.
The wording 'limited residential development' in part 2 of the policy is not defined and lacks clarity.	0232	The council is satisfied that the language used – read sensibly in accordance with established case law – and the context provided by the circumstances listed in parts 2a) – c) provide sufficient clarity to decision makers about the scale of development that would be considered acceptable under this part of the policy.
Policy 2a) is unnecessary as national policy already encourages development on PDL, without the requirement for this to be adjacent to a settlement.	0232	The council is satisfied that the policy approach is consistent with national policy as regards the separate considerations to recognise the intrinsic character and beauty of the countryside; supporting the growth of rural communities; and the need for the planning system to be genuinely plan led.
The wording 'a small gap' in supporting paragraph 5.21 is not defined and lacks clarity	0232	The council is satisfied that the language used, read sensibly in accordance with established case law, and the context provided by the policy and supporting text, provide sufficient clarity to decision makers.
Paragraph 5.18 is not justified as there is no clear explanation why some Tier 3 settlements have allocations and others do not, particularly where the level of services and facilities vary.	0232	Please refer to the Topic Paper: Housing: Site allocations (2024) which explains the selection of site allocations.
Part 3 of the policy contradicts other areas of the plan, including policy SS2 2 e) which acknowledges needs will be met through the proportionate and sustainable extension of defined minor settlements; and paragraph 5.95 which	0235, 0305, 0318	The council is satisfied that no contradiction exists between SS4 and SS2 2e), as the latter refers to the planned expansion of settlements as per the allocations within the plan and relevant changes to settlement boundaries. The council is similarly satisfied that that no contradiction exists with

Detail	Respondent numbers	Response
acknowledges unplanned countryside development may be approved where there is a lack of land supply.		paragraph 5.95, as this simply reflects the flexibility built into policy SS3.
Paragraph 5.22 supports growth of minor settlements through neighbourhood plan allocations. This recognition that there will be circumstances where development to grow villages may be acceptable, albeit in a planned way, is contrary to the restrictive approach to development proposals.	0235	The comment itself acknowledges the distinction between plan led development and speculative development. Consistency and certainty are fundamentally important principles of the plan-led system. Allocations through a neighbourhood plan will need to go through a robust and holistic site assessment process, having regard to the comparative impacts and sustainability of sites on the edge of a minor settlement or settlements. No such exercise is required through speculative applications. The council considers this approach to be consistent with the NPPF requirement for the planning system to be genuinely plan-led.
The policy should be reworded to introduce the similar tests as Part 2 of SS3 where a five year supply of deliverable sites cannot be demonstrated, so that sites at minor settlements can contribute to addressing the shortfall.	0244, 0276, 0301, 0302	The council has considered whether policy SS3 (in particular part 2) should also applying to minor settlements and is satisfied that a separate policy approach to minor settlements through SS4 is justified. This recognises that major and modest settlements are the most sustainable in the identified hierarchy. Unplanned development adjacent to minor settlements is considered to conflict with the spatial strategy and be unsustainable even in the event of unforeseen housing delivery issues. The exceptions set out in SS4 part 2 are therefore proportionate to allow rural areas to grow in a manner commensurate with their level of sustainability.
Concern over the robustness of the policy wording (specifically parts 1 and 2) to adequately protect minor settlements from cumulative development (both within and adjacent). This includes the lack	0246	The Local Plan Update should be read and interpreted as a whole, with all policies being viewed together and not in isolation. Policies relating to design, heritage, flooding, sites of urban landscape value and other matters must be considered

Detail	Respondent numbers	Response
of definition in part 2 of an upper quantum of development that would be acceptable, which is defined in part 1, which may lead to existing services being overwhelmed.		when determining development proposals within settlements. This will influence whether harm is caused by virtue of character, highways impact, etc in relation to developments within minor settlements. It should also be noted that development within minor settlements may enhance the sustainability of existing services, due to increased patronage. Regarding development adjacent to settlements, the council is satisfied that policy SS5 relating to development in the countryside, alongside other development plan policies, is clear that cumulative developments on the edge of settlements are not acceptable in principle.
Development within and adjacent to settlements must provide appropriate primary care mitigations for their proposals through early engagement with the ICB	0303	Noted. As stated at paragraph 1.30, the Local Plan Update should be read and interpreted as a whole, with all policies being viewed together and not in isolation. Policy SS15 relates to securing infrastructure. Modifications not considered necessary or appropriate for policy SS4.
Whilst accepting that a plan must be read as a whole, Policy SS4 should require development supported in principle to also meet the requirements of Policy SS7.	0321	As stated at paragraph 1.30, the Local Plan Update should be read and interpreted as a whole, with all policies being viewed together and not in isolation. Any development proposal within this area would be subject to consideration under Policy SS7: Development in vicinity of AWE requiring full consideration of potential impacts on the operability of the AWE Off-Site Emergency Plan. No modification is considered necessary.

MAIN ISSUE: POLICY IMPLEMENTATION

Detail	Respondent numbers	Response
<p>A recent appeal, where the Inspector found that development outside of development limits on greenfield land would be required to redress the shortfall in land supply, demonstrates that a blanket approach is harmful to meeting needs.</p>	<p>0221</p>	<p>This appeal relates to the existing development plan. The Local Plan Update seeks to meet need in full and, based on the housing trajectory, it is anticipated that the five year supply can be maintained over the plan period. This is a materially different circumstance to the current lack of a five year supply. Further, policy SS3 introduces flexibility to address supply shortfall, by supporting development (subject to meeting defined requirements) adjacent to the borough’s most sustainable settlements. The council considers the approach taken in SS4, when the plan is read as a whole, is justified and appropriate.</p>
<p>Policy needs amending to recognise that Land off School Road, Hurst has gained outline consent for the erection of 23 dwellings on the edge of a minor settlement.</p>	<p>0223</p>	<p>The nature of the requested amendment is unclear. It is not considered that a change to the wording of SS4 is required. Consequential changes to settlement boundaries to be considered under SS2.</p>
<p>Whilst the plan may support the principle of minor residential development in Minor Settlements (such as Swallowfield), the tightly drawn nature of settlement boundaries to existing built-form means there is limited potential for development, other than infill. Therefore, there is a need for less restrictive settlement boundaries.</p>	<p>0306</p>	<p>Noted. Please refer to the Topic Paper Settlement Boundaries Review (2024) for the methodology used to define settlement boundaries. The council considers the approach to defining boundaries to be robust, and would note that the plan includes provision to meet development needs in full.</p>

OTHER ISSUES

- Respondents 0225, 0232, 0244, 0254, 0268, 0301, and 0302 consider the policy not to be legally compliant.
- Respondent 0144, 0225, 0306, and 0343 consider the policy not to comply with the Duty to Co-operate.
- Respondent 0232 noted that two proposed allocations at the minor settlement of Hurst have not been carried forward into the Proposed Submission Plan.
- Respondent 0343 consider SS4 to be unsound but provided no explanation.

Policy SS5: Development in the countryside

24 respondents

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0108	Sport England	0266	Haines Hill Estate
0143	Singh, Raphael	0267	Stanlake Park
0206	Mr and Mrs Cunningham	0268	Wates Developments Ltd
0221	Mac Mic Group	0269	Cirrus Land Ltd
0222	Richborough	0276	David Wilson Homes Southern
0225	Catesby Estates	0280	Bewley Homes
0238	Reading Blue Coat School	0291	London and Regional
0244	Woolf Bond Planning	0305	University of Reading
0246	Hurst Neighbourhood Plan Group	0306	Loddon Mill Enterprises Ltd
0254	Croudace Homes	0314	Vistry Group
0256	Historic England	0318	Bloor Homes
0265	Shinfield Studios	0321	AWE plc

Support

Respondents **0108**, 0221, 0238, 0246, **0256**, 0265, 0269, 0291, 0305, 0306, 0318, and 0321 consider the policy to be legally compliant.

Respondents **0108**, 0221, 0238, 0244, **0256**, 0265, 0268, 0269, 0291, 0305, 0318, and 0321 consider the policy to comply with the Duty to Cooperate.

Respondents **0108**, 0221, **0256**, and 0291 support the policy.

Sport England (0108) support the policy as regards its provision for outdoor sport and recreation but noted it may also be appropriate for indoor sport facilities to be provided in the countryside to complement outdoor facilities.

Historic England (0256) support the policy in principle and suggest minor modifications to add additional reference to heritage within the policy wording and supporting text.

Respondent 0291 identified Land at St Anne’s Manor as an appropriate location for residential use, comprising previously developed land as supported by SS5 part 2g). This respondent is included in the Omission Sites table.

While respondent 0238 broadly supports the policy intention and respondents 0265, 0269, 0305, and 0318 welcome the principle of support being set out for types of development in the countryside, each raised specific concerns with aspects of the policy which are covered below.

Respondent 0305 identified Land at Stanbury Park (site reference 5SH061) as an appropriate location for Suitable Alternative Natural Greenspace (SANG).

MAIN ISSUE: CONSISTENCY WITH NATIONAL POLICY AND GUIDANCE

Detail	Respondent numbers	Response
The policy does not adequately reflect NPPF paragraph 88 which requires policies to support the sustainable growth and expansion of all types of business in rural areas.	0238	The council is satisfied that these requirements are addressed by policy ER3, with the plan needing to be read as a whole.
The requirement of part 3e) that proposals do not lead to isolated homes is inconsistent with NPPF paragraph 84 which includes a list of circumstances where isolated homes can be supported.	0266, 0267	Agreed. A related change is set out within the Schedule of proposed modifications.
The requirement of part 3f) that proposals do not lead to new buildings is overly restrictive and contrary to the aim in the NPPF of supporting sustainable growth of rural areas.	0266, 0267	The intention of part 3f) is as set out in supporting paragraph 5.32 which explains that the re-use of existing buildings should not subsequently result in additional agricultural buildings being required elsewhere to replace those converted to different uses. It is acknowledged that some of the types of development supported in part 2 of the policy will require the construction of new buildings, and therefore the policy does not preclude new buildings in the countryside, rather it places an emphasis on conversion / re-use in the first instance.

<p>The binary approach to the location of development either within or outside of settlements is more prescriptive than the NPPF as demonstrated by appeal decisions</p>	<p>0276</p>	<p>Consistency and certainty are fundamentally important principles of the plan-led system. The definition of settlements where development will be directed towards, in addition to the identification of types of development that may be acceptable outside of settlements (i.e. in the countryside), provides the clarity necessary for consistent decision making. The council is satisfied that the identification of countryside is consistent with the NPPF requirement for the planning system to be genuinely plan-led.</p>
--	-------------	---

MAIN ISSUE: POLICY WORDING

Detail	Respondent number	Response
<p>Objection to policy recognising the intrinsic character and beauty of the countryside, and the implication that all land outside of a settlement has such character – criterion 1 should therefore be deleted.</p>	<p>0143, 0254, 0280, 0314</p>	<p>Policy wording is wholly consistent with NPPF paragraph 180 b) which states “<i>Planning policies and decisions should contribute to and enhance the natural and local environment by: ... b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services</i>”. The policy goes on to set a positive framework for development that may be acceptable in the countryside, which clearly acknowledges that some areas of countryside (and some types of development) are capable of being developed without harming intrinsic character and beauty.</p>
<p>Support should be included within the policy for development proposals within historic settlements (which aren’t defined in the settlement hierarchy), specifically Carters Hill within the Loddon Valley Garden Village SDL area.</p>	<p>0206</p>	<p>The council considers part 2g) provides support for appropriate development at historic villages and therefore the policy as drafted is sufficient. ‘Historic settlements’ have not been defined, and inclusion of the proposed modification would lack clarity without additional supporting evidence.</p>

Detail	Respondent number	Response
		Carters Hill specifically has been considered as part of the LVGV proposed development and associated masterplanning and specific reference is not necessary.
The policy excludes the countryside development supported under policy SS3 and SS4 meaning the plan is therefore internally inconsistent.	0222, 0225, 0244, 0268, 0276	The starting principle is that the extensions to settlements as described in SS3 part 2 are not considered acceptable forms of countryside development. SS3 part 2 sets out that in exceptional circumstance where the presumption in favour of sustainable development applies, additional types of development in the countryside may be acceptable. Therefore, it is not considered appropriate to cross refer to SS3 part 2 in policy SS5. SS3 part 3 cross refers to development of PDL and to policy H4 which are already reflected in SS5. Policy SS4 part 2 sets out limited types of development that may be acceptable adjacent to minor settlements. The council is satisfied that SS5 2g) is consistent with this, with the former adding additional nuance in relation to minor settlements that is unnecessary to be replicated in SS5.
Concern over the robustness of the policy wording (specifically 2g)) to adequately protect the countryside from cumulative development, which is inconsistent with SS2 part 10 which appears more restrictive towards development in countryside	0246	The council is satisfied that reading policy SS5 as a whole – specifically the requirements of part 3 – and other development plan policies, that cumulative developments on the edge of settlements are not acceptable in principle.
Concern that the opening wording to part 2 of the policy is overly restrictive as it does not recognise that other forms of development may be	0265, 0269, 0305, 0318	The council is satisfied that the list of developments listed in part 2 of the policy is comprehensive and that other types of development will generally be unsuitable in the countryside. This helps to add clarity and certainty to decision making,

Detail	Respondent number	Response
considered acceptable when assessed on their merits – the word ‘only’ should be deleted		which is a key part of the plan led approach. In the rare event that a form of countryside development is proposed that hasn’t been envisaged by the list but that may be justified at a planning application stage, this will be assessed on its own merits against parts 1 and 3 of the policy and other relevant policies.
Additional clarity should be provided that SANG is an appropriate use in the countryside, considering land is not specifically allocated for this use in the LPU unlike the adopted plan.	0305	Agreed. A related change is set out within the Schedule of proposed modifications to provide additional clarity.
Lack of recognition of the acceptability of relocating existing countryside uses within LVGV to Tanners Farm in order to facilitate the delivery of the new SDL	0305	The council is satisfied that criteria 2c) or 2h) of the policy would facilitate suitable proposals to relocate the agricultural research facilities currently at LVGV. It is not considered necessary to specify the requested level of detail in SS5.
Concern that in supporting development Policy SS5 does not reference the application of Policy SS7 concerning the acceptability of development within the AWE Burghfield Detailed Emergency Planning Zone. Modifications are proposed to avoid confusion and ensure clarity.	0321	As stated at paragraph 1.30, the Local Plan Update should be read and interpreted as a whole, with all policies being viewed together and not in isolation. Any development proposal within the DEPZ would be subject to consideration under Policy SS7: Development in vicinity of AWE requiring full consideration of potential impacts on the operability of the AWE Off-Site Emergency Plan. No modification is considered necessary.

MAIN ISSUE: COUNTRYSIDE EXTENT

Detail	Respondent numbers	Response
The council should consider removal of land around existing settlement boundaries from countryside	0306	The extent of settlements has been carefully considered in the drafting of the plan. Please refer to the 'Topic Paper Settlement Boundaries Review (2024)' for details of how the settlement boundaries, and therefore the extent of countryside, have been determined.

MAIN ISSUE: REQUESTED MODIFICATIONS

Detail	Respondent numbers	Response
Reference should be added to heritage significance in criterion 1.	0256	Not agreed. The wording of the first criterion reflects NPPF paragraph 180 b). It is not considered necessary in this instance to deviate and add reference to historic significance given this is already covered in heritage policies and the need for the plan to be read as a whole.
Criterion 2e) and associated supporting text at paragraph 5.31 should include reference to sustaining heritage significance.	0256	Agreed. A related change is set out within the Schedule of proposed modifications to provide additional clarity.

OTHER ISSUES

- Respondents 0143, 0222, 0225, 0244, 0254, 0268, and 0280 consider the policy not to be legally compliant.
- Respondents 0143, 0222, 0225, and 0306 consider the policy not to comply with the Duty to Co-operate.
- Respondent 0244 notes the plan contains housing allocations within the countryside which are not proposed to be incorporated into a settlement

Policy SS6: Development in the Green Belt

Four respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0124	Joyner, Ross	0228	Ladds Garden Centre
0212	Jorgensen, Pauline	0256	Historic England

Support

Historic England (**0256**) broadly support the policy but seek changes to the policy wording to integrate heritage significance in the consideration of adapting and re-using historic buildings.

Respondent 0212 supports the plan's commitment to protect the Green Belt.

MAIN ISSUE: POLICIES, DECISION TAKING AND IMPLEMENTATION

Detail	Respondent numbers	Response
Inconsistency with emerging national planning policy, which widens the forms of development that would not be inappropriate. Policy should provide flexibility by removing the criteria.	0124, 0228	<p>At the time of the publication of the Proposed Submission Plan, the latest NPPF had not been published. The LPU is to be considered under the 2023 NPPF as per the transitional arrangements.</p> <p>The council is satisfied that the policy is consistent with national planning policy, as paragraph 1 recognises the continued protection of the Green Belt from inappropriate development in accordance with national planning policy.</p>

REQUESTED MODIFICATIONS

Detail	Respondent number	Response
<p>Modify wording in paragraph 3 of the policy to ensure it doesn't become out of date after adoption by replacing 'are' with 'include' or making it consistent with the emerging NPPF.</p>	0124	<p>Not agreed. The LPU is to be considered under the 2023 NPPF as per the transitional arrangements.</p> <p>The policy is consistent with national policy, and therefore no modification is necessary.</p>
<p>Review Green Belt land in line with Government guidance</p>	0124	<p>Not agreed. The LPU is to be considered under the 2023 NPPF as per the transitional arrangements, and therefore under current green belt policy.</p> <p>A Green Belt Review was undertaken in 2016, which has informed the plan-making process. The council does not consider an update to the Green Belt Review is necessary.</p>
<p>Consider allocating sites within the Green Belt.</p>	0124	<p>Not agreed. The current National Planning Policy Framework (NPPF) states that once established there is no need to review Green Belt boundaries when plans are being prepared. Whilst local authorities may choose to do this, exceptional circumstances must be fully evidenced and justified. Before concluding that such exceptional circumstances exist, all other reasonable options for meeting development needs must have been examined.</p> <p>The council has undertaken a comprehensive approach to site selection, informed by technical evidence. It is considered that there is sufficient land outside of the Green Belt to meet development needs.</p>

Detail	Respondent number	Response
<p>Modify policy wording and supporting text to integrate heritage significance in the consideration of adapting and re-using historic buildings.</p>	<p>0256</p>	<p>Agreed. The council does not consider a modification to the policy is necessary but is recommending a change to the supporting text to recognise the consideration of heritage significance in the adaptation and re-use of historic buildings.</p> <p>Paragraph 5 of the policy addresses matters such as scale, footprint and size, and therefore it is not considered necessary for this additional detail to be included in the policy requirement. The plan should be read as a whole, and Policy DH5 covers heritage significance in further detail.</p> <p>Ongoing engagement has led to the signing of a Statement of Common Ground with Historic England, where it is agreed that a modification to the supporting text would provide useful clarity in decision-making.</p> <p>The proposed modification is set out in the Schedule of proposed modifications.</p>

Policy SS7: Development in the vicinity of Atomic Weapons Establishment (AWE)

11 respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0119	Cooper Estates Strategic Land Limited	0283	Office for Nuclear Regulation
0144	John, James	0299	West Berkshire Council
0222	Richborough	0301	City & Country
0240	Hallam Land and Wilson Enterprises	0321	AWE plc
0245	Crest Nicholson Partnerships and Strategic Land	0323	Obsidian Strategic
0268	Wates Developments Ltd		

Support

The Office for Nuclear Regulation (**0283**) and AWE plc (and AWE plc on behalf of the Ministry of Defence) (**321**) consider the policy to be legally compliant. West Berkshire Council (**0299**) did not specifically comment on legal compliance, but comments indicate broad agreement. Representations from resident and landowner interests are split, with respondents 0119, 0144, 0245 0323 considering the policy to be legally compliant.

West Berkshire Council (**0299**), the Office for Nuclear Regulation (**0283**), and AWE plc (and AWE plc on behalf of the Ministry of Defence) (**321**) consider the policy to comply with the Duty to Cooperate. Representations from resident and landowner interests are split, with respondents 0119, 0240, 0245, 0268, 0301 considering the policy to meet the Duty to Cooperate.

The Office for Nuclear Regulation (**0283**) and West Berkshire Council (**0299**) both consider the policy to be sound, with modifications proposed to further improve clarity. AWE plc (AWE Plc on behalf of Ministry of Defence (**321**)) whilst stating the policy was unsound strongly supported the principle of the policy and seek modifications to address issues.

MAIN ISSUE: LEGAL COMPLIANCE

Detail	Respondent numbers	Response
Lack of evidence provided on how the DEPZ was defined.	0240, 0301	<p>The DEPZ is not defined through the local plan process, but in response to health and safety legislation, specifically The Radiation (Emergency Preparedness and Public Information) Regulations 2019. The responsible local authority is West Berkshire District Council who maintain information on their website.</p> <p>In 2021 the High Court dismissed a challenge relating to the definition of the DEPZ.</p>
The Sustainability Appraisal has not considered growth in the western part of the borough as a reasonable alternative, in the absence of evidence that the Off-Site Emergency Plan cannot accommodate development.	0240, 0268, 0301	The Sustainability Appraisal appropriately considers various growth scenarios across the borough. The DEPZ is considered to be a major constraint affecting land to the west of Shinfield, with the Office for Nuclear Regulation advising that the AWE Off-Site Emergency Plan is stretched and that this poses a challenge for accommodating new development.
Lack of evidence provided as to how AWE matters have been considered in the plan-making process.	0268	Information is provided within the Housing and Economic Land Availability Assessment 2024 and within the plan. The DEPZ is considered to be a major constraint affecting land to the west of, with the Office for Nuclear Regulation advising that the Off-Site Emergency Plan is stretched and that this poses a challenge for accommodating new development.

MAIN ISSUE: DUTY TO COOPERATE

Detail	Respondent numbers	Response
<p>ONR and other agencies should not restrict development but work to ensure growth can be managed in a safe way.</p>	<p>0144</p>	<p>The Office for Nuclear regulation has established a Land Use Planning Policy for the purposes of providing advice to local planning authorities on proposed developments on and around nuclear licenced sites. The advice provided seeks to limit both the potential for developments to pose external hazards to nuclear licenced sites and the radiological consequences to members of the public in the event of a radiation emergency occurring on such sites. ONR's advice on proposed developments is informed by the views of local authority emergency planners and the nuclear site's planning function.</p>
<p>Reliance on the August 2021 Statement of Common Ground between the Western Berkshire local authorities.</p>	<p>0323</p>	<p>The council is satisfied that the Duty to Cooperate has been discharged, as evidenced in the representations of relevant bodies and the agreement of Statements of Common Ground to support the plan.</p> <p>The 2021 statement represented an important point in time agreement, with matters having been progressed since as evidenced within the Duty to Cooperate Statement.</p>

The following tables set out the issues raised regarding soundness.

MAIN ISSUE: OFF-SITE EMERGENCY PLAN AND/OR OPERATION OF AWE

Detail	Respondent number	Response
<p>Lack of evidence from emergency planners, ONR and AWE to explain how development would adversely affect the operability of the Off-Site Emergency Plan or the operation of AWE.</p>	<p>0119, 0268, 0245, 0240</p>	<p>The Office for Nuclear Regulation has responsibilities for nuclear safety, nuclear security, nuclear safeguards, transport of radioactive material and health and safety on nuclear licenced sites. This also includes assessing the adequacy and testing of local authorities' Off-Site Emergency Plans.</p> <p>The ONR has established a Land Use Planning Policy for the purposes of providing advice to local planning authorities on proposed developments on and around nuclear licenced sites. The advice provided seeks to limit both the potential for developments to pose external hazards to nuclear licenced sites and the radiological consequences to members of the public in the event of a radiation emergency occurring on such sites. The ONR's advice on proposed developments is informed by the views of local authority emergency planners and the nuclear site's planning function.</p> <p>The ONR's judgement is that the AWE Off-Site Emergency Plan is stretched which poses a challenge for accommodating new development within the DEPZ.</p> <p>The council is entitled to place substantial weight on the opinion of the ONR as the regulator of nuclear licenced sites and assessor of the AWE Off-Site Emergency Plan.</p>
<p>Lack of evidence provided as to how AWE matters have been considered in the plan-making process, including the non-publication of the Off-Site Emergency Plan, any review of the OSEP and</p>	<p>02401, 0245, 0268, 0301 0323</p>	<p>The DEPZ is not defined through the local plan process, but in response to health and safety legislation, specifically The Radiation (Emergency Preparedness and Public Information) Regulations 2019. The responsible local authority for defining</p>

Detail	Respondent number	Response
associated actions, any review of the DEPZ, and the likelihood of a nuclear incident.		<p>the DEPZ and lead for the AWE Off-Site Emergency Plan is West Berkshire District Council.</p> <p>Information is provided within the Housing and Economic Land Availability Assessment 2024 and within the Plan. The DEPZ is considered to be a major constraint affecting land to the west of Shinfield, with the Office for Nuclear Regulation advising their judge the Off-Site Emergency Plan to be stretched, which poses a challenge for accommodating new development.</p>
Instances of housing being permitted elsewhere within the DEPZ.	0144	Development proposals are assessed on their individual merits against the development plan and other material considerations. Whilst some planning applications have been permitted, others have been refused and dismissed on appeal.
Whether adverse impacts could be avoided through financial contributions to fund implementation of the OSEP or a site-specific emergency plan.	0222	<p>The Office for Nuclear Regulation has established a Land Use Planning Policy for the purposes of providing advice to local planning authorities on proposed developments on and around nuclear licenced sites. The advice provided seeks to limit both the potential for developments to pose external hazards to nuclear licenced sites and the radiological consequences to members of the public in the event of a radiation emergency occurring on such sites. The ONR's advice on proposed developments is informed by the views of local authority emergency planners and the nuclear site's planning function.</p> <p>The ONR's judgement is that the AWE Off-Site Emergency Plan is stretched which poses a challenge for accommodating new development within the DEPZ.</p>

MAIN ISSUE: SUSTAINABILITY APPRAISAL

Detail	Respondent number	Response
The Sustainability Appraisal has not considered growth in the western part of the borough as a reasonable alternative, in the absence of evidence that the Off-Site Emergency Plan cannot accommodate development.	0268, 0301	The Sustainability Appraisal appropriately considers various growth scenarios across the borough. The DEPZ is considered to be a major constraint affecting land to the west of, with the Office for Nuclear Regulation advising that the Off-Site Emergency Plan is stretched and that this poses a challenge for accommodating new development.

MAIN ISSUE: HOUSING SUPPLY AND BUSINESS

Detail	Respondent number	Response
Impact of the policy on housing and business, and the failure to acknowledge that benefits may outweigh adverse impacts.	0222, 0240, 0268, 0301	The council is satisfied that the policy will not impact the ability to meet the development requirement set out in the plan, with the spatial strategy enabling development land beyond the DEPZ. It is not necessary for the policy to consider balance, with this being part of the decision taking process.

MAIN ISSUE: DECISION TAKING AND IMPLEMENTATION

Detail	Respondent number	Response
The appropriateness of phrasing, including reference to permission being refused and whether only	0119, 0222	The council is satisfied that phrasing is appropriate given the context of the policy.

Detail	Respondent number	Response
development giving rise to significant adverse effects should be contrary to the policy.		With regard to defence requirements, the NPPF refers to ensuring operational sites are not adversely affected by the impact of other development proposals. There is no qualification of impacts being significant being acceptable.
Whether developments outside the Urgent Protective Action (UPA) distance should be presumed to not have adverse impacts.	0222	<p>The Urgent Protective Action distance is the minimum distance for defining the DEPZ, the area around a nuclear licenced site where it is proportionate to pre-define protective actions which can then be implemented without delay in the event of a radiation emergency.</p> <p>Presuming development beyond the minimum UPA distance would not have an adverse impact runs contrary to emergency planning requirements and is therefore inappropriate. The supporting text advises that development proposals beyond the DEPZ are less likely to have an adverse effect, depending on the specific scale and nature.</p>
Whether the policy is ambiguous with reference to developments beyond consultation zones.	0222	The council is satisfied that the policy is clear. Attention is drawn to Table 5 within the supporting text which sets out the Office for Nuclear Regulation’s land use planning consultation zones, specifically the ‘special’ zone which considers impact irrespective of distance.
Whether the policy should include the ONR consultation zones and criteria, and whether there is a need to specifically reference that these may change over time.	0299, 0321	The policy refers to consultation zones, with a description of these provided in Table 5 within the supporting text. The council is satisfied that this approach is appropriate, noting that incorporating details within the policy would inhibit the application of policy and/or clarity in the event that zones were to change.

Detail	Respondent number	Response
		<p>Notwithstanding, the council is minded to accept a modification to supporting paragraph 5.57 that clarifies that Policy SS7 should be applied to the zones and AWE Off-Site Emergency Plan which exist at the time of decision. Ongoing engagement has led to the signing of a Statements of Common Ground with West Berkshire District Council where it is agreed that a modification to the policy would provide useful clarity in decision-making.</p> <p>The proposed modification is set out in the Schedule of proposed modifications.</p>
<p>Whether AWE and MOD should be added in addition to ONR as consultees to ensure their views on national security and defence requirements are considered.</p>	<p>0299, 0321</p>	<p>The policy already refers to consulting with AWE, however the Ministry of Defence is not listed.</p> <p>The council is minded to accept a modification to add the Ministry of Defence which would provide a useful clarification and would ensure consistency with emerging policy within the West Berkshire Local Plan Review.</p> <p>Ongoing engagement has led to the signing of a Statements of Common Ground with West Berkshire District Council and the Office for Nuclear Regulation where it is agreed that a modification to the policy would provide useful clarity in decision-making.</p> <p>The proposed modification is set out in the Schedule of proposed modifications.</p>
<p>Whether the policy should specifically refer to significant weight being given to the</p>	<p>0283, 0299, 0321</p>	<p>The council is minded to accept a modification to specifically reflect the importance of advice from the Office for Nuclear</p>

Detail	Respondent number	Response
<p>recommendation of ONR or permission being refused in the event they recommend against a proposal.</p>		<p>Regulation, as the regulator of nuclear sites. The modification would provide a useful clarification and would ensure consistency with emerging policy within the West Berkshire Local Plan Review.</p> <p>Ongoing engagement has led to the signing of a Statements of Common Ground with West Berkshire District Council and the Office for Nuclear Regulation where it is agreed that a modification to the policy would provide useful clarity in decision-making.</p> <p>The proposed modification is set out in the Schedule of proposed modifications.</p>
<p>Whether reference to advisedly affecting human health should be defined more widely as public safety.</p>	<p>0283</p>	<p>The council is minded to accept a modification on this matter which provides useful clarification.</p> <p>Ongoing engagement has led to the signing of a Statements of Common Ground with the Office for Nuclear Regulation where it is agreed that a modification to the policy would provide useful clarity in decision-making.</p> <p>The proposed modification is set out in the Schedule of proposed modifications.</p>
<p>Whether the policy should reference future defence capability.</p>	<p>0321</p>	<p>The policy already refers to the current and future operation of AWE, however the term capability is not used.</p> <p>The council is minded to accept a modification to insert reference to capability which provides useful clarification and</p>

Detail	Respondent number	Response
		<p>would ensure consistency with emerging policy within the West Berkshire Local Plan Review.</p> <p>The proposed modification is set out in the Schedule of proposed modifications.</p>
<p>Whether reference to the OSEP should clarify that this is the one that is in place at the time of decision and that statutory requirements and naming may change.</p>	<p>0321</p>	<p>The council is minded to accept a modification to refer the relevant Off-Site Emergency Plan being that in place at the time of decision. which provides useful clarification.</p> <p>The proposed modification is set out in the Schedule of proposed modifications.</p>

Policy SS8: Meeting employment needs

14 respondents submitted representations on Policy SS8: Meeting employment needs.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0148	Gleeson	0269	Cirrus Land Ltd
0209	Hart District Council	0273	Frasers Property
0212	Jorgensen, Pauline	0299	West Berkshire Council
0239	University College of Estate Management	0305	University of Reading
0245	Crest Nicholson Partnerships and Strategic Land	0309	Royal Borough of Windsor and Maidenhead
0253	Wrenbridge (FRELD Reading) LLP	0315	Oracle Corporation UK Ltd
0265	Shinfield Studios	0321	AWE plc

Support

Respondents 0148, 0239, 0245, 0253, 0265, 0269, 0273, 0305, 0315 and 0321 consider the policy to be legally compliant. The Royal Borough of Windsor and Maidenhead (**0309**) did not specifically comment on legal compliance but comments indicate broad support.

Respondents 0148, 0239, 0245, 0253, 0265, 0269, 0273, **0299**, 0305, 0315 and 0321 consider the policy to comply with the Duty to Cooperate. The Royal Borough of Windsor and Maidenhead (**0309**) did not specifically comment on the Duty to Cooperate, but comments indicate broad support.

Respondents 0148, **0209**, 0305, **0309** and 0315 consider the policy to be sound.

Respondent 0265 supports the policy in principle but proposes modifications to the policy.

No respondents provided details on why the plan is or is not legally compliant, or complies with the duty to cooperate.

Two respondents requested that their land is allocated for employment uses. Respondent 0245 identified Land at Grazeley (site reference 5SH040) as an appropriate location for industrial and logistics uses. Respondent 0253 identified Land at Shinfield Park as an appropriate location for industrial uses. Both respondents are included in the Omission Sites table.

The following tables set out the issues raised regarding soundness.

MAIN ISSUE: EMPLOYMENT NEED AND SUPPLY

Detail	Respondent numbers	Response
The calculation of employment need is not accurate given there are vacant office and industrial units	0212	<p>It is recognised that there are some vacant units across the borough, particularly offices. However, in general vacancy levels are not unusually high, and reflect the position identified in the Employment Land Needs Review (ELNR) that some a degree of vacancy is needed to allow choice and competition in the market. The reasons for vacant units/sites will vary, for example, due to high rental demands, location, or a landowner prioritising other assets.</p> <p>The ELNR identified that Thames Valley Park has a higher vacancy rate than other Core Employment Areas. However, investment is anticipated from new occupiers.</p> <p>The ELNR identified very low levels of vacancy for industrial uses and a limited supply of new sites across the Thames Valley.</p>
The ELNR underestimates industrial needs given the market has been constrained	0253, 0269	<p>The ELNR takes into account the take up of industrial land, vacancy rates, and evidence from the market about the demand for industrial uses in the borough as part of calculating future needs.</p> <p>The ELNR and the Employment Topic Paper set out how industrial needs have been identified, using a combination of past trends and economic forecasts. The identified need therefore recognises the low levels of vacancy, high job densities and very limited recent industrial floorspace losses.</p>

Detail	Respondent numbers	Response
Unclear why employment land is given a higher level of policy protection compared to e.g. agricultural land	0212	<p>The plan sets out how different land uses are proposed to be protected for different reasons, for example heritage or nature conservation.</p> <p>The plan seeks to protect existing employment uses to support the local economy and provide and create job opportunities. The existing use of land promoted for future development is assessed as part of the HELAA.</p> <p>Policy SS1: Sustainable development principles, is clear that the unplanned loss of best and most versatile agricultural land, except in exceptional circumstances.</p>
Insufficient use of previously developed land to meet employment needs.	0212	<p>Limited land has been promoted for employment use, including previously developed land. The expansion and intensification of employment uses within CEA is supported as set out in Policy ER1. Policy ER2 sets out where employment uses outside CEA will be supported.</p> <p>Proposed extensions to TVSP and Hogwood Park help to deliver new employment floorspace in suitable locations.</p>
The plan is contradictory on whether additional office floorspace is required.	0212	<p>Table 3 of the plan shows that there is an identified need for office development in the borough, but that completions and commitments together meet, and exceed this identified need. As a result the plan does not identified additional land for office development, it is anticipated that new office developments will be delivered over the plan period.</p>

Detail	Respondent numbers	Response
The stock of industrial and logistics uses in the borough is too low and has been constrained	0245	The plan identifies the need for industrial and logistics uses over the plan period and sets out how employment needs will be met in full.
Recent development at TVSP demonstrates the demand for employment land	0269	The ELNR and the Employment Topic paper recognise that the need for new industrial floorspace has increased. The plan sets out a strategy to facilitate the delivery of the employment needs identified.
The supply of larger, higher grade industrial and logistics units in the borough should be increased	0253, 0245	The plan sets out a strategy that meets employment needs over the plan period, including the extension of two CEA. The policy approach facilitates the intensification of CEA, and commitments data shows that industrial floorspace is likely to be delivered on windfall sites over the plan period. It is for the market to determine the size and specification of new industrial floorspace, whilst recognising the policy approach of Policies CE1 and CE2.
Changes to national planning policy mean a more positive approach to employment development is needed.	0245, 0269	The plan sets out a strategy that meets employment needs over the plan period, and the council is satisfied this approach reflects national planning policy.
The plan period should extended to 2041, or 2042 to ensure a 15 year period post adoption	0245	<p>Adoption of the plan within the published Local Development Scheme is May 2026, the start of the 2026/27 monitoring year. Including the year of adoption, the council accepts this provides a 14 year period, marginally less than the 15 year period required by the NPPF.</p> <p>Whilst the plan and evidence base was progressed to achieve a 15 year period from adoption, this was affected by revisions</p>

Detail	Respondent numbers	Response
		<p>to national planning policy and the timing of the general election which acted to slow progression.</p> <p>The council has carefully considered whether to extend the plan period to 2041 and has concluded that the additional time required to update the evidence base for this purpose is significantly at odds with the government’s objective of boosting housing delivery. The benefits are disproportionate to the time, cost and resourcing required.</p> <p>The continuation of the plan process without modification and associated delay, supports the granting of planning permission for substantial new housing opportunities, including the Loddon Valley Garden Village and the Arborfield Green and South Wokingham Strategic Development Locations. A delay to the plan process will inhibit the ability of the council to grant planning permission for substantial new housing and thereby act to slow the delivery of housing.</p> <p>Updating the evidence base to accommodate additional years is resource intensive and considered disproportionate given the plan will be reviewed shortly after adopted, as required by NPPF 2024 paragraph 234(b).</p> <p>In summary, the council recognises that the plan period from adoption is likely to be 14 years. In light of the current deliverable housing land supply position and the government’s objectives on housing delivery, the council’s judgement is that the benefits of modifying the plan to achieve a 15 year period from adoption is significantly and</p>

Detail	Respondent numbers	Response
		demonstrably outweighed by the benefits of earlier housing delivery enabled by continuing with the plan process.

MAIN ISSUE: IMPLEMENTATION AND MODIFICATIONS

Detail	Respondent numbers	Response
The policy is too inflexible and does not allow non B2, B8 or E uses.	0239	<p>Not agreed. The council is satisfied that Policy ER1: Core Employment Areas, provides appropriate flexibility, including the delivery of uses that are complementary to the successful operation of the Core Employment Area.</p> <p>The respondent's land is located outside the boundary of the Thames Valley Science and Innovation Park Core Employment Area, but within the wider boundary of the Loddon Valley Garden Village SDL.</p>
The policy should reflect the operational uses at TVSP and be modified to refer to 'innovation'.	0265	Not agreed. The council is satisfied that 'research and development' appropriately reflects the current and proposed uses at the TVSP and is a widely used and well understood term.
The policy should clarify whether extensions to all Core Employment Areas would be supported, and the approach to employment development adjacent to major and modest settlements.	0273, 0269	<p>Not agreed. Policy SS8 identifies the two Core Employment Areas that are proposed to be extended to include additional land.</p> <p>The council is satisfied that the policy approach is appropriate.</p>

Detail	Respondent numbers	Response
		<p>Policy ER1 provides a series of criteria where the expansion and intensification of Core Employment Areas will be supported. Reference in ER1(3) to ‘employment uses within Core Employment Areas’ denotes that this applies to proposals within the boundary of the CEA. Policy ER2: Employment uses outside Core Employment Areas and Policy ER3: Supporting the rural economy would be relevant policies where employment development was proposed outside a Core Employment Area, and/or outside a defined settlement in the countryside.</p>
<p>The location of the Green Park Business Park in the DEPZ results in a tension with Policy SS7: Development in the vicinity of AWE Burghfield. The policy should be modified to ensure SS7 remains effective.</p>	<p>0299, 0321</p>	<p>Not agreed. The council is satisfied that Policy SS7: Development in the vicinity of Atomic Weapons Establishment (AWE), provides an appropriate policy basis from which to consider the potential implications on public safety and/or defence operations and capability.</p> <p>As stated at paragraph 1.30, the Local Plan Update should be read and interpreted as a whole, with all policies being viewed together and not in isolation. Any development proposal within this area would be subject to consideration under Policy SS7: Development in vicinity of AWE requiring full consideration of potential impacts on the operability of the AWE Off-Site Emergency Plan.</p> <p>A Statement of Common Ground has been agreed with West Berkshire Council that recognises the engagement undertaken on proposed modifications to Policy SS7: Development in the vicinity of AWE.</p>

Detail	Respondent numbers	Response
Land at Grazeley should be allocated for industrial and logistics development	0245	Not agreed. Land at Grazeley was assessed and found not to be suitable as part of the site assessment undertaken in the HELAA (2024).
Land at Shinfield Park should be allocated for approximately 20,000sqm floorspace	0253	Noted. Land at Shinfield Park is currently in employment use and is located within a settlement. It is not considered necessary to allocate the site. A planning application for the redevelopment of the site is anticipated.

Policy SS9: Whiteknights Campus

Seven respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0108	Sport England	0305	University of Reading
0256	Historic England		

Support

Sport England (**0108**) and respondent 0305 support the policy.

Historic England (**0256**) broadly support the policy but seek changes to the policy wording to include an additional requirement for heritage impact assessments.

MAIN ISSUE: POLICY WORDING

Detail	Respondent numbers	Response
Need for additional flexibility to acknowledge the potential need for new built development in the medium to longer term. The Local Plan horizon is longer than the 10-year Estates Strategy.	0305	The council considers that paragraph 2 of the policy provides sufficient flexibility, by acknowledging the continued adaptation and development of the Whiteknights Campus, and to allow the University of Reading to continue to fulfil its role in economic success of the area.
Additional requirement and detail for heritage assets (Foxhill House) and heritage impact assessments	0256	The council considers the additional detail to criterion 4a of the policy and the supporting text would provide useful clarity. Ongoing engagement has led to the signing of a Statement of Common Ground with Historic England, where it is agreed

Detail	Respondent numbers	Response
		that a modification to the policy and supporting text would provide further clarity in decision-making.

REQUESTED MODIFICATIONS

Detail	Respondent number	Response
Modify requirement to recognise the site's heritage assets, and to require a heritage impact assessment.	0256	<p>Agreed. The council is minded recommending a modification to criterion 4a of the policy and supporting text, to ensure development proposals are informed by a heritage impact assessment, and to recognise heritage assets.</p> <p>The modification to Policy SS9 and supporting text is set out in the council's Schedule of proposed modifications.</p>
Modify supporting text so policy can be flexible in facilitating additional new built development in the medium to longer term.	0305	Not agreed. The council does not consider a modification is necessary, as paragraph 2 acknowledges the continued adaptation and development of the Whiteknights Campus.

Policy SS10: Meeting our housing needs

58 respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0120	Cox, Mr A and Mr C	0246	Hurst Neighbourhood Plan Group
0124	Joyner, Ross	0252	Gladman
0132	Bracknell Forest Council	0254	Croudace Homes
0143	Singh, Raphael	0261	Moss, Stephen (representing multiple landowners)
0144	John, James	0268	Wates Developments Ltd
0145	South Oxfordshire and Vale of the White Horse	0270	Rokeby Homes Limited
0148	Gleeson	0271	Holdstock, Michael
0152	Shinfield Parish Council	0272	Helmsley Limited
0165	Reading Borough Council	0275	Oxford Diocesan Board of Finance
0182	National Highways	0276	David Wilson Homes Southern
0184	O'Connor Properties Ltd	0277	Croudace Homes, Vortal Homes Ltd and Falcon Developments (SE) Limited
0206	Cunningham, Mr and Mrs	0278	Hill Residential Ltd
0207	Frankham, John	0280	Bewley Homes
0209	Hart District Council	0281	Vortal Homes Ltd
0211	Legal and General Assurance (Pensions Management) Ltd	0282	Taylor Wimpey Strategic Land
0212	Jorgensen, Pauline	0286	Mac Mic Group (Nexus Planning
0215	Maverick Property Investments Ltd	0298	Nicholas King Homes
0219	Anwyl Land Limited	0301	City & Country
0221	Mac Mic Group (Planning Potential)	0302	Dandara Southern Ltd and Elstree Land
0222	Richborough	0303	Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board
0224	Home Builders Federation	0305	University of Reading
0225	Catesbury Estates	0306	Loddon Mill Enterprises Ltd

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0227	Oxfordshire County Council	0309	Royal Borough of Windsor and Maidenhead
0228	Ladds Garden Centre	0311	Berkeley Strategic Land Limited
0233	Dutton, Chris and Shirley Gallagher, Karen and Brian Dutton, Lucas Geering, Wendy, Timothy and Laura	0314	Vistry Group
0234	Thakeham Homes Ltd	0317	Hatch Farm Land Limited
0235	The Old Redingensians Association	0329	Waingels College
0239	University College of Estate Management	0343	Darcliffe Homes Ltd
0244	Woolf Bond Planning	0354	Ashridge Wokingham Ltd

Support

Respondents 0120, 0124, 0144, **0145**, 0148, 0219, 0221, **0227**, 0235, 0239, 0246, 0261, 0270, 0275, 0278, 0282, 0298, 0305, 0306, **0309**, 0317, 0329, 0343 consider the policy to be legally compliant.

Respondents 0120, **0145**, 0148, 0152, 0219, 0221, **0227**, 0228, 0235, 0239, 0244, 0268, 0271, 0272, 0275, 0278, 2082, 0298, 0301, 0302, 0305, **0309**, 0317, 0329 consider the policy complies with the Duty to Cooperate which includes the prescribed bodies South Oxfordshire and the Vale of the White Horse District Councils, Oxfordshire County Council, and the Royal Borough of Windsor and Maidenhead. No prescribe body responded stating the duty had not been met.

Respondents **0132**, **0145**, 0148, **0227**, 0305, **0309**, 0317 which includes Bracknell Forest Council, South Oxfordshire and the Vale of the White Horse District Councils, Oxfordshire County Council, and the Royal Borough of Windsor and Maidenhead consider the policy sound, noting that the housing need was based on the calculation of local housing need as calculated using the national standard method. Bracknell Forest Council (0132) recognised that housing needs would be met, but queried how the housing requirement was calculated.

MAIN ISSUE: LEGAL COMPLIANCE

Detail	Respondent numbers	Response
The plan or SA has not considered growth reforms to the NPPF including higher housing need as a result of a new standard method calculation.	0228, 0244, 0268, 0271, 0272, 0301, 0302	<p>For the purpose of preparing local plans, the policies in NPPF 2024 will apply from 12 March 2025 save in specified circumstances. These include where a plan has been submitted on or before 12 March 2025 in which case the plan will be examined against the previous version of the NPPF.</p> <p>The plan has been submitted under the transitional arrangements, meaning it will be examined against the requirements of the NPPF 2023 and the related housing need. The council is satisfied that the Duty to Cooperate has been discharged against this framework.</p>
The plan or SA has not considered unmet need from Reading Borough Council.	0228, 0272, 0301	Engagement has confirmed that Reading Borough Council does not consider there to be a need to make any additional allowance for unmet needs from Reading Borough in the Wokingham Borough local plan.

MAIN ISSUE: DUTY TO COOPERATE

Detail	Respondent numbers	Response
The policy and engagement has not addressed the proposed reforms to the NPPF including higher housing need as a result of a new standard method calculation.	0124, 0144, 0225, 0270	For the purpose of preparing local plans, the policies in NPPF 2024 will apply from 12 March 2025 save in specified circumstances. These include where a plan has been submitted on or before 12 March 2025 in which case the plan will be examined against the previous version of the NPPF.

		The plan has been submitted under the transitional arrangements, meaning it will be examined against the requirements of the NPPF 2023 and the related housing need. The council is satisfied that the Duty to Cooperate has been discharged against this framework.
Insufficient engagement with other local authorities.	0124, 0144, 0234, 0270	The council is satisfied that the Duty to Cooperate has been discharged, as evidenced within the Duty to Cooperate Statement, in the representations of relevant bodies and the agreement of Statements of Common Ground to support the Submission Plan.
No update in cross boundary engagement with other local authorities since the 2021 Statement of Common Ground.	0343	The council is satisfied that the Duty to Cooperate has been discharged, as evidenced in the representations of relevant bodies and the agreement of Statements of Common Ground to support the Submission Plan. The 2021 statement represented an important point in time agreement, with matters having been progressed since as evidenced within the Duty to Cooperate Statement.
Calculation of housing need relies on dated data/agreement, such as the Berkshire (including South Bucks) Strategic Housing Market Assessment and OAN Sensitivity Testing study.	0124, 0144, 0270	Incorrect. As set out in the supporting text to Policy SS10, the housing requirement is based on the outcome of the national standard method.
Whether the policy should consider the potential for unmet housing need depending on the outcome of the Reading Borough Local Plan Partial Update.	0281	Engagement has confirmed that Reading Borough Council does not consider that there to be a need to make any additional allowance for unmet needs from Reading Borough in the Wokingham Borough local plan.

MAIN ISSUE: PLAN PERIOD

Detail	Respondent number	Response
<p>Whether the plan period to 2040 provides for a 15-year period from adoption.</p>	<p>0120, 0228, 0235, 0244, 0252, 0268, 0271, 0272, 0276, 0281, 0282, 0298, 0301, 0302, 0305</p>	<p>Adoption of the plan within the published Local Development Scheme is May 2026, the start of the 2026/27 monitoring year. Including the year of adoption, the council accepts this provides a 14 year period, marginally less than the 15 year period required by the NPPF.</p> <p>Whilst the plan and evidence base was progressed to achieve a 15 year period from adoption, this was affected by revisions to national planning policy and the timing of the general election which acted to slow progression.</p> <p>The council has carefully considered whether to extend the plan period to 2041 and has concluded that the additional time required to update the evidence base for this purpose is significantly at odds with the government’s objective of boosting housing delivery. The benefits are disproportionate to the time, cost and resourcing required.</p> <p>The continuation of the plan process without modification and associated delay, supports the granting of planning permission for substantial new housing opportunities, including the Loddon Valley Garden Village and the Arborfield Green and South Wokingham Strategic Development Locations. A delay to the plan process will inhibit the ability of the council to grant planning permission for substantial new housing and thereby act to slow the delivery of housing.</p> <p>Updating the evidence base to accommodate additional years is resource intensive and considered disproportionate given</p>

		<p>the plan will be reviewed shortly after adopted, as required by NPPF 2024 paragraph 236.</p> <p>In summary, the council recognises that the plan period from adoption is likely to be 14 years. In light of the current deliverable housing land supply position and the government’s objectives on housing delivery, the council’s judgement is that the benefits of modifying the plan to achieve a 15 year period from adoption is significantly and demonstrably outweighed by the benefits of earlier housing delivery enabled by continuing with the plan process.</p>
--	--	---

MAIN ISSUE: HOUSING REQUIREMENT

Detail	Respondent number	Response
Whether the housing requirement should reflect reforms to the NPPF including higher housing need as a result of a new standard method calculation.	0120, 0152 , 0219, 0221, 0244, 0268, 0271, 0276, 0275, 0278, 0302	The plan has been submitted under the transitional arrangements set out in the 2024 NPPF and accordingly will be examined against the 2023 NPPF and associated housing expectations.
Whether the housing requirement should be increased to respond to the scale of affordable housing need.	0120, 0298	<p>To determine the minimum number of homes to be built, the NPPF expects housing need to be calculated using a standard method. This standard method includes a specific adjustment to reflect affordability. Within this context, the size, type and tenure of housing needed by different groups should be assessed and reflected, including affordable housing.</p> <p>The LHNA calculates a need for 403 affordable dwellings a year. The majority of this need is to meet the housing</p>

		<p>preference of households currently able to rent suitable housing, rather than those who cannot afford to buy or rent.</p> <p>The plan seeks to deliver more affordable housing compared to past delivery through continuing to require contribution from development proposing 5 or more dwellings and increasing the expected scale of contribution from larger developments. Projected delivery would significantly exceed that required to meet pressing housing needs.</p>
Whether the base year should be amended.	0228, 0244, 0252, 0268, 0271, 0272, 0301, 0302, 0317	<p>The plan is based at 1 April 2023 to reflect the practical position of this being the most recent year for which monitoring data was available at the time of preparation.</p> <p>The PPG: Housing and economic needs assessments recognises that the standard method for calculating housing need varies as inputs are published, but continues to recognise that the output may be relied on for a period.</p> <p>Basing the plan at the time of adoption is not achievable and contrary to the PPG advise that local housing need should be calculated at the start of the of the plan-making process.</p>
Whether local housing need for the plan period from 1 April 2023 should be calculated using the affordability ratio at 1 April 2024, including whether it is appropriate to combine calculations at 1 April 2023 and 1 April 2024.	0132, 0228, 0244, 0268, 0271, 0272, 0301, 0302	<p>The council is satisfied the calculation of local housing need reflects national planning policy and guidance. Whilst the PPG refers to using the most recent median workplace based affordability ratios, this should be interpreted within the context of an annual calculation, with no requirement or expectation for in year recalculation.</p> <p>The council consider it reasonable to base the plan at 2023 and thereby use local housing need calculations from 1 April</p>

		2023 and 1 April 2024. It is noted that the former is higher than the latter, so resulting in a higher housing requirement.
Whether previous completions should have been considered when establishing the housing requirement.	0120	The plan promotes a housing requirement based on the standard method for calculating housing need. The method is considered by the government to respond to the past delivery of housing.
Whether unmet housing need from Reading Borough should be accounted for.	0228, 0244, 0268, 0271, 0272, 0301, 0302	Engagement has confirmed that Reading Borough Council does not consider that there to be a need to make any additional allowance for unmet needs from Reading Borough in the Wokingham Borough local plan.

MAIN ISSUE: HOUSING DELIVERY

Detail	Respondent number	Response
Whether the scale of projected delivery from the Loddon Valley Garden Village is realistic.	0228, 0244, 0268, 0271, 0272, 0301, 0302	The council is satisfied that the housing delivery rates set out in the policy and the house trajectory are realistic. The landowners similarly agree the delivery rates are achievable. An EIA scoping application was submitted in December 2024, which demonstrates how the site is progressing. A planning application to establish the principle of development is due to be submitted in 2025.
Whether Gypsy and Traveller pitches should be included within the supply.	0228, 0244, 0268, 0271, 0272, 0301, 0302	The council is satisfied that a housing requirement includes all forms of housing that constitute dwellings. This therefore includes housing delivered in the form of caravans, including those occupied by Gypsies and Travellers.

Whether the scale of projected delivery from Wokingham town centre is realistic.	0228, 0272, 0301	The council is satisfied that the projected delivery from Wokingham town centre over the plan period is realistic.
Whether delivery from windfall sites is realistic.	0228, 0244, 0268, 0271, 0272, 0301, 0302	The council is satisfied that the projected delivery from Wokingham town centre over the plan period is realistic.
Whether supply from windfall sites is included in the early years of the plan period.	0221	<p>Incorrect. Table 6: Housing land supply identifies sources of supply and the number of dwellings. The third source is “Sites with planning permission for 9 or fewer dwellings and sites which can be anticipated (windfall)”.</p> <p>80 dwellings per year are anticipated to be delivered from sites delivering 9 or fewer dwellings each year, slightly lower than historic completions. Those small sites with planning permission would be expected to deliver in the early years, with windfall sites anticipated after the initial period. This approach has been consistently used by the council in housing land supply assessments.</p> <p>A modification to Table 6 is proposed to clarify delivery from small sites with planning permission and that anticipated from windfall sites. Corresponding modifications to Table 2 are also proposed, as set out in the Schedule of proposed modifications.</p>
Whether there is over reliance on existing sites with planning permission to meet the housing requirement.	0120	Sites within planning permission are inherently a deliverable supply of housing and as such should be included within any housing trajectory.
Whether a five-year housing land supply of deliverable sites will be demonstrable at the time of adoption.	0221, 0239	The council is satisfied that the housing land supply enabled and promoted by the plan is sufficient to provide a 5 year housing land supply at the time of adoption.

Whether the plan should identify reserve sites.	0305	The council is satisfied that the housing land supply enabled and promoted by the plan is sufficient to meet the housing requirement, with a suitable level of flexibility.
---	------	---

OTHER ISSUES

- Whether the council should have reviewed the local plan and not progress with submission under the NPPF 2024 transitional arrangements (0329).
- Whether the council’s current land of five-year supply of deliverable sites is relevant to future supply (0221).

Policy SS11: Arborfield Green Strategic Development Location

23 respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0019	Gribble, Jules	0233	Dutton, Chris and Shirley Gallagher, Karen and Brian Dutton, Lucas Geering, Wendy, Timothy and Laura
0078	Hillcoat, Chris	0245	Crest Nicholson Partnership and Strategic Land
0118	Natural England	0250	Barkham Parish Council
0142	Steel, Paul	0256	Historic England
0182	National Highways	0276	David Wilson Homes Southern
0184	O'Connor Properties Ltd	0303	Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board
0199	Thames Valley Police	0316	Thames Water
0206	Mr and Mrs Cunningham	0319	Barley, Joseph (Cllr)
0216	Kay, Carolyn and Garrod, Christopher	0320	King, Robert
0220	Barkham Village Residents Association	0331	Battison, Jenny
0222	Richborough	0355	Environment Agency
		0356	Tott, Daryl

Support

Historic England (0256) supported the policy but sought a modification to align with requirements in Policy SS14. Clearer heritage requirements were also sought in the development guidelines (Appendix A). These matters are considered and resolved in further detail in the Statement of Common Ground with Historic England.

Natural England (0118) did not raise issues of soundness, but commented on the policy wording with respect to SANG provision and impact on the Longmoor Bog SSSI.

The Environment Agency (0355) stated that the policy was unsound, and raised a series of technical matters, including foul water and sewerage and the potential for capacity upgrades, ecological buffer zones along watercourses and water quality. These matters are being considered further detail in a Statement of Common Ground with the Environment Agency which is due to be agreed shortly.

Thames Water (0316) did not raise any issues of soundness, but commented that the SDL is likely to require upgrades to existing infrastructure, and welcomed further engagement with the council and developers on infrastructure delivery to ensure necessary upgrades align with site delivery.

National Highways (0182) did not state whether the policy is sound, and raised several matters including impact on the M4 and seeking changes to policy wording to recognise impact of the proposed employment floorspace on the Strategic Road Network.

Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board (0303) raised a soundness issue regarding health care mitigation, and sought subsequent changes to the policy wording.

The landowner/developer (0245) supported the principle of the policy, in particular the allocation of Barkham Square but recommended some modifications to seek further clarity on infrastructure provision, site capacity and site delivery.

Respondent 0356 was interpreted as supporting the policy.

The following tables set out the issues raised regarding the duty to cooperate, legal compliance, and soundness.

DUTY TO COOPERATE

Detail	Respondent numbers	Response
Insufficient consultation and engagement with residents on the proposal	0019, 0220, 0331	The council has undertaken an extensive consultation programme across several local plan consultations, including the Proposed Submission Plan. Consultations were undertaken in accordance with national legislation, national planning policy and the council’s Statement of Community Involvement. The council’s approach to consultation and engagement is set out in the Regulation 22 Consultation Statement.

Detail	Respondent numbers	Response
Validity of transport modelling	0220	<p>The traffic surveys were undertaken at the earliest opportunity after furlough ended. The transport evidence published to support the plan uses traffic modelling calibrated and validated to 2021 as the model base year.</p> <p>The impact on local highways has been assessed, and discussed with relevant bodies, including neighbouring councils responsible for highways and transport.</p> <p>Appropriate to the stage in planning, robust and credible traffic modelling has been used to inform the emerging IDP.</p>
Councillors had insufficient time to review the documentation prior to the full council vote	0331	Councillors were provided with key documentation prior to the full council meeting to be able to make a decision. Other evidence documents were made publicly available on the website.

LEGAL COMPLIANCE

Detail	Respondent numbers	Response
Insufficient consultation with residents on the proposal	0320	Significant public engagement has been undertaken across several local plan consultations, as set out in this Statement, and earlier summaries of the consultation undertaken.
Current major development and planned infrastructure has not been delivered	0019	A significant amount of infrastructure has been delivered as part of the existing SDL, including a schools, a leisure centre and improvements to bus services, with remaining key infrastructure now benefitting from planning permission (for example Arborfield Green District Centre). The scale of the

Detail	Respondent numbers	Response
		SDL means infrastructure is delivered in phases as development progresses.
Lack of clear justification to explain suitability of Barkham Square as an allocation. Barkham Square was previously petitioned by 4000 residents.	0320, 0220	The council's justification for the selection of sites in the Proposed Submission Plan is set out in the housing site allocations topic paper (September 2024). The suitability of sites is set out in Stages 2b and 2c of the council's Housing and Economic Land Availability Assessment.
Accuracy and validity of the transport modelling	0331	<p>The traffic surveys were undertaken at the earliest opportunity after furlough ended. The transport evidence published to support the plan uses traffic modelling calibrated and validated to 2021 as the model base year.</p> <p>The impact on local highways has been assessed, and discussed with relevant bodies, including neighbouring councils responsible for highways and transport.</p> <p>Appropriate to the stage in planning, robust and credible traffic modelling has been used to inform the emerging IDP.</p>
Inaccuracies in the concept plans contained in the growth scenarios reports	0331	The purpose of the plans is to provide a visual interpretation of the broad concepts and themes of the proposal. The plans are indicative at this stage, with additional detail to be included at the planning application stage.

MAIN ISSUE: IMPACT ON INFRASTRUCTURE

Detail	Respondent numbers	Response
Existing infrastructure and services cannot cope with growth, with reference to roads, public transport, schools	0019, 0078, 0216, 0319, 0320	<p>A significant amount of infrastructure has been delivered as part of the existing SDLs, within remaining key infrastructure now benefitting from planning permission (for example the District Centre). The scale of the SDLs mean infrastructure is delivered in phases as development progresses.</p> <p>The Infrastructure Delivery Plan (IDP) sets out the infrastructure proposed, including project types, costs, timing, delivering mechanism and priority of infrastructure to support the delivery of the site. The IDP is based on the best available information at the time.</p> <p>The transport mitigation proposed is set out in the IDP, which shows various interventions across the network. This mitigation has been tested in the traffic modelling to ensure the changes reduce the risk that congestion will be severe.</p> <p>It is acknowledged that responses from residents show a preference for infrastructure to be provided earlier, but this is not possible in all cases, with a population having to be established before schools or shops become viable. This helps to ensure infrastructure is delivered when it is needed.</p>
Impact of traffic congestion on the network, with reference to Barkham Road, Langley Common Road	0142, 0216, 0319, 0320	<p>Appropriate to the stage in planning, transport modelling and assessments have been undertaken throughout the preparation of the plan.</p> <p>The transport evidence published to support the plan uses traffic modelling calibrated and validated to 2021 as the model base year, which is considered robust.</p>

Detail	Respondent numbers	Response
		<p>Appropriate to the stage in planning, the model assumes some of the journeys generated by future residents of the site will be internalised. This means that for local journeys, for example to local schools and shops, the network of walking and cycling routes, and public transport will provide a realistic alternative to private car journeys. Longer trips, for example to railway stations, and to town and retail centres will also be supported by improvements to the walking, cycling and public transport networks.</p> <p>Together, the transport evidence helps to identify key roads, junctions and areas where intervention may be required to mitigate the impact of the development.</p> <p>The highways mitigation proposed is set out in the emerging IDP, which shows various interventions across local junctions. This mitigation has been tested in the traffic modelling to ensure the changes do not have significant adverse impacts on other parts of the highway network.</p>
<p>Impact on water supply and sewerage capacity. Arborfield Sewage Treatment Works is already at capacity and not able to cope with the additional demand</p>	<p>0250</p>	<p>The Water Cycle Studies consider the impact of development on the sewage and sewerage network and were prepared in consultation with Thames Water.</p> <p>Thames Water's representation acknowledges that the development proposed is likely to require upgrades to existing infrastructure.</p> <p>Following consultation with Thames Water, the Infrastructure Delivery Plan (IDP) identifies that an upgrade of the Arborfield</p>

Detail	Respondent numbers	Response
		<p>Sewage Treatment Works is planned, which is capable of mitigating the impact of the development proposed.</p> <p>Engagement with Thames Water will continue on an ongoing basis to ensure the timely delivery of infrastructure capacity upgrades as agreed in a signed Statement of Common Ground.</p>
Validity of transport modelling outputs	0320	<p>The traffic surveys were undertaken at the earliest opportunity after furlough ended. The transport evidence published to support the plan uses traffic modelling calibrated and validated to 2021 as the model base year.</p> <p>The impact on local highways has been assessed, and discussed with relevant bodies, including neighbouring councils responsible for highways and transport.</p> <p>Appropriate to the stage in planning, robust and credible traffic modelling has been used to inform the emerging IDP.</p>
Recognition of substantial employment floorspace and impact on the Strategic Road Network. Modification proposed to include requirement similar to para 12C of Policy SS13	0182	<p>The council considers that the modification requested by National Highways would provide useful clarity in decision-making.</p>

MAIN ISSUE: FLOOD RISK AND DRAINAGE

Detail	Respondent numbers	Response
The policy is unclear on the application of the sequential test across all sources of flooding	0355	Agree. While WBC considers this to be a clarification rather than a soundness issue, particularly when the plan is read as a whole, a proposed change to criteria 4d) of the policy is set out in the Schedule of proposed modifications.
Limited reference to foul drainage provision	0355	<p>The Water Cycle Studies consider the impact of development on the sewage and sewerage network and were prepared in consultation with Thames Water.</p> <p>Thames Water’s representation acknowledges that the development proposed is likely to require upgrades to existing infrastructure.</p> <p>Following consultation with Thames Water, the IDP identifies that an upgrade of the Arborfield Sewage Treatment Works is planned, which is capable of mitigating the impact of development proposed. Engagement with Thames Water will continue on an ongoing basis.</p> <p>WBC does not therefore consider this to be a soundness issue. Notwithstanding, proposed additions to parts 4 and 7 of the policy are set out in the council’s Schedule of proposed modifications for additional clarity.</p>
Policy requirements should acknowledge that infiltration SuDS are unlikely to be suitable for the SDL given nature of underlying geology	0355	WBC considers this to be a clarity rather than a soundness issue. There will be a need for site specific FRAs at the application stage and separate SuDS guidance exists that will need to be considered, which prioritises use of infiltration SuDS first in the SuDS train. Without certainty at this stage

Detail	Respondent numbers	Response
		<p>that infiltration SuDS are not appropriate across all parts of the site, it is not considered reasonable to preclude their use. The current policy allows for a flexible approach to drainage solutions, which is essential given the variability in site conditions across this strategic site. The suitability of infiltration SuDS can only be accurately determined through detailed site investigations, including geotechnical and hydrogeological assessments. These assessments are typically carried out during the planning application stage. The EA and other relevant bodies provide input during the planning application process, ensuring that drainage solutions are appropriate and do not pose a risk to the environment.</p> <p>Therefore, it is not considered necessary to include that level of prescription in the site-specific policy.</p>

MAIN ISSUE: SANG

Detail	Respondent number	Response
Uncertainty regarding SANG provision and delivery	0184, 0206, 0233, 0250	<p>The council has produced a Habitats Regulation Assessment (HRA) which concludes (in paragraph 6.17) that the council has an adequate inventory of strategic SANG in place to mitigate residential growth in the plan, both in terms of residual capacity and geographic siting of SANGs.</p> <p>The council is confident that sufficient SANG capacity will be made available at the appropriate time to provide mitigation for the planned and anticipated development in the plan.</p>

Detail	Respondent number	Response
Proposed SANG contains areas of ancient woodland. Careful consideration of paths, tree planting, buffers etc	0118	<p>Noted. The Development Guidelines for the site (Appendix A) set a series of key place making principles, which help to ensure areas of woodland and other green infrastructure are protected and enhanced, such as A1.7a) and b).</p> <p>Ongoing engagement has led to the signing of a Statement of Common Ground with Natural England, where both parties agree that there is no challenge to the soundness of the plan.</p>
SANG should be phased to ensure it is operational prior to occupation	0118	<p>Noted. Policy SS11 includes a series of development principles, including 3a) the phased delivery of an appropriate solution to avoid and mitigate the impact of development upon the Thames Basin Heaths SPA through provision of sufficient SANG.</p> <p>The development proposal will be accompanied by a masterplan and supported by a strategy to ensure the timely delivery of facilities and infrastructure necessary to support the delivery of the SDL.</p> <p>The policy is supported by development guidelines (Appendix A) which set out key infrastructure requirements. Criteria A1.9k) requires the provision of sufficient SANG in line with Policy NE3 and acknowledges that SANG can be delivered in phases and will need to reflect Natural England’s standards.</p>
Allocation within 400m-5km SPA zone, where mitigation is required. Future planning applications for housing and SANG would be subject to project level HRA	0118	<p>Noted. Criteria 3f) of Policy SS11 includes a requirement for the phased delivery of the SDL, including a solution to avoid and mitigate the impact of development upon the Thames Basin Heaths SPA through provision of sufficient SANG (subject to monitoring of the quality and quantity standards).</p>

MAIN ISSUE: ENVIRONMENTAL IMPACTS

Detail	Respondent number	Response
Future planning applications expected to provide evidence that development is outside catchment of the Longmoor Bog SSSI	0118	Noted.
Heritage impact assessment should be explicitly referenced in the policy	0256	<p>The council considers the requested modification by Historic England will provide useful clarity.</p> <p>A Statement of Common Ground with Historic England, agrees that a modification should be recommended to this effect.</p>
Settlement separation impacts due to allocation at Barkham Square	0250, 0320	<p>Part 4a) of the policy is clear that the siting, layout and form of development should <i>'Protect and retain the physical, visual and perceived separation of the defined settlements of Arborfield Cross, Barkham Hill and Finchampstead North'</i>. Development will change the visual appearance of the area, the policy approach, concept masterplan and landscape evidence show settlement coalescence can be effectively avoided.</p>
Harm to landscape character	0320	<p>The policy is supported by development guidelines (Appendix A) which sets out further guidance for the Arborfield Green SDL. The concept rationale sets out several key elements, recognised as fundamental to the site's continued success, including A1.6b) creating a cohesive place inspired by the landscape setting and existing features through carefully planned design, to provide an attractive environment.</p> <p>Policy NE5 ensures proposals adopt a landscape led approach to development, which protects and enhances the character</p>

Detail	Respondent number	Response
		<p>and distinctiveness of landscapes using the most up-to-date landscape studies.</p> <p>Part 3 of Policy NE5 also requires development proposals to be accompanied by a landscape and visual impact assessment.</p>
Ecological buffer zones sought along watercourses	0355	<p>The watercourse at Barkham Brook is minor in nature. Any crossings are likely to be insignificant in scale and limited to pedestrians rather than vehicles.</p> <p>Part 4e) of Policy SS11 ensures that development proposals draw on the recreational and ecological opportunities of watercourses.</p> <p>Policy FD3 ensures that development proposals recognise the special contribution of rivers and watercourses through their conservation and enhancement.</p> <p>Part 2d) of Policy FD3 requires, where appropriate, development proposals to provide or retain an undeveloped buffer zone from a river or watercourse.</p> <p>Notwithstanding, a proposed addition to part 8 of the policy is set out in the council's Schedule of proposed modifications for additional clarity.</p>
Recommend reference to 'water quality' in part 4 of the policy, to ensure development does not outpace delivery of foul water and sewerage upgrades	0355	Part 7a of policy refers to water quality with respect to SuDS provision. Reference to water quality is also in policies FD2, HC5 and HC9 of the plan.

Detail	Respondent number	Response
		WBC does not therefore consider this to be a soundness issue. Notwithstanding, proposed additions to parts 4 and 7 of the policy is set out in the council's Schedule of proposed modifications for additional clarity.

MAIN ISSUE: ALTERNATIVE SITES

Detail	Respondent number	Response
Alternative areas should be developed to meeting housing needs. Barkham Square should be used for recreation	0216	Strategic scale development opportunities have been considered as part of plan making, including through technical work and Sustainability Appraisal. The council has reviewed the representations and remains of the opinion that the proposed allocation at Barkham Square is a suitable and sustainable option, forming an appropriate strategy for meeting the borough's development needs.
Disproportionate level of development at Arborfield Green SDL	0331	<p>Strategic scale development opportunities have been considered as part of plan making, including through technical work and Sustainability Appraisal. The distribution of housing across the borough considers constraints, opportunities and where land has been promoted and has shown to be available.</p> <p>The council has reviewed the representations and remains of the opinion that the proposed allocation of land to the north of Arborfield Studios, known as Barkham Square and optimising development density at land currently occupied by Arborfield Studios on the Arborfield Green SDL, are suitable and sustainable options, which form part of an appropriate strategy for meeting the borough's development needs.</p>

MAIN ISSUE: DEVELOPMENT AT ARBORFIELD GREEN SDL

Detail	Respondent number	Response
Clarification sought regarding infrastructure provision across the whole SDL, with specific reference to employment, education, district and local centres	0245	<p>The requirements of Policy SS11 apply to the Arborfield Green SDL as a whole. The policy and development guidelines (Appendix A) clearly set out key infrastructure requirements, including for schools, employment and centres.</p> <p>Further detail on infrastructure to be delivered as part of the SDL is set out in the council's Infrastructure Delivery Plan (IDP).</p>
Optimistic delivery profile over the plan period	0222, 0276	<p>The council is satisfied that the housing delivery rates set out in the policy and the housing trajectory (Appendix F) are realistic. The landowner similarly agrees the delivery rates are achievable and further suggest in their response to the Proposed Submission Plan that the proposed allocation of land to the north of Arborfield Studios, known as Barkham Square is capable of delivering much earlier in the plan period.</p>
Timing of infrastructure delivery, with reference to GPs/health care	0250, 0320	<p>The IDP sets out the project type, timing, cost and priority of the infrastructure identified to support the delivery of the site. It is based on the best information available at the time.</p> <p>The council will continue to liaise with BOB ICB on the timely delivery of health infrastructure.</p>
Barkham Square allocation is not well located or supported by necessary infrastructure, services and employment opportunities, contrary to para 74 of the NPPF	0320	<p>The allocation of land north of Arborfield Studios, known as Barkham Square is considered to relate effectively to and complement the existing SDL. The development opportunity is wholly in line with the plan's spatial strategy and will be supported by a comprehensive package of infrastructure,</p>

Detail	Respondent number	Response
		<p>including delivering new or improved services and facilities, as set out in the Infrastructure Delivery Plan.</p> <p>Criteria A1.6 f) ensures a range of housing is provided that is supported by well-connected opportunities for local employment.</p> <p>Criteria A1.6 j) supports the expansion of employment facilities for local working, including the retention of Hogwood Industrial Estate as a Core Employment Area, which is capable of further expansion and intensification of employment uses.</p> <p>Criteria A1.7 introduces a set out key place making principles, notably criteria e), which prioritises efficient public transport services and infrastructure to connect to existing and new communities and opportunities for local employment in the area, including Crowthorne, Finchampstead North and the proposed Loddon Valley Garden Village.</p>
Delays experienced with infrastructure delivery at the Arborfield Green SDL	0320	A significant amount of infrastructure has been delivered as part of the existing SDL, including a school, a leisure centre and improvements to bus services, with remaining key infrastructure now benefitting from planning permission (for example Arborfield Green District Centre). The scale of the SDL means infrastructure is delivered in phases as development progresses.
Extension contrary to original vision of the SDL in the Core Strategy	0320	The proposed allocation of land north of Arborfield Studios, known as Barkham Square, is considered to relate effectively to and complement the existing Arborfield Green SDL, and is wholly in line with the plan's spatial strategy.

Detail	Respondent number	Response
		<p>Policy SS11 is supported by a concept rationale (in Appendix A) which ensures development proposals maintain a degree of self-sufficiency and achieve a vibrant, thriving and healthy community of the SDL. The concept rationale is supported by a set of key elements which are considered fundamental to the continued success of the SDL.</p>
Lack of reference to crime prevention	0199	<p>Further work is ongoing to develop the concept plan and design code(s) for the site, including the importance of reducing crime and the fear of crime through effective urban design.</p> <p>The policy is supported by development guidelines (Appendix A) which include a series of place making principles. Criteria A1.7d) requires proposals to create residential neighbourhoods that are inclusive, safe, accessible and attractive.</p>
Limited reference or regard to policies in the Arborfield and Barkham Neighbourhood Plan	0250	<p>All made Neighbourhood Plans have been considered as part of preparing the local plan. The local plan is a strategic document which considers the long-term development strategy for the borough, and it may therefore not always be possible to reflect every aspiration set out in neighbourhood plans.</p>

REQUESTED MODIFICATIONS

Detail	Respondent number	Response
Remove proposed allocations at Barkham Square and land to the north of Arborfield Studios from the plan	0142, 0320	Not agreed. The council considers the proposed allocations at Barkham Square and land to the north of Arborfield Studios form part of an appropriate strategy for meeting the borough’s development needs. Both allocations would be consistent with the original vision of the Arborfield Green SDL.
Include requirement in paragraph 12C of Policy SS13 in Policy SS11	0182	<p>Agreed. The council considers the recommended modification by National Highways would provide useful clarity.</p> <p>The recommended modification to Policy SS11 is set out in the council’s Schedule of proposed modifications.</p>
Modify the place shaping principles to cover measures to design out crime and enhancing the safety and security of development	0199	<p>Not agreed. Relevant policies in the local plan provide a suitable framework for addressing crime, safety and security, notably part 1q) of Policy DH1 (Place making and quality design).</p> <p>Further work is ongoing to development the concept plan and design code(s) for the site, including importance of reducing crime and fear of crime through effective urban design.</p>
Modify criteria 3a) of policy to read ‘at least 2,550 dwellings due to optimistic delivery profile’	0222	<p>Not agreed. Paragraph 3a) of Policy SS11 qualifies the phased delivery of ‘around’ 3,047 dwellings. This provides sufficient flexibility for higher site capacities to come forward subject to masterplanning.</p> <p>The council is satisfied that the housing delivery rates set out in the policy and the housing trajectory (Appendix F) are realistic. The landowner similarly agrees the delivery rates are achievable.</p>

Detail	Respondent number	Response
Modify policy requirement to increase site capacity of Barkham Square to 660 dwellings and therefore increase the delivery from the site to 3,107 dwellings	0245	Not agreed. The council does not consider a modification to this requirement of the policy is necessary. Criteria 3a) of the 'Development principles' clearly state the ' <i>phased delivery of around 3,047 dwellings</i> ', which provides sufficient flexibility for higher site capacities to come forward subject to masterplanning.
Modify policy requirement to provide clarity on committed development at the SDL and extent of delivery to date	0245	Not agreed. Part 3a) of Policy SS11 provides clarity on what has been delivered on the Arborfield SDL to date. Further information on site delivery is set out in the council's latest Five-Year Housing Land Supply Statement.
Provide flexibility by enabling proposals to justify the sustainable transport measures specified in the policy criteria	0245	Not agreed. The council does not consider a modification to paragraph 9 of the policy is necessary, as the sustainable transport and movement strategy should be informed by a detailed Transport Assessment, which would provide further justification for the schemes identified in criteria a) to f).
Modify policy or supporting text to clarify infrastructure requirements across the whole SDL, with reference to employment floorspace, primary school, district centre and local centres	0245	Not agreed. Infrastructure requirements are clearly set out in Policy SS11 and the accompanying Development Guidelines. A number of phases of the planned development have been completed or are progressing, including the new district centre which has planning permission. The IDP sets out the infrastructure proposed, including projects, costs, timing and delivery mechanism. The IDP is an iterative document.

Detail	Respondent number	Response
Modify policy to include the timing of infrastructure, with particular reference to GPs/health care, water supply and wastewater	0250	<p>Not agreed. Part 6c) clearly states that development should be led by a masterplan that provides a strategy for the timely delivery of facilities and infrastructure necessary to support the delivery of the SDL.</p> <p>The IDP also sets out the project type, timing, cost and priority of the infrastructure identified to support the delivery of the site. It is based on the best available information at the time.</p>
Modify policy requirements to ensure development proposals respond positively to the evidence base and policies of the Arborfield and Barkham Neighbourhood Plan	0250	<p>Not agreed. The council does not consider a modification to the policy is necessary, as all made Neighbourhood Plans have been considered as part of preparing the local plan. The local plan is a strategic document, and it may therefore not always be possible to reflect every aspiration set out in neighbourhood plans.</p>
Modify requirements in Appendix A to consider safe and secure access to the linear park and prioritising housing for local needs	0250	<p>Not agreed. Paragraph A1.7b) under 'Key place making principles' of the Development Guidelines ensures good, safe access and use and connectivity between areas of SANG, parkland, open space and green and blue infrastructure assets.</p> <p>Paragraph A1.6e) and f) require proposals to provide a mix and range of housing types, sizes and tenures to achieve inclusive, balanced and healthy communities. Criteria 2 of Policy H1 (Housing mix, density and standards) ensures that housing mix reflects and responds to the most up to date evidence of housing need.</p>
Modify policy requirement to explicitly reference the requirement for a heritage impact assessment	0250	<p>Agreed. The council considers this suggested change would provide useful clarity.</p>

Detail	Respondent number	Response
		The proposed change to criteria 4c) of the policy is set out in the Schedule of proposed modifications.
Provide evidence of site deliverability	0276	Not agreed. The council is satisfied that the housing delivery rates set out in the policy and the housing trajectory (Appendix F) are realistic. The landowner similarly agrees the delivery rates are achievable.
Modify policy requirement to include health care mitigation and engagement with the ICB or other relevant bodies at an early stage	0303	<p>Discussions with the Integrated Care Board (ICB) are ongoing about primary health care capacity in the area. The IDP identifies the provision of additional GP capacity and is an iterative document. The IDP will be updated as new information becomes available.</p> <p>The council does not consider a modification to this policy is necessary, however a modification is recommended to the supporting text of Policy SS15 to recognise early and timely engagement between developers and infrastructure/service providers.</p> <p>The recommended modification to Policy SS15 is set out in the council's Schedule of proposed modifications.</p>
Further consultation with residents on proposal at Barkham Square	0331	<p>Noted. Significant public engagement has been undertaken across several local plan consultations. Further details are set out in the Consultation Statement.</p> <p>Residents and other stakeholders will also be consulted on the proposal as part of the planning application stage, in accordance with the council's Statement of Community Involvement.</p>

Detail	Respondent number	Response
Further transport work to assess impact on Langley Common Road and surrounding roads	0331	<p>Appropriate to the stage in planning, the LPU evidence acknowledges proposals will increase levels of congestion and delay in some areas. The IDP identifies a package of improvements that will support sustainable travel alternatives to be confident the residual cumulative effects would not be severe.</p> <p>Paragraph 9 of the policy ensures proposals devise and implement a sustainable transport and movement strategy, informed by a detail Transport Assessment. Paragraph 9 is supported by a set of criteria, including e) providing highway improvements along Barkham Road.</p> <p>Transport modelling and assessments have also been undertaken throughout the preparation of the plan, helping to identify key roads, junctions and areas where intervention may be required to mitigate the impact of development.</p> <p>The site concept plan (Figure 6) shows an indicative access off Langley Common Road. It is recognised that further work on the design of the junction would be undertaken by the site promoter/developer at the planning application stage.</p>
Additional detail on water quality and opportunities to improve watercourses and watercourse corridors	0355	Proposed change to the policy is set out in the council's Schedule of proposed modifications for additional clarity.
Recommend reference to 'all sources' of flooding in the policy	0355	Relevant policies in the local plan provide a suitable framework for addressing flood risk (from all sources) in development proposals. Notwithstanding, proposed change to the policy is set out in the council's Schedule of proposed modifications for additional clarity.

Detail	Respondent number	Response
Provide clarity in delivery requirements that infiltration SUDs are unlikely to be suitable given nature of the underlying geology	0355	It is not considered necessary to include that level of prescription in the site-specific policy.
Relocate proposed allotments and car park to the northeast section of the SANG near Barkham Square	0356	<p>Not agreed. The purpose of the plans is to provide a visual interpretation of the broad concepts and themes of the proposal. The plans are indicative at this stage, with additional detail to be included at the planning application stage.</p> <p>The concept plan does not show the location of any allotments, but it is recognised the promoters of the site have include the possible location of allotments as part of their public consultation material. Further work will be undertaken on the concept plan and design code(s).</p>

Policy SS12: South Wokingham Strategic Development Location

32 respondents submitted representations on Policy SS12 South Wokingham Strategic Development Location.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0041	Wokingham Without Parish Council	0207	Frankham, John
0071	Sleight, David	0222	Richborough
0072	Hughes, Rob	0248	Myers, Perry
0078	Hillcoat, Chris	0256	Historic England
0102	McHale, Peter	0262	Crowthorne Village Action Group
0108	Sport England	0263	Lightwood Strategic
0116	Plume, Aaron	0264	Miller Homes and Kier Ventures
0117	Fenny, Richard	0276	David Wilson Homes Southern
0118	Natural England	0296	Rogers, Janet
0132	Bracknell Forest Council	0298	Nicholas King Homes
0166	Shaves, Thomas	0300	Network Rail
0177	Stephens, Paul	0303	Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board
0179	Shaves, Deborah	0309	Royal Borough of Windsor and Maidenhead
0182	National Highways	0316	Thames Water
0197	Frewer, Christopher and Helen	0352	Davies, David
0199	Thames Valley Police	0355	Environment Agency

Support

Respondents **0041**, 0078, 0108, 0166, 0177, 0179, 0197, 0256, 0262, 0263, 0296, 0298, 0352, **0355**, consider the policy to be legally compliant. The Royal Borough of Windsor and Maidenhead (**0309**) did not specifically comment on legal compliance but comments indicate broad support.

Respondents, 0078, 0108, 0166, 0177, 0179, 0197, 0256, 0262, 0263, 0296, 0298, consider the policy to comply with the Duty to Cooperate. The Royal Borough of Windsor and Maidenhead (**0309**) did not specifically comment on the Duty to Cooperate, but comments indicate broad support.

Respondents 0108, 0256, 0263, 0298 and **0309** consider the policy to be sound.

The proposed allocation encompasses several landowners. The two major landowners/promoters, Lightwood Strategic (0263) and Nicholas King Homes (0298) consider the plan to be legally compliant and compliant with the duty to cooperate. The landowners/promoters support the principle of the policy and the allocation, and suggested modifications. Lightwood Strategic (0263) stated that the 980 homes specified in the policy are deliverable within the plan period, especially as a planning application has been submitted for the development. Nicholas King Homes (0298) stated that the lead in time for the delivery of the site could be shorter than stated in the published housing trajectory.

Bracknell Forest Council (**0132**) did not consider the policy be sound, and commented on the cross boundary impacts of the proposed SDL extension, particularly regarding landscape character/gap, and the impact on the Bracknell transport network. These matters are considered in detail in the Statement of Common Ground with Bracknell Forest Council.

Natural England (**0118**) did not raise soundness issues, but commented that the concept plan showed an area of proposed SANG that looked quite disconnected, and that a site visits would therefore be required.

National Highways (**0182**) did not state whether the policy is sound and raised several matters, including that the planning application for the area should take account of all approved traffic on the South Wokingham site, in addition to any employment development proposed.

Historic England (**0256**) stated that the policy is sound, but requested modifications regarding a heritage impact assessment, and archaeological matters.

Sport England (**0108**) support the inclusion of a sports hub at Gray's Farm.

The Environment Agency (**0355**) stated that the policy was unsound, and raised a series of technical matters, including that an assessment is undertaken to determine whether safe access and egress will be possible, waste water treatment capacity and water quality. The response supported other aspects, including natural flood management opportunities, and requiring sustainable drainage systems. The EA therefore recommended a series of modifications. These matters are considered and resolved in further detail in the Statement of Common Ground with the Environment Agency.

Network Rail **(0300)** note the engagement with the council regarding the delivery of the SDL and potential railway impacts, and consider a means of crossing the railway is essential to support effective delivery of the SDL. Network Rail propose modifications to ensure safe means of crossing the railway are delivered.

The Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board **(0303)**, stated that development will have a material impact on local GP services, and propose a modification to include health care mitigation in the draft policy.

The following tables set out the issues raised regarding the duty to cooperate, legal compliance, and soundness.

Many respondents did not set out the details of why the plan fails to comply with the duty to cooperate, and/or is not legally compliant

DUTY TO COOPERATE

Detail	Respondent numbers	Response
Planning permission should require the delivery of adequate resources, including road, schools, and healthcare.	0102	<p>Policy SS12 sets out the infrastructure to be delivered as part of the development. This includes two new primary schools, highways and transport infrastructure, retail centres, and a sports hub at Grays Farm. Further information is set out in the IDP.</p> <p>Discussions with the Integrated Care Board (ICB) are ongoing about primary health capacity in the area. The IDP identifies the provision of additional GP capacity via either a new facility, new branch surgery, and an extension or relocation of an of existing facility.</p>

LEGAL COMPLIANCE

Detail	Respondent numbers	Response
Planning permission should require the delivery of adequate resources, including road, schools, and healthcare.	0102	<p>Policy SS12 sets out the infrastructure to be delivered as part of the development. This includes two new primary schools, highways infrastructure, retail centres, and a sports hub at Grays Farm. Further information is set out in the IDP.</p> <p>Discussions with the Integrated Care Board (ICB) are ongoing about primary health capacity in the area. The IDP identifies the provision of additional GP capacity via either a new facility, new branch surgery, and an extension or relocation of an of existing facility.</p>

MAIN ISSUE: IMPACT ON INFRASTRUCTURE

Detail	Respondent numbers	Response
Impact on the highways network, which is not able to support the scale of development. The mitigation proposed is insufficient, which will lead to further congestion.	0041, 0071, 0078, 0116, 0117, 0248, 0262, 0296	<p>Appropriate to the stage in planning, transport modelling and assessments have been undertaken throughout the preparation of the plan.</p> <p>The transport evidence published to support the plan uses traffic modelling calibrated and validated to 2021 as the model base year.</p> <p>Appropriate to the stage in planning, the model assumes some of the journeys generated by future residents of the site will be internalised. This means that for local journeys, for example to local schools and shops, the network of walking and cycling routes, and public transport will provide a realistic</p>

Detail	Respondent numbers	Response
		<p>alternative to private car journeys. Longer trips, for example to railway stations, and to town and retail centres will also be supported by improvements to the walking, cycling and public transport networks.</p> <p>Together, the transport evidence helps to identify key roads, junctions and areas where intervention may be required to mitigate the impact of the development.</p> <p>The modelling acknowledges some increases in congestion and delay, but the mitigation identified in the IDP, will reduce the risks these become severe.</p> <p>The transport assessment also shows that the proposed level of development could be accommodated on the strategic road network, with immaterial changes in flows/journey times on the M4.</p>
Impact on the road network in Bracknell Forest	0132	<p>The council is satisfied that the transport modelling and assessment, together with the mitigation proposed, will not result in significant adverse impacts on the road network in Bracknell Forest.</p> <p>Following the publication of the Proposed Submission Plan, further engagement with Bracknell Forest Council has helped to resolve several of the issues raised. Engagement will continue as the live planning application for the SDL extension is considered.</p>

Detail	Respondent numbers	Response
Potential impact on the A329(M) and M4	0309	<p>The council is satisfied that the transport modelling and assessment which informed the mitigation proposed is appropriate.</p> <p>The A329(M) forms part of the Major Road Network (MRN). Transport for the Southeast (TfSE) provide a wider strategic role on this corridor, and WBC/BFC are liaising over long term plans linked to TfSE.</p> <p>The IDP sets out a series of highways improvements, including the A329 Coppid Beech roundabout and between the Coppid Beech roundabout and Jennett's Park.</p> <p>The M4 forms part of the Strategic Road Network (SRN), where National Highways act as the highway authority for the Secretary of State.</p>
Impact on the junction of Molly Millars Lane and Finchampstead Road.	0071, 0072	Improvements to this junction are planned as part of delivering the western gateway, to facilitate access to the South Wokingham SDL. Appropriate to the stage in planning transport modelling acknowledges levels of congestion and delay will increase but these will not be severe. Other improvements are identified in the IDP to support the use of alternative modes of transport.
The junction of Easthampstead Road and Old Wokingham Road is dangerous. Proposals to close Easthampstead Road to through traffic will cause traffic to take alternative routes, including into Bracknell Forest borough. This would also risk	0041, 0262, 0296	The introduction of further modal filters on Easthampstead Road will contribute to a significant reduction in traffic on this road (broadly around 10% of current levels) delivering a substantial improvement in road safety.

Detail	Respondent numbers	Response
disconnecting Crowthorne (Pinewood) to Wokingham town.		<p>These proposals will result in the redistribution of traffic to the new road through the development that will connect Old Wokingham Road with South Wokingham Distributor Road (SWDR).</p> <p>Appropriate to the stage in planning transport modelling acknowledges levels of congestion and delay will increase but these will not be severe and will only subtly increase journey times between Crowthorne and Wokingham. Consistent with the Local Transport Plans for both WBC and BFC, the proposals for Easthampstead Road alongside other IDP improvements, will offer an improved cycle route and support the use of alternative modes of transport.</p>
Impact on public transport, including lack of proposed provision.	0041 , 0132, 0117, 0248, 0352,	<p>The development will implement measures to promote and improve sustainable travel, which includes enhanced public transport through the SDL. The delivery of the South Wokingham SDL will deliver a new (east/west) bus service between Wokingham and Bracknell.</p> <p>Development Guidelines B9(h) and B3.11 sets out how the development is expected to provide public transport services to maximise opportunities for sustainable travel. B3.8(i) further refers to the delivery of a bus corridor to support public transport.</p>
Impact on active travel options, including on existing byways.	0041 , 0072, 0166, 0179, 0197, 0248,	<p>The council has developed a Public Rights of Way Improvement Plan (PROWIP) and Local Walking, Cycling & Infrastructure Plans (LWCIP), which are intended to meet existing and future needs. Development will implement measures to promote and improve sustainable travel, which</p>

Detail	Respondent numbers	Response
		<p>includes enhanced active travel through the site and to nearby services and facilities.</p> <p>Part 9 of the policy sets out how development should provide new and improved active travel connections to surrounding areas. The concept plan also shows how existing public rights of way and active travel routes should be incorporated and/or protected.</p> <p>Development will alter the character of some PROW. Improvements to the PROW network with Greenways are expected to be beneficial, outweighing adverse effects.</p>
Impact on GP surgeries and healthcare	0041, 0303	The IDP identifies the provision of additional GP capacity via either provision of a new facility, new branch surgery, extension of existing, or relocation of an existing facility. The council will work with the Integrated Care Board to consider how this project can be delivered.
Impact on utilities, including water supply, sewerage and sewage treatment works	0177, 0316, 0355	<p>The Water Cycle Studies consider the impact of development on water supply, sewerage and sewerage network and were prepared in consultation with Thames Water and South East Water.</p> <p>Thames Water highlighted that improvement to wastewater network capacity in the area would be required to serve the proposed growth, but that no significant constraints to the provision of infrastructure have been identified. The council will work with developer and Thames Water to help ensure there is sufficient network capacity.</p>

Detail	Respondent numbers	Response
		<p>A Statement of Common Ground with Thames Water agrees that there are no known significant water supply, waste water, or sewage treatment capacity issues that would be likely to prevent, or delay the delivery of the site allocations proposed in the plan.</p> <p>South East Water are confident the Water Resource Management Plan can accommodate the level of growth proposed.</p>
Cumulative impact of development at Priors Farm and Hall Farm	0352	The cumulative impact of development has been considered in the preparation of the local plan, and has informed the infrastructure proposed to help mitigate identified impacts.

MAIN ISSUE: ENVIRONMENTAL IMPACTS

Detail	Respondent numbers	Response
Adverse impacts of flooding, including surface water flooding beyond the site	0132,	<p>Part 7 of the policy sets out how a comprehensive drainage and flood alleviation strategy will need to be prepared. Part B3.9 of the Development Guidelines further highlights the climate change and flood risk matters, including exploring opportunities to achieve flood betterment and reducing risk within and beyond the SDL.</p> <p>Given the large areas of land available, the council is confident a suitable strategy can be prepared that mitigates the impact of flooding on and beyond the site.</p>

Detail	Respondent numbers	Response
The SFRA should demonstrate that safe access and egress is achievable.	0355,	The EA has subsequently confirmed they are satisfied that it is likely that a safe route of access and egress will be possible from the new dwellings to Easthampstead Road or Waterloo Road located in Flood Zone 1. This is agreed in a Statement of Common Ground.
Ensure the water quality of the Emmbrook does not deteriorate but improves	0355,	<p>Part 7a of policy refers to water quality with respect to SuDS provision. Reference to water quality is also included in policies FD2, HC5 and HC9 of the plan.</p> <p>WBC does not therefore consider this to be a soundness issue. Notwithstanding, proposed additions to parts 4 and 7 of the policy are set out in the council's Schedule of proposed modifications for additional clarity.</p>
Impact of additional crossings on water courses and the importance of incorporating sufficient buffers.	0355,	A proposed addition to part 8 of the policy is set out in the council's Schedule of proposed modifications for additional clarity.
Adverse impacts on heritage and conservation	0179, 0197	<p>Part 4(b) of the policy sets out how place shaping principles should incorporate measures regarding heritage assets and their settings, and Development Guideline B3.9(e) sets out heritage assets and their settings should be conserved and where appropriate enhanced.</p> <p>This is reflected in the concept plan also shows areas identified as 'historic settlements' and proposes landscape buffers to help conserve their settings.</p>

Detail	Respondent numbers	Response
		The Historic England Statement of Common Ground sets out that Historic England do object to any of the proposed allocations in the plan.
Adverse impacts on biodiversity and habitats	0041, 0352	Part 4(f) of the policy sets out how the recreational and ecological opportunities of the Emm Brook should be drawn upon, and part 8 highlights the delivery of 10% biodiversity net gain and the provision of on site SANG. As part of a comprehensive ecological strategy the council is satisfied any adverse impacts are capable of being mitigated.
Adverse impacts on trees, hedgerows, open space and other green infrastructure.	0041, 0352,	The council acknowledges that the proposed development will result in a change to the landscape. Part 8 of the policy and Development Guideline B3.11 sets out how a 10% biodiversity net gain should be achieved on site, alongside the delivery of open space, SANG, Greenways and other green infrastructure.
Adverse landscape impacts.	0041, 0132, 0352,	The council acknowledges that the proposed development will result in a change to the landscape. The policy seeks to protect and maintain the separation of settlements, set out in part 4(a), ensure the layout of the scheme is sensitively designed, and as set out in B3.8(e) of the Development Guidelines recognise the landscape setting and notable buildings.
Adverse impacts on air quality, noise and odour.	0177, 0352,	Environmental impacts, including noise, odour and air quality have been considered and do not inhibit the delivery of the development. If further evidence identifies adverse impacts suitable mitigation measures will be proposed.

Detail	Respondent numbers	Response
		<p>There will be noise and disturbance as the development is delivered, which will be mitigated as far as possible. A Construction Management Plan will set out operating hours and vehicle routing to avoid sensitive locations wherever possible.</p> <p>The implications of development on air quality have been assessed and considered as part of the HRA.</p>

MAIN ISSUE: DEVELOPMENT AT SOUTH WOKINGHAM SDL

Detail	Respondent numbers	Response
The lead in time and housing delivery rates are unrealistic. No planning application has been submitted, and research has shown larger sites will take longer to deliver, including beyond the plan period.	0222, 0264, 0296,	<p>The council is satisfied that the housing delivery rates set out in the policy and the house trajectory are realistic. The landowners similarly agree the delivery rates are achievable.</p> <p>There is a live application for the SDL extension, which demonstrates progress towards delivery.</p>
The proposed housing delivery rates are achievable.	0263	Noted. Information on housing delivery rates is set out in the Housing Trajectory.
Complex landownership means delivery is uncertain	0041 , 0262, 0296	The allocated South Wokingham SDL benefits from planning permission. Submission of Reserved Matters applications is anticipated in 2025.
Risk of settlement coalescence	0041 , 0071, 0102, 0132, 0262, 0296	Part 4(a) of the policy highlights the importance of the development protecting and maintaining separation from

Detail	Respondent numbers	Response
		<p>defined settlements, through its siting, layout, form design and landscaping.</p> <p>Proposed modifications to the concept plan show the proposed roundabout access moved further westwards into the site, and larger areas of planting to reduce any impact regarding settlement coalescence.</p>
Loss of Green Belt land	0177	The site is not located in the Green Belt.
Delivery of a pedestrian crossing of the railway line should be prioritised.	0041, 0071, 0300,	The IDP identifies the delivery of the 'South Wokingham Railway Bridge' as essential, in recognising its role connecting the SDL to Wokingham town centre.
New active and public transport routes should be delivered, including links to areas beyond the site.	0078, 0132	<p>The development will implement measures to promote and improve sustainable travel, which includes enhanced public transport and active travel.</p> <p>Development Guidelines B9(h) and B3.11 sets out how the development is expected to provide public transport services to maximise opportunities for sustainable travel. B3.8(i) further refers to the delivery of a bus corridor to support public transport.</p> <p>Part 9 of the policy sets out how development should provide new and improved active travel connections to surrounding areas. The concept plan also shows how existing public rights of way and active travel routes should be incorporated.</p>

Detail	Respondent numbers	Response
The proposed centres should be reconfigured, with the SDL extension instead providing a larger centre.	0116	The council is satisfied the local centre to be delivered at the existing SDL, and the proposed local centre in the SDL extension will provide an appropriate range of services and facilities to meet the day to day needs of residents. Further information is set out in Development Guideline B3.9(g)
Sports facilities at Pinewood and Grays Farm should complement each other	0116	The council is working to deliver a new sports hub at Gray's Farm, with the IDP setting out the anticipated facilities. As the project develops the council will consider the links between the sites.
The layout of the proposed SANG requires further assessment.	0118	The council will work with Natural England and the site promoter to ensure the delivery of an appropriate SANG.
Clarity is required on the provision and location of the gypsy and traveller pitches, including provision elsewhere in the SDL. Alternatives include council owned land at Gray's Farm.	0263, 0298	The Gypsy and Traveller accommodation topic paper (2024) sets out the need for pitches, which can be delivered and effectively integrated into the proposed site. Off site provision outside the SDL is not appropriate. Gray's Farm is already planned to provide significant sports facilities.
Insufficient evidence to justify the education requirement and an additional one form entry primary school may not be required	0263, 0264, 0298	It is important land is identified for the provision of a primary school to ensure the impact of development on education can be appropriately mitigated. Engagement with the council's school place planners has helped to identify this requirement.
Viability evidence should be reassessed to ensure up to date costs are used to inform affordable housing requirements	0264	The Local Plan and Community Infrastructure Levy Viability Study (2024) tests a range of typologies and policy requirements and shows the plan can be delivered viably. The council will consider whether any further viability testing is required as appropriate.

Detail	Respondent numbers	Response
Viability evidence does not support the requirement for 40% affordable housing.	0263, 0298	The Local Plan and Community Infrastructure Levy Viability Study (2024) tests a range of typologies and policy requirements and shows the plan can be delivered viably. The council will consider whether any further viability testing is required as appropriate.
The requirement to deliver of self and custom build plots is not supported	0298	The Self build and custom housebuilding topic paper (2024) identifies a need for plots, which can be delivered and effectively integrated into the proposed site.
Support the provision of sports facilities at Gray's Farm	0298	Noted.
The requirement to deliver specialist accommodation is not supported. Provision should instead be directed to town centre locations.	0298	The site is planned to provide a mix of housing types and tenures, including provision for specialist housing as part of delivery mixed and sustainable communities.
Some of the highways improvements specified are not required	0298	Highways improvements to help mitigate the impact of development are set out in the policy and the IDP. The council will consider any subsequential information submitted regarding highways improvements, including as part of the planning application(s).

ISSUES: POLICIES, DECISION TAKING AND IMPLEMENTATION

Detail	Respondent number	Response
The policy should clarify the approach to the area of Holme Green and Gardeners Green, including as part of the masterplanning	0041 , 0179, 0197, 0262, 0296	Part 4(c) of the policy identifies measures should be incorporated to respect the setting of Holme Green Lane, as part of the place shaping principles. The concept plan further

Detail	Respondent number	Response
		shows undeveloped areas of land around the Holme Green Lane, which reflects Development Guideline B3.9(e).
Compatibility of the SDL extension with the original vision for the SDL and the importance of effective integration	0071, 0207, 0262,	The effective integration of the SDL and the SDL extension is recognised, with part 6 of the policy 'Masterplanning' setting out the requirement for a coordinated and comprehensive approach to development, including the integration across both areas in terms of land uses, access, layout and other principle matters.
Policy wording is not clear and should define the requirements in more detail.	0166, 0179, 0197, 0263,	The council is satisfied that the policy provides an appropriate balance between setting out the requirements of the site, and ensuring there is sufficient flexibility to facilitate the delivery of the development and supporting infrastructure.
Policy is inconsistent with national policy by not referring to designing out crime	0199,	Policies DH1 and DH2 set out the importance of creating safe spaces, including to discourage crime and the fear of crime. The council is satisfied that these principles do not need to be replicated.
Additional work to prepare design codes and masterplanning is required, including coordination between the permitted SDL and proposed extension	0132	Noted. Parts 5 and 6 of the policy set out the importance of comprehensive delivery led by a masterplan and a design code.
The concept plan should be updated to provide clarity, including regarding site boundaries, and the area defined as 'historic settlements'	0132	The council is satisfied the high level concept plan appropriately shows the site boundaries and areas identified as 'historic settlements' appropriate to the stage of plan preparation. The Schedule of proposed modifications includes an updated concept plan, showing the proposed location of development and infrastructure.

Detail	Respondent number	Response
Evidence to justify the deliverability of the site must be published	0276	Noted. Various information has been published to support the deliverability of the site.
Coordinated planning applications have been submitted by the two landowners/promoters for the proposed SDL extension.	0298, 0263	Noted. The planning applications are being considered by the local planning authority.

MAIN ISSUE: REQUESTED MODIFICATIONS

Detail	Respondent number	Response
Modify part 3(a) policy to reduce the number of dwellings to be delivered in the plan period to 2,550 dwellings, to reflect the timing of development and infrastructure delivery.	0222, 0264	Not agreed. The council is confident the delivery rates set out in the housing trajectory are realistic and have been corroborated by the promoters/developers as achievable and deliverable.
Modify part 3(a) of the policy to reduce the affordable housing requirement to 35%	0263, 0298	Not agreed. The Local Plan and CIL Viability Study shows 40% affordable housing is deliverable. No information has been provided to show the delivery of 40% affordable housing is not achievable.
Modify part 3(a) of the policy to refer to remove the requirement for self and custom build plots	0298	Not agreed. The Self build and custom housebuilding topic paper (2024) identifies a need for plots, which can be delivered and effectively integrated into the proposed site. The site is planned to provide a mix of housing types and tenures, as part of delivery mixed and sustainable communities.
Modify part 3(a) and footnote 7 to refer to the delivery of gypsy and traveller pitches either within	0263, 0298	Not agreed. The Gypsy and Traveller accommodation topic paper (2024) sets out the need for pitches, which can be

Detail	Respondent number	Response
the SDL, or Gray's Farm, or another suitable location outside the SDL		delivered and effectively integrated into the proposed site. Off site provision outside the SDL is not appropriate. Gray's Farm is already planned to provide significant sports facilities. The site is planned to provide a mix of housing types and tenures, as part of delivery mixed and sustainable communities.
Modify part 3(a) of the policy to remove reference to the delivery of specialist accommodation	0298	Not agreed. The site is planned to provide a mix of housing types and tenures, including provision for specialist housing as part of delivery mixed and sustainable communities.
Modify part 3(a) of the policy to state that the 5% of homes will be delivered to M4(3) standard, to ensure clarity and consistency with Policy H1: Housing mix, density and standards.	0298	Not agreed. The policy is not referring to accessibility standards, which are already clearly set out in Policy H1.
Modify part 3 of the policy to add a new part (f) to require engagement with the Integrated Care Board, to identify healthcare mitigation.	0303	Not agreed. The council is satisfied appropriate reference to healthcare is set out in Policy HC1 and the IDP.
Modify part 3(b) to remove reference to the delivery of a 1 form entry primary school, or refer to an assessment undertaken during the planning application process to determine whether there is a need for a primary school.	0263, 0298	Not agreed. It is important land is identified for the provision of a primary school to ensure the impact of development on education can be appropriately mitigated.
Modify part 4(c) of the policy to refer to the incorporation of measures to respect residential amenity the setting of existing properties on Holme Green Lane	0041 , 0166, 0179, 0197, 0262, 0263	Not agreed. The council is satisfied that the current wording in part 4(c) of the policy and B3.9(e) of the development guidelines is appropriate to ensure the setting of Holme Green Lane is considered as part of the development.
Modify part 4(c) to remove reference to the 'setting' of Holme Green Lane given it does not benefit from a designated or non-designated heritage asset.	0298	Noted. Although there are no identified designated or non designated heritage assets on Holme Green Lane, the Grade II Listed Holme Grange School is nearby and the setting of the

Detail	Respondent number	Response
		rural lane, with mature trees and hedgerows should be respected.
Modify part 4(d) to refer to the concept plan included in figure 7	0298	Not agreed. The concept plan is relevant to several elements of part 4, and it is not necessary to include reference to part d) specifically.
Modify the concept plan to relocate development away from Holme Green Lane and byway WOKI30, and show the area as countryside.	0041 , 0166, 0179, 0197, 0262	Not agreed. The concept plan already shows an undeveloped area around Holme Green Lane. It is therefore not necessary to identify the area as countryside, which would also affect the flexibility in how this part of the site would be delivered.
Modify part 4(b) to clarify that buildings are not expected to be delivered to Passivhaus standard.	0263, 0298	Not agreed. The council is satisfied Chapter 6: Climate Change and Energy is clear. There is no requirement that all buildings are delivered to Passivhaus standard.
Modify part 4(d) to refer to a heritage impact assessment and archaeological desk based assessment	0256	Agreed. The modification is reflected in the Schedule of proposed modifications.
Modify part 4 to refer to 'water quality' and add an additional section setting out the need for development not to outpace the delivery of sewage infrastructure, and the sewerage upgrades required.	0355	Agreed. A proposed change to the policy is set out in the council's Schedule of proposed modifications for additional clarity.
Modify parts 5 and 6 to clarify how a masterplanning approach will be undertaken	0263	Not agreed. The council is satisfied that parts 5 and 6 provide sufficient information regarding delivery principles.
Modify part 9(b) to only include off site highway improvements based on the Transport Assessment, and agreed through the planning application process	0298	Not agreed. It is not necessary to refer specifically to the Transport Assessment.

Detail	Respondent number	Response
Retain a green space along Old Wokingham Road to maintain visual and perceived separation	0041, 0102, 0262, 0296	The concept plan shows a green area and active travel route along Old Wokingham Road. Proposed modifications to the concept plan show additional areas of green space, notably around the proposed roundabout access.
Undertake additional traffic modelling, including incorporating 2024 data and a review the junction at Easthampstead Road in collaboration with Bracknell Forest Council	0041, 0262, 0296	<p>The introduction of further modal filters on Easthampstead Road will contribute to a significant reduction in traffic on this road (broadly around 10% of current levels) delivering a substantial improvement in road safety.</p> <p>These proposals will result in the redistribution of traffic to the new road through the development that will connect Old Wokingham Road with South Wokingham Distributor Road (SWDR).</p> <p>Appropriate to the stage in planning transport modelling acknowledges levels of congestion and delay will increase but these will not be severe and will only subtly increase journey times between Crowthorne and Wokingham. Consistent with the Local Transport Plans for both WBC and BFC, the proposals for Easthampstead Road alongside other IDP improvements, will offer an improved cycle route and support the use of alternative modes of transport.</p>
Modify the policy to require the delivery of new health facilities, such as a GP surgery	0102	Not agreed. The IDP identifies the provision of additional GP capacity via either provision of a new facility, new branch surgery, extension of existing, or relocation of an existing facility. The council will work with the Integrated Care Board to consider how this project can be delivered.

Detail	Respondent number	Response
Modify the policy to include measures to design out crime and enhance safety and security of development	0199	Not agreed. Policies DH1 and DH2 set out the importance of creating safe spaces, including to discourage crime and the fear of crime. The council is satisfied that these principles do not need to be replicated.
Modify part B3 under 'Access and Movement' of the development guidelines to refer to providing safe access over the railway line, including facilitating the closure of level crossings.	0300	Agreed. Additional wording proposed as a modification to B3.11(b) The IDP identifies the delivery of the 'South Wokingham Railway Bridge' as essential, in recognising its role connecting the SDL to Wokingham town centre.
Modify part 8(c) 'Biodiversity' to include: 'Provide measures to avoid and mitigate the impact of development on new watercourse crossings on both the channel and the river corridor.'	0355	Agreed. A proposed change to the policy is set out in the Schedule of proposed modifications for additional clarity.
Modify the part 7 with an additional point (c) to ensure the Emm Brook (physical, ecology and/or chemical) WFD/RBMP status does not further deteriorate but rather improve the WFD status of the watercourse, by adding: 'Provide measures to ensure the status of watercourses do not deteriorate but is enhanced/improved.'	0355	Agreed. A proposed change to the policy is set out in the Schedule of proposed modifications for additional clarity.
Provide a greenway route through the site close to the route of Easthampstead Road/Old Wokingham Road	0262, 0296	Noted. The concept plan shows several potential active travel routes and public rights of way. The location of greenways will be further considered as part of the review of the live planning application.

Detail	Respondent number	Response
A review of the spatial strategy will be required if planning permission for the SDL is revoked	0264	Planning permission has been granted for the South Wokingham SDL area allocated in the Core Strategy.
Undertake additional viability evidence, to test whether the policy requirements and CIL rates remain appropriate.	0264	The Local Plan and Community Infrastructure Levy Viability Study (2024) tests a range of typologies and policy requirements and shows the plan can be delivered viably. The council will consider whether any further viability testing is required as appropriate.
Publish all the evidence to justify the deliverability of the site	0276	Noted. Various information has been published to support the deliverability of the site.
Information should be provided to demonstrate whether and how safe access and egress can be achieved, to demonstrate that the exception test can be passed.	0355	The EA has subsequently confirmed they are satisfied that it is likely that a safe route of access and egress will be possible from the new dwellings to Easthampstead Road or Waterloo Road located in Flood Zone 1. This is agreed in a Statement of Common Ground.

Policy SS13: Loddon Valley Garden Village

156 respondents submitted representations on Policy SS13: Loddon Valley Garden Village.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0001	Gowers, Andy	0171	Connolly, Liz
0003	Sawyer, Andy	0173	Sykes, Hayley
0004	Sawyer, Marina	0176	Cook, Elaine
0005	Luck, William	0180	Heard, Michael
0006	Welsh, Kevin	0181	Stevens, Paul (SOLVE)
0007	Kitt, Stephen	0182	National Highways
0008	Holsgrove, Nick	0184	O'Connor Properties Ltd
0011	Chiorean, Maria	0185	Watts, Lucy
0012	Browning, Stephen	0192	Williams, Kelly
0018	Harvey, Paul	0198	Howard, David
0020	Hodgson, Sophie	0199	Thames Valley Police
0021	Rowden, Nigel	0200	Luke, Steven
0025	Leisupe, Peter	0201	Phillips, Ian
0027	Henderson, Jacqui	0202	Jones, Elaine
0029	Starke, Chris	0204	ACER The Whitegates Residents Association
0031	Clayden, Helen	0206	Mr and Mrs Cunningham
0033	Edmonds, Rachel	0207	Frankham, John
0034	Lale, Kerry	0212	Jorgensen, Pauline
0035	Davis, Ian & Helen	0213	Mann, Barrie
0036	Provins, Alison	0214	Mann, June
0039	Ashford, Debbie	0217	McCurry, Jenny
0040	Hughes, Susan	0218	Ridgway, Kenneth
0042	Miller, R (Mr)	0222	Richborough

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0043	Miller, H (Mrs)	0228	Ladds Garden Centre
0044	Bisicchia, Paola	0230	Kak, Manju
0046	Hillier, Toby	0233	Dutton, Chris and Shirley Gallagher, Karen and Brian Dutton, Lucas Geering, Wendy, Timothy and Laura
0048	McManus, Shelagh	0236	Arborfield and Newland Parish Council
0063	Padghawala, Zainab	0239	University College of Estate Management
0064	Srinivasan, Girish	0241	Brown, David
0066	Gillard, Gill	0242	Choi, Kelvin (Ka Chung)
0067	Van de Velde, Marc	0244	Woolf Bond Planning
0070	Green, Dave	0245	Crest Nicholson Partnership and Strategic Land
0073	Babin, Vincent	0247	Dickie, Stephen
0075	Bartlett, David	0249	Winnersh Parish Council
0078	Hillcoat, Chris	0256	Historic England
0079	Gadd, Colin	0257	Carters Hill Residents Action Group
0080	Keane, Noel	0258	Rance, Jacqueline (Campaign for Fairer Housing - Wokingham Borough)
0081	Finlayson, Ian	0259	Everton, Steve
0082	White, Sonia and Simon	0260	Heard, Janet
0084	Clifford, Graham	0265	Shinfield Studios
0088	Raman, Ramasubramoni	0268	Wates Developments Ltd
0092	Manston, Susan	0271	Holdstock, Michael
0093	Wang, Yang	0272	Helmsley Land Ltd
0094	Chen, George	0276	David Wilson Homes Southern
0099	Parkinson, Matthew	0279	Tallis, Andrea
0101	Winterbourne, Amanda	0280	Bewley Homes
0103	Granger, Amanda	0284	Wicks, Francis
0107	Brookling, Victoria	0285	Wicks, Gail
0108	Sport England	0286	Mac Mic Group

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0109	Thomas, Rhys	0288	Jones, Sarah
0112	Fenn, Chris	0289	Jones, Oliver
0113	Donaldson, Fiona	0293	Prince, Julie
0118	Natural England	0294	Tyers, Peter
0121	Cockram, Mark	0295	Grandison, Guy
0126	Dowling, Peter	0303	Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board
0127	Yates, Maria	0304	Wicks, Ann and Tim
0128	Cowan, Gary	0305	University of Reading
0129	Smith, Greta	0309	Royal Borough of Windsor and Maidenhead
0130	East, James	0311	Berkeley Strategic Land Limited
0131	Smith, Catherine	0312	Haigh, Christina
0133	Lawes, John	0316	Thames Water
0134	Luckose, Gibi	0317	Hatch Farm Land Limited
0135	Johnson, Frankie	0319	Barley, Joseph (Cllr)
0136	Frewin, James	0322	Booth, John
0137	Thorne, Barry	0325	Beaulieu Land Ltd
0138	Gillard, David	0326	French, Mrs A and Mr K
0139	Jones, Nick	0333	Panwar, Karen Singh
0140	Chan, Lilian	0334	Bailey, Andy
0141	Graham, Adele	0335	Davies, Ryan and Craig, Georgina
0146	Chadwick, Jason	0338	Hughes, Geoff
0148	Gleeson	0340	Evans, George (Cllr)
0149	Earley Town Council	0347	Frame, Paul
0151	Chadwick, Jo	0350	Tootill, Sandra
0152	Shinfield Parish Council	0352	Davies, David
0158	Steed, Lacey	0353	Abbeymill Homes
0162	Connolly, Frank	0354	Ashridge Wokingham Ltd

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0164	Batson, Kevin	0355	Environment Agency
0165	Reading Borough Council	0357	Brannan, James

Support

Respondents 0018, 0025, 0029, 0036, 0039, 0040, 0044, 0048, 0067, 0075, 0078, 0107, 0108, 0148, 0164, 0176, 0181, 0185, 0201, 0204, 0239, 0245, 0247, 0249, **0256**, 0258, 0265, 0305, 0317, 0325, 0334, 0335, 0340, 0352, 0353, 0355 consider the policy to be legally compliant. The Royal Borough of Windsor and Maidenhead (**0309**) did not specifically comment on legal compliance but comments indicate broad support.

Respondents 0007, 0012, 0018, 0025, 0029, 0036, 0039, 0040, 0044, 0048, 0075, 0078, 0084, 0092, 0101, 0107, 0108, 0148, 0152, 0164, 0176, 0181, 0185, 0202, 0204, 0228, 0239, 0244, 0247, 0245, 0249, **0256**, 0265, 0268, 0271, 0272, 0305, 0317, 0325, 0334, 0335, 0353, 0355, consider the policy to comply with the Duty to Cooperate. The Royal Borough of Windsor and Maidenhead (**0309**) did not specifically comment on the Duty to Cooperate, but comments indicate broad support.

Respondents 0025, 0108, 0245, **0256**, 0305 and **0309** consider the policy to be sound.

The proposed allocation encompasses several landowners. The three major landowners, University of Reading (0305), Gleeson, (0148) and Hatch Farm Land Limited (0317) consider the Plan to be legally compliant and compliant with the duty to cooperate. The landowners support the principle of the policy and the allocation but made technical objections to specific elements of the policy.

Shinfield Studios (0265), who occupy the northern part of the site stated the plan is not sound and proposed modifications, but support allocation of the site, which includes the Shinfield Studios development. The University College of Estate Management (0239), also support the inclusion of their land at Shinfield Grange within the proposed allocation.

Natural England (**0118**) did not raise soundness issues, but commented on the policy wording, including welcoming the commitment to 20% biodiversity net gain and advising that early engagement through the Discretionary Advice Service (DAS) will help to ensure SANG provision complies with their guidelines.

The Environment Agency (**0355**) stated that the policy was unsound, and raised a series of technical matters, including foul water and sewerage capacity and upgrading, river corridor habitat management, and the assessments undertaken in the Strategic Flood Risk Assessment (SFRA). The EA therefore

recommended a series of modifications. These matters are considered in further detail in a draft Statement of Common Ground with the Environment Agency which is due to be agreed shortly.

Historic England **(0256)** stated that the policy is sound, but requested a series of modifications, in particular regarding the site of the former St Bartholomew’s Church.

National Highways **(0182)** did not state whether the policy is sound, and raised several matters, including their expectation that the site maximises trip internalisation, the importance of the masterplanning process and early engagement with National Highways, and seeking changes to policy wording.

Reading Borough Council (RBC) **(0165)** stated that they do not object in principle to the level of development proposed at Loddon Valley Garden Village but cannot support the proposals at it stands. RBC then set out a series of comments regarding highways, active travel, public transport and infrastructure delivery.

Early Town Council **(0149)** stated that they were pleased to see concerns raised in an earlier local plan consultation have been addressed. The following tables set out the issues raised regarding the duty to cooperate, legal compliance, and soundness.

Many respondents did not set out the details of why the plan fails to comply with the duty to cooperate, and/or is not legally compliant.

DUTY TO COOPERATE

Detail	Respondent numbers	Response
The impact on local highways has not been fully considered	0020, 0021	The impact on local highways has been assessed, and discussed with relevant bodies, including neighbouring councils responsible for highways and transport.
Lack of cooperation with Town and Parish Councils	0070	Significant engagement has been undertaken across several local plan consultations, including with town and parish councils. This includes public events in various parishes across the borough, as set out in the covering report.
Lack of cooperation with adjacent planning and highway authorities	0070	The Duty to Cooperate Statement sets out the engagement undertaken with planning and highway authorities.

Detail	Respondent numbers	Response
Lack of cooperation with residents	0099, 201, 0312, 0347	Residents are not a specified duty to cooperate body, but significant engagement has been undertaken across several local plan consultations in accordance with the Statement of Community Involvement (SCI).
Changes to legislation means the duty to cooperate no longer applies	0171	The duty to cooperate continues to apply, as set out in the Duty to Cooperate Statement.
The question about the duty to cooperate is confusing	0162	The question is required by national planning policy and guidance.
The plan is motivated by local politics	0198, 0340	Noted.
Councillors had insufficient time to review the documentation prior to the full council vote	0217, 0340	Councillors were provided with key documentation prior to the full council meeting to be able to make a decision. Other evidence documents were available publicly on the website.
Conflict with the Arborfield and Barkham Neighbourhood Plan	0338	All made Neighbourhood Plans have been considered in preparing the local plan. It is important to note the strategic nature of the local plan and that it sets out a development strategy for the whole borough.

LEGAL COMPLIANCE

Detail	Respondent numbers	Response
Inconsistencies with national planning policy	0152, 0217	The council is satisfied the plan is consistent with national planning policy.

Detail	Respondent numbers	Response
Over development of the area/housing should be distributed more evenly across the borough/alternative sites offer more sustainable options	0198	The council considers the plan sets out an appropriate strategy for the development of the borough, including considering constraints and opportunities of available land.
The Sustainability Appraisal should consider additional options elsewhere	0092, 0268	The SA appropriately considers various growth scenarios across the borough and is not intended to appraise every development option. Several interim SA have been prepared to support plan making, which considers growth across multiple areas and sites.
Page 69 of the Sustainability Appraisal (SA), section 9.9.1, refers to an aim to minimise impacts of the plan update on the historic environment. In the case of LVGV, there is an opportunity to have a positive impact on the historic environment in support of effective place-shaping. Page 129 of the SA notes the Scheduled Monument St Bartholomew's Church being on the national Heritage at Risk Register and is described as a "potential development-related opportunity".	0256	Noted. Modifications are proposed to the policy and development guidelines regarding heritage matters.
Conflict with the Arborfield and Barkham Neighbourhood Plan	0312	All made Neighbourhood Plans have been considered in preparing the local plan. It is important to note the strategic nature of the local plan and that it sets out a development strategy for the whole borough.
Individual properties within the site have not been acknowledged/referenced	0347	The plan and supporting evidence refer to several different areas of the site, but it is not necessary to refer to all individual properties.

Detail	Respondent numbers	Response
Unable to make a judgement regarding legal compliance	0162, 0258, 0347, 0338	Noted.
Insufficient local consultation	0021, 0099	Significant public engagement has been undertaken across several local plan consultations, as set out in this Statement, and earlier summaries of the consultation undertaken.
Councillors had insufficient time to consider the documentation prior to the full council meeting in September 2024.	0070	Councillors were provided with key documentation prior to the full council meeting to be able to make a decision. Other evidence documents were available publicly on the website.

MAIN ISSUE: IMPACT ON INFRASTRUCTURE

Detail	Respondent numbers	Response
Impact on the highways network, which is not able to support the scale of development. The mitigation proposed is insufficient, which will lead to further congestion.	0001, 0003, 0004, 0006, 0008, 0018, 0021, 0027, 0033, 0034, 0035, 0040, 0046, 0048, 0063, 0064, 0066, 0067, 0070, 0079, 0080, 0081, 0084, 0088, 0092, 0093, 0094, 0099, 0101, 0103, 0107, 0109, 0112, 0113, 0121, 0126, 0127, 0129, 0131, 0133, 0134, 0136, 0137, 0138, 0139, 0164, 0171, 0173, 0176, 0180, 0181, 0185, 0192, 0198, 0200, 0201, 0212, 0213, 0214, 0230, 0236 , 0242, 0249, 0259, 0260,	<p>Appropriate to the stage in planning, transport modelling and assessments have been undertaken throughout the preparation of the plan.</p> <p>The transport evidence published to support the plan uses traffic modelling calibrated and validated to 2021 as the model base year.</p> <p>Appropriate to the stage in planning, the model assumes some of the journeys generated by future residents of the site will be internalised. This means that for local journeys, for example to local schools and shops, the network of walking and cycling routes, and public transport will provide a realistic alternative to private car journeys. Longer trips, for example</p>

Detail	Respondent numbers	Response
	0279, 0284, 0288, 0289, 0304, 0312, 0319, 0334, 0350, 0357	<p>to railway stations, and to town and retail centres will also be supported by improvements to the walking, cycling and public transport networks.</p> <p>Together, the transport evidence helps to identify key roads, junctions and areas where intervention may be required to mitigate the impact of the development.</p> <p>The modelling acknowledges some increases in congestion and delay, but the mitigation identified in the IDP, will reduce the risks these become severe.</p> <p>The transport assessment also shows that the proposed level of development could be accommodated on the strategic road network, with immaterial changes in flows/journey times on the M4.</p>
Impact on highways in Lower Earley which are already congested.	0005, 0006, 0018, 0020, 0027, 0029, 0031, 0040, 0066, 0070, 0073, 0078, 0082, 0099, 0101, 0103, 0138, 0139, 0151, 0158, 0181, 0212	<p>The modelling acknowledges some increases in congestion and delay, but with the mitigation identified in the IDP, potential improvements will reduce the risks these become severe.</p> <p>The IDP package identifies an array of improvements to the B3270 Lower Earley Way corridor, where the proposed M4 bridge will help relieve pressure at congestion hotspots east and west. In addition, a range of improvements are being developed to support the use of alternative modes of transport.</p>

Detail	Respondent numbers	Response
Impact on local junctions at Mole Road, Mill Lane, Black Boy roundabout, Showcase roundabout	0018, 0029, 0070, 0131, 0164, 0181, 0212, 0217, 0247, 0249, 0259, 0288, 0289, 0334	<p>Appropriate to the stage in planning, the LPU evidence acknowledges proposals will increase levels of congestion and delay in some areas. The IDP identifies a package of improvements that will support sustainable travel alternatives to be confident the residual cumulative effects would not be severe.</p> <p>Mill Lane is proposed to be closed as a through route as part of the development. Some representations supported the closure, whilst others raised concerns about the resulting impact on surrounding roads. Modelling shows the closure leads to the improved operation of the Lower Earley Way/Rushey Way roundabout, minimising the effect on the adjacent B3270/River Loddon bridge.</p> <p>The IDP sets out improvements to various local highways and junctions, including improvements on Shinfield Eastern Relief Road, an additional circulatory lane on the Black Boy roundabout, and capacity improvements at the Showcase roundabout.</p>
Impact on water supply and sewerage capacity. Arborfield Sewage Treatment Works is already at capacity and not able to cope with the additional demand	0006, 0007, 0033, 0035, 0036, 0039, 0040, 0042, 0043, 0048, 0067, 0075, 0088, 0092, 0094, 0112, 0130, 0131, 0133, 0135, 0136, 0137, 0138, 0146, 0158, 0180, 0198, 0200, 0201, 0202, 0214, 0217, 0218, 0236 , 0241, 0247, 0258, 0279, 0285, 0289, 0304, 0347, 0350	<p>The Water Cycle Studies consider the impact of development on the sewage and sewerage network and were prepared in consultation with Thames Water.</p> <p>Thames Water's representation acknowledges that the development proposed is likely to require upgrades to existing infrastructure.</p> <p>Following consultation with Thames Water, the IDP identifies that an upgrade of the Arborfield STW is planned, which is</p>

Detail	Respondent numbers	Response
		<p>capable of mitigating the impact of the development proposed.</p> <p>A Statement of Common Ground with Thames Water agrees that there are no known significant water supply, waste water, or sewage treatment capacity issues that would be likely to prevent, or delay the delivery of the site allocations proposed in the plan. Engagement with Thames Water will continue on an ongoing basis.</p>
Energy provision and capacity is insufficient/overhead power cables inhibit development	0304, 0334	The council is confident sufficient energy will be available to supply the development proposed. The relocation of overhead electricity cabling is being investigated, possibly underground.
Impact on GP surgeries and healthcare	0006, 0035, 0066, 0079, 0082, 0094, 0109, 0121, 0131, 133, 0135, 0136, 0137, 0139, 0158, 0164, 0176, 0181, 0201, 0214, 0242, 0258, 0288, 0304, 0319, 0350	The policy sets out how health uses are planned as part of the new district centre to be delivered as part of the development, as set out in the policy and the IDP. Discussions with the Integrated Care Board (ICB) about the form and type of health uses are ongoing.
Impact on public transport, including lack of proposed provision.	0007, 0008, 0018, 0063, 0064, 0073, 0078, 0081, 0092, 0094, 0128, 0130, 0131, 0176, 0181, 0185, 0200, 0213, 0214, 0242, 0258, 0279, 0288, 0295, 0322, 0350	<p>It is recognised that the site currently has limited access to public transport, but existing bus routes are located around part of the site, for example the Leopard (route 3) service along Reading Road (A327).</p> <p>Significant investment in public transport is planned as part of the proposal, as set out in the Transport Assessment. This includes services to both internal services and facilities, for example to schools and retail, and to wider destinations, including railway stations and town centres. Public transport</p>

Detail	Respondent numbers	Response
		<p>improvements will be delivered in phases, to ensure access to services is available as the first homes are delivered.</p> <p>The promoters of the site have prepared a Public Transport Technical Report. This proposes to deliver services on a 15 minute frequency for journeys to Arborfield, Shinfield and Reading town centre from the south western part of the site in phase 1. Phase 1 is anticipated to deliver around 1,075 dwellings. A service with a 30 minute frequency is proposed at the eastern part of the site in phase 1, which would link the development parcels across the site, and provide a route to Winnersh station and Wokingham town centre. New bus stops would also be provided in proximity to the phases.</p>
Impact on schools and education	0035, 0046, 0066, 0079, 0082, 0094, 0121, 0128, 0136, 0139, 0164, 0201, 0258	<p>Part 2(c) of the policy specifies that the site will include the phased delivery of two primary schools, a secondary school, including land for a sixth form and space for the integrated teaching of pupils with special education needs and disabilities.</p> <p>The council is satisfied that the education provision proposed is appropriate.</p>
Planned infrastructure has not been delivered as part of the existing SDLs	0012, 0164, 0181	<p>A significant amount of infrastructure has been delivered as part of the existing SDLs, with remaining key infrastructure now benefitting from planning permission (for example Arborfield Green District Centre). The scale of the SDLs mean infrastructure is delivered in phases as development progresses.</p>

MAIN ISSUE: ENVIRONMENTAL IMPACTS

Detail	Respondent number	Response
<p>Flooding from the River Loddon will be exacerbated and will have negative impacts on site and further downstream.</p>	<p>0003, 0004, 0012, 0035, 0039, 0040, 0042, 0043, 0046, 0066, 0075, 0079, 0082, 0103, 0109, 0112, 0113, 0127, 0128, 0130, 0131, 0133, 0135, 0136, 0137, 0140, 0141, 0146, 0152, 0162, 0180, 0198, 0200, 0212, 0214, 0217, 0236, 0249, 0259, 0288, 0289, 0312, 0334, 0347</p>	<p>Part 3 of the policy sets out how new buildings should be located outside areas of flood risk, while part 7 sets out how a comprehensive drainage and flood alleviation strategy should be prepared. Part (b) specifically highlights opportunities to improve and reduce the risk of flooding to areas beyond the garden village.</p> <p>The council has published a Strategic Flood Risk Assessment (SFRA), Water Cycle Study and Sequential & Exception Tests which have been produced with input from the Environment Agency.</p> <p>The concept masterplan shows that no development is proposed in areas of flood risk. The council is therefore confident that the risk of flooding on site and elsewhere will not be increased.</p> <p>The council will shortly agree a Statement of Common Ground with the Environment Agency where it is agreed that there are no flood risk barriers that would prevent the delivery of the garden village.</p>
<p>Risk of flooding from the reservoir at Bearwood Lakes</p>	<p>0131, 0137, 0158, 0200, 0236, 0334</p>	<p>The risk of flooding from the reservoir at Bearwood Lakes is very low. The SFRA assesses the risk of flooding from reservoirs, including Bearwood Lakes and has helped to inform the concept plan for the site, which does not show development in the area at risk of reservoir flooding.</p>

Detail	Respondent number	Response
		The council will shortly have a signed Statement of Common Ground with the Environment Agency which endorses the evidence base as being a robust assessment of flooding from all sources and supports the principle of the spatial strategy.
Adverse impacts on biodiversity and habitats	0003, 0004, 0006, 0008, 0018, 0020, 0036, 0040, 0042, 0043 0044, 0046, 0066, 0067, 0082, 0088, 0092, 0093, 0094, 0107, 0113, 0121, 0126, 0129, 0134, 0141, 0173, 0180, 0181, 0192, 0212, 0217, 0247, 0249, 0279, 0288, 0295, 0304, 0322, 0335, 0347, 0350, 0352	<p>Part 8 of the policy seeks the preparation and implementation of a comprehensive ecological strategy. Part 3 also seeks the creation of coherent ecological networks as part of the creation of a county park. The policy also seeks a measurable biodiversity net gain of at least 20% calculated using the latest statutory metric.</p> <p>Evidence submitted by the landowners states that at least a 20% biodiversity net gain for habitats, linear habitats and watercourses will be achievable.</p> <p>The concept masterplan shows that appropriate SANG can be provided on site, which forms part of mitigating adverse impacts on the Thames Basin Heaths SPA. Natural England's response has sought early engagement to ensure the proposed SANG is compliant with Natural England's guidelines, but have not raised objections to the proposal.</p> <p>A Statement of Common Ground has been agreed with Natural England, who agree any likely significant effects on important nature conservation sites can be fully mitigated.</p>
Adverse impacts on heritage and conservation	0040, 0092, 0131, 0137, 0141, 0158, 0173, 0181, 0200, 0217, 0242, 0257, 0260, 0288, 0350	Part 3 of the policy seeks to ensure the siting, layout and form of development protects and retains the permanent physical and visual sense of separation of Arborfield and the defined settlements of Arborfield Cross and Shinfield. The policy also sets out place shaping principles to ensure the development

Detail	Respondent number	Response
		<p>incorporates measures to protect the separate identity of Carter’s Hill.</p> <p>The concept plan identifies several areas as ‘Historic Settlements’ to help conserve and enhance the setting of these areas, including by providing appropriate landscaping and other green infrastructure.</p> <p>The area which includes the ruins of St Bartholomew’s Church has been identified as an opportunity for restoration and enhancement, with further work with Historic England, the Diocese and landowners ongoing. The landowner has submitted a Technical Paper on Built Heritage which will help to inform future work.</p> <p>A Statement of Common Ground has been agreed with Historic England that recognises there are no heritage constraints that would prevent the delivery of the strategy promoted in the plan.</p> <p>These measures are considered to be sufficient to ensure the conservation and enhancement of the heritage assets identified.</p>
Adverse impacts on trees, hedgerows, open space and other green infrastructure.	0012, 0040, 0066, 0082, 0092, 0113, 0138, 0139, 0141, 0173, 0192, 0198, 0217, 0293, 0304, 0319, 0333, 0352	<p>Part 3 of the policy seeks to ensure the development draws on and enhances the site’s irreplaceable habitats, hedgerows, trees, woodland and other features.</p> <p>Part 6 of the policy seeks the preparation and implementation of a comprehensive strategic landscape and green and blue infrastructure strategy.</p>

Detail	Respondent number	Response
		<p>Although there will be some impact on trees, hedgerows, open space and other green infrastructure this will be minimised as far as possible, and suitable mitigation implemented. The garden village will also provide significant areas of new open space as part of the country park, on land which is currently not publicly accessible, and which will include new and improved green and blue infrastructure.</p>
Adverse landscape impacts	0070, 0092, 0107, 0181, 0212, 0214, 0249, 0260, 0289, 0352	<p>Part 6 of the policy seeks the preparation and implementation of a comprehensive strategic landscape and green and blue infrastructure strategy.</p> <p>The site is also located in the proposed River Loddon Valued Landscape, which as set out in Policy NE6: Valued landscapes, sets out the importance of taking into account the attributes and characteristics of the landscape.</p>
Adverse impact on existing agricultural and research uses.	0012, 0040, 0044, 0092, 0137, 0158, 0164, 0171, 0181, 0200, 0214, 0217	<p>The primary landowner has purchased alternative land for the relocation and continued operation of research and agricultural uses.</p>
Noise, air quality and odour impacts	0099, 0113, 0151, 0230, 0289, 0304, 0335	<p>Environmental impacts, including noise, odour and air quality have been considered and do not inhibit the delivery of the development. If further evidence identifies adverse impacts suitable mitigation measures will be proposed.</p> <p>There will be noise and disturbance as the development is delivered, which will be mitigated as far as possible. A Construction Management Plan will set out operating hours and vehicle routing to avoid sensitive locations wherever possible.</p>

Detail	Respondent number	Response
		The implications of development on air quality have been assessed and considered as part of the HRA.
Adverse impacts on climate change ambitions.	0067, 0128, 0140, 0158, 0173, 0180, 0200, 0236 , 0249, 0295, 0334, 0352	The garden village is expected to devise and implement a comprehensive energy and sustainability strategy, aligned to deliver zero carbon development. This accords with the council's climate emergency declaration and Climate Emergency Action Plan. The Proposed Submission Plan includes a dedicated chapter on energy and climate change which includes policies relating to energy standards for residential and non residential developments.

MAIN ISSUE: ALTERNATIVE SITES

Detail	Respondent number	Response
Development of other strategic scale sites, particularly Ashridge has not been full considered.	0001, 0004, 0007, 0018, 0027, 0033, 0035, 0063, 0064, 0066, 0067, 0081, 0101, 0103, 0109, 0112, 0130, 0139, 0152, 0173, 0176, 0180, 0185, 0201, 0202, 0241, 0260, 0334	Strategic scale development opportunities have been considered as part of plan making, including through technical work and the sustainability appraisal. The council has reviewed the representations and remains of the opinion that the Loddon Valley Garden Village is the most suitable and sustainable option.
Development of other strategic scale sites, particularly Twyford/Ruscombe has not been fully considered.	0001, 0004, 0007, 0018, 0027, 0033, 0035, 0042, 0043, 0063, 0064, 0066, 0067, 0073, 0081, 0101, 0103, 0112, 0130, 0139, 0152, 0173, 0176, 0180, 0185,	Strategic scale development opportunities have been considered as part of plan making, including through technical work and the sustainability appraisal.

Detail	Respondent number	Response
	0201, 0202, 0241, 0260, 0334, 0338	<p>The promotion of land to the east of Twyford, within Ruscombe Parish is situated within the Green Belt, with large parts comprising best and most versatile agricultural land. The council is satisfied that development needs can be met sustainably through land outside of the Green Belt, and as such no exceptional circumstances exist to necessitate amending Green Belt boundaries.</p> <p>The council has reviewed the representations and remains of the opinion that that the Loddon Valley Garden Village is the most suitable and sustainable option.</p>
Over development of the area/housing should be distributed more evenly across the borough/alternative sites offer more sustainable options	0012, 0035, 0067, 0109, 0121, 0126, 0137, 0158, 0162, 0164, 0181, 0200, 0247, 0249, 0257, 0258, 0279, 0284, 0289, 0293, 0326, 0338, 0340	Strategic scale development opportunities have been considered as part of plan making, including through technical work and the sustainability appraisal. The distribution of housing across the borough considers constraints, opportunities and where land has been promoted and has shown to be available. The council has reviewed the representations and remains of the opinion that that the Loddon Valley Garden Village is the most suitable and sustainable option. The Site Selection Topic Paper sets out the council's approach in further detail.

MAIN ISSUE: DEVELOPMENT AT LODDON VALLEY GARDEN VILLAGE

Detail	Respondent number	Response
<p>The lead in time and housing delivery rates are unrealistic. No planning application has been submitted, and research has shown larger sites will take longer to deliver, including beyond the plan period.</p>	<p>0067, 0128, 0184, 0222, 0228, 0233, 0244, 0258, 0268, 0271, 0272, 0280, 0311, 0353, 0354</p>	<p>The council is satisfied that the housing delivery rates set out in the policy and the house trajectory are realistic. The landowners similarly agree the delivery rates are achievable. An EIA scoping application was submitted in December 2024, which demonstrates how the site is progressing. A planning application to establish the principle of development is due to be submitted in 2025.</p>
<p>Lack of evidence to require custom/self build plots</p>	<p>0148, 0305</p>	<p>The Self-build and custom housebuilding topic paper (2024) sets out the council's evidence and justification for seeking self and custom plots. The council considers this a robust assessment of existing and future needs.</p>
<p>Lack of evidence to require the number of gypsy and traveller plots</p>	<p>0148, 0305</p>	<p>The delivery of gypsy and traveller plots is an important part of creating balance and mixed communities, that reflect the principles of garden settlements.</p> <p>The Gypsy and Traveller and Travelling Showperson Accommodation Assessment (2023) (GTAA) identifies a significant need across the plan period for 86 additional pitches. Specific allocations proposed within the plan are sufficient to meet half of this need. Strategic sites are therefore also required to make provision in order for needs to be met. This approach is considered reasonable and proportionate, and facilitates the delivery of mixed communities. It is considered to be the most effective way of achieving the aim of national policy to promote peaceful and integrated co-existence between sites and the local community. The 'Topic Paper: Housing: Gypsy and Traveller</p>

Detail	Respondent number	Response
		accommodation' (2024) acknowledges that the existing and past plans have not allocated land for Gypsy and Traveller use and therefore windfalls have been the only mechanism to meet need. Past windfall rates are therefore not reflective of future rates when taking a plan led, proactive approach to land allocation, and the approach to allocation is therefore justified.
Insufficient infrastructure planned at Loddon Valley Garden Village	0001, 0007, 0018, 0036, 0181, 0236	The IDP sets out the infrastructure proposed, including projects, costs, timing and delivery mechanism, to mitigate the impact of the development proposed.
New transport routes, including active travel and public transport are required	0078, 0099, 0165, 0322	<p>The IDP sets out the project type, timing, cost and priority of the infrastructure identified to support the delivery of the site.</p> <p>The IDP explores M4 crossings, with active travel routes throughout the site, including links to adjoining areas, and extended public transport routes into the site providing links to nearby settlements, services and facilities.</p>
The timing and cost of infrastructure delivery is unclear/uncertain	0034, 0048, 0067, 0070, 0084, 0092, 0093, 0094, 0128, 0134, 0135, 0181, 0201, 0222, 0233, 0236 , 0241, 0249, 0258, 0259, 0260, 0279, 0295, 0311, 0319, 0322, 0334, 0353, 0354	<p>The IDP sets out the project type, timing, cost and priority of the infrastructure identified to support the delivery of the site. It is based on the best available information available at the time.</p> <p>It is acknowledged that responses from residents show a preference for infrastructure to be provided earlier, but this is not possible in all cases, with a population having to establish before schools or shops become viable. This helps to ensure infrastructure is delivered when it is needed, and avoids, for</p>

Detail	Respondent number	Response
		example, opening a new school when there are insufficient pupil numbers. This approach also ensures development can be delivered viably. However, some infrastructure projects can be delivered earlier in the phasing, for example to ensure active travel routes to key destinations, or key highway connections.
The site is too far away from services, facilities, and public transport	0018, 0020, 0040, 0066, 0127, 10130, 0152, 0173, 0176, 0180	Significant on and off site infrastructure will be delivered, to encourage residents to use services and facilities on site and reduce the need to travel. New and upgraded highways, public transport and active travel measures set out in the IDP facilitate access to other services and facilities off site.
Lack of evidence to show how biodiversity net gain can be delivered	0148, 0181, 0335	<p>The council is confident that the 20% biodiversity net gain sought in the policy can be delivered.</p> <p>Evidence submitted by the landowners states that at least a 20% biodiversity net gain for habitats, linear habitats and watercourses will be achievable.</p>
The future design of the site is important, including design codes, the concept plan and crime.	0005, 0199	Noted. Further work is ongoing to develop the concept plan and design code(s) for the site, including the importance of reducing crime and the fear of crime through effective urban design.
A site-specific viability assessment is required, and the viability work undertaken does not fully consider the infrastructure costs.	0236 , 0311, 0335	Viability of the development, including the delivery of necessary infrastructure, has been tested through the 'Local Plan and Community Infrastructure Levy Viability Study'.
Risk of settlement coalescence	0040, 0067, 0092, 0141, 0213, 0249, 0288, 0319	Part 3(b) of the policy is clear that the siting, layout, and form of development should ' <i>Protect and retain the permanent</i>

Detail	Respondent number	Response
		<p><i>physical and visual sense of separation of Arborfield and the defined settlements of Arborfield Cross and Shinfield.'</i></p> <p>The policy approach, concept masterplan, and landscape evidence show settlement coalescence can be effectively avoided.</p>
Settlement boundaries should be amended to add/remove land	0148, 0206, 0265, 0317, 0325	<p>The settlement boundaries have been set out to reflect the anticipated location of future development, whilst seeking to protect the separate identity of settlements. For example, the area around Carter's Hill is not included within a settlement, and is located in the countryside. The concept plan (Figure 8) shows this area as 'historic settlements' to recognise the character of this area.</p> <p>The SDL site boundary includes a wider area, encompassing the TVSP and land north of the M4. Land located within the SDL boundary but outside the settlement is countryside. Policies SS3 and SS4 set out the policy approach to land within and adjacent to major, modest and minor settlements.</p>

MAIN ISSUES: POLICIES, DECISION TAKING AND IMPLEMENTATION

Detail	Respondent number	Response
Development conflicts with national planning policy /is premature given changes to national planning policy	0070, 0093, 0152	The council considers the policy does not conflict with national planning policy or guidance. The plan will be submitted under the transitional arrangements set out in the NPPF (2024). The council remains committed to progressing the plan to adoption.

Conflict with the Arborfield and Barkham Neighbourhood Plan	0040, 0092, 0131, 0135, 0141, 0164, 0180, 0181, 0217, 0260, 0288, 0289	All made Neighbourhood Plans have been considered as part of preparing the local plan. The local plan is a strategic document which considers the long term development strategy for the borough, and it may therefore not always be possible to reflect every aspiration set out in neighbourhood plans.
The decision taking process for proposing the site for development, including concerns regarding predetermination	0131, 0136, 0137, 0162, 0181, 0200, 0236 , 0288, 0289	<p>The site was first proposed by the council as a potential strategic allocation in the Revised Growth Strategy consultation (2021). Following the consultation, the consultation responses were reviewed and analysed, and further technical work was undertaken.</p> <p>This included engagement with the landowners to help understand the constraints and opportunities of the site and how it can be delivered sustainably.</p> <p>There has been no predetermination regarding the inclusion of the site in the plan.</p>

MAIN ISSUE: REQUESTED MODIFICATIONS

Detail	Respondent number	Response
The number of homes to be delivered in the plan period is optimistic and should be reduced.	0222, 0228, 0244, 0268, 0271, 0272, 0280, 0286, 0311, 0353	The council is satisfied that the housing delivery rates set out in the policy and the house trajectory are realistic. The landowners similarly agree the delivery rates are achievable. A planning application to establish the principle of development is due to be submitted in 2025.

Detail	Respondent number	Response
Modify the requirement for GRT pitches	0148, 0305	Not agreed. The Gypsy and Traveller accommodation topic paper (2024) sets out the need for pitches, which can be delivered and effectively integrated into the proposed site.
Modify the requirement for custom and self build serviced plots	0148, 0305	Not agreed. The Self build and custom housebuilding topic paper (2024) identifies a need for plots, which can be delivered and effectively integrated into the proposed site.
Modify the requirement for housing mix and affordable housing	0206, 0305	Not agreed. The Local Plan and CIL Viability Study shows 40% affordable housing is deliverable.
Modify the design requirements setting out how the site will be delivered.	0199 , 0204, 0305, 0317	Not agreed. As set out in the policy further work regarding masterplanning and design coding will inform the design of the site in more detail.
Modify reference to the facilities to be delivered at the District Centre, including removing the amount of floorspace to be delivered, and ensuring the food store delivery is linked to the District Centre, rather than local centres	0305, 0317	Not agreed. The council is satisfied reference to a 'food store of around 2,500m ² ' provides flexibility, whilst ensuring a food store of this scale is delivered at the district centre that is of sufficient size and choice to help meet the day to day needs of residents. Smaller convenience food stores will be more appropriate at local centres, for example the co-op stores delivered as part of the existing North Wokingham SDL and South Wokingham SDL.
Further information required about the impact of traffic, including at peak times.	0020, 0029, 0031, 0040, 0046, 0075, 0084, 0092, 0093, 0094, 0101, 0103, 0141, 0181, 0201, 0230, 0304, 0344, 0350	The council is satisfied appropriate information is available in the published transport modelling and transport assessment.
Further assessment required about the impact on agricultural land, landscape, habitats and biodiversity.	0036, 0040, 0044, 0094, 0181, 0350	Not agreed. Assessments have been undertaken to inform the proposals on a variety of technical areas. Further assessment will be undertaken as required, and as the site progresses.

Detail	Respondent number	Response
Modify the policy to require a buffer zone between Loddon Valley Garden Village and the settlement of Sindlesham	0092	Not agreed. The council is satisfied the policy and development guidelines appropriately consider the context of the existing site, including its relationship to existing settlements.
Modify the policy to ensure existing historic lanes and tracks are retained	0092	Not agreed. The council is satisfied the policy and development guidelines appropriately consider the character of the site, including opportunities to utilise existing routes as part of active travel and greenway networks.
Further information required about active travel and public transport	0075, 0141, 0181, 0201, 0350	<p>The development will implement measures to promote and improve sustainable and active travel, which includes enhanced public transport through the SDL and to nearby services and centres, a comprehensive network of greenways, walking and cycling routes including public rights of way, as set out in Development Guidelines.</p> <p>Development guidelines B4.4(g), B4.5(p) and the Access and Movement section highlight the important role of active travel and public transport.</p> <p>Further work will continue as part of the masterplanning of the site to deliver active travel and public transport networks.</p>
Further information required about heritage assets and their conservation	0092, 0164, 0181, 0256 , 0257, 0350	<p>Not agreed. Assessments have been undertaken to inform the proposals on a variety of technical areas. Further assessment will be undertaken as required, and as the site progresses.</p> <p>A Statement of Common Ground has been agreed with Historic England that recognises there are no heritage constraints that would prevent the delivery of the strategy promoted in the plan.</p>

Detail	Respondent number	Response
Modify the policy to refer to heritage impact, and archaeological assessments to demonstrate how the site of St Bartholomew's Church will be safeguarded and maintained	0256	Agreed. The Schedule of proposed modifications sets out the proposed changes, which are also referred to in the Statement of Common Ground with Historic England.
Further information required about impacts on noise, health and visual amenity	0099, 0334	Not agreed. Assessments have been undertaken to inform the proposals on a variety of technical areas. Further assessment will be undertaken as required, and as the site progresses.
Relocate development away from areas at risk of flooding	0021, 0040, 0099, 0140, 0217, 0334, 0347	<p>Flood risk is a key constraint that has informed the proposals for the site. No built development is proposed inside areas at risk of flooding.</p> <p>The council will shortly have a signed Statement of Common Ground with the Environment Agency which endorses principle of the spatial strategy and agrees the deliverability of the Loddon Valley Garden Village on the basis of recommended modifications to aid clarity.</p>
Modify the policy to refer to flooding from all sources	0355	Relevant policies in the local plan provide a suitable framework for addressing flood risk (from all sources) in development proposals. Notwithstanding, proposed change to the policy is set out in the Schedule of proposed modifications for additional clarity.
Investigate water and sewerage capacity locally.	0036, 0039, 0040, 048, 0067, 0075, 0092, 0146, 0201, 0258, 0217, 0350, 0355	<p>The Water Cycle Studies consider the impact of development on the sewage and sewerage network and were prepared in consultation with Thames Water.</p> <p>Thames Water's representation acknowledges that the development proposed is likely to require upgrades to existing infrastructure.</p>

Detail	Respondent number	Response
		Following consultation with Thames Water, the IDP identifies that an upgrade of the Arborfield STW is planned, which is capable of mitigating the impact of the development proposed. A Statement of Common Ground with Thames Water agrees that there are no known significant water supply, waste water, or sewage treatment capacity issues that would be likely to prevent, or delay the delivery of the site allocations proposed in the plan. Engagement with Thames Water will continue on an ongoing basis.
Further information required about infrastructure timing, delivery and cost, including amendments to policy.	0048, 0093, 0094, 0181, 0201, 0206, 0242, 0304, 0305, 0311, 0334	The IDP is an iterative document, and subsequent updates will consider the latest information on infrastructure costs, timing and delivery.
Additional clarity required about the health uses to be delivered including the delivery mechanism.	0181, 0303 , 0350	Noted. The policy sets out how health uses are planned as part of the new district centre to be delivered as part of the development, as set out in the policy and the IDP. Discussions with the Integrated Care Board (ICB) about the form and type of health uses are ongoing. The Development Guideline B4.7(jj) recognises the engagement undertaken with the ICB and the identified needs.
Modify reference to the uses at the Thames Valley Science and Innovation Park, including adding reference to 'innovation' uses.	0305	Not agreed. The council is satisfied reference to research and development is sufficient, and more appropriately reflects the use classes order.
Modify the parking standards to be based on the number of bedrooms and restrict commercial vehicles in residential roads.	0204	Not agreed. The current parking standards are considered appropriate and will be reviewed when appropriate.
Remove the proposed allocation to avoid settlement coalescence, and impacts on adjoining settlements	0040, 0092, 0148	Not agreed. The site forms an important part of the local plan and the delivery of a sustainable new community. Appropriate

Detail	Respondent number	Response
		Measures will be incorporated into the site to mitigate impacts on adjoining settlements as far as possible.
Modify the policy to identify Park Farm at Carter's Hill as an allocated site	0206	<p>Not agreed. Land at Park Farm is located within the Loddon Valley Garden Village SDL boundary, but outside a defined settlement.</p> <p>Paragraph 5.114 of supporting text states that defined settlement areas reflects areas where building is anticipated. Development may therefore come forward in a different manner, subject to consideration of constraints and opportunities and place making principles. Development guideline B4.5(n) also sets out how the layout and design of schemes should incorporate measures to conserve the separate identity of Carter's Hill. Some limited development may therefore be achievable subject to the factors set out in the policy and the development guidelines.</p>
Modify the settlement boundary to include additional land around the area controlled by Gleeson	0148	Not agreed. The council is satisfied the settlement boundary is appropriate. No information has been provided by the landowner showing how the boundary should be modified.
Modify the settlement boundary and allocate Land north east of Mill Lane (site reference 5WI001)	0325	<p>Not agreed.</p> <p>The land is located outside settlement boundary but within SDL boundary for Loddon Valley Garden Village. There is insufficient confidence the site could be delivered.</p>
Modify the Loddon Valley Garden Village allocation to remove Carter's Hill	0164, 0257	Not agreed. The Carter's Hill area is included in the wider SDL boundary, but is not included within a defined settlement and is

Detail	Respondent number	Response
		<p>therefore located in the countryside. It would be impractical to remove the area from the SDL.</p> <p>The area is also identified in the concept plan as a 'historic settlement' incorporating a significant landscape buffer. Detailed design work will be undertaken to help identify where development will be located, including consultation with communities.</p>
Modify the concept plan to ensure consistency with settlement boundaries and the Core Employment Area	0265	Not agreed. The concept plan provides a high level overview of the development area, including the location of uses which benefit from temporary planning permission. The settlement boundary reflects land which benefits from permanent planning permission.
Remove the proposed allocation at Loddon Valley Garden Village	0012, 036, 0040, 0181, 0198, 0322	Not agreed. The site forms an important part of the local plan and the delivery of a sustainable new community.
Allocate alternative sites for development	0046, 0067, 0101, 0103, 0127, 0141, 0146, 0151, 0164, 0173, 0181, 0185, 0192, 0213, 0217, 0230, 0247, 0257, 0258, 0289, 0311, 0340, 0347	Not agreed. The site forms an important part of the local plan and the delivery of a sustainable new community. Alternative sites have been considered and assessed, including as part of the Sustainability Assessment.

OTHER ISSUES

- The impact of construction traffic (0130, 0335).
- New areas of SANG should be incorporated into the development and should be useable year-round (0217).
- The importance of health and wellbeing matters (0304).
- All evidence that supports the allocation of the site should be published (0276).

Policy SS14: Sites allocated for residential, including residential as part of mixed-use development

SS14 Sites allocated for residential, including residential as part of mixed-use development

Five respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0184	O'Connor Properties Ltd	0309	Royal Borough of Windsor and Maidenhead
0256	Historic England	0355	Environment Agency
0303	Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board	0360	South East Water

Support

RBWM Council (**0309**) and Historic England (**0256**) consider the policy to be sound, legally compliant and to comply with the duty to co-operate. Additional general comments expressed are shown in the table below.

South East Water (**0360**) stated they are confident the Water Resources Management Plan (WRMP) 2024 can accommodate the level of growth proposed in Wokingham Borough. They would be happy to receive further site allocation information going forwards and will work with authorities and developers through the process ahead of occupation of developments. There are no planned schemes for new water supplies or infrastructure development in Wokingham Borough, and localised level work will be carried out in line with any further information.

MAIN ISSUES

Detail	Respondent number	Response
Trajectory of sites is skewed towards the second half of the plan period – not enough small and medium sites allocated	0184	The council is satisfied that an appropriate level of sites delivering in the first half of the plan period have been proposed for allocation as part of SS14.
There is a typo in the table column headers in Policy SS14: “wellings” rather than “dwellings”	0256	Noted. The Schedule of proposed modifications proposes this correction.
ICB requires primary care mitigations to be secured in all forthcoming planning applications	0303	Noted. The council will work with the ICB to consider how to take this forward.
Non-strategic sites could have more significant impact on RBWM in terms of traffic – welcome continued involvement in cross-boundary discussions	0309	A Statement of Common Ground has been agreed with RBWM which recognises that both councils do not expect the growth identified in the plan to generate significant additional traffic within RBWM.
For sites in Flood Zone 1 with watercourses close to or within the site the advice is to incorporate development buffers either side	0355	The requirement for a buffer around watercourses is included within policy FD3: River corridors and watercourse. The Local Plan Update should be read and interpreted as a whole, with all policies being viewed together and not in isolation.

SS14.1 High Barn Farm, Commonfield Lane, Barkham

Four respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0220	Barkham Village Residents Association	0316	Thames Water
0297	Williams, Iain	0355	Environment Agency

Support

No representations expressed support for the policy.

Thames Water (**0316**) stated that no infrastructure concerns are envisaged with respect to water supply, waste water or sewage treatment capacity for the proposed allocation.

MAIN ISSUES

Detail	Respondent number	Response
Disproportionate amount of Gypsy and Traveller pitches allocated in Barkham – in excess of provision in policies SS12 and SS13	0220	Six of the sites promoted for Gypsy and Traveller pitches were assessed as potentially developable and four proposed for allocation. The distribution of sites is constrained by available and suitable sites. The proposed provision of Gypsy and Traveller pitches within the SDLs is considered appropriate as part of a mix of uses.
Loss of Grade 2 best and most versatile agricultural land	0297	Noted. Planning application 211081 provides more up to date information regarding Grade 2 rather than Grade 3a agricultural land. The council does not consider this to alter the overall outcome of the site assessment in the HELAA.

Detail	Respondent number	Response
Conflict with an existing solar farm planning permission	0297	The solar farm planning permission does not include any solar PV or associated development on site SS14.1. The council is satisfied that development would not be in conflict with the solar farm.
Impact on the countryside and landscape	0297	The council is satisfied that development of this type is appropriate for its location.
Lack of sustainability, access and deliverable infrastructure	0297	The council is satisfied with the level of accessibility for development of this type.
Lack of clarity regarding proposal of the site for permanent or temporary pitches	0297	All allocations for Gypsy and Traveller pitches, and other types of development, are permanent unless otherwise stated.
The site is not deliverable and therefore inconsistent with national policy	0355, 0297	The site is considered to be demonstrably deliverable within the plan period in accordance with national policy. It is now agreed between the council and Environment Agency that there are no barriers to delivery of sites, except for one site as covered below. This will shortly be confirmed in a signed Statement of Common Ground.
Wastewater should be discharged into mains infrastructure – WwTW must have sufficient capacity	0355	<p>Noted. Development guidelines have been included in the plan for relevant sites requiring appropriate consideration of sewerage. On this basis, and given wastewater discharge will be matters of detail for the application stage, the council is satisfied this matter is appropriately addressed.</p> <p>A Statement of Common Ground with Thames Water agrees that there are no known significant water supply, waste water, or sewage treatment capacity issue that would be</p>

Detail	Respondent number	Response
		likely to prevent, or delay the delivery of the site allocations proposed in the plan. Engagement with Thames Water will continue on an ongoing basis.

OTHER ISSUES

- Respondent 0220 considers the policy not to be legally compliant and not to comply with the duty to co-operate.

SS14.2 Honeysuckle Lodge, Commonfield Lane, Barkham

Three respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0220	Barkham Village Residents Association	0355	Environment Agency
0316	Thames Water		

Support

No representations expressed support for the policy.

Thames Water (**0316**) stated that no infrastructure concerns are envisaged with respect to water supply, waste water or sewage treatment capacity for the proposed allocation.

No representations expressed that the policy is legally compliant or complies with the duty to co-operate.

MAIN ISSUES

Detail	Respondent number	Response
Disproportionate approach to Gypsy and Traveller pitch allocations in Barkham – in excess of provision in policies SS12 and SS13	0220	Six of the sites promoted for Gypsy and Traveller pitches were assessed as potentially developable and four proposed for allocation. Site distribution is constrained by availability and suitable sites. Proposed provision of Gypsy and Traveller pitches within the SDLs is considered appropriate as part of a mix of uses.
The site is not deliverable and therefore inconsistent with national policy	0355	The site is considered to be demonstrably deliverable within the plan period in accordance with national policy. It is now agreed between the council and Environment Agency that there are no barriers to delivery of the site. This will shortly be confirmed in a signed Statement of Common Ground.
Waste water treatment works must have sufficient capacity	0355	A Statement of Common Ground with Thames Water agrees that there are no known significant water supply, waste water, or sewage treatment capacity issue that would be likely to prevent, or delay the delivery of the site allocations proposed in the plan. Engagement with Thames Water will continue on an ongoing basis.

SS14.3 Woodlands Farm, Wood Lane, Barkham

Five respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0184	O'Connor Properties Ltd	0316	Thames Water
0220	Barkham Village Residents Association	0355	Environment Agency
0225	Catesby Estates		

Support

No representations expressed support for the policy.

The landowner – O'Connor Properties Ltd (0184) – expressed that the site is no longer available for Gypsy and Traveller pitches.

Thames Water (**0316**) stated that no infrastructure concerns are envisaged with respect to water supply, waste water or sewage treatment capacity for the proposed allocation.

MAIN ISSUES

Detail	Respondent number	Response
Site promoter has no intention of delivering pitches and expresses the site is available for residential development (up to 30 dwellings)	0184	The site was originally promoted by the landowner for residential development including Gypsy and Traveller pitches. The site was further promoted by the landowner in response to a specific call for sites as potentially suitable for Gypsy and Traveller pitches. The site was proposed for allocation for Gypsy and Traveller pitches within both the LPU Draft Plan and Revised Growth Strategy Consultations.

		<p>Through the HELAA process, the council's judgement is that the site is not suitable for bricks and mortar housing, however is potentially suitable for Gypsy and Traveller pitches.</p> <p>In the context of need for Gypsy and Traveller pitches, the site being assessed as unsuitable for alternative forms of housing and a landowner who has previously expressed a willingness for the site to be developed for this use on several occasions, the council does not consider the removal of the allocation appropriate and maintains that the site is realistically developable in the plan period.</p>
Disproportionate approach to Gypsy and Traveller pitch allocations in Barkham – in excess of provision in policies SS12 and SS13	0220	Six of the sites promoted for Gypsy and Traveller pitches were assessed as potentially developable and four proposed for allocation. Site distribution is constrained by available and suitable sites. Proposed provision of Gypsy and Traveller pitches within the SDLs is considered appropriate as part of a mix of uses.
The site lies a greater distance away from services and facilities than a site at Longwater Road	0225	The Housing and Economic Land Availability Assessment (HELAA) (2024) and Housing Site Allocations topic paper (2024) outline the site assessment and selection process. In determining the sites to be taken forward as housing allocations the council had regard to a wide ranging, proportionate suite of evidence base studies. The council is satisfied that this is an appropriate and robust process.
The site is not deliverable and therefore inconsistent with national policy	0355	The site is considered to be demonstrably deliverable within the plan period in accordance with national policy. It is now agreed between the council and Environment Agency that there are no barriers to delivery of the site.

		This will shortly be confirmed in a signed Statement of Common Ground.
WwTW must have sufficient capacity to ensure no deterioration to water quality of Barkham Brook	0355	A Statement of Common Ground with Thames Water agrees that there are no known significant water supply, waste water, or sewage treatment capacity issues that would be likely to prevent, or delay the delivery of the site allocations proposed in the plan. Engagement with Thames Water will continue on an ongoing basis.
Advise development buffers incorporated either side of watercourses	0355	The requirement for a buffer around watercourses is included within policy FD3: River corridors and watercourse. The Local Plan Update should be read and interpreted as a whole, with all policies being viewed together and not in isolation.

OTHER ISSUES

- Respondent 0225 considers the policy not to be legally compliant and not to comply with the duty to co-operate.

SS14.4 Land west of Park Lane, Charvil

Five respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0028	Chambers, David	0342	Hicks Development Ltd
0225	Catesby Estates	0355	Environment Agency
0316	Thames Water		

Support

The landowner – Hicks Development (0342) – considers the policy to be legally compliant and to comply with the Duty to Co-operate. It is also interpreted from their representations that they support the proposed allocation of this site in principle.

Thames Water (**0316**) stated that no infrastructure concerns are envisaged with respect to water supply, waste water or sewage treatment capacity for the proposed allocation.

MAIN ISSUES

Detail	Respondent number	Response
Does not follow rules for increasing the residential boundary	0028	A settlement boundary review was undertaken in 2024 and the Charvil settlement boundary updated in light of proposed allocations and in accordance with guidelines.
High level of objections to the site which seem to have been ignored	0028	All representations to local plan consultations have been reviewed and the issues raised considered, including by Planning Committee who resolved to grant permission for an outline application of up to 75 dwellings at the site in December 2024.
Planning Inspector allowed previous 25 homes did not recommend any further development	0028	The council is satisfied that the proposed level of development is acceptable on this site, as demonstrated by Planning Committee's resolution to grant outline permission in December 2024.
Adverse impact on ancient woodland	0028	Ancient woodland lies adjacent to the south of the site. The council is satisfied that development would not negatively impact the ancient woodland.

Poor level of public transport	0028	Sustainable transport has been considered through the site assessment process in the HELAA.
The site lies adjacent to a minor settlement – similarly to site at Longwater Road	0225	The Housing and Economic Land Availability Assessment (HELAA) (2024) and Housing Site Allocations topic paper (2024) outline the site assessment and selection process. In determining the sites to be taken forward as housing allocations the council had regard to a wide ranging, proportionate suite of evidence base studies. The council is satisfied that this is an appropriate and robust process.
Proposed capacity of 61 dwellings is unjustified and should be at least 75 dwellings	0342	Policy SS14 supporting text states that the number of dwellings is indicative and does not represent a fixed requirement for each site. It is noted a resolution to grant permission for up to 75 dwellings is now in place.
The site is not deliverable and therefore inconsistent with national policy	0355	The site is considered to be demonstrably deliverable within the plan period in accordance with national policy. The site benefits from a resolution to grant outline planning permission for up to 75 dwellings (reference 232704) as per the Planning Committee meeting of 11 December 2024. It is now agreed between the council and Environment Agency that there are no barriers to delivery of the site, and that it benefits from a resolution to grant permission. This will shortly be confirmed in a signed Statement of Common Ground.
Opportunities for enhancement of watercourse should be included in masterplan	0355	The requirement for a natural enhancements to watercourses is included within policy FD3: River corridors and watercourse. The Local Plan Update should be read and interpreted as a whole, with all policies being viewed together and not in isolation. Notwithstanding, the site

		now benefits from a resolution to grant permission for up to 75 dwellings.
Not suitable for infiltration SuDs due to high groundwater levels	0355	A Flood Risk Assessment and Drainage Strategy has been considered for the application, which now benefits from a resolution to grant permission. Modifications are proposed to policy FD2 and its supporting text to clarify the council's position regarding site specific consideration of SuDS. The council is confident that this approach will be endorsed by the Environment Agency in the shortly to be confirmed Statement of Common Ground.

OTHER ISSUES

- Respondents 0028 and 0225 consider the policy not to be legally compliant and not to comply with the duty to co-operate.

SS14.5 24 Barkham Ride, Finchampstead

Four respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0210	VV Contractors Limited	0348	A1 Roberts Properties Ltd
0316	Thames Water	0355	Environment Agency

Support

Two landowners responded – VV Contractors Ltd (0210) and A1 Roberts Properties Ltd (0348) – they consider the policy to be legally compliant and to comply with the Duty to Co-operate. They support the proposed allocation of this site in principle.

Thames Water (**0316**) stated that no infrastructure concerns are envisaged with respect to water supply, waste water or sewage treatment capacity for the proposed allocation.

MAIN ISSUES

Detail	Respondent number	Response
The removal of Rooks Nest Farm site allocation and resulting lack of information on the uses planned for the site leading to potential for piecemeal development	0210	The council is satisfied that the uses envisaged are appropriate for the location and do not require allocation in the local plan. A large part of the area previously proposed for development at Rooks Nest is planned to be used for SEND schools, and a woodland.
Capacity is considered too low and should increase to 60 dwellings in line with masterplanning undertaken and subsequent planning application	0210	Policy SS14 supporting text states that the number of dwellings is indicative and does not represent a fixed requirement for each site.
The site is not deliverable and therefore inconsistent with national policy	0355	The site is considered to be demonstrably deliverable within the plan period in accordance with national policy. It is now agreed between the council and Environment Agency that there are no barriers to delivery of the site. This will shortly be confirmed in a signed Statement of Common Ground.
WwTW must have sufficient capacity to ensure no deterioration to water quality of Barkham Brook	0355	A Statement of Common Ground with Thames Water agrees that there are no known significant water supply, waste water, or sewage treatment capacity issue that would be likely to prevent, or delay the delivery of the site allocations proposed in the plan. Engagement with Thames Water will continue on an ongoing basis.

SS14.6 31-33 Barkham Ride, Finchampstead

One respondent.

Respondent number	Name/Organisation
0316	Thames Water

Support

No representations expressed support for the policy.

Thames Water (**0316**) stated that no infrastructure concerns are envisaged with respect to waste water or sewage treatment capacity for the proposed allocation.

MAIN ISSUES

Detail	Respondent number	Response
Further modelling will be required on the water supply network and upgrades are anticipated to be necessary	0316	A Statement of Common Ground with Thames Water agrees that there are no known significant water supply, waste water, or sewage treatment capacity issues that would be likely to prevent, or delay the delivery of the site allocations proposed in the plan. Engagement with Thames Water will continue on an ongoing basis.

SS14.7 Greenacres Farm, Nine Mile Ride, Finchampstead

Three respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0225	Catesby Estates	0355	Environment Agency
0316	Thames Water		

Support

No representations expressed support for the policy.

Thames Water (**0316**) stated that no infrastructure concerns are envisaged with respect to water supply, waste water or sewage treatment capacity for the proposed allocation.

MAIN ISSUES

Detail	Respondent number	Response
The site lies away from defined settlement boundary of Finchampstead and has a comparable level of accessibility to the site at Longwater Road, Finchampstead	0225	The Housing and Economic Land Availability Assessment (HELAA) (2024) and Housing Site Allocations topic paper (2024) outline the site assessment and selection process. In determining the sites to be taken forward as housing allocations the council had regard to a wide ranging, proportionate suite of evidence base studies. The council is satisfied that this is an appropriate and robust process.
Site is not deliverable and therefore inconsistent with national policy	0355	The site is considered to be demonstrably deliverable within the plan period in accordance with national policy. It is now agreed between the council and Environment Agency that there are no barriers to delivery of the site.

		This will shortly be confirmed in a signed Statement of Common Ground.
WwTW must have sufficient capacity to ensure no deterioration to water quality of Barkham Brook	0355	A Statement of Common Ground with Thames Water agrees that there are no known significant water supply, waste water, or sewage treatment capacity issues that would be likely to prevent, or delay the delivery of the site allocations proposed in the plan. Engagement with Thames Water will continue on an ongoing basis.

OTHER ISSUES

- Respondent 0225 considers the policy not to be legally compliant and not to comply with the duty to co-operate.

SS14.8 Hillside, Lower Wokingham Road, Finchampstead

Three respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0225	Catesby Estates	0355	Environment Agency
0316	Thames Water		

Support

No representations expressed support for the policy.

Thames Water (**0316**) stated that no infrastructure concerns are envisaged with respect to water supply, waste water or sewage treatment capacity for the proposed allocation.

MAIN ISSUES

Detail	Respondent number	Response
The site lies within defined modest settlement boundary of Finchampstead (North) and has a lower level of accessibility as site at Longwater Road, Finchampstead	0225	The Housing and Economic Land Availability Assessment (HELAA) (2024) and Housing Site Allocations topic paper (2024) outline the site assessment and selection process. In determining the sites to be taken forward as housing allocations the council had regard to a wide ranging, proportionate suite of evidence base studies. The council is satisfied that this is an appropriate and robust process.
The site is not deliverable and therefore inconsistent with national policy	0355	The site is considered to be demonstrably deliverable within the plan period in accordance with national policy. The site benefits from a resolution to grant outline planning permission for up to 18 dwellings (reference 240803) as per the Planning Committee meeting of 9 October 2024. It is now agreed between the council and Environment Agency that there are no barriers to delivery of the site. This will shortly be confirmed in a signed Statement of Common Ground.
WwTW must have sufficient capacity to ensure no deterioration to water quality of Barkham Brook	0355	A Statement of Common Ground with Thames Water agrees that there are no known significant water supply, waste water, or sewage treatment capacity issue that would be likely to prevent, or delay the delivery of the site allocations proposed in the plan. Engagement with Thames Water will continue on an ongoing basis.

OTHER ISSUES

- Respondent 0225 considers the policy not to be legally compliant and not to comply with the duty to co-operate.

SS14.9 39-53 New Road, Ruscombe

One respondent.

Respondent number	Name/Organisation
0316	Thames Water

Support

No representations expressed support for the policy.

Thames Water (**0316**) stated that no infrastructure concerns are envisaged with respect to water supply, waste water or sewage treatment capacity for the proposed allocation.

MAIN ISSUES

- No issues were raised.

SS14.10 Land to the rear of Northbury Lane, Ruscombe

One respondent.

Respondent number	Name/Organisation
0316	Thames Water

Support

No representations expressed support for the policy.

Thames Water (**0316**) stated that no infrastructure concerns are envisaged with respect to water supply, waste water or sewage treatment capacity for the proposed allocation.

MAIN ISSUES

- No issues were raised.

SS14.11 Land north of Arborfield Road, Shinfield

Two respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0305	University of Reading	0355	Environment Agency

Support

The landowner – University of Reading (0305) – considers the policy to be legally compliant and to comply with the duty to co-operate. They support the proposed allocation of this site and state an application for 191 units has since been submitted on 4 November 2024 (242484).

MAIN ISSUES

Detail	Respondent number	Response
The site is not deliverable and therefore inconsistent with national policy	0355	The site is considered to be demonstrably deliverable within the plan period in accordance with national policy. It is now agreed between the council and Environment Agency that there are no barriers to delivery of the site.

		This will shortly be confirmed in a signed Statement of Common Ground.
The site is located in the 1 in 100 year plus climate change flood extent, and therefore it is not clear whether exceptions test can be passed	0355	It is now agreed between the council and Environment Agency that there are no barriers to delivery of the site, subject to additional detail being provided through the live planning application. This will shortly be confirmed in a signed Statement of Common Ground.

SS14.12 Land east and west of Hyde End Road, Shinfield

Four respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0305	University of Reading	0318	Bloor Homes
0316	Thames Water	0355	Environment Agency

Support

The landowner – University of Reading (0305) – and the housebuilder – Bloor Homes (0318) – consider the policy to be legally compliant and to comply with the duty to co-operate. They support the proposed allocation of this site in principle.

Thames Water (**0316**) stated that no infrastructure concerns are envisaged with respect to waste water or sewage treatment capacity for the proposed allocation.

MAIN ISSUES

Detail	Respondent number	Response
The capacity is considered too low and should increase to 210 dwellings	0305, 0318	Policy SS14 supporting text states that the number of dwellings is indicative and does not represent a fixed requirement for each site.
Further modelling will be required on the water supply network and upgrades are anticipated to be necessary	0316	A Statement of Common Ground with Thames Water agrees that there are no known significant water supply, waste water, or sewage treatment capacity issue that would be likely to prevent, or delay the delivery of the site allocations proposed in the plan. Engagement with Thames Water will continue on an ongoing basis.
The site is not deliverable and therefore inconsistent with national policy	0355	The site is considered to be demonstrably deliverable within the plan period in accordance with national policy. It is now agreed between the council and Environment Agency that there are no barriers to delivery of the site. This will shortly be confirmed in a signed Statement of Common Ground.
The site is located in the 1 in 100 year plus climate change flood extent, and therefore it is not clear whether exceptions test can be passed	0355	It is now agreed between the council and Environment Agency that there are no barriers to delivery of the site. This will shortly be confirmed in a signed Statement of Common Ground.

SS14.13 Rustlings, The Spring and land rear of Cushendall, Shinfield Road, Shinfield (North)

One respondent.

Respondent number	Name/Organisation
0316	Thames Water

Support

No representations expressed support for the policy.

Thames Water (**0316**) stated that no infrastructure concerns are envisaged with respect to water supply, waste water or sewage treatment capacity for the proposed allocation.

MAIN ISSUES

- No issues were raised.

SS14.14 69 King Street Lane, Sindlesham

Two respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0316	Thames Water	0355	Environment Agency

Support

No representations expressed support for the policy.

Thames Water (**0316**) stated that no infrastructure concerns are envisaged with respect to water supply, waste water or sewage treatment capacity for the proposed allocation.

MAIN ISSUES

Detail	Respondent number	Response
The site is not deliverable and therefore inconsistent with national policy	0355	The site is considered to be demonstrably deliverable within the plan period in accordance with national policy. The site benefits from outline permission for up to 28 dwellings (reference 231094) granted November 2024. It is now agreed between the council and Environment Agency that there are no barriers to delivery of the site, and that it benefits from planning permission. This will shortly be confirmed in a signed Statement of Common Ground.
Not suitable for infiltration SuDs due to high groundwater levels	0355	Modifications are proposed to policy FD2 and its supporting text to clarify the council's position regarding site specific consideration of SuDS. The council is confident that this approach will be endorsed by the Environment Agency in the shortly to be confirmed Statement of Common Ground.
Advise development buffers incorporated either side of watercourses	0355	The requirement for a buffer around watercourses is included within policy FD3: River corridors and watercourse. The Local Plan Update should be read and interpreted as a whole, with all policies being viewed together and not in isolation.

SS14.15 Land off Wheatsheaf Close, Sindlesham

One respondent.

Respondent number	Name/Organisation
0316	Thames Water

Support

No representations expressed support for the policy.

Thames Water (**0316**) stated that no infrastructure concerns are envisaged with respect to water supply, waste water or sewage treatment capacity for the proposed allocation.

MAIN ISSUES

- No issues were raised.

SS14.16 Land east of Pound Lane, Sonning

One respondent.

Respondent number	Name/Organisation
0316	Thames Water

Support

No representations expressed support for the policy.

Thames Water (**0316**) stated that no infrastructure concerns are envisaged with respect to waste water or sewage treatment capacity for the proposed allocation.

MAIN ISSUES

Detail	Respondent number	Response
Further modelling will be required on the water supply network and upgrades are anticipated to be necessary	0316	A Statement of Common Ground with Thames Water agrees that there are no known significant water supply, waste water, or sewage treatment capacity issues that would be likely to prevent, or delay the delivery of the site allocations proposed in the plan. Engagement with Thames Water will continue on an ongoing basis.

SS14.17 Land at Sonning Farm, Sonning

Two respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0305	University of Reading	0316	Thames Water

Support

The landowner – University of Reading (0305) – considers the policy to be legally compliant and to comply with the duty to co-operate. They support the proposed allocation of this site in principle.

Thames Water (**0316**) stated that no infrastructure concerns are envisaged with respect to water supply, waste water or sewage treatment capacity for the proposed allocation.

MAIN ISSUES

- No issues were raised.

SS14.18 Land west of Trowes Lane, Swallowfield

Two respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0225	Catesby Estates	0316	Thames Water

Support

No representations expressed support for the policy.

Thames Water (**0316**) stated that no infrastructure concerns are envisaged with respect to waste water or sewage treatment capacity for the proposed allocation.

MAIN ISSUES

Detail	Respondent number	Response
The site lies adjacent to Swallowfield – a minor settlement similar to Finchampstead (as per site at Longwater Lane)	0225	The Housing and Economic Land Availability Assessment (HELAA) (2024) and Housing Site Allocations topic paper (2024) outline the site assessment and selection process. In determining the sites to be taken forward as housing allocations the council had regard to a wide ranging, proportionate suite of evidence base studies. The council is satisfied that this is an appropriate and robust process.

Further modelling will be required on the water supply network and upgrades are anticipated to be necessary	0316	A Statement of Common Ground with Thames Water agrees that there are no known significant water supply, waste water, or sewage treatment capacity issue that would be likely to prevent, or delay the delivery of the site allocations proposed in the plan. Engagement with Thames Water will continue on an ongoing basis.
---	-------------	--

OTHER ISSUES

- Respondent 0225 considers the policy not to be legally compliant and not to comply with the duty to co-operate.

SS14.19 Land at Bridge Farm, New Bath Road, Twyford

Two respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0316	Thames Water	0355	Environment Agency

Support

No representations expressed support for the policy.

Thames Water (**0316**) stated that no infrastructure concerns are envisaged with respect to waste water or sewage treatment capacity for the proposed allocation.

MAIN ISSUES

Detail	Respondent number	Response
Further modelling will be required on the water supply network and upgrades are anticipated to be necessary	0316	A Statement of Common Ground with Thames Water agrees that there are no known significant water supply, waste water, or sewage treatment capacity issue that would be likely to prevent, or delay the delivery of the site allocations proposed in the plan. Engagement with Thames Water will continue on an ongoing basis.
The site is not deliverable and therefore inconsistent with national policy	0355	The site is considered to be demonstrably deliverable within the plan period in accordance with national policy. The site benefits from outline permission for up to 200 dwellings (reference 212720) granted July 2023. It is now agreed between the council and Environment Agency that there are no barriers to delivery of the site, and that it benefits from planning permission. This will shortly be confirmed in a signed Statement of Common Ground.
Request information regarding access/egress is detailed in the SFRA to demonstrate that the exceptions test can be passed	0355	It is now agreed between the council and Environment Agency that there are no barriers to delivery of the site. This will shortly be confirmed in a signed Statement of Common Ground.

SS14.20 Land west of Old Forest Road, Winnersh

One respondent.

Respondent number	Name/Organisation
0316	Thames Water

Support

No representations expressed support for the policy.

Thames Water (**0316**) stated that no infrastructure concerns are envisaged with respect to waste water or sewage treatment capacity for the proposed allocation. Note that water supply provided by South East Water.

MAIN ISSUES

- No issues were raised.

SS14.21 Land off Poplar Lane and Watmore Lane, Winnersh

Three respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0282	Taylor Wimpey Strategic Land	0355	Environment Agency
0316	Thames Water		

Support

The landowner – Taylor Wimpey Strategic Land (0282) – considers the policy to be legally compliant and to comply with the duty to co-operate. They support the proposed allocation of this site in principle.

Thames Water (**0316**) stated that no infrastructure concerns are envisaged with respect to waste water or sewage treatment capacity for the proposed allocation.

MAIN ISSUES

Detail	Respondent number	Response
The capacity is considered too low and should increase to 234 dwellings to include the area Winnersh Farm within the allocation boundary	0282	The site has been allocated for 111 dwellings in accordance with the planning permission granted. Policy SS14 supporting text states that the number of dwellings is indicative and does not represent a fixed requirement for each site.
Further modelling will be required on the water supply network and upgrades are anticipated to be necessary	0316	A Statement of Common Ground with Thames Water agrees that there are no known significant water supply, waste water, or sewage treatment capacity issues that would be likely to prevent, or delay the delivery of the site allocations proposed in the plan. Engagement with Thames Water will continue on an ongoing basis.
The site is not deliverable and therefore inconsistent with national policy	0355	The site is considered to be demonstrably deliverable within the plan period in accordance with national policy. The site benefits from outline permission for up to 234 dwellings (reference 230208) granted March 2024. It is now agreed between the council and Environment Agency that there are no barriers to delivery of the site and that it

		benefits planning permission. This will shortly be confirmed in a signed Statement of Common Ground.
The site is located in the 1 in 100 year plus climate change flood extent, and therefore it is not clear whether exceptions test can be passed	0355	It is now agreed between the council and Environment Agency that there are no barriers to delivery of the site. This will shortly be confirmed in a signed Statement of Common Ground.

SS14.22 Land rear of the Bulldog garage and BP garage, Reading Road, Winnersh

Three respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0110	CBREIM	0355	Environment Agency
0316	Thames Water		

Support

One of the landowners of the site – CBREIM (0110) – supports the proposed allocation of this site in principle with a long term aspiration for the site for housing, but raise more detailed concerns dealt with in the table below.

Thames Water (**0316**) stated that no infrastructure concerns are envisaged with respect to water supply, waste water or sewage treatment capacity for the proposed allocation.

MAIN ISSUES

Detail	Respondent number	Response
Potential to incorporate some alternative technologies (e.g. EV charging)	0110	Noted. Other policies within the plan, specifically C5, support the provision of alternative technologies.
Propose that the re-provision of a convenience store should be included in the allocation	0110	Agreed. The council consider it appropriate to include reference to opportunities for the re-provision of retail facilities in the development guidelines. A related change is set out within the Schedule of proposed modifications.
Suggest the allocation specifies access should be provided in the area of the existing car wash	0110	Development guidelines state that vehicular access is preferred from Reading Road. The council is satisfied with this level of detail at this stage to allow for further investigation and flexibility.
Site is not deliverable and therefore inconsistent with national policy	0355	The site is considered to be demonstrably deliverable within the plan period in accordance with national policy. It is now agreed between the council and Environment Agency that there are no barriers to delivery of the site. This will shortly be confirmed in a signed Statement of Common Ground.
Not suitable for infiltration SuDs due to high groundwater levels	0355	Modifications are proposed to policy FD2 and its supporting text to clarify the council's position regarding site specific consideration of SuDs. The council is confident that this approach will be endorsed by the Environment Agency in the shortly to be confirmed Statement of Common Ground.
Contamination likely to be present at site	0355	Noted.

SS14.23 Winnersh Plant Hire, Reading Road, Winnersh

Five respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0184	O'Connor Properties Ltd	0316	Thames Water
0206	Cunningham, Mr and Mrs	0355	Environment Agency
0233	Dutton, Chris and Shirley Gallagher, Karen and Brian Dutton, Lucas Geering, Wendy, Timothy and Laura		

Support

No representations expressed support for the policy.

Thames Water (**0316**) stated that no infrastructure concerns are envisaged with respect to waste water or sewage treatment capacity for the proposed allocation.

MAIN ISSUES

Detail	Respondent number	Response
The site lies within Flood Zones 2 and 3 and development may not be achievable	0184, 0206, 0233	Level 1 and 2 SFRA undertaken as part of LPU evidence base, including a detailed Level 2 assessment of the site. The Sequential and Exceptions Tests (2024) and associated development guidelines set out how development can be safely delivered. The capacity of site was reduced to reflect flooding information.

Detail	Respondent number	Response
Further modelling will be required on the water supply network and upgrades are anticipated to be necessary	0316	A Statement of Common Ground with Thames Water agrees that there are no known significant water supply, waste water, or sewage treatment capacity issues that would be likely to prevent, or delay the delivery of the site allocations proposed in the plan. Engagement with Thames Water will continue on an ongoing basis.
The site is not deliverable and therefore inconsistent with national policy	0355	The site is considered to be demonstrably deliverable within the plan period in accordance with national policy. Notwithstanding, the council commits to investigating additional evidence regarding safe access and egress to inform the Local Plan Examination. This will shortly be confirmed in a signed Statement of Common Ground.
Not suitable for infiltration SuDs	0355	Modifications are proposed to policy FD2 and its supporting text to clarify the council's position regarding site specific consideration of SuDs. The council is confident that this approach will be endorsed by the Environment Agency in the shortly to be confirmed Statement of Common Ground.
Contamination likely to be present at site	0355	Noted.
Ensure safe access/egress is achievable up to the appropriate 1 in 100 year plus appropriate allowance for climate change flood level (please update Table E – Development Guidelines)	0355	Noted. Development guidelines to be updated to incorporate reference to safe access / egress. The council commits to investigating additional evidence regarding safe access and egress to inform the Local Plan Examination. This will shortly be confirmed in a signed Statement of Common Ground.

SS14.24 Woodside, Blagrove Lane, Wokingham

Two respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0316	Thames Water	0355	Environment Agency

Support

No representations expressed support for the policy.

Thames Water (**0316**) stated that no infrastructure concerns are envisaged with respect to waste water or sewage treatment capacity for the proposed allocation. Note that water supply is under South East Water.

MAIN ISSUES

Detail	Respondent number	Response
The site is not deliverable and therefore inconsistent with national policy	0355	The site is considered to be demonstrably deliverable within the plan period in accordance with national policy. It is now agreed between the council and Environment Agency that there are no barriers to delivery of the site. This will shortly be confirmed in a signed Statement of Common Ground.
Advise development buffers incorporated either side of watercourses	0355	The requirement for a buffer around watercourses is included within policy FD3: River corridors and watercourse. The Local Plan Update should be read and interpreted as a whole, with all policies being viewed together and not in isolation.

SS14.25 Rosery Cottage and 171 Evendons Lane, Wokingham

Four respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0184	O'Connor Properties Ltd	0233	Dutton, Chris and Shirley Gallagher, Karen and Brian Dutton, Lucas Geering, Wendy, Timothy and Laura
0206	Cunningham, Mr and Mrs	0316	Thames Water

Support

No representations expressed support for the policy.

Thames Water (**0316**) stated that no infrastructure concerns are envisaged with respect to waste water or sewage treatment capacity for the proposed allocation.

MAIN ISSUES

Detail	Respondent number	Response
The site has planning permission and is delivering against the current adopted Plan rather than meeting future needs. Inappropriate for this to be an allocation	0184, 0206, 0233	Sites with planning permission are one of the components of housing land supply (see Table 6 in Proposed Submission Plan). The site is proposed for allocation to ensure delivery of residential development on the site rather than alternative uses.

SS14.26 Bridge Retail Park, Finchampstead Road, Wokingham

Two respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0316	Thames Water	0355	Environment Agency

Support

No representations expressed support for the policy.

Thames Water (**0316**) stated that no infrastructure concerns are envisaged with respect to waste water or sewage treatment capacity for the proposed allocation. Note that water supply is provided by South East Water.

MAIN ISSUES

Detail	Respondent number	Response
Site is not deliverable and therefore inconsistent with national policy	0355	The site is considered to be demonstrably deliverable within the plan period in accordance with national policy. It is now agreed between the council and Environment Agency that there are no barriers to delivery of the site. This will shortly be confirmed in a signed Statement of Common Ground.
The site is located in the 1 in 100 year plus climate change flood extent therefore an assessment should be included within the Level 2 SFRA to determine if safe access and egress will	0355	The EA has subsequently confirmed they are satisfied that it is likely that a safe route of access and egress will be possible from the new dwellings to Easthampstead Road or Waterloo Road located in Flood Zone 1. This will shortly be confirmed in a signed Statement of Common Ground.

be possible – detail the information in the SFRA to demonstrate exceptions test can be passed		
---	--	--

SS14.27 Land south of London Road, Wokingham

Two respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0231	Willson Developments Ltd	0316	Thames Water

Support

The landowner – Willson Developments Ltd (0231) – considers the policy to be legally compliant and to comply with the duty to co-operate. They support the proposed allocation of this site.

Thames Water (**0316**) stated that no infrastructure concerns are envisaged with respect to waste water or sewage treatment capacity for the proposed allocation. Note that water supply is provided by South East Water.

MAIN ISSUES

Detail	Respondent number	Response
Amend the site boundary to remove the area of the site within Bracknell Forest	0231	Agreed. A related change is set out within the Schedule of proposed modifications.

SS14.28 Land adjacent to Amen Corner, north of London Road, Wokingham

Four respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0100	Peter Humphreys	0246	Hurst Neighbourhood Plan Group
0231	Willson Developments Ltd	0316	Thames Water

Support

The landowner – Willson Developments Ltd (0231) – considers the policy to be legally compliant and to comply with the duty to co-operate. They support the proposed allocation of this site and note that the site has received resolution to grant (232026) with the S106 agreement progressing.

Thames Water (**0316**) stated that no infrastructure concerns are envisaged with respect to waste water or sewage treatment capacity for the proposed allocation. Note that water supply is provided by South East Water.

Respondent 0100 considers the policy to comply with the duty to co-operate.

Respondent 0246 considers the policy to be legally compliant.

MAIN ISSUES

Detail	Respondent number	Response
The proposed allocation for residential development is in an area that is also proposed to be designated as Valued Landscape – incompatible	0100	The proposed Valued Landscape designation does not preclude development. The site has resolution to grant planning permission prior to the Valued Landscape designation.
Whilst the site is within Hurst parish it will become a separate settlement	0246	Noted.

adjacent to the Bracknell Forest development		
--	--	--

OTHER ISSUES

- Respondent 0100 considers the policy not to be legally compliant

SS14.29 Station Industrial Estate, Oxford Road, Wokingham

Three respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0122	Industrial Property Investment Fund	0355	Environment Agency
0316	Thames Water		

Support

The landowner – Industrial Property Investment Fund (0122) – supports the proposed allocation of this site in principle. Specific issues are considered in the table below.

Thames Water (**0316**) stated that no infrastructure concerns are envisaged with respect to waste water or sewage treatment capacity for the proposed allocation. Note that water supply is provided by South East Water.

MAIN ISSUES

Detail	Respondent number	Response
Proposed capacity of 40 dwellings is an inefficient use of a highly accessible town centre site and should be increased	0122	A capacity review undertaken in July 2021 advised a reduction in capacity on the site from 92 to 40 dwellings based on constraints. Policy SS14 supporting text states that the number of dwellings is indicative and does not represent a fixed requirement for each site.
The site is not deliverable and therefore inconsistent with national policy	0355	The site is considered to be demonstrably deliverable within the plan period in accordance with national policy. It is now agreed between the council and Environment Agency that there are no barriers to delivery of the site. This will shortly be confirmed in a signed Statement of Common Ground.
Not suitable for infiltration SuDs	0355	Modifications are proposed to policy FD2 and its supporting text to clarify the council's position regarding site specific consideration of SuDs. The council is confident that this approach will be endorsed by the Environment Agency in the shortly to be confirmed Statement of Common Ground.
Contamination likely to be present at site	0355	Noted.

SS14.30 Wokingham Borough Council offices, Shute End, Wokingham

Four respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0184	O'Connor Properties Ltd	0233	Dutton, Chris and Shirley Gallagher, Karen and Brian Dutton, Lucas Geering, Wendy, Timothy and Laura
0206	Cunningham, Mr and Mrs	0316	Thames Water

Support

No representations expressed support for the policy.

Thames Water (**0316**) stated that no infrastructure concerns are envisaged with respect to waste water or sewage treatment capacity for the proposed allocation. Note that water supply is provided South East Water.

MAIN ISSUES

Detail	Respondent number	Response
Deliverability of the site is doubtful and unlikely to contribute towards housing delivery with existing tenancy arrangements and the need to find alternative premises	0184, 0206, 0233	The council is satisfied that the site provides a deliverable development opportunity within the plan period.

SS14.31 Land at the north corner of Wellington Road and Station Road, Wokingham

One respondent.

Respondent number	Name/Organisation
0316	Thames Water

Support

No representations expressed support for the policy.

Thames Water (**0316**) stated that no infrastructure concerns are envisaged with respect to waste water or sewage treatment capacity for the proposed allocation. Note that water supply is provided South East Water.

MAIN ISSUES

- No issues were raised.

Policy SS15: Securing infrastructure

10 respondents

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0065	Shashank, Garg	0300	Network Rail
0132	Bracknell Forest Council	0303	Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board
0148	Gleeson	0308	NHS Property Services
0182	National Highways	0317	Hatch Farm Land Limited
0221	Mac Mic Group	0355	Environment Agency

Support

Respondents 0148, 0221, 0317 and **0355** consider the policy to be legally compliant to comply with the Duty to Cooperate.

Respondents 0148, 0221, and **0300** support the policy.

While respondent 0303 supports the clawback mechanism in part 3 of the policy, they raise specific concerns with other aspects of the policy which are covered below.

The **Environment Agency (0355)** supports the requirement for the timely provision of infrastructure as set out in the policy, however raise specific concerns in relation to capacity of Arborfield Sewerage Treatment Works.

MAIN ISSUE: CONSISTENCY WITH NATIONAL POLICY AND GUIDANCE

Detail	Respondent numbers	Response
Concern expressed that Policy SS15 is inconsistent with national policy, with reference to 'necessary' and 'appropriate' confirmed as satisfying the requirements of NPPF paragraph 57.	0317, 0355	The council is satisfied that the wording is consistent with national policy and additional referencing of the NPPF is unnecessary.

MAIN ISSUES: CLARITY OF POLICY

Detail	Respondent number	Response
The policy would benefit from reference to other mechanisms such as conservation covenants in part 2.	0132	The policy wording specifically refers to 'legal obligations' rather than 'planning obligations' to provide flexibility for other legal regimes that might not fall specifically under planning. The council is satisfied that the wording as proposed is sufficient.
The policy does not provide sufficient detail on the methodology for calculating contributions.	0308	The council do not consider the policy to be the appropriate place to set out the detail of calculating contributions.

MAIN ISSUES: POLICIES, DECISION TAKING AND IMPLEMENTATION

Detail	Respondent number	Response
Lack of clear mechanisms for ensuring the timely and adequate delivery of necessary infrastructure. Essential services should be guaranteed to support any new developments. Without a structured plan	0065	The council considers the spatial strategy will maximise the delivery of new and improved infrastructure. Infrastructure requirements are set out in the Infrastructure Delivery Plan (2024). SS15 is a NPPF compliant policy which will ensure

Detail	Respondent number	Response
for infrastructure, the community may face challenges in maintaining quality of life.		development provides the necessary infrastructure in order to be considered acceptable. Legal agreements secured through planning permissions will contain triggers for delivery of infrastructure, as necessary.
Lack of policy wording related to early pre-application engagement between developers and service providers, which should be addressed in part 1.	0303	Noted. While not considered necessary to include within the policy, an addition to supporting text is set out in the Schedule of proposed modifications to highlight the value of early engagement to understand and coordinate infrastructure delivery.
Part 2 of the policy should include a requirement for mitigation to be agreed with the relevant infrastructure provider and that they are consulted throughout negotiation of legal obligations.	0303	Statutory consultees are engaged on relevant applications in accordance with standard procedures. It is incumbent on providers to feed their comments into applications to aid the decision maker. It is not appropriate, and there are no formal mechanisms that allow, for each relevant provider to agree to the mitigation proposed. The modifications proposed above highlight how early engagement is encouraged.
Part 3 of the policy relating to viability conflicts with parts 1 and 2 which require timely provision of infrastructure. It does not set out how the council would support service providers to deliver the necessary infrastructure if full mitigation / contributions can't be secured.	0303	Part 3 recognises that there will be instances where developments cannot viably provide all necessary mitigation. It sets a high bar for where decision makers might depart from the policy requirements of parts 1 and 2. The council considers the wording to be robust and consistent with national policy. It is incumbent on service providers to identify necessary improvements and explore all opportunities available to them for funding, which are not limited to developer contributions.

Detail	Respondent number	Response
Further engagement with the NHS is required to refine the identified healthcare needs – for which there needs to be a flexible approach to meeting needs – and to determine the appropriate form of contribution towards the provision.	0308	Further engagement with the NHS is welcomed. The IDP is capable of being updated based on information from providers.
Concern over the capacity of Arborfield Sewerage Treatment Works and the lack of evidence to show development allocations are deliverable without adversely impacting on water quality. Development should not take place until necessary STW improvements are made.	0355	A Statement of Common Ground with Thames Water agrees that there are no known significant water supply, waste water, or sewage treatment capacity issues that would be likely to prevent, or delay the delivery of the site allocations proposed in the plan. Engagement with Thames Water will continue on an ongoing basis.

OTHER ISSUES

- Certain types of development may require infrastructure that is subject to a separate planning application (0132)
- It may not be possible to secure Biodiversity Net Gain provision by the s106 route, if council owns the land involved (0132)
- Support for the flexibility of the policy in allowing a range of ways to make provision for infrastructure as well as its recognition of viability (0148)
- It is important that the Local Plan provides the planning policy framework to ensure development cannot progress without the appropriate infrastructure being in place (0182)
- Infrastructure improvements on the strategic road network should only be considered as a last resort (0182)
- The importance of the role of development in unlocking required infrastructure (0221)
- Lack of standardised approach on how improvements to the primary care estate will be funded, with a need for greater contributions from development, and for these to be delivered before occupation of new homes (0303)

Policy SS16: Safeguarded routes

Six respondents

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0078	Hillcoat, Chris	0212	Jorgensen, Pauline
0145	South Oxfordshire and Vale of White Horse	0227	Oxfordshire County Council
0209	Hart District Council	0292	Sharpe, John

Support

Respondents 0078, **0145** and **0227** consider the policy to be legally compliant.

Respondents **0145** and **0227** consider the policy to comply with the Duty to Cooperate.

Respondents **0145**, 0209, 0212, and **0227** support the policy.

South Oxfordshire and Vale of White Horse Councils (South and Vale) (**0145**) are not proposing to safeguard land for a third Thames Crossing in their joint local plan. Given the difference of approach, South and Vale suggest that supporting text within the plan clarifies the South and Vale position.

Recommended modifications to supporting text are set out in the Schedule of proposed modifications.

Hart District Council (**0209**) supports improvements to highway capacity along the A327 (including the Eversley Bypass), subject to review by Hampshire County Council in their capacity as Highway Authority.

Oxfordshire County Council (**0227**), in its capacity as highway authority, acknowledges the safeguarding of land for a route for a third Thames Crossing. While Oxfordshire County Council's position is that it does not support the principle of an additional crossing for vehicular traffic, it does welcome the wording within the plan to acknowledge the safeguarded land does not predetermine additional feasibility work that is required and that the plan strategy is not reliant on a new crossing for mitigation. Oxfordshire County Council considers the approach taken in the LPU to be pragmatic and sound.

While respondent 0212 supports the policy, particularly the principle of safeguarding land for a potential third Thames Crossing, they consider the route is likely to lead to increased traffic in the Earley area.

MAIN ISSUE: DUTY TO COOPERATE

Detail	Respondent number	Response
No agreement reached with neighbouring authority to support safeguarding of transport route.	0292	<p>The Duty to Cooperate Statement of Compliance (2024) (and predecessor documents) sets out in detail the engagement in relation to the third Thames Crossing and the agreed position. This includes the acknowledgment from Oxfordshire County Council and South Oxfordshire Council that safeguarding of land is a pragmatic approach, despite their reservations about the need for, and impact of, a new crossing.</p> <p>The council is liaising with Transport for the South East to explore supporting proposals to explore how complementary measures might be introduced to reduce traffic pressures on less suitable routes and ensure that forecast effects do not result in levels of congestion and delay that become severe elsewhere in the network.</p>

MAIN ISSUE: SPECIFIC ROUTE

Detail	Respondent number	Response
Lack of consistency between safeguarded route for a Third Thames crossing and the designation of Local Green Space (LGS029)	0292	Noted. Any proposals would need to demonstrate compatibility with the LGS. However, it is acknowledged that local transport infrastructure is not necessarily considered inappropriate in Green Belt and therefore Local Green Spaces in the NPPF.

MAIN ISSUE: ALTERNATIVE ROUTE IMPROVEMENTS

Detail	Respondent number	Response
<p>The Third Thames Crossing should be constructed as a dual carriageway between Thames Valley Park and Caversham Park Road, with adequate walking and cycling facilities in line with LTN 1/20. A continuation of the route should provide a bypass of Caversham round to the A4074.</p>	<p>0078</p>	<p>Noted. This alternative route would require extensive business case work and assessment of impacts. Reasonable options have previously been considered, and the area of land that is proposed to be safeguarded reflects the preferred route based on initial assessment. There is no evidence to suggest the proposed alternative might be achievable.</p>
<p>The link between Napier Road in Reading and the A3290 should be resurrected and delivered to divert vehicular traffic away from the centre of Reading. If the full version of this scheme cannot be delivered then a bus and active travel only route should be constructed, as was planned recently.</p>	<p>0078</p>	<p>A development proposal for this scheme was refused by WBC planning committee. There is no active scheme proposed by Reading Borough Council or WBC.</p>

OTHER ISSUES

- Respondent 0078 considers the policy not to comply with the Duty to Co-operate.

Policy SS17: Transport improvements

Three respondents

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0078	Hillcoat, Chris	0300	Network Rail
0243	British Horse Society		

Support

Respondents 0078 considers the policy to be legally compliant and to comply with the Duty to Cooperate.

Respondent **0300** supports the policy.

MAIN ISSUE: RECOMMENDED IMPROVEMENT SCHEMES

Detail	Respondent number	Response
Enhancements required to Twyford Station to include: active travel routes towards Woodley, Hurst and Wargrave; additional car parking; increased public transport, including bus routes from Woodley.	0078	Noted. The principle of these improvements is supported by SS17 part 1e), the Local Transport Plan and the Local Cycling Walking Infrastructure Plan (LCWIP). The need for improvements to Twyford Station are understood by the council, and opportunities continue to be explored while recognising the constraints that exist.

MAIN ISSUE: RIGHTS OF WAY PROVISION

Detail	Respondent number	Response
Public rights of way within Wokingham borough with bridleway status is well below the national average and therefore routes need to be more inclusive of horse riders, as well as disabled users and wheelers. Modification suggested to include a requirement for the Walking, Cycling and Horse Riding Assessment (WCHRA) to be used to ensure Local Cycling and Walking Infrastructure Plan (LCWIP) routes are appropriately place.	0243	Policy SS17 is a high level principles policy that supports improvements to the transport network. It supports the principle of expansions to the greenways network, noted also in the LTP, LCWIP and Public Rights of Way Improvement Plan (PROWIP) which are routes capable of accommodating horse riders. It is considered that specifics related to LCWIP schemes are best addressed through relevant documents outside of the plan rather than being specified in policy wording.

Chapter 6: Climate change and energy

No respondents commented on this chapter.

Policy CE1: Design principles for efficient buildings

12 respondents

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0148	Gleeson	0298	Nicholas King Homes
0245	Crest Nicholson Partnership and Strategic Land	0305	University of Reading
0254	Croudace Homes	0309	Royal Borough of Windsor and Maidenhead
0256	Historic England	0314	Vistry Group
0274	Bridge House of Twyford	0322	Booth, John
0280	Bewley Homes	0354	Ashridge Wokingham Ltd

Support

Respondents 0148, 0245, **0256**, 0298, 0305, and **0309** consider the policy to be legally compliant and to comply with the Duty to Cooperate.

Respondents 0245, **0256**, 0305, **0309**, 0314, and 0354 support the policy.

Support was contingent in a couple of instances on minor modifications to not completely preclude fossil fuel use (0245) and to add clarity to the policy title (**0256**).

While respondents 0254, 0274, 0280, 0298, and 0322 all support the principle and intention of the policy in moving towards net zero development, each raised specific concerns with aspects of the policy which are covered below.

MAIN ISSUE: CONSISTENCY WITH NATIONAL POLICY AND GUIDANCE

Detail	Respondent numbers	Response
<p>The policy requirements – including for renewable energy generation on site to meet regulated and unregulated total energy demand – exceed the proposed Future Homes Standard (FHS) and are impractical for smaller dwellings. It hasn't been demonstrated that the requirements in exceedance of FHS are achievable at scale.</p>	<p>0148, 0254, 0274, 0298</p>	<p>The Net Zero Policy – Technical Evidence Base (2024) demonstrates that the policy requirement for on-site renewables to meet or exceed on-site energy use is technically feasible in the case of typical developments.</p> <p>The policy requirement (set out in more detail in CE3) does not mandate on-plot generation to match demand, rather this is expressed as a preference with the requirement being for demand across the site to be matched by on-site renewables. This recognises that certain dwellings (or plots) may not be able to achieve the requirements individually.</p> <p>Exceptional basis clauses are supplied to assist applicants in developing acceptable proposals in cases where the energy demand and/or generation requirements are more difficult to achieve due to constraints of the site or programme of development.</p> <p>Notwithstanding, the council is aware of the Written Ministerial Statement December 2023 which requires policies to be expressed in terms of improvements to Target Emissions Rate. The council expects this to be a matter for discussion at the examination.</p>
<p>It is not clear how a building's energy performance would be monitored, verified and reported post construction, and there is no current or planned requirement in building regs for such monitoring.</p>	<p>0148</p>	<p>The council intends to introduce supplementary guidance post adoption of the plan to provide greater clarity. In principle, the council is seeking to address the climate emergency by setting policy requirements which are based on absolute targets for energy use rather than relying on comparison to</p>

Detail	Respondent numbers	Response
		<p>“notional” model buildings as used by Building Regulations. Applicants have flexibility in the modelling method they choose, e.g. the free to use Passivhaus Planning Package. The plan uses total energy demand (regulated and unregulated) to measure building performance since this can be easily monitored through meter readings. These requirements are developed through careful consideration of technical feasibility evidence and evidence of best practice policies adopted elsewhere.</p>

MAIN ISSUE: CLARITY OF POLICY

Detail	Respondent numbers	Response
<p>Without clarity on the offset/payment solution, it is impossible to understand the impact of the policy in practice.</p>	<p>0148</p>	<p>The principle of offsetting is established elsewhere and found not to impact on development viability. Opportunities for offsetting support the viability of the policies by providing options to development not able to meet energy demand or generation targets on site. An offset calculation mechanism will be robustly evidenced based on national and regional standards and precedents, and is intended to be index linked.</p>
<p>Lack of clarity over how renewable energy is to be accounted for given different requirements for heat and electricity.</p>	<p>0322</p>	<p>The use of targets for both space heating demand and total energy use allows applicants to have a clearer idea of whether the proposed development achieves an adequate level of building performance. Targets for space heating demand are set out because, for any space heating demand that exceeds this range, it will be more difficult to achieve policy compliance for total energy use. Space heating demand can</p>

		<p>be significantly reduced through design measures and cases where this range cannot be met will be the exception. In such cases, the Exceptional Basis clauses can be activated to allow for mitigation through offsetting. It is expected that developments should generate renewable energy equivalent to their total demand on site wherever possible, this figure will include energy for space heating as well as all other uses. The targets set for energy use intensity and space heating demand are based on best practice and standard metrics.</p>
--	--	---

MAIN ISSUE: POLICY ACHIEVABILITY

Detail	Respondent number	Response
<p>The requirements for full on-site renewable energy are not evidenced to be achievable early in the plan period, including lack of guarantees until the UK power grid is enhanced and decarbonised.</p>	<p>0254, 0274, 0280, 0298</p>	<p>The Net Zero Policy – Technical Evidence Base (2024) demonstrates that the policy requirement for on-site renewables to meet or exceed on-site energy use is technically feasible in the case of typical developments.</p> <p>The approach taken to net zero is not reliant on grid decarbonisation, it requires that net zero operation is achievable at the point of handover, ensuring that dwellers and building users benefit from net zero buildings throughout the plan period. This is key to ensuring that the Borough can approach its local and national commitments to carbon emissions reductions.</p> <p>In exceptional cases where the full on-site renewable energy generation requirement cannot be met due to viability constraints, an Exceptional Basis clause can be activated to allow for mitigation through offsetting.</p>

Detail	Respondent number	Response
There is lack of certainty that the policy requirements can be implemented without impacting development viability.	0254, 0274, 0280, 0298	The Net Zero Policy – Technical Evidence Base (2024) provides robust cost estimate uplifts for achieving policy requirements and a greater % uplift has been tested in the Local Plan and Community Infrastructure Levy Viability Study (2024) and found to be generally viable in combination with other policy requirements.
Concern expressed that achieving net zero standard will compromise design quality.	0254, 0274, 0298	The Net Zero Policy – Technical Evidence Base (2024) includes realistic and representative assumptions about form factor of dwellings that are delivered on the ground. It is considered that the requirements for net zero can be achieved without resulting in poor design. The need to achieve net zero requires high quality design for example, the need for high quality materials and high quality construction detailing to reduce risk of poor performance. The adoption of Net Zero planning policies across the UK is already driving an increase in the quality of construction and it is appropriate that Wokingham Borough should benefit from this improvement.
That there is a need for requirements to be phased over the plan period.	0254, 0274, 0280, 0298	The Net Zero Policy – Technical Evidence Base (2024) demonstrates that the policy requirements for net zero development are technically feasible in the case of typical developments at the point of adoption, meaning that phasing is not considered to be necessary.
Concern over how the timing (in terms of time of day and season) of generation from solar PV matches the worst case demand from buildings and the associated practicalities of electricity storage or conversion to hydrogen.	0322	Solar PVPs are a widely used and efficient means of generating renewable energy. Practicalities of storing and using energy is a general issue that has and continues to be addressed through improved technology. Notwithstanding, the use of solar PVPs is not specified in the policies which support all forms of renewable energy generation, however it

Detail	Respondent number	Response
		is acknowledged that solar PVPs will be one of the more common methods of on-site renewable energy generation. The need for consideration of peak loading and storage capacity is important, and individual proposals will be assessed in terms of their suitability with this in mind.
The need to reinforce the national grid and/or local distribution networks	0322	This point is national and acknowledged. Larger schemes will be particularly encouraged to consider heat networks and decentralised local energy solutions to improve energy resilience.

OTHER ISSUES

- Respondents 0254, 0274, and 0280 consider the policy not to be legally compliant.

Policy CE2: Environmental standards for non-residential development

10 respondents

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0148	Gleeson	0308	NHS Property Services
0256	Historic England	0309	Royal Borough of Windsor and Maidenhead
0265	Shinfield Studios	0322	Booth, John
0269	Cirrus Land Ltd	0355	Environment Agency
0305	University of Reading	0360	South East Water

Support

Respondents 0148, 0265, 0269, 0305, and **0309** consider the policy to be legally compliant and to comply with the Duty to Cooperate.

Respondents **0256**, 0305, 0308, **0309** and **0355** support the policy.

Support was contingent in the case of **0256** on minor modifications to add clarity to the policy title so it is clear the requirements relates to new development given that a fabric first approach is not appropriate for the retrofit of traditionally constructed buildings, which merit a “whole building approach” to avoid maladaptation of historic buildings.

Respondent **0360** strongly support the commitment to sustainable design in new commercial development, and welcomes any requirements for more sustainable water standards.

Respondents 0265, 0269, and 0305 acknowledged that the total energy demand target will be achievable for most buildings and supported the exceptional basis clauses for cases where targeted performance cannot justifiably be met. Respondent 0265 and 0305 further supported the requirements to incorporate water demand reduction measures and consumption monitoring technology. However, each raised specific concerns with aspects of the policy which are covered below.

MAIN ISSUE: CONSISTENCY WITH NATIONAL POLICY AND GUIDANCE

Detail	Respondent numbers	Response
The approach to Energy Use Intensity and space heating targets go beyond current and planned building regulations and are inconsistent with the Dec 2023 Written Ministerial Statement. The policy should express improvements as a percentage improvement over building regulations to align with the WMS.	0265, 0269, 0305	In principle, the council is seeking to address the climate emergency by exceeding building regulations consistent with best practice policies adopted elsewhere. The Net Zero Policy – Technical Evidence Base (2024) demonstrates that the policy requirements for net zero development are technically and financially feasible in the case of typical developments. Notwithstanding, the council is aware of the Written Ministerial Statement December 2023 which requires policies to be expressed in terms of improvements to Target Emissions Rate. The council expects this to be a matter for discussion at the examination.

MAIN ISSUE: CLARITY OF POLICY

Detail	Respondent numbers	Response
The policy should include specific targets for different types of non-residential use rather than a single, catch all target.	0265, 0269, 0305	The approach taken in Policy CE2 is aligned with the higher end of the LETI recommended EUI values. This is because the policy is intended to be usable across non-residential development types, however the comment is correct that some archetypes will be able to achieve better results, and more specific guidance for different archetypes would be helpful. A proposed addition to supporting text is detailed in the Schedule of proposed modifications.
Lack of clarity over how renewable energy is to be accounted for given different requirements for heat and electricity.	0322	The use of targets for both space heating demand and total energy use allows applicants to have a clearer idea of whether the proposed development achieves an adequate level of

Detail	Respondent numbers	Response
		building performance. Targets for space heating demand are set out because, for any space heating demand that exceeds this range, it will be more difficult to achieve policy compliance for total energy use. Space heating demand can be significantly reduced through design measures and cases where this range cannot be met will be the exception. In such cases, the Exceptional Basis Clauses can be activated to allow for mitigation through offsetting. It is expected that developments should generate renewable energy equivalent to their total demand on site wherever possible, this figure will include energy for space heating as well as all other uses. The targets set for energy use intensity and space heating demand are based on best practice and standard metrics.
A fabric first approach is not appropriate for the retrofit of traditionally constructed buildings, which merit a “whole building approach” to avoid maladaptation of historic buildings.	0256	Noted. A recommended modification is detailed in the Schedule of proposed modifications to provide additional wording in supporting text for Policy CE6. That policy covers retrofit of existing building and therefore is considered a more logical place to provide further clarity.

MAIN ISSUE: POLICY ACHIEVABILITY

Detail	Respondent number	Response
The requirement for on-site renewable energy generation to match on-site demand is onerous and difficult to achieve, and it is not clear what evidence justifies it.	0148	The Net Zero Policy – Technical Evidence Base (2024) demonstrates that the policy requirement for on-site renewables to meet or exceed on-site energy use is technically feasible in the case of typical developments. It should be noted that the policy approach encourages energy

Detail	Respondent number	Response
		demand reduction as far as possible first (through design measures) so that residual demand is of a scale that is not onerous to meet through renewable energy generation on site in the majority of cases.
The requirement for unregulated operational energy to offset by on site renewables rather than regulated only is inconsistent with recently adopted plans and is not achievable due to lack of accurate measurement of the former.	0265, 0269, 0305	Recently adopted plans do require regulated and unregulated energy to be accounted for, so this comment is inaccurate. The use of total energy (rather than regulated energy only) in the policy approach allows for much simpler measurement for monitoring and compliance as total energy use can be verified through meter readings. Accurate “pre-built” modelling of total energy demand can be achieved through various methods, for example the Passivhaus Planning Package (PHPP) which is a free to use spreadsheet-based tool.
Concern expressed regarding the robustness of using BREEAM requirements as an exceptional basis alternative, given high ratings can be achieved without prioritising fabric efficiency.	0322	Flexibility is considered justified in the policy to ensure development needs can still be met. The required BREEAM standards are reflective of best practice and proposals will still need to demonstrate compliance with Policy CE1 which mandates adherence to the energy hierarchy. BREEAM ENE credits will need to be achieved to Exceptional level as a minimum in order to use the BREEAM clause. The policy also takes account of the wider sustainable development benefits achieved through BREEAM assessment and certification.
Concern over how the timing (in terms of time of day and season) of generation from solar PV and associated practicalities of electricity storage or conversion to hydrogen.	0322	Solar PVPs are a widely used and efficient means of generating renewable energy. Practicalities of storing and using energy is a general issue that has and continues to be addressed through improved technology. Notwithstanding, the use of solar PVPs is not specified in the policies which support all forms of renewable energy generation, however it

Detail	Respondent number	Response
		<p>is acknowledged that solar PVPs will be one of the more common methods of on-site renewable energy generation. The need for consideration of peak loading and storage capacity is important, and individual proposals will be assessed in terms of their suitability with this in mind.</p>

OTHER ISSUES

- The need to reinforce the national grid and/or local distribution networks (0322)

Policy CE3: Environmental standards for residential development

24 respondents

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0148	Gleeson	0305	University of Reading
0224	Home Builders Federation	0308	NHS Property Services
0225	Catesby Estates	0309	Royal Borough of Windsor and Maidenhead
0245	Crest Nicholson Partnership and Strategic Land	0314	Vistry Group
0252	Gladman	0316	Thames Water
0254	Croudace Homes	0318	Bloor Homes
0256	Historic England	0322	Booth, John
0274	Bridge House of Twyford	0324	Churchill Living and McCarthy Stone
0276	David Wilson Homes Southern	0343	Darcliffe Homes Ltd
0280	Bewley Homes	0354	Ashridge Wokingham Ltd
0282	Taylor Wimpey Strategic Land	0355	Environment Agency
0298	Nicholas King Homes	0360	South East Water

Support

Respondents 0148, 0245, 0256, 0282, 0298, 0305, **0309**, 0318, and 0324 consider the policy to be legally compliant and to comply with the Duty to Cooperate.

Respondents 0245, **0256**, 0305, 0308, **0309**, and **0355** support the policy.

Support was contingent in the case of **0256** on minor modifications to add clarity to the policy title so it is clear the requirements relates to new dwellings rather than conversions.

Respondent **0316** supports reference to water efficiency, but noted that a condition is necessary on planning permissions for these measures to be achieved in the current system.

Respondent **0360** strongly supports the commitment to sustainable design in new residential development, and welcomes the requirement for the 110 litres per person per day optional building regulations water standard being required through policy given the area’s water stress. The respondent believes it is appropriate for this standard to be strengthened even further, which is covered in the main issues below.

While respondent 0225, 0252, 0254, 0274, 0280, 0298, 0318, 0343, and 0354 supported the Council’s climate change objectives and/or the general need to act to reduce carbon emissions, each raised specific concerns with aspects of the policy which are covered below.

Respondent 0305 supported the exceptional basis clauses for cases where targeted performance cannot justifiably be met. Respondents 0305 and 0314 supported the requirements to incorporate water demand reduction measures and consumption monitoring technology. However, they both raised specific concerns with aspects of the policy which are covered below.

MAIN ISSUE: DUTY TO COOPERATE

Detail	Respondent number	Response
Concern with lack of update to cross boundary issues with neighbouring authorities since SoCG dated 2021.	0343	Incorrect. The Duty to Cooperate: Statement of Compliance (2025) (and predecessor documents) sets out in detail the engagement undertaken on the plan and evidence base, including updated Statements of Common Ground at the point of submission.

MAIN ISSUE: CONSISTENCY WITH NATIONAL POLICY AND GUIDANCE

Detail	Respondent numbers	Response
The policy requirements – including for renewable energy generation on site to meet total energy demand and setting of energy use intensity targets – exceed the proposed Future Homes Standard (FHS) and are inconsistent with the Written Ministerial Statement. Policy should align with	0148, 0224, 0225, 0245, 0252, 0274, 0282, 0305, 0318, 0343, 0354	In principle, the council is seeking to address the climate emergency by exceeding building regulations / FHS consistent with best practice policies adopted elsewhere. The Net Zero Policy – Technical Evidence Base (2024) demonstrates that the policy requirement for on-site renewables to meet or exceed on-site energy use is technically feasible in the case of typical developments. This approach is necessary to allow for local

Detail	Respondent numbers	Response
building regulations / comply with the requirements of the WMS.		and national emissions reductions commitments to be approached and is in alignment with robust supporting evidence. Notwithstanding, the council is aware of the Written Ministerial Statement December 2023 which requires policies to be expressed in terms of improvements to Target Emissions Rate. The council expects this to be a matter for discussion at the examination.
Local plans are not the appropriate place to introduce standards, as the Future Homes Standard (FHS) will enable consistency and certainty at the national level.	0224, 0252, 0274, 0343	The local plan is required to align with local and national carbon reduction commitments, and to follow evidence. Legislation and national policy / guidance allows for local planning authorities to introduce standards for development. In principle, the council is seeking to address the climate emergency by exceeding building regulations / FHS consistent with best practice policies adopted elsewhere. A key issue identified through the evidence for the plan was the need to set policy requirements which are based on absolute targets for energy use rather than relying on comparison to “notional” model buildings as used by Building Regulations. Policy CE3 uses total energy demand (regulated and unregulated) to measure building performance since this can be easily monitored through meter readings, providing accurate and certain information on how buildings perform in use. These requirements are developed through careful consideration of technical feasibility evidence and evidence of best practice policies adopted elsewhere. Notwithstanding, the council is aware of the Written Ministerial Statement December 2023 which requires policies to be expressed in terms of improvements to Target Emissions Rate. The council expects this to be a matter for discussion at the examination.

Detail	Respondent numbers	Response
The requirement for water consumption not to exceed 105 litres per person per day is inconsistent with national policy and building regulations.	0224, 0274, 0318, 0343	This is incorrect. The policy specifies 105 l/p/p/p/d plus an allowance of up to 5 litres for external water consumption i.e. a total requirement of 110 l/p/p/p/d. This is consistent with the optional standard in building regs for areas where there is a clear local need which specify the same allowances for internal vs external consumption. As an area of serious water stress, the standards mandated in policy are justified.

MAIN ISSUE: CLARITY OF POLICY

Detail	Respondent numbers	Response
Lack of clarity on the offset/payment solution, and how this will work in practice.	0148, 0305, 0318	The principle of offsetting is established elsewhere and found not to impact on development viability. Opportunities for offsetting support the viability of the policies by providing options to development not able to meet energy demand or generation targets on site. An offset calculation mechanism will be robustly evidenced based on national and regional standards and precedents, and is intended to be index linked.
Lack of clarity over how renewable energy is to be accounted for given different requirements for heat and electricity.	0322	The use of targets for both space heating demand and total energy use allows applicants to have a clearer idea of whether the proposed development achieves an adequate level of building performance. Targets for space heating demand are set out because, for any space heating demand that exceeds this range, it will be more difficult to achieve policy compliance for total energy use. Space heating demand can be significantly reduced through design measures and cases where this range cannot be met will be the exception. In such

Detail	Respondent numbers	Response
		cases, the Exceptional Basis Clauses can be activated to allow for mitigation through offsetting. It is expected that developments should generate renewable energy equivalent to their total demand on site wherever possible, this figure will include energy for space heating as well as all other uses. The targets set for energy use intensity and space heating demand are based on best practice and standard metrics.

MAIN ISSUE: POLICY ACHIEVABILITY

Detail	Respondent number	Response
The requirement for net zero homes, including on-site renewable energy generation to match on-site demand, is onerous and difficult to achieve due to skills shortages and supply chain challenges. It is not clear what evidence justifies it.	0148, 0254, 0274, 0280	The Net Zero Policy – Technical Evidence Base (2024) demonstrates that the policy requirement for on-site renewables to meet or exceed on-site energy use is technically feasible in the case of typical developments. It should be noted that the policy approach encourages energy demand reduction as far as possible first (through design measures) so that residual demand is of a scale that is not onerous to meet through renewable energy generation on site in the majority of cases.
Not clear why Building Regs and SAP calculations are not appropriate, instead of the certification schemes listed in the policy.	0148	The local plan is required to align with local and national carbon reduction commitments, and to follow evidence. A key issue identified through the evidence for the plan was the need to set policy requirements which are based on absolute targets for energy use rather than relying on comparison to “notional” model buildings as used by Building Regulations.

Detail	Respondent number	Response
		<p>Policy CE3 uses total energy demand (regulated and unregulated) to measure building performance since this can be easily monitored through meter readings, providing accurate and certain information on how buildings perform in use. These requirements are developed through careful consideration of technical feasibility evidence and evidence of best practice policies adopted elsewhere.</p> <p>It should be noted that the Building Regulations act as a legal compliance framework for minimum performance standards and do not capture an accurate picture of building performance due to their reliance on the “notional” building, and exclusion of unregulated energy. Modification of the policies to reduce their requirements to those of the Building Regulations is not considered an acceptable way to ensure sustainable development and would also represent unnecessary duplication of the requirements of the Building Regulations.</p> <p>The referenced certification schemes are well known and commonly used and would assist in achieving the council’s aims for net zero development.</p>
<p>It is not clear how a building's energy performance would be monitored, verified and reported post construction. This is overly onerous and it is not clear whether this is achievable with regard to Council resources.</p>	<p>0148, 0254, 0298, 0305, 0318, 0354</p>	<p>The council intends to introduce supplementary guidance post adoption of the plan to provide greater clarity. In principle, the council is seeking to address the climate emergency by setting policy requirements which are based on absolute targets for energy use rather than relying on comparison to “notional” model buildings as used by Building Regulations. Applicants have flexibility in the modelling method they choose, e.g. the free to use Passivhaus Planning Package. The</p>

Detail	Respondent number	Response
		plan uses total energy demand (regulated and unregulated) to measure building performance since this can be easily monitored through meter readings. These requirements are developed through careful consideration of technical feasibility evidence and evidence of best practice policies adopted elsewhere.
Concern expressed that achieving net zero standard will compromise design quality.	0148, 0224, 0274	The Net Zero Policy – Technical Evidence Base (2024) includes realistic and representative assumptions about form factor of dwellings that are delivered on the ground. It is considered that the requirements for net zero can be achieved without resulting in poor design. The need to achieve net zero requires high quality design for example, the need for high quality materials and high quality construction detailing to reduce risk of poor performance. The adoption of Net Zero planning policies across the UK is already driving an increase in the quality of construction and it is appropriate that Wokingham Borough should benefit from this improvement.
Inappropriate for the net zero requirement to apply to individual dwellings rather than the development as a whole.	0224	Net zero is defined at the level of the development (para 6.15) rather than individual dwellings. Further, the policy does not mandate on-plot generation to match demand, rather this is expressed as a preference with the requirement being for demand across the site to be matched by on-site renewables. This recognises that certain dwellings (or plots) may not be able to achieve the requirements individually. Policy CE3 requires a site-wide average for energy performance while setting a (much higher) cap for individual buildings. This ensures that while a development achieves overall compliance, no individual buildings will suffer from unacceptably poor energy performance.

Detail	Respondent number	Response
<p>The energy use of a new building is dependent on occupant behaviour and beyond the control of the developer, specifically unregulated energy which can't be influenced through design, materials, systems etc.</p>	<p>0245, 0276</p>	<p>Emphasis is placed on the design-led reduction of energy demand in the first instance following the energy hierarchy. This will primarily relate to regulated demand and maximises the likelihood occupiers will use homes efficiently. Once this has been reduced as far as possible, residual loads including unregulated energy can be assessed and wherever possible mitigated through on-site renewable energy generation. The policy approach reflects adopted best practice from plans elsewhere. The need for adequate building operation information to be provided to ensure that buildings perform as expected, is key and will be reflected in forthcoming supplementary guidance in support of the policies. This is particularly important where building users are encountering systems such as Mechanical Ventilation and Heat Recovery (MVHR) with high airtightness or Air Source Heat Pumps (ASHP) for the first time.</p>
<p>The requirement for in use monitoring would be difficult to implement.</p>	<p>0245</p>	<p>The council intends to introduce supplementary guidance post adoption of the plan to provide greater clarity. The policy approach reflects adopted best practice from plan elsewhere. In essence, in-use monitoring will be based on information from energy meters and will therefore be simple to collect and assess. The need for appropriate council resource to implement this aspect of the policy is noted.</p>
<p>It hasn't been demonstrated that the requirements to effectively achieve Passivhaus standard are achievable, particularly at scale.</p>	<p>0254, 0274, 0280, 0298, 0314, 0354</p>	<p>The Net Zero Policy – Technical Evidence Base (2024) demonstrates that the policy requirement for net zero development is technically feasible in the case of typical developments. Furthermore, where exceptional circumstances restricting the viability of this approach exist,</p>

Detail	Respondent number	Response
		Exceptional Basis Clauses are provided to support applicants to achieve an acceptable level of sustainable development through alternative means.
The requirements for full on-site renewable energy are not evidenced to be achievable early in the plan period	0254	The Net Zero Policy – Technical Evidence Base (2024) demonstrates that the policy requirement for on-site renewables to meet or exceed on-site energy use is technically feasible in the case of typical developments. The policy approach requires that net zero operation is achievable at the point of handover, ensuring that dwellers and building users benefit from net zero buildings throughout the plan period. This is key to ensuring that the borough can approach its local and national commitments to carbon emissions reductions. In exceptional cases where the full on-site renewable energy generation requirement cannot be met due to viability constraints, an Exceptional Basis Clause can be activated to allow for mitigation through offsetting.
There is lack of certainty that the policy requirements can be implemented without impacting development viability, including that the uplifts used in the viability evidence are much lower than alternative sources. Particular reference to viability in the case of older people accommodation.	0224, 0274, 0314, 0324	The Net Zero Policy – Technical Evidence Base (2024) provides robust cost estimate uplifts for achieving policy requirements and a greater % uplift has been tested in the Local Plan and Community Infrastructure Levy Viability Study (2024) and found to be generally viable in combination with other policy requirements. The policy contains flexibility in its exceptions clauses and viability justification for not meeting policy requirements can be advanced at the individual planning application stage, where relevant.
The policy requirements will slow down delivery of housing, even if technically achievable.	0224, 0314	The policy requirements are consistent with best practice policies adopted elsewhere, and no evidence has been advanced that delivery has slowed in those authority areas.

Detail	Respondent number	Response
That there is a need for requirements to be phased over the plan period.	0254, 0280	The Net Zero Policy – Technical Evidence Base (2024) demonstrates that the policy requirements for net zero development are technically feasible in the case of typical developments at the point of adoption, meaning that phasing is not considered to be necessary.
The requirement that no single dwelling is to have a total energy demand in excess of 60kWh/sq m/year should be removed, instead relying on the requirement for 15-20 kWh/m2/year for space heating.	0314	The Net Zero Policy – Technical Evidence Base (2024) demonstrates that the policy requirements for net zero development are technically feasible in the case of typical developments. Upper limits for individual buildings are set at a level which allows flexibility across a development while ensuring that no individual building suffers from an unacceptably poor level of energy performance. The requirements are considered appropriate and achievable.
Concern over how the timing (in terms of time of day and season) of generation from solar PV and associated practicalities of electricity storage or conversion to hydrogen.	0322	Solar PVPs are a widely used and efficient means of generating renewable energy. Practicalities of storing and using energy is a general issue that has and continues to be addressed through improved technology. Notwithstanding, the use of solar PVPs is not specified in the policies which support all forms of renewable energy generation, however it is acknowledged that solar PVPs will be one of the more common methods of on-site renewable energy generation. The need for consideration of peak loading and storage capacity is important, and individual proposals will be assessed in terms of their suitability with this in mind.
Conflict between maximising density through taller buildings and the reduced capacity of flatted development for on plot renewables	0322	While density will be maximised through the plan, this will be in a manner that is appropriate to existing character.

Detail	Respondent number	Response
		<p>Therefore, very few tall buildings will be delivered and policy compliant levels of on plot renewables will be achievable.</p> <p>The majority of development will be able to achieve an appropriate level of on-site generation, however in cases where development type or other constraints affect the viability of on-site generation, Exceptional Basis Clauses can be activated to support applicants to achieve an appropriate level of sustainable development through alternative means.</p> <p>Taller and attached buildings will benefit from improved form factors and reduced heat loss through their envelope, reducing space heating demand and thereby reducing the amount of renewable energy required to offset their demand.</p>
The need to reinforce the national grid and/or local distribution networks	0322	To support energy resilience, heat networks, microgrids and other local energy solutions are encouraged. The largest developments will need Distribution Network Operator (DNO) engagement. Storage and demand flexibility is encouraged for all developments.

MAIN ISSUE: POLICY WORDING

Detail	Respondent number	Response
Believe, and strongly encourage local planning authorities to consider, that all new homes should be built to a minimum standard of 100 litres per person per day.	0360	Through Part G of the Building Regulations all developments are required to achieve a mandatory standard of 125 litres per person per day. The optional technical standards for housing allows local authorities to apply a higher standard of 110 litres

Detail	Respondent number	Response
		<p>per person per day where there is a clear local need, and this is the approach taken in Policy CE3 (including a fixed factor of water for outdoor use of 5 litres per person per day).</p> <p>Wokingham Borough is identified as being within an area of serious water stress and so this optional standard is justified. The council notes the respondent's ambition to go further, and this is also recognised in the wording of Policy CE3 5.a) which encourages developments to deliver standards above optional building regulations requirements. At this time, it is not considered appropriate to mandate more stringent targets, given the approach already reflects the most stringent national target available. This position will be revisited through future local plan reviews.</p>

OTHER ISSUES

- Respondents 0224, 0225, 0254, 0274, 0280 and 0343 consider the policy not to be legally compliant.
- Respondents 0224 and 0225 consider the policy not to comply with the Duty to Co-operate.
- The capacity of the grid to accommodate the required level of on site renewables (0148).
- That the following condition should be applied to all residential planning permissions (**0316**):
“The dwelling(s) shall be constructed to meet as a minimum the higher Building Regulation standard Part G for water consumption limited to 110 litres per person per day using the fittings approach.

Reason: The site is in an area of serious water stress requiring water efficiency opportunities to be maximised; to mitigate the impacts of climate change; in the interests of sustainability; and to use natural resources prudently in accordance with the NPPF.”

- The importance of careful consideration of heat source e.g. heat pumps and accurate estimates of energy usage (0322).

Policy CE4: Supporting a circular economy

Seven respondents

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0224	Home Builders Federation	0309	Royal Borough of Windsor and Maidenhead
0252	Gladman	0314	Vistry Group
0274	Bridge House of Twyford	0343	Darcliffe Homes Ltd
0305	University of Reading		

Support

Respondents 0305 and **0309** (the Royal Borough of Windsor and Maidenhead) consider the policy to be legally compliant.

Respondents 0305 and **0309** (the Royal Borough of Windsor and Maidenhead) consider the policy to comply with the Duty to Cooperate.

Respondents 0305, **0309** (the Royal Borough of Windsor and Maidenhead), and 0314 support the policy.

MAIN ISSUE: DUTY TO COOPERATE

Detail	Respondent number	Response
Concern with lack of update to cross boundary issues with neighbouring authorities since SoCG dated 2021.	0343	Incorrect. The Duty to Cooperate: Statement of Compliance (2025) (and predecessor documents) sets out in detail the engagement undertaken on the plan and evidence base, including updated Statements of Common Ground at the point of submission.

MAIN ISSUE: CONSISTENCY WITH NATIONAL POLICY AND GUIDANCE

Detail	Respondent numbers	Response
The policy requirements exceed current and proposed national policy and is not supported by sufficient evidence.	0343	The policy approach is considered consistent with national policy which requires consideration to be given to the reuse of existing resources as a key aspect of transitioning to a low carbon future. The Climate Change evidence base report (2022) contains robust evidence detailing why circular economy principles are justified and best practice examples of where similar requirements have been introduced elsewhere.

MAIN ISSUES: POLICIES, DECISION TAKING AND IMPLEMENTATION

Detail	Respondent number	Response
The policy should not be prescriptive in its approach to circular economy audits and instead allow flexibility.	0224, 0252	The plan does not prescribe specific guidance that should be followed. Instead, paragraph 6.35 simply directs applicants to an example of best practice. The wording “ <i>such as</i> ” makes it clear that this is not a closed list and alternative best practice approaches will be acceptable.
Concern with the requirement for additional strategy documents to support applications without adding value to decision making.	0224, 0252, 0274, 0343,	The policy approach is consistent with the NPPF requirements to make prudent use of resources. The requirement for formal reporting as part of Energy and Sustainability Statements (an existing validation requirements) is not considered onerous. The need for upskilling across the industry and the council is recognised as being necessary to move to net zero carbon. Circular economy strategies can be brief and simple – introducing a requirement for them is appropriate to guide

		applicants in considering this important issue through the design process.
--	--	--

OTHER ISSUES

- Respondents 0224, 0274, and 0343 consider the policy not to be legally compliant.
- Respondent 0224 consider the policy not to comply with the Duty to Co-operate.

Policy CE5: Embodied carbon

15 respondents

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0224	Home Builders Federation	0298	Nicholas King Homes
0245	Crest Nicholson Partnership and Strategic Land	0305	University of Reading
0252	Gladman	0309	Royal Borough of Windsor and Maidenhead
0254	Croudace Homes	0314	Vistry Group
0256	Historic England	0324	Churchill Living and McCarthy Stone
0274	Bridge House of Twyford	0343	Darcliffe Homes Ltd
0276	David Wilson Homes Southern	0354	Ashridge Wokingham Ltd
0280	Bewley Homes		

Support

Respondents 0245, **0256** (Historic England), 0298, 0305, **0309** (the Royal Borough of Windsor and Maidenhead), and 0324 consider the policy to be legally compliant and to comply with the Duty to Cooperate.

Respondents **0256** (Historic England), 0305, **0309** (the Royal Borough of Windsor and Maidenhead), and 0314 support the policy.

Support was contingent in the case of **0256** (Historic England) on minor modifications to ensure CE5 cross refers to heritage policy and is clearer on the benefits of retaining and repairing historic buildings.

Support was contingent in the case of 0245 on the policy being modified so that the mechanism for accounting for whole life carbon impacts was the RICS whole life carbon assessment as per current and future building regulations.

While respondent 0254, 0276, 0298, and 0354 support the general need to act to reduce carbon emissions (including embodied carbon), each raised specific concerns with aspects of the policy which are covered below.

MAIN ISSUE: DUTY TO COOPERATE

Detail	Respondent number	Response
Concern with lack of update to cross boundary issues with neighbouring authorities since SoCG dated 2021.	0343	Incorrect. The Duty to Cooperate: Statement of Compliance (2025) (and predecessor documents) sets out in detail the engagement undertaken on the plan and evidence base, including updated Statements of Common Ground at the point of submission.

MAIN ISSUE: POLICY ACHIEVABILITY

Detail	Respondent number	Response
Lack of robustness of whole life carbon assessments due to: a lack accurate data regarding the embodied carbon of building materials; lack of clarity early in the planning stage (especially at outline) as to the materials to be used (potentially not to after the grant of permission).	0224, 0252, 0254, 0274, 0280, 0298, 0343, 0354	<p>Embodied carbon accounts for around 20% of total greenhouse gas emissions and cannot be ignored in order to achieve climate emergency objectives. The policy recognises that embodied carbon assessments is a step change and requires these only for the largest development proposals – a schemes of 50 dwellings or 5,000m² floorspace, rather than simply ‘major development’. At early design stage, decisions which have a significant impact on embodied carbon are made. These include: decisions to demolish and rebuild versus retrofit, scale of development, structural type, extent of groundworks and excavation.</p> <p>Whole Life Carbon Assessment (WLCA) is an iterative process, used to inform decision making in the design process, and is refined at later stages. At early design stages, relevant at Outline Planning stage, some or all of the above mentioned decisions will have been considered using placeholder materials as appropriate – WLCA allows carbon implications of</p>

Detail	Respondent number	Response
		<p>these choices to be weighed. Outputs from WLCA at application stage, whether outline, full or reserved matters, will support the assessment of the suitability of development.</p> <p>The policy is reflective of best practice policies recently found sound elsewhere.</p>
<p>Local plans are not the appropriate place to introduce embodied carbon requirements / the requirements are premature. There is an emerging roadmap to reducing embodied carbon and an agreed national approach will enable consistency and certainty.</p>	<p>0224, 0252, 0254, 0274, 0298, 0354</p>	<p>In principle, the council is seeking to address the climate emergency by going beyond building regulations on embodied emission. There is no guarantee that a national approach will be introduced and the climate science is clear embodied carbon needs to be addressed now. The policy approach is consistent with best practice policies adopted elsewhere.</p>
<p>Policy requirements will impact on deliverability of housing, especially SME housebuilders (for reasons including their reduced scope to influence supply chains).</p>	<p>0224, 0254, 0274, 0298</p>	<p>The policy requirements are consistent with best practice policies adopted elsewhere, and no evidence has been advanced that delivery has slowed in those authority areas.</p>
<p>Concern about setting specific embodied carbon targets, with flexibility being required and clarity on how decision makers will react in situations where the policy can't be achieved.</p>	<p>0274,</p>	<p>The policy does not set specific embodied carbon limits. Instead, it requires all reasonable and practical opportunities to consider, measure and minimise embodied carbon emissions, consistent with recently adopted policies elsewhere.</p>
<p>Policy requirements have not been demonstrated to be viable for older people accommodation.</p>	<p>0324</p>	<p>Noted that the Local Plan and Community Infrastructure Levy Viability Study (2024) concludes policy requirements for elderly accommodation are not expected to be viable. Viability justification for not meeting policy requirements will need to be advanced at the individual planning application stage.</p>

OTHER ISSUES

- Respondents 0224, 0254, 0274, 0280, and 0343 consider the policy not to be legally compliant.
- Respondent 0224 consider the policy not to comply with the Duty to Co-operate.

Policy CE6: Reducing energy consumption in existing buildings

Four respondents

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0256	Historic England	0305	University of Reading
0275	Oxford Diocesan Board of Finance	0309	Royal Borough of Windsor and Maidenhead

Support

All respondents (**0256**, 0275, 0305, and **0309**) consider the policy to be legally compliant and to comply with the Duty to Cooperate. This includes both Historic England and the Royal Borough of Windsor and Maidenhead.

All respondents (**0256**, 0275, 0305, and **0309**) support the policy. As above, this includes Historic England and the Royal Borough of Windsor and Maidenhead.

Support was contingent in the case of **0256** (Historic England) on minor modifications to clarify the ‘whole building approach’ in supporting text which is addressed below.

MAIN ISSUES: POLICY WORDING

Detail	Respondent number	Response
A fabric first approach is not appropriate for the retrofit of traditionally constructed buildings, which merit a “whole building approach” to avoid maladaptation of historic buildings.	0256	The council agrees reference to the whole building approach guidance document could be added to the supporting text to strengthen this policy. Please refer to the Schedule of proposed modifications for detail.

Policy CE7: Low carbon and renewable energy generation

Four respondents

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0256	Historic England	0309	Royal Borough of Windsor and Maidenhead
0305	University of Reading	0314	Vistry Group

Support

Respondents **0256** (Historic England), 0305, and **0309** (the Royal Borough of Windsor and Maidenhead) consider the policy to be legally compliant and to comply with the Duty to Cooperate with respondent 0314 not stating.

All respondents (**0256**, 0305, **0309**, and 0314) support the policy. This includes Historic England and the Royal Borough of Windsor and Maidenhead.

Support was contingent in the case of **0256** (Historic England) on minor modifications to make stronger reference to the setting of heritage assets in the policy and to clarify the evidence required in supporting text to demonstrate consideration of heritage impacts. clarify the ‘whole building approach’ in supporting text.

MAIN ISSUES: POLICIES, DECISION TAKING AND IMPLEMENTATION

Detail	Respondent number	Response
The Climate Change evidence base report (2022) does not include heritage assets in its methodology for identifying areas suitable for ground mounted solar PV, and therefore the policy would benefit from greater clarity on the need to avoid impact on the setting of heritage assets.	0256	The council agrees clarification should be provided. Please refer to the Schedule of proposed modifications for detail.

MAIN ISSUES: OMISSION SITE FOR RENEWABLE ENERGY USE

Detail	Respondent number	Response
That site 5HU053 is available to deliver a range of uses, including renewable energy.	0305	The site was assessed as potentially developable through the HELAA, but ultimately there was a lack of clarity about the intended uses to warrant allocation in the plan. A development proposal for renewable energy use would be considered against Policy CE7 and other relevant policies.

Policy CE8: Protecting renewable energy infrastructure

Two respondents

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0305	University of Reading	0309	Royal Borough of Windsor and Maidenhead

Support

All respondents (0305 and **0309**) consider the policy to be legally compliant and to comply with the Duty to Cooperate.

All respondents (0305 and **0309**) support the policy.

For the avoidance of doubt, no main issues were raised in representations regarding the policy.

Chapter 7: Connections

One respondent.

Respondent number	Name/Organisation
0246	Hurst Neighbourhood Plan Group

Support

Respondent 0246 considers the chapter to be legally compliant but did not comment on the Duty to Cooperate.

MAIN ISSUES: CLARITY

Detail	Respondent number	Response
The chapter title is misleading, not reflective of the policies it contains which relate primarily to transport, and is not consistent with the heading of Section 9 of the NPPF.	0246	Noted. Whilst the policies within the chapter primarily cover transport related matters, the chapter also covers other 'connections', including utilities and digital technologies. It therefore encompasses matters beyond just those covered in NPPF section 9, for example section 10 – Supporting high quality communications. The council is satisfied the chapter title is appropriate.

Policy C1: Active and sustainable transport and accessibility

12 respondents

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0132	Bracknell Forest Council	0256	Historic England
0182	National Highways	0274	Bridge House of Twyford
0221	Mac Mic Group	0300	Network Rail
0231	Willson Developments Ltd	0305	University of Reading
0235	The Old Redingensians Association	0314	Vistry Group
0246	Hurst Neighbourhood Plan Group	0318	Bloor Homes

Support

Respondents 0221, 0231, 0235, 0246, **0256**, 0305, and 0318 consider the policy to be legally compliant.

Respondents 0221, 0231, 0235, **0256**, 0305, and 0318 consider the policy to comply with the Duty to Cooperate.

Respondents 0221, **0256**, 0274, **0300**, 0305, 0314 support the policy.

Whilst respondent 0274 supports the policy to provide greater priority to pedestrians and cyclists, they noted that residents of older persons accommodation have different levels of mobility and daily routes compared to normal residential development.

While respondent 0305 states support for the policy and noted it would not be an impediment to the delivery of the Loddon Valley Garden Village SDL, some specific concerns about how the policy would apply more generally and consistency with national policy were raised.

National Highways (0182) did not comment on legal compliance or the Duty to Cooperate. National Highways did not specifically indicate whether the policy was sound, but their comments expressed support for the approach of focussing on active and sustainable transport measures through development which limits journeys made by private car.

While respondents 0231 and 0318 support the general principles of the policy, each raised specific issues which are covered below.

MAIN ISSUE: CONSISTENCY WITH NATIONAL POLICY AND GUIDANCE

Detail	Respondent numbers	Response
Policy wording at part 4 is too onerous in requiring all 9 criteria to be met which is not consistent with NPPF (paragraphs 114a and 16). Suggestion that the wording 'where appropriate' is added to part 4.	0231, 0235, 0305	Noted, but part 4 requires that 'a proportionate package of measures' are implemented. This allows sufficient flexibility for development proposals on a case by case basis. Notwithstanding, a small amendment is proposed to the policy wording of the final paragraph as detailed in the Schedule of proposed modifications.

MAIN ISSUES: CLARITY OF POLICY

Detail	Respondent number	Response
Greater clarity should be provided that links to walking and cycling networks need to extend beyond the borough boundary	0132	The council agrees a modification would provide clarity regarding routes beyond the borough, as set out in the Schedule of proposed modifications.
That the wording 'long-term' (in paragraphs 7.9 and 7.11) lacks clarity and is open to interpretation / abuse and should be replaced with 'for a minimum of 20 years'.	0246	The council is satisfied with the wording as drafted. Bus operators for example, will have their own definition of long-term, so flexibility is required.

OTHER ISSUES

- Respondent 0274 considers the policy not to be legally compliant
- The important role that development plays in delivering active travel improvements through direct provision / funding through CIL and s106 (0221)

Policy C2: Mitigation of transport impacts and highways safety and design

Eight respondents

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0132	Bracknell Forest Council	0245	Crest Nicholson Partnership and Strategic Land
0148	Gleeson	0300	Network Rail
0231	Willson Developments Ltd	0305	University of Reading
0235	The Old Redingensians Association	0318	Bloor Homes

Support

Respondents 0148, 0231, 0235, 0245, **0256**, 0305, and 0318 consider the policy to be legally compliant and to comply with the Duty to Cooperate.

Respondents 0245 and **0300** support the policy.

Support was contingent in the case of 0245 on minor modifications to generalise the policy by removing reference to Living Streets and Healthy Streets.

While respondent 0231 and 0305 support the general principles of the policy, each raised specific concerns with aspects of the policy which are covered below.

MAIN ISSUE: CONSISTENCY WITH NATIONAL POLICY AND GUIDANCE

Detail	Respondent numbers	Response
Conflict with NPPF 115 as the policy refers to 'any material adverse impacts' whereas NPPF states development only refused when the cumulative impact would be severe. The policy should be modified for consistency.	0148, 0231, 0235, 0305, 0318	The council is satisfied the wording strikes an appropriate balance between transport impacts needing to be appropriately mitigated, given the high level of car ownership / usage in the borough, and consistency with national policy.

MAIN ISSUES: CLARITY OF POLICY

Detail	Respondent number	Response
Greater clarity should be provided that provision of, or contributions towards, infrastructure necessary to address impacts of a development may need to be provided beyond WBC's administrative boundary	0132	The council has proposed a modification in the Schedule of proposed modifications to provide clarity.
it is unclear what is meant by "existing and forecast traffic conditions" which should be modified to simply "forecast conditions"	0231, 0235, 0318	The council considers it important that development which will impact on specific parts of the network appropriately address existing congestion as appropriate, as well as ensure future impacts are mitigated. This reflects that developments may be phased with associated transport mitigation later in the plan period, however main access arrangements will need to be provided prior to occupation, and this has the potential to alleviate existing issues if designed appropriately.

MAIN ISSUES: POLICY EVIDENCE BASE

Detail	Respondent number	Response
The level of assessment of cross-boundary transport impacts and links does not appear to accord with Policy C2 which requires transport impacts to be fully assessed.	0132	The council is satisfied the transport modelling and assessment undertaken is appropriate. Planning applications will submit further information regarding the potential implications of the development proposed. The council will continue to work closely with other highways authorities regarding highways and transport matters.

MAIN ISSUES: POLICIES, DECISION TAKING AND IMPLEMENTATION

Detail	Respondent number	Response
Reference to Living Streets and Healthy Streets should be removed to keep the aspirations of the policy more generalised.	0245	Living Streets and Healthy Streets principles are supported by the council and referenced in the highways guidance. The policy deliberately seeks to embed these best practice principles into development plan policy.

Policy C3: Active travel

Seven respondents

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0078	Hillcoat, Chris	0274	Bridge House of Twyford
0132	Bracknell Forest Council	0300	Network Rail
0148	Gleeson	0314	Vistry Group
0212	Jorgensen, Pauline		

Support

Respondents 0078 and 0148 consider the policy to be legally compliant and to comply with the Duty to Cooperate.

Respondents 0212, 0274, **0300** and 0314 support the policy.

MAIN ISSUE: CONSISTENCY WITH NATIONAL POLICY AND GUIDANCE

Detail	Respondent numbers	Response
Active travel infrastructure should be built in line with LTN 1/20 standards, approved by Active Travel England, and in accordance with the agreed LCWIP and Wokingham should aspire to Active Travel England ranking level 3 or 4 instead of the current level 2.	0078	Noted. The policy 2d) and 3b) set out how the most up to date walking and cycling strategy, which includes the LCWIP, should be considered. Supporting text paragraph 7.27 also sets out that routes should accord with LTN 1/20. Active Travel England are a statutory consultee on relevant applications, and their views will be taken into account. The aspiration for higher Active Travel England ranking is noted, and it is considered that the policy aims are consistent with achieving this outcome.

MAIN ISSUES: CLARITY OF POLICY

Detail	Respondent number	Response
Greater clarity should be provided that links to walking and cycling networks need to extend beyond the borough boundary	0132	The council is satisfied the policy wording is appropriate. In addition, a proposed modification to Policy C1 includes reference to connectivity beyond the borough boundary.

MAIN ISSUE: POLICY ACHIEVABILITY

Detail	Respondent number	Response
Seeking to 'avoid' severance is too onerous and not always achievable, likewise segregating cycle lanes is not always appropriate. Modifications suggested for additional flexibility.	0148	The council is satisfied the wording is appropriate. 'Avoid' severance has similar meaning to the suggested modification to 'minimise or reduce' severance and therefore the wording provides little by way of clarification or additional flexibility. Likewise, supporting text does not mandate segregation of cycle routes, this is simply the best practice aim in accordance with national LTN 1/20 guidance. Flexibility through decision making will be necessary where this is demonstrably unachievable.

OTHER ISSUES

- Commitment to segregated cycleways and safe and secure cycle storage welcomed (0212)
- Respondents 0274 considers the policy not to be legally compliant

Policy C4: Green and blue infrastructure and public rights of way

Five respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0118	Natural England	0256	Historic England
0132	Bracknell Forest Council	0355	Environment Agency
0243	British Horse Society		

Support

Bracknell Forest Council (**0132**) commented that the policy should recognise walking and cycling networks extend beyond Wokingham Borough.

Historic England (**0256**) supported the policy and sought a minor change to the wording with respect to heritage significance.

Environment Agency (**0355**) supported the policy.

Natural England (**0118**) do not state whether they support the policy or if they consider it to be sound.

MAIN ISSUE: CLARITY, BRIDLEWAYS AND IMPLEMENTATION

Detail	Respondent numbers	Response
Recognition that walking and cycling networks extend beyond Wokingham Borough boundaries	0132	The council is satisfied the policy wording is appropriate. In addition, a proposed modification to Policy C1 includes reference to connectivity beyond the borough boundary.
Recommend reference to 'heritage significance' be added to the policy wording, to acknowledge that the natural and historic environments are integral to each other.	0256	The council considers the requested modification by Historic England will provide useful clarity. The proposed change to paragraph 1 of the policy is set out in the Schedule of proposed modifications.

Detail	Respondent numbers	Response
Support the policy, noting that improvements to water quality should form part of green and blue infrastructure ambitions	0355	Noted. The council seeks to improve water quality in its green and blue infrastructure policies/strategies.
Recommend the NE Green Infrastructure Framework is used to develop Local Plan policies and wider GI strategies, including the 5 headline Green Infrastructure Standards.	0118	Noted. The council will review the NE Green infrastructure Framework with regards to council-wide green infrastructure strategies.
<p>Health, well-being and recreation benefits will largely be limited to walking and cycling, though the BHS has campaigned locally for more bridleways.</p> <p>Request an additional policy requirement to give definitive bridleway status to specific routes, subject to several criteria being met.</p>	0243	<p>Noted. Parts 2c and 4 of the policy and the supporting text promote accessibility and recognise the role of bridleways and opportunities for enhancement, which is considered to be sufficient.</p> <p>The council reviews the status and routes of bridleways across the borough, and an additional policy requirement is not considered necessary.</p>

Policy C5: Parking and electric vehicle charging

Nine respondents

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0110	CBREIM	0298	Nicholas King Homes
0149	Earley Town Council	0314	Vistry Group
0254	Croudace Homes	0324	Churchill Living and McCarthy Stone
0274	Bridge House of Twyford	0354	Ashridge Wokingham Ltd
0280	Bewley Homes		

Support

Respondents 0298 and 0324 consider the policy to be legally compliant and to comply with the Duty to Cooperate.

Respondents 0274, 0280, and 0314 support the policy.

Support is contingent in the case of respondents 0274 and 0314 on a minor modification relating to electric vehicle infrastructure as addressed in the main issues below. Whilst respondent 0280 supports the policy, they query whether it is necessary given it duplicates elements of existing building regulations.

While respondent 0110, 0254, 0298, and 0354 support the general principles of the policy, each raise specific concerns with aspects of the policy which are covered below.

MAIN ISSUE: POLICY JUSTIFICATION

Detail	Respondent numbers	Response
Policy is not justified given it replicates elements of building regulations and should be deleted. The	0254, 0298, 0354	Noted. The policy introduces additional nuance beyond building regulations requirements, including the support for retrofitting, and the council is satisfied it is justified.

Detail	Respondent numbers	Response
requirement for the submission of EV Charging Strategies is unjustified and overly onerous.		

MAIN ISSUES: CLARITY OF POLICY

Detail	Respondent number	Response
That greater flexibility is needed to allow occupants to choose whether or not they wish to install an EV charger.	0274, 0314	Noted. The council has proposed a modification in the Schedule of proposed modifications to provide flexibility.
Two separate sections of the policy are labelled as part 4.	0354	Typo noted and reflected in the Schedule of proposed modifications.

MAIN ISSUES: POLICY ACHIEVABILITY

Detail	Respondent number	Response
The requirements for EV charging for housing for older people have not been shown to be viable	0324	The cost of providing charging infrastructure is considered to be a very modest part of wider build costs and likely to be achievable.

MAIN ISSUES: POLICIES, DECISION TAKING AND IMPLEMENTATION

Detail	Respondent number	Response
Charging infrastructure is likely to change rapidly over the plan period and therefore the policy requires flexibility for sites to be considered for alternative uses, especially where retrofit occurs early in the plan period prior to developments later in the plan period.	0110	Noted. The policy does not preclude future changes of use, and implied loss of installed EV infrastructure, which would need to be considered on the basis of specific development proposals. The policy includes flexibility with reference to adopted standards, which can be updated as required.

OTHER ISSUES

- Respondent 0254, 0274, and 0280 consider the policy not to be legally compliant
- The policy tackles the problems with parking associated with garage conversions and building extensions **(0149)**

Policy C6: Technology and innovation in transport

One respondent

Respondent number	Name/Organisation
0110	CBREIM

Support

The respondent (0110) does not state whether they consider the policy to be legally compliant or to comply with the Duty to Cooperate.

The respondent (0110) supports the policy, noting that it is expected that the garage site (for which they are the promoter) would need to adapt to provide hydrogen refuelling and EV charging infrastructure in the short term before redevelopment during the latter part of the plan period.

Policy C7: Digital infrastructure and communications technology

Two respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0256	Historic England	0314	Vistry Group

Support

Both consultees supported the policy. Respondent 0256 supported the principle but suggested a modification to the policy and supporting text.

MAIN ISSUE: HERITAGE

Detail	Respondent numbers	Response
Policy requirement 3a) should consider the significance of heritage assets	0256	The plan should be read as a whole. There are several policies in the local plan which address the significance of heritage assets, notably Policy SS1 (Sustainable development principles) and Policy DH5 (The historic environment). Notwithstanding, the council considers the suggested modification to criteria 3a) would improve the effectiveness of the policy.
Modify supporting text (paragraph 7.57) should refer to the setting of heritage assets	0256	Agreed. A modification is proposed in the Schedule of proposed modifications, and agreed in the Statement of Common Ground with Historic England.
Modify the requirement and supporting text to recognise the significance of heritage assets and their settings	0256	Agreed. A modification is proposed in the Schedule of proposed modifications and agreed in the Statement of Common Ground with Historic England.

Policy C8: Utilities

Six respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0254	Croudace Homes	0280	Bewley Homes
0256	Historic England	0314	Vistry Group
0274	Bridge House of Twyford	0354	Ashridge Wokingham Ltd

Support

Historic England (0256) did not raise any issues with the soundness of the policy but recommended a requirement for proposals to avoid harm to archaeological remains.

MAIN ISSUE: POLICY APPROACH

Detail	Respondent numbers	Response
Applicants should not be responsible for demonstrating that there is sufficient network capacity for electricity, water supply and waste water treatment.	0254, 0274, 0280, 0314, 0354	Supporting text (paragraph 7.60) to Policy C8 qualifies that proposals will need to be supported by information to demonstrate there is capacity to service the development, or that this can be readily provided. It also highlights early engagement with utility / service providers to identify any potential infrastructure requirements.
Utility upgrades controlled by third parties, likely to impact on completion rates	0280, 0254	The council has engaged infrastructure/service and utility providers regarding the capacity of infrastructure and improvements that would be required to support population growth. This engagement is reflected in the Infrastructure Delivery Plan.

Detail	Respondent numbers	Response
The restriction on occupation to align with the off-site infrastructure upgrades should be deleted	0274, 0314, 0354	A restriction on occupation ensures the necessary infrastructure required to mitigate impacts from development is delivered in a timely manner.

REQUESTED MODIFICATIONS

Detail	Respondent number	Response
Further information required on avoiding harm to archaeological remains	0256	Not agreed. The plan should be read as a whole. Policy DH6 in the local plan addresses matters related to archaeology and provides further detail for development proposals by exploring and explaining impacts on any archaeological remains. Paragraph 3 of the policy ensures proposals take appropriate measures to protect archaeological remains in situ.
Review or remove Part 2 of the policy	0254, 0274, 0280	Not agreed. The council is satisfied part 2 of the policy helps to ensure development proposals and any utility infrastructure upgrades are suitably aligned.

Chapter 8: Economy, Employment and Retail

One respondent.

Respondent number	Name/Organisation
0132	Bracknell Forest Council

Support

Bracknell Forest Council (0132) consider the approach to meeting economic need through Core Employment Areas to be pragmatic.

MAIN ISSUES

Detail	Respondent number	Response
The Plan's ambitions with regards to the location of office development appear confusing and inconsistent with national policy	0132	The council is satisfied the approach to office development and Core Employment Areas is consistent and will continue to deliver appropriate development in CEA, which form a key part of the economic strategy.

Policy ER1: Core Employment Areas

10 respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0182	National Highways	0273	Frasers Property UK Ltd
0239	University College of Estate Management	0287	Englefield Estate
0240	Hallam Land and Wilson Enterprises Ltd	0299	West Berkshire Council
0245	Crest Nicholson Partnerships and Strategic Land	0305	University of Reading
0265	Shinfield Studios	0315	Oracle Corporation UK Ltd

Support

Respondents 0239, 0245, 0265, 0273, 0305 and 0315 consider the policy to be legally compliant.

Respondents 0239, 0240, 0245, 0265, 0273, 0305, and 0315 consider the policy complies with the duty to cooperate. No details were provided by respondents to explain why the policy does, or does not comply with the duty to cooperate.

Respondents 0305 and 315 consider the policy to be sound. The University College of Estate Management (0239), also support the policy whilst seeking clarity regarding the proposed policy wording.

LEGAL COMPLIANCE

Detail	Respondent numbers	Response
The Sustainability Appraisal has not considered all the reasonable alternatives	0240	The council is satisfied the SA appropriately considers sufficient reasonable alternatives.

MAIN ISSUE: CORE EMPLOYMENT AREA DEVELOPMENT

Detail	Respondent numbers	Response
Impact of the intensification of Core Employment Areas on the M4, particularly Green Park and Thames Valley Science and Innovation Park. All proposals in CEA should assess the impact on the strategic road network.	0182	<p>The Transport modelling and Transport Assessment consider the impact of proposed new development on the highway network, including the strategic road network.</p> <p>The assessment concludes that the strategic model and the microsimulation model the show the proposed level of development could be accommodated on the strategic road network.</p> <p>Development proposals will prepare separate transport assessments as they come forward.</p>
The boundary of the Thames Valley Science and Innovation Park should be extended to include land with planning permission	0265	Core Employment Area boundaries have been defined taking into account land which benefits from planning permission, in addition to development constraints, which at TVSP relates to flood risk.
The designation of valued landscapes is a barrier to the delivery of land within Core Employment Areas	0287	Policy NE6: Valued Landscapes is clear that development proposals must carefully consider and take account of the important landscape attributes and characteristics. This would not prevent the delivery of appropriate, well designed development.
Impact of Green Park Core Employment Area on the Detailed Emergency Planning Zone around AWE Burghfield.	0299	Land at Green Park was identified as a Core Employment Area in the adopted Core Strategy. The designation of the site and the boundary are unchanged in the emerging local plan.

MAIN ISSUE: EMPLOYMENT NEEDS

Detail	Respondent numbers	Response
The policy does not meet the needs identified, particularly for ecommerce and larger scale units.	0245	The council is satisfied future employment needs have been accurately identified. The ELNS recognises the wider industrial needs in the Thames Valley, but that provision of strategic distribution/logistics uses is beyond the scope of the study. Engagement with other local authorities has shown the limited availability of land suitable for distribution/logistics uses.
Evidence shows there are opportunities for growth across multiple sectors at Thames Valley Science Park	0305	Noted. The proposed expansion of the TVSP supports the delivery of further employment uses, to complement delivery of the wider Loddon Valley Garden Village.

MAIN ISSUE: ALTERNATIVE SITES

Detail	Respondent numbers	Response
Land at Grazeley should be identified as a Core Employment Area and allocated for industrial and logistics uses.	0240, 0245	Land at Grazeley was assessed and found not to be suitable as part of the site assessment undertaken in the HELAA (2024).

PROPOSED MODIFICATIONS

Detail	Respondent numbers	Response
Reference to the 'Loss of employment floorspace is ambiguous' and should be clarified to refer to the redevelopment for non-employment uses	0239	Agreed that the subheading does not fully reflect part 5. A modification is proposed to remove the subheading.

Detail	Respondent numbers	Response
To provide flexibility reduce the 18 month marketing requirement to 6 months	0273	Not agreed. The council considers an 18 month period is appropriate to undertake effective marketing, with sufficient time needed to ensure it is both genuine and sustained, potentially across an internal market.
Include reference to the expansion of Green Park into the areas land west of Kirtons Farm Road	0287	Not agreed. It is not necessary to refer to specific areas of land within a Core Employment Area, which are shown in Appendix H and on the policies map.
Ensure the Policies Map includes the whole of the borough, including the land at Green Park.	0287	Agreed. An updated version of the policies map has been prepared. Appendix H: Core Employment Area Maps, shows the proposed area of all the sites, including at Green Park. In addition all the information shown on the policies map, including proposed allocations and designations were available on the interactive mapping on the council's website.
Modify the policy to refer to the location of Green Park within the DEPZ around AWE Burghfield	0299	Not agreed. The Local Plan Update should be read and interpreted as a whole, with all policies being viewed together and not in isolation. Any development proposal within this area would be subject to consideration under Policy SS7: Development in vicinity of AWE requiring full consideration of potential impacts on the operability of the AWE Off-Site Emergency Plan.
Modify the policy to refer to employment development within the DEPZ needing to take into account the potential impacts on public safety and defence operations and capabilities set out in policy SS7.	0321	Not agreed. The Local Plan Update should be read and interpreted as a whole, with all policies being viewed together and not in isolation. Any development proposal within this area would be subject to consideration under Policy SS7: Development in vicinity of AWE requiring full consideration of

Detail	Respondent numbers	Response
		potential impacts on the operability of the AWE Off-Site Emergency Plan.
Modify the allocation of the Thames Valley Science and Innovation Park to refer to 'innovation.'	0265	Not agreed. The council is satisfied reference to research and development is sufficient, and more appropriately reflects the use classes order

Policy ER2: Employment uses outside Core Employment Areas

Four respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0229	Wyvols Court Farm Ltd	0240	Hallam Land and Wilson Enterprises Ltd
0245	Crest Nicholson Partnerships and Strategic Land	0253	Wrenbridge (FRELD Reading) LLP

Support

Respondents 0245 and 0253 consider the policy to be legally compliant.

Respondents 0240, 0245 and 0253 consider the policy complies with the duty to cooperate. No details were provided by respondents to explain why the policy does, or does not comply with the duty to cooperate.

LEGAL COMPLIANCE

Detail	Respondent numbers	Response
The Sustainability Appraisal has not considered all the reasonable alternatives	0240	The council is satisfied the SA appropriately considers sufficient reasonable alternatives.

MAIN ISSUE: EMPLOYMENT NEEDS

Detail	Respondent numbers	Response
The policy does not meet the needs identified, particularly for ecommerce and larger scale units.	0245	The council is satisfied future employment needs have been accurately identified. The ELNS recognises the wider industrial needs in the Thames Valley, but that provision of strategic distribution/logistics uses is beyond the scope of the study. Engagement with other local authorities has shown the limited availability of land suitable for distribution/logistics uses.
The ELNR does not include a past trend or forecast based assessment of future demand for film/tv related jobs demand	0240	The ELNR calculates an indirect job dividend from Shinfield Studios, which results in a net demand for an additional 6 hectares of employment land, which is factored into the employment needs over the plan period.

MAIN ISSUE: POLICY IMPLEMENTATION

Detail	Respondent numbers	Response
Lack of support for expansion of existing rural employment	0229	The council is satisfied policy ER3 appropriately considers employment uses in the countryside.
No timeline has been provided setting out floorspace delivery at Thames Valley Science and Innovation Park	0240	Employment floorspace at TVSP will be delivered within the plan period to 2040. Discussions with the landowners and potential operators are ongoing.
The policy is not positively prepared or consistent with national policy because economic development will be well ventilated, which	0240	Policy SS7 sets out the policy basis for development proposals within the zones around AWE Burghfield. This has been informed by engagement with ONR and AWE.

Detail	Respondent numbers	Response
minimises the entry of radioactive material for development located in the UPA around AWE Burghfield		
Policy ER2 applies a different set of policy tests from policy SS8. The NPPF only advocates a sequential approach to office development in the context of offices being a main town centre use. The proposed approach is therefore not consistent with national policy.	0253	The council is satisfied policies SS8 and ER2 provide an appropriate approach to employment development. Core Employment Areas form an important part of the economy on a wider than local scale, and include national and international businesses. It is appropriate for economic development proposals to review suitable and available opportunities within CEA, before considering opportunities elsewhere.

MODIFICATIONS

Detail	Respondent numbers	Response
Modify ER2 to refer to established employment locations in rural areas that are capable of expansion	0229	Not agreed. Policy ER3 appropriately considers economic development in the countryside.
Land at Grazeley should be identified as a Core Employment Area and allocated for industrial and logistics uses.	0240	Not agreed. Land at Grazeley was assessed and found not to be suitable as part of the site assessment undertaken in the HELAA (2024).
Modify ER2 to include an additional criteria relating to employment development outside a defined settlement	0240	Not agreed. The council is satisfied policies ER2 and ER3 provide an appropriate framework for employment proposals outside Core Employment Areas, and in the countryside.

Detail	Respondent numbers	Response
Modify ER2 to refer to established employment locations in rural areas that are capable of expansion	0229	Not agreed. Policy ER3 appropriately considers economic development in the countryside.
Modify criteria 2(a) to remove the sequential approach that favours locations within Core Employment Areas	0253	Not agreed. Core Employment Areas form an important part of the economy on a wider than local scale, and include national and international businesses. It is appropriate for economic development proposals to review suitable and available opportunities within CEA, before considering opportunities elsewhere.
Modify criteria 3 to clarify that the loss of employment uses outside Core Employment Areas to non employment uses, relates to only those uses outside classes E(g), B2 and B8.	0253	Not agreed. Paragraph 5.6 is clear that employment uses for the purposes of the policies are B2, B8 and E(g) and the council is satisfied repetition is not necessary.

Policy ER3: Supporting the rural economy

Two respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0229	Wyvols Court Farm Ltd	0256	Historic England

Support

Respondent 0256 considers the policy to be legally compliant, complies with the duty to cooperate, and sound.

MAIN ISSUE: IMPLEMENTATION

Detail	Respondent numbers	Response
The policy does not support rural businesses and plan positively for the rural economy, which is contrary to the NPPF	0229	The council is satisfied the policy provides an approach that supports appropriate development that supports the rural economy, and is in accordance with the national planning policy.
Lack of flexibility for existing employment sites located close to settlements	0229	The council is satisfied the policy provides an approach that supports appropriate development that supports the rural economy.
The policy is not clear on how the appropriate scale and nature of development proposals is to be measured	0229	The acceptability of the scale and nature of development proposals will vary depending on several factors. Defining strict parameters would reduce the level of flexibility.

MODIFICATIONS

Detail	Respondent numbers	Response
Modify the policy to remove the requirement for evidence of 'genuine need.'	0229	Not agreed. The requirement to demonstrate the need for economic development in the countryside helps to ensure the sustainable growth of the rural economy as appropriate.
Modify the policy to refer to policy DH5 to ensure historic buildings cannot be removed if they are derelict	0256	Agree a modification would provide clarity to the policy. Proposed modifications are set out in the Schedule of proposed modifications.

Policy ER4: Employment and skills plans

No respondents commented on this policy.

Policy ER5: The hierarchy of centres

Two respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0132	Bracknell Forest Council	0148	Gleeson

Support

One of the major landowners for Loddon Valley Garden Village – Gleeson (0148) – considers the policy to be legally compliant and to comply with the Duty to Co-operate. They expressed support for the principles of new centres at Loddon Valley Garden Village.

MAIN ISSUES

Detail	Respondent number	Response
Policy SS13 Loddon Valley Garden Village should set out the purpose and function of the new centres at the SDL, rather than Policy ER5	0148	Not agreed. The council is satisfied that this level of detail is appropriate within Policy ER5 as part of the hierarchy of centres. Further detail and principles guiding the approach at LVGV are within Policy SS13 and Appendix C development guidelines.
The geographical extent of Crowthorne Station, Dukes Ride local centre within Wokingham Borough should be shown on the policies map	0132	The small extent of the Dukes Ride local centre within Wokingham Borough is shown on the policies map. As the designated area is very small it is more easily viewed on the interactive map on the website where all Proposed Submission Plan layers are available to view in full.

Policy ER6: Town, district and local centres and shopping parades

One respondent.

Respondent number	Name/Organisation
0199	Thames Valley Police

Support

No representations expressed support for the policy.

MAIN ISSUES

Detail	Respondent number	Response
Modify policy point 1 to cover measures to design out crime in any town centre development as part of the list of criteria	0199	Not agreed. Relevant policies in the local plan provide a suitable framework for addressing crime, safety and security, notably part 1q) of Policy DH1 (Place making and quality design).

Policy ER7: Strengthening the role of centres

One respondent.

Respondent number	Name/Organisation
0132	Bracknell Forest Council

Support

No representations expressed support for the policy.

MAIN ISSUES

Detail	Respondent number	Response
Consider a sequential test should be applied to all proposals for main town centre uses outside designated centres regardless of size	0132	Not agreed. A 500m ² threshold is currently in place in the adopted development plan – no new evidence suggests it would be appropriate to alter this threshold and therefore it is proposed to continue in the LPU.
Lack of information regarding impact of new local centres from development in South Wokingham SDL extension	0132	Not agreed. The South Wokingham SDL concept plan shows one new local centre to be delivered as part of the SDL extension, providing small-scale retail to serve the day-to-day needs of local residents. The council is satisfied that this will have limited impact on services and facilities within Bracknell Forest.
Expansion of policy point 7 regarding retail impact assessments would ensure consistency with the NPPF	0132	Not agreed. The council is satisfied that part 7 provides the flexibility for retail impact assessments to assess the impact

Detail	Respondent number	Response
		on existing and future centres and wider catchment areas in line with NPPF para 94.

Policy ER8: Wokingham town centre

Two respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0199	Thames Valley Police	0256	Historic England

Support

Historic England (**0256**) consider the policy to be legally compliant and to comply with the Duty to Co-operate. They expressed support for elements of the policy – specific concerns are considered in the table below.

MAIN ISSUES

Detail	Respondent number	Response
Modify policy point 1 to cover measures to design out crime in any town centre development as part of the list of criteria	0199	Not agreed. Relevant policies in the local plan provide a suitable framework for addressing crime, safety and security, notably part 1q) of Policy DH1 (Place making and quality design).
Modify policy point 1 g) to improve clarity regarding heritage assets in the town centre	0256	Agreed. A related change is set out within the Schedule of proposed modifications.
Modify supporting text to include reference to Conservation Area Appraisals	0256	Not agreed. The council is satisfied that this is appropriately covered through reference to Conservation Area Appraisals in supporting text for Policy DH5: The Historic Environment.

Policy ER9: Woodley town centre and Lower Earley district centre

One respondent.

Respondent number	Name/Organisation
0199	Thames Valley Police

Support

No representations expressed support for the policy.

MAIN ISSUES

Detail	Respondent number	Response
Modify policy point 1 to cover measures to design out crime in any town centre development as part of the list of criteria	0199	Not agreed. Relevant policies in the local plan provide a suitable framework for addressing crime, safety and security, notably part 1q) of Policy DH1 (Place making and quality design).

Chapter 9: Housing

No comments were received on this chapter.

Policy H1: Housing mix, density and standards

17 respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0148	Gleeson	0280	Bewley Homes
0183	Vistry Thames Valley	0282	Taylor Wimpey Strategic Land
0204	ACER The Whitegates Residents Association	0305	University of Reading
0221	Mac Mic Group	0314	Vistry Group
0225	Catesby Estates	0318	Bloor Homes
0234	Thakeham Homes Ltd	0324	Churchill Living and McCarthy Stone
0254	Croudace Homes	0329	Waingels College
0256	Historic England	0354	Ashridge Wokingham Ltd
0274	Bridge House of Twyford		

Support

Respondent 0148 was supportive of the policy.

Historic England (**0256**) were broadly supportive of the principle of the policy but sought reference to Conservation Area Appraisals in the supporting text.

Respondents 0221, 0234, 0254, 0280 and 0354 were broadly supportive of the policy in recognising site-specific circumstances.

Some respondents disagreed that the plan was legally compliant or met the duty to co-operate, however did not provide any reasoning.

DUTY TO COOPERATE

Detail	Respondent numbers	Response
Data used to assess housing need across the Housing Market Area is based on a Statement of Common Ground dated 2021, and needs updating. Cooperation on housing needs should be wider than the HMA, and consider the implications of the draft NPPF.	0234	<p>Incorrect. As set out in the supporting text to Policy SS10, the housing requirement is based on the outcome of the national standard method.</p> <p>The council is satisfied that the Duty to Cooperate has been discharged, as evidenced in the representations of relevant bodies and the agreement of Statements of Common Ground to support the Submission Plan.</p> <p>The 2021 statement represented an important point in time agreement, with matters having been progressed since as evidenced within the Duty to Cooperate Statement.</p>

MAIN ISSUE: ACCESSIBILITY STANDARDS

Detail	Respondent numbers	Response
Requirement for all proposals to achieve M4(2) standard is onerous, inflexible and would impact on development viability	0183, 0274, 0282, 0305, 0314, 0318, 0324	<p>The council is satisfied that the accessibility standards can be delivered viably as part of development proposals.</p> <p>The plan is supported by a plan-wide viability study, which concludes that the cost implications of requirements in Policy H1 would have only a modest downwards impact on residual land values.</p> <p>Paragraph 7 of the policy requires proposals to provide justification for not meeting the accessibility standards, thereby enabling a degree of flexibility to reflect local circumstances.</p>

Detail	Respondent numbers	Response
Consistency with Building Regulations	0225	<p>The council considers the policy is fully consistent with Building Regulations. A national consultation to mandate M4(2) as a minimum requirement is yet to be confirmed, but the clear direction of travel in national policy is for all new dwellings to meet the M4(2) standard.</p>
Lack of evidence of need for M4(3) standards	0274, 0305, 0324	<p>Policy is supported by an up-to-date Local Housing Needs Assessment (LHNA).</p> <p>The LHNA establishes a clear need for an additional 670 households to require some form of wheelchair adapted housing over the period (2021-2040) (paragraph 7.102). This amounts to 5% of the identified housing need, suggesting a minimum need for 5% of new dwellings to be built to M4(3) standard.</p> <p>The requirements are set at a level that would allow the anticipated need to be met.</p>
Impractical in all development proposals	0305	<p>Paragraph 7 of the policy offers a degree of flexibility as development proposals are able to provide robust evidence that justifies a departure from the standards.</p> <p>Supporting text at paragraph 9.10 qualifies that the mix and density of development should take into consideration place-making aspects, such as character and setting and high-quality design.</p>

MAIN ISSUE: POLICIES, DECISION TAKING AND IMPLEMENTATION

Detail	Respondent numbers	Response
Impact on development viability	0282	<p>The council is satisfied that the accessibility standards can be delivered in development proposals.</p> <p>The plan is supported by a plan-wide viability study, which concludes that the cost implications of requirements in Policy H1 would have only a modest downwards impact on residual land values.</p> <p>Paragraph 7 of the policy requires proposals to provide justification for not meeting the accessibility standards, thereby enabling a degree of flexibility to reflect local circumstances.</p>
Lack of evidence to justify standards (e.g. Nationally Described Space Standards)	0305, 0324	<p>The policy is supported by a Local Housing Needs Assessment (LHNA). The LHNA has identified a clear need for a proportion of new build dwellings in the borough to be built to M4(2) and M4(3) standard.</p> <p>The plan is supported by a plan-wide viability study, which concludes that the cost implications of the requirements in Policy H1 would have only a modest downwards impact on residual land values.</p>
Requirement for First Homes likely to dampen demand for smaller dwellings by first time buyers	0305	<p>The council does not agree that First Homes will dampen the demand for smaller dwelling by first time buyers. Part 5 of Policy H3 (Affordable housing) is clear that where the level of discount proposed does not make First Homes affordable, another form of home ownership product should be delivered.</p>

Detail	Respondent numbers	Response
The policy approach will inhibit the quality of placemaking	0183, 0314	<p>Supporting text at paragraph 9.10 qualifies that the mix and density of development should take into consideration place-making aspects, such as character and setting and high-quality design.</p> <p>Other aspects of place-making and design are covered in Policy DH1.</p>
Flexibility to reflect site-specific circumstances	0305, 0314, 0318, 0329	<p>Paragraphs 2 and 3 of the policy clearly state that the mix of housing should reflect up to date evidence of need, and respond to size, location, opportunities and constraints of the site.</p> <p>Paragraph 9.10 of the supporting text qualifies that the mix and density of developments should take into consideration place-making aspects such as character and setting, access to walking, cycling and public transport, high quality design and environmental and neighbour impacts.</p> <p>The council therefore consider the policy approach provides appropriate flexibility to respond and reflect site-specific circumstances.</p>
Provide an objective assessment of character	0204	<p>Assessment of character adequately covered by other relevant policies in the local plan.</p> <p>Development proposals are required to be accompanied by a Design and Access Statement which should explain how the proposal suitably responds to the site and its setting.</p>

Detail	Respondent numbers	Response
		The Design and Access Statement explain the principles and concepts of design that have been applied to the scheme and demonstrate how the site's context has influenced scheme design.

REQUESTED MODIFICATIONS

Detail	Respondent number	Response
Modify the policy to allow some flexibility where site constraints make M4(2) standards difficult to achieve	0183, 0274, 0314	Not agreed. The council does not consider a modification to this requirement of the policy is necessary. Paragraph 7 of the policy allows for exceptional circumstances where standards cannot be met.
Modify the criteria to provide an objective assessment of character	0204	Not agreed. Assessment of character adequately covered by other relevant policies in the local plan. Development proposals are required to be accompanied by a Design and Access Statement which should explain how the proposal suitably responds to the site and its setting. The Design and Access Statement explain the principles and concepts of design that have been applied to the scheme and demonstrate how the site's context has influenced scheme design.
Modify criteria 4) to 7) to align with Building Regulations	0225	Not agreed. The council considers the policy is fully consistent with Building Regulations and reflects latest evidence of need.
Modify criteria 5) to allow some flexibility to reflect local circumstances by inserting ' <i>where possible</i> '	0282, 0318	Not agreed. Paragraph 7 already allows for this flexibility through demonstrating exceptional circumstances to depart from the required standards.
Modify criteria 8) to reflect lack of evidence of need	0305, 0324	Not agreed. The council does not consider a modification to the requirement of this policy is necessary.

Detail	Respondent number	Response
<p>Modify the policy to state that housing mix targets are subject to development viability and design constraints</p>	<p>0305</p>	<p>Not agreed. The council recognises that the mix and density of development proposals should act as the starting point, with housing mix being able to react to changing circumstances, such as place-making aspects (paragraphs 9.7 and 9.8 of the plan). Further guidance is set out in Policy DH1.</p> <p>Paragraph 9.8 of the supporting text qualifies that the final mix of dwelling types and sizes will be subject to negotiation, with applicants requiring sufficient evidence to support their proposals.</p> <p>The council does not consider a modification to the policy is necessary.</p>
<p>Move content from paragraph 9.8 of supporting text into policy wording</p>	<p>0329</p>	<p>Not agreed. The Planning Advisory Service 'Local Plan Route Mapper' (October 2019) qualifies that the supporting text carries weight in decision-making, with its purpose in setting the context and justification for the policy and providing further explanation as to how it is intended to operate (paragraph 87).</p> <p>The council considers the wording is appropriate in the supporting text by explaining how it should operate, and therefore no modification to the policy is necessary.</p>

Policy H2: Presumption against residential losses

One respondent

Respondent number	Name/Organisation
0253	Wrenbridge (FRELD Reading) LLP

Support

The respondent (0253) considers the policy to be legally compliant and to comply with the Duty to Cooperate.

Whilst the respondent (0253) does not object to the principle of the policy, they did however note the NPPF does not specifically advocate the approach proposed and raise specific concerns with the flexibility of the policy, which is covered below.

MAIN ISSUES: POLICIES, DECISION TAKING AND IMPLEMENTATION

Detail	Respondent number	Response
Lack of provision in the policy for loss to be weighed in the planning balance against a proposal's benefits or other material considerations, particularly linked to a wider comprehensive scheme.	0253	Noted, the importance of not compromising the delivery of wider comprehensive schemes is reflected in part 1d) of the policy. The council is satisfied that the policy does not preclude the necessary planning balance exercise being carried out by decision makers where relevant material considerations and other benefits, including compliance with other policies within the plan, are taken into account. It remains for decision makers to determine whether a scheme complies with the development plan as a whole.

Policy H3: Affordable housing

27 respondents

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0110	CBREIM	0298	Nicholas King Homes
0120	Cox, Mr A and Mr C	0305	University of Reading
0148	Gleeson	0308	NHS Property Services
0149	Earley Town Council	0314	Vistry Group
0224	Home Builders Federation	0318	Bloor Homes
0225	Catesby Estates	0323	Obsidian Strategic
0234	Thakeham Homes Ltd	0324	Churchill Living and McCarthy Stone
0239	University College of Estate Management	0336	Pleace, Deborah
0245	Crest Nicholson Partnership and Strategic Land	0337	McCarthy, Maya
0254	Croudace Homes	0343	Darcliffe Homes Ltd
0263	Lightwood Strategic	0345	Scales, Elizabeth
0275	Oxford Diocesan Board of Finance	0353	Abbeymill Homes
0276	David Wilson Homes Southern	0354	Ashridge Wokingham Ltd
0277	Croudace Homes, Vortal Homes Ltd and Falcon Developments (SE) Limited		

Support

Respondents 0120, 0148, 0239, 0245, 0263, 0275, 0298, 0305, 0318, 0323, 0324, 0336, 0337, 0345, 0353 consider the policy to be legally compliant.

Respondents 0120, 0148, 0239, 0245, 0263, 0275, 0298, 0305, 0318, 0324, 0336, 0337, 0345, 0353 consider the policy to comply with the duty to cooperate.

Respondents 0148, 0245, 0275 consider the policy to be sound.

No respondent commented on legal compliance.

MAIN ISSUE: DUTY TO COOPERATE

Detail	Respondent numbers	Response
Reliance on the August 2021 Statement of Common Ground between the Western Berkshire local authorities.	0234, 0323, 0343	<p>The council is satisfied that the Duty to Cooperate has been discharged, as evidenced in the representations of relevant bodies and the agreement of Statements of Common Ground to support the Submission Plan.</p> <p>The 2021 statement represented an important point in time agreement, with matters having been progressed since as evidenced within the Duty to Cooperate Statement.</p>

MAIN ISSUE: AFFORDABLE HOUSING THRESHOLDS

Detail	Respondent numbers	Response
The 5 unit threshold is too low and would affect development viability, and should reflect the national policy threshold of 10 dwellings	0110, 0224, 0225, 0239, 0323, 0343, 0353	The council is satisfied development is deliverable when applying the 5 unit threshold. The application of the threshold has not prevented schemes of this size from being delivered. Recent viability evidence also demonstrates development can be delivered viably. Further information is set out in the Affordable Housing Topic Paper.
Other local planning authorities have attempted to apply a lower threshold in local plans unsuccessfully	0224	Noted. The council is satisfied appropriate evidence has been presented to justify the proposed approach.
The lower threshold will have a disproportionate adverse impact on small and medium sized housebuilders	0224, 0343, 0353	Local data shows small and medium sized sites have been delivered viably, including on site affordable housing provision, or provision of a commuted sum.

Detail	Respondent numbers	Response
The approach is unlikely to deliver significant quantities of additional affordable homes	0224	Local data shows the application of a five unit threshold has helped to deliver additional affordable housing on site, or has helped to fund off site provision via commuted sums.
It is not clear how much of the borough is a designated rural area, where a threshold of 5 units can apply, as set out in the Written Ministerial Statement from 2014.	0225, 0353	The Housing Act, includes multiple parishes in the borough, including Arborfield and Newland, Barkham, Charvil, Remenham, Ruscombe and Swallowfield.

MAIN ISSUE: AFFORDABLE HOUSING DELIVERY

Detail	Respondent numbers	Response
Not clear why brownfield land at major settlements has a lower requirement than brownfield land in other settlements, including SDLs	0120	The SDLs are very large, greenfield sites which are shown to be viable to deliver. Brownfield land within settlements can be more complex and costly to deliver, which can have implications for development viability.
The requirement to deliver 25% First Homes should not be a definitive position, and there should be demonstrable demand.	0234	Part 5 is clear that where the level of discount proposed does not make First Homes affordable, another form of home ownership product should be delivered.
Government policy is more focussed on social rent rather than intermediate homeownership. Greater flexibility is therefore required	0245	Part 3 of the policy is clear the council will negotiate the tenure, size and type of affordable units on a site by site basis. Supporting text guides the typical tenure split, with a focus on social rent.
The 50% discount on First Homes is not justified	0305	Evidence from the Local Housing Needs Assessment shows the delivery of First Homes is only achievable in the borough by applying a 50% discount.

Detail	Respondent numbers	Response
Increasing the total housing delivery to reflect changes to the calculation of local housing need would enable the delivery of more affordable housing	0239, 0254, 0277, 0280, 0354	<p>The plan will be examined under the NPPF (2023) as per the transitional arrangements enabled by paragraphs 234-235 of the NPPF (2024).</p> <p>It is accepted that in principle the plan could seek to deliver a higher amount of affordable housing through an increased housing requirement. However, this would need to be balanced against wider factors, including environmental issues and the achievability and deliverability of additional sites.</p> <p>Policy H3 seeks to lower the site size threshold where affordable housing is sought, which the council considers is a more appropriate response through the local plan to support the delivery of affordable housing. This is coupled with increased requirements when supported by viability evidence.</p> <p>The council is satisfied an appropriate balance has been struck between the delivery of affordable housing and the scale of development proposed in the local plan.</p>
The viability evidence is inconsistent, and not sufficient to justify the proposed approach	0224, 0254	The council is satisfied the viability evidence is consistent and helps to justify the proposed approach.
A review of the CIL charging schedule may impact on the provision of affordable housing and the ability to seek 40%.	0254, 0280	Any review of the CIL charging schedule will consider the implications of any change in rates, including on the provision of affordable housing.
The evidence does not show delivery of 40% affordable housing at the Arborfield Green SDL and South Wokingham SDL is viable	0263, 0280, 0298, 0318	The evidence tests the viability of typologies rather than individual sites. No evidence has been provided by the landowners/promoters of the sites that 40% affordable

Detail	Respondent numbers	Response
		housing cannot be delivered viably. Both sites are well related to existing SDLs which are planned to deliver significant infrastructure, which reduces the costs for the proposed sites, and supports the delivery of affordable housing proposed.
Affordable housing requirements may need to be altered through the planning application process, where further viability evidence is available	0263	The NPPF is clear that viability should be primarily considered at the plan making stage, rather than at the planning application stage.
The viability testing does not test bedspaces, only units, and shows older person's housing is not viable.	0305	The viability evidence tests 3 typologies for housing for the elderly, for C2 and C3 uses. There is an identifiable need for affordable bedspaces in the borough which relevant schemes should make an appropriate contribution towards.
Reference to a 'minimum' affordable housing means there is no certainty on how the policy should be applied	0305	The council is satisfied the approach provides suitable flexibility to deliver in excess of the stated percentage of affordable housing. Part 2 of the policy sets out the response if the affordable housing proposed is not policy compliant.
The affordable housing needs of NHS staff and health and care providers should be factored into assessment	0308	Noted. The council supports the provision of housing for key workers as part of an appropriate mix of affordable housing. The council's Allocations Policy includes clinical national health staff (except doctors and dentists), and support staff, in its definition of key workers.
The policy is inconsistent with national policy by requiring a contribution from self builders	0336, 0337, 0345	The threshold of 5 units means it is very unlikely contributions will be sought from those developing genuinely self build plots.

Detail	Respondent numbers	Response
A lower affordable housing requirement would reduce the risk of trade offs with other policy aspirations	0354	The council is satisfied an appropriate balance has been struck between infrastructure provision and the delivery of affordable housing.

MODIFICATIONS

Detail	Respondent numbers	Response
Modify the 5 unit threshold to reflect the national policy threshold of 10 dwellings	0110, 0343, 0353	Not agreed. The council is satisfied development is deliverable when applying the 5 unit threshold. The application of the threshold has not prevented schemes of this size from being delivered. Recent viability evidence also demonstrates development can be delivered viably. Further information is set out in the Affordable Housing Topic Paper.
Modify the policy to state only major development proposals should deliver 40% affordable housing	0110	Not agreed. The council is satisfied the level of affordable housing proposed is appropriate.
Modify the policy to remove reference to bed spaces	0305	Not agreed. The viability evidence tests 3 typologies for housing for the elderly, for C2 and C3 uses. There is an identifiable need for affordable bedspaces in the borough which relevant schemes should make an appropriate contribution towards.
Modify the policy to remove reference to a 'minimum' level of affordable housing	0305	Not agreed. The policy reflects that some schemes may delivery additional affordable housing.
Modify the policy to explain why brownfield land in major settlements only require 30% affordable	0120	Not agreed. The council is satisfied the proposed approach is appropriate. Previously developed land in major settlements

Detail	Respondent numbers	Response
housing, whilst other settlements require at least 40%; or increase the requirement to 40% on all sites		are more likely to encounter abnormal costs, including demolition of existing uses, remediation and other factors.
Modify the policy to reflect that First Homes should only be required subject to evidence demand	0234	Not agreed. Part 5 is clear that where the level of discount proposed does not make First Homes affordable, another form of home ownership product should be delivered.
Modify the policy to remove the requirement to deliver First Homes	0276, 0314	Not agreed. Part 5 is clear that where the level of discount proposed does not make First Homes affordable, another form of home ownership product should be delivered.
Modify the policy to clarify when First Homes should be delivered	0305	Not agreed. Part 5 is clear that where the level of discount proposed does not make First Homes affordable, another form of home ownership product should be delivered.
Additional land should be allocated to help meet identified needs for affordable housing	0239, 0254	Not agreed. The local plan will be examined under the NPPF (2023) as per the transitional arrangements. The council is satisfied an appropriate balance has been struck between the delivery of affordable housing and the scale of development proposed in the local plan.
The requirement for 40% of homes to be delivered as affordable is too high and should instead be 35%	0254, 0263, 0277, 0280, 0298, 0314, 0318, 0354	Not agreed. The council is satisfied the viability evidence shows 40% affordable housing is deliverable.
The delivery of affordable housing should be referred to as a target, rather than a minimum	0263	Not agreed. The council is satisfied the approach provides suitable flexibility to deliver in excess of the stated percentage of affordable housing. Part 2 of the policy sets out the response if the affordable housing proposed is not policy compliant.

Detail	Respondent numbers	Response
Modify the policy to remove reference to the exceptional circumstances needed to justify a lower level of affordable housing.	0263	Not agreed. The NPPF is clear that viability should be primarily considered at the plan making stage, rather than at the planning application stage.
Modify the review mechanism proposed in supporting text to clarify that it does not apply to single phase developments.	0324	Not agreed. There is no justification to not apply a review mechanism to a specific scale of development.
Modify the text to clarify that the policy does not apply to special housing proposals for older people	0324, 0345	Not agreed. The policy will apply to specialist accommodation, to recognise the needs for affordable bedspaces.
Allocate land adjacent to Whistley Green Cottage, Hurst for residential development	0336, 0337, 0345	Not agreed. Policy H3 does not allocation sites for future development.

Policy H4: Exception sites

Two respondents

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0306	Loddon Mill Enterprises Ltd	0329	Waingels College

Support

Respondents 0306 and 0329 consider the policy to be legally compliant.

Respondent 0329 considers the policy to comply with the Duty to Cooperate.

No respondents support the policy.

MAIN ISSUE: POLICY WORDING

Detail	Respondent numbers	Response
Policy is restrictive as it limits the amount of market housing allowed on exception sites, which will impede housing delivery.	0306	The council is satisfied that the approach of limiting market housing on exception sites to 20% is consistent with national policy and guidance which recognise that ‘a small portion’ of market housing may be appropriate on exception sites and specifically encourages policies to identify the proportions considered acceptable. Policies elsewhere in the plan ensure that the housing requirement can be met and exceeded, so the approach of H4 does not impede housing delivery, rather it allows further housing to meet specific needs in locations where this otherwise would not be acceptable.

Detail	Respondent numbers	Response
The policy requirements around evidencing need for exception housing are overly onerous and prohibitive to proposals coming forward to meet an acknowledged acute affordable housing need.	0329	Given the nature of exception sites is to facilitate housing to meet particular needs on sites that otherwise would not be acceptable for housing, it is imperative that they are justified by robust evidence. The council is satisfied that the evidence requirements are proportionate and justified.
Limiting proposals to up to 9 dwellings in arbitrary and will preclude suitable schemes for higher numbers of dwellings from being delivered.	0329	The policy wording does not limit proposals to up to 9 dwellings. Rather, it recognises schemes ' <i>will usually be limited to small scale sites of up to 9 dwellings</i> ' but provides flexibility for development proposals of larger scale, where appropriately justified. Notwithstanding, minor (i.e. up to 9 dwellings) is considered an appropriate guide as this scale reflects that exception sites will be located outside of settlements in locations generally more distant from services and facilities where non-specialist housing is not likely to be supported.

OTHER ISSUES

- Respondent 0306 considered the policy not to comply with the Duty to Cooperate.

Policy H5: Rural workers' dwellings

No respondents commented on this policy.

Policy H6: Self-build and custom build housebuilding

13 respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0078	Hillcoat, Chris	0314	Vistry Group
0207	Frankham, John	0336	Pleace, Deborah
0254	Croudace Homes	0337	McCarthy, Maya
0280	Bewley Homes	0339	Osborne, William
0298	Nicholas King Homes	0345	Scales, Elizabeth
0305	University of Reading	0354	Ashridge Wokingham Ltd
0309	Royal Borough of Windsor and Maidenhead		

Support

The Royal Borough of Windsor and Maidenhead (**0309**) support the policy, with minor suggestions dealt with in the table below.

Respondents 0280, 0314 and 0354 express support for changes to policy wording since the LPU Draft Plan 2020.

Respondent 0207 expresses support for the policy wording and provision of self and custom build dwellings in the borough.

Respondents 0078, 0298, **0309**, 0336, 0337, 0339 and 0345 consider the policy to be legally compliant and to comply with the duty to co-operate.

MAIN ISSUES

Detail	Respondent numbers	Response
Sites should be specifically allocated for self and custom build housing	0298, 0345, 0354	Very few areas of land were promoted to the council for potential self-build or custom build plots, which was recognised in the Local Housing Needs Assessment (2023). The council is satisfied that the approach of Policy H6,

Detail	Respondent numbers	Response
		alongside other policies within the Plan, will allow for appropriate sites to come forward.
There should be a minimum requirement of 20% self-build and custom build plots on large scale developments	0078	The council is satisfied the approach to self and custom housebuilding is appropriate. A percentage based policy requiring 20% self and custom build plots on large scale developments is not considered achievable or viable.
Provision of 100 self-build and custom build plots at Loddon Valley Garden Village SDL is too high	0305	<p>The council is satisfied that 100 self and custom build plots to be delivered as part of the new Loddon Valley Garden Village represents a level that is both viable and appropriately contributes to the level of need across the plan period.</p> <p>The Self-build and custom housebuilding topic paper (2024) sets out the council’s evidence and justification for seeking self and custom plots. The council considers this a robust assessment of existing and future needs.</p> <p>The impacts of Policy H6 were considered in the Viability Study (2024) and it was concluded there would not be material impact on development viability.</p>
There has previously been a lack of credible interest in self-build and custom build plots	0254, 0280, 0298, 0354	The council has held a self-build register since 2016. At October 2023 the register includes 266 individuals on Part 1 of the register and 357 on Part 2. The Self-build and custom housebuilding topic paper (2024) sets out further detail and the potential future need across the plan period.
Plots can cause issues during the delivery of the wider development site.	0254, 0298, 0354	The council is satisfied that self and custom build plots can be appropriately planned into the delivery of the SDLs.

Detail	Respondent numbers	Response
Impact on design of a development, including lack of design coherency	0298	As set out in Policy H6 and supporting text – on sites with multiple self-build plots the council will seek the agreement of a design code with the provider of the plots, prior to marketing.
Part 2 of the policy sets out a problematic sequential approach by having to offer unsold plots to the council and Registered Providers for an unspecified time period	0254, 0298, 0354	It is important that self-build plots remain available and the alternative delivery of plots to market housing should only be after alternative options have been investigated. The council is satisfied that the sequential approach to these alternative options is appropriate.
Policy should support residents building a home rather than create barriers to doing so	0345	The council is satisfied that the approach of Policy H6, alongside other policies within the Plan, will allow for appropriate, unallocated sites to come forward.
Lack of opportunity to pursue self-build and custom build opportunities/no self-build allocations in Hurst	0336, 0337, 0339, 0345	The council is satisfied that the approach of Policy H6, alongside other policies within the Plan, will allow for appropriate sites to come forward. This includes policies SS3 and SS4 regarding development within and adjacent to settlements.
Under-delivery of self-build and custom build plots under the current local plan	0336	Noted. The plan seeks to deliver additional self and custom build plots as set out in the supporting topic paper.
May want to consider a percentage requirement on developments above a particular size to help secure delivery of more plots throughout the plan period	0309	A percentage policy was proposed in the Draft Plan (2020). Following a review of consultation responses and best practice advice, this approach was considered to not provide sufficient confidence that plots would be delivered. The council is satisfied that the approach in the Proposed Submission Plan is appropriate to deliver self and custom build plots throughout the plan period.

Policy H7: Specialist accommodation

Seven respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0274	Bridge House of Twyford	0305	University of Reading
0275	Oxford Diocesan Board of Finance	0314	Vistry Group
0298	Nicholas King Homes	0354	Ashridge Wokingham Ltd
0303	Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board		

Support

The Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board (**0303**) did not state whether the policy was sound but welcomed early engagement with developers on primary care services.

Respondents 0275, 0305 and 0314 supported the policy.

Respondent 0274 supported the principle of the policy but suggested a modification to increase provision.

Some respondents disagreed that the plan was legally compliant or met the duty to co-operate, however did not provide any reasoning.

MAIN ISSUE: NEED

Detail	Respondent numbers	Response
Recommend a minimum of 10% of all new housing on major developments is provided as older persons housing	0274	The council considers that Policy H7 of the plan provides a suitable policy framework for managing development proposals related to specialist accommodation, including older persons housing. Policy H7 is a criteria-based policy that allows development proposals related to specialist accommodation to be supported.

Detail	Respondent numbers	Response
		<p>Further, paragraph 2a) to c) of the policy qualifies that the delivery of specialist accommodation will be met through strategic scale development with appropriate onsite provision as part of creating mixed and balanced communities; approving applications for additional provision; and protecting existing provision.</p> <p>The deliver of specialist housing, including accommodation for older persons is also included in Policy SS13: Loddon Valley Garden Village.</p>
<p>South Wokingham SDL extension is not an appropriate location for specialist accommodation. Modification suggested to require a proportion of housing to meet M4(3) standards.</p>	<p>0298</p>	<p>The original vision in the Core Strategy was to identify land at South Wokingham (the SDL) to deliver a sustainable, well-designed and mixed-use development.</p> <p>It is important to ensure that future development to the south of Wokingham continues to be built according to the principles of sustainable development and good design. Achieving inclusive, balanced and healthy communities, by providing a range of housing types, sizes and tenures is recognised as one of several key components of the site's Concept Rationale (Development guidelines, Appendix A); and will be fundamental to its continued success.</p>
<p>Query whether the identified need for specialist accommodation is sufficient to meet needs over the plan period.</p>	<p>0354</p>	<p>The council considers that the identified need for specialist accommodation is sufficient to meet needs over the plan period.</p> <p>The plan is supported by a Local Housing Needs Assessment (2022) which has assessed the likely level of need for bedspaces for older people (within use class C2), based on</p>

Detail	Respondent numbers	Response
		<p>projections of how many people are likely to suffer from issues such as reduced mobility and dementia. It identifies an indicative need to plan for around 925 places over the period 2021-2040, to be provided through a mix of sheltered and extra care housing and domiciliary care to accommodate people with specific requirements, such as older population and vulnerable people, including people with disabilities.</p> <p>The council considers that Policy H7 of the plan provides a suitable policy framework for managing development proposals related to specialist accommodation, including older persons housing. Policy H7 is a criteria-based policy that allows development proposals related to specialist accommodation to be supported.</p> <p>Further, paragraph 2a) to c) of the policy qualifies that the delivery of specialist accommodation will be met through strategic scale development with appropriate onsite provision as part of creating mixed and balanced communities (such as through the proposed Loddon Valley Garden Village, South Wokingham SDL and Arborfield Green SDL); approving applications for additional provision; and protecting existing provision.</p>

REQUESTED MODIFICATIONS

Detail	Respondent number	Response
<p>Recommend that, on major development proposals, a minimum of 10% of all new housing is provided as older persons housing</p>	<p>0274</p>	<p>Not agreed. The policy qualifies that the delivery of specialist accommodation will be met through strategic scale development (such as the SDLs). In addition, the policy supports proposals for specialist accommodation subject to meeting criteria and protects existing provision.</p> <p>The council therefore considers that the policy provides a suitable policy framework to assist in meeting the identified need for specialist accommodation over the plan period.</p>
<p>Modify requirements in Policy SS13 and Policy SS12 to require 5% of new homes to meet M4(3) standard</p>	<p>0298</p>	<p>Not agreed. Paragraph 5 of Policy H1 (Housing mix, density and standards) requires development proposals for 20 or more new build dwellings to deliver at least 5% of new housing as wheelchair accessible and adaptable in line with M4(3) of Building Regulations.</p> <p>It will be important to ensure that the proposed Loddon Valley Garden Village, and future development to the south of Wokingham is built according to the principles of sustainable development and good design. Achieving inclusive, balanced and healthy communities, by providing a range of housing types, sizes and tenures is recognised as a key component of each site's Concept Rationale (Development guidelines, Appendix B and Appendix C); and are fundamental to their success.</p>

Policy H8: Conversion and sub-division of buildings

4 respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0149	Earley Town Council	0204	ACER The Whitegates Resident Association
0199	Thames Valley Police	0256	Historic England

Support

Historic England (**0256**) and ACER (0204) consider the policy to be legally compliant. The other responders did not specifically comment.

Historic England (**0256**) and ACER (0204) consider the policy to comply with the Duty to Cooperate. The other responders did not specifically comment.

Historic England (**0256**) and Earley Town Council (**0149**) consider the policy to be sound. ACER (0204) whilst stating the policy was unsound, welcomed the policy and propose modifications to address issues. Similarly, the Thames Valley Police (**0199**) proposed modifications to address issues.

MAIN ISSUE: DECISION TAKING AND IMPLEMENTATION

Detail	Respondent number	Response
Whether the heritage significance of the original building should be referenced.	0256	The council is satisfied heritage matters are appropriately reflected in other policies included in the plan.

MAIN ISSUE: SAFETY AND SECURITY

Detail	Respondent number	Response
Safety and security should be considered, including building access, management of deliveries, and secure vehicle parking.	0199	Whilst other policies within the plan refer to safety, the council is minded to accept a modification to add specific reference within Policy H8. A related change is set out within the Schedule of proposed modifications.

MAIN ISSUE: PARKING

Detail	Respondent number	Response
Whether the term 'should' be amended to 'must' with regard to parking requirements (1(d)).	0204	The council is satisfied that phrasing is appropriate given the context of the policy. Whilst the policy direction is for onsite parking provision, there may be circumstances where offsite provision is acceptable. Evidence requirements are set out in paragraph 9.88 and 9.90.
Strengthening of wording related to providing sufficient parking provision and clarify the basis of the calculation in paragraph 9.88 of the supporting text	0204	<p>The supporting text states very clearly that off-site vehicle parking will only be considered acceptable where it can be fully justified. Evidence requirements are set out in paragraph 9.88 and 9.90.</p> <p>The council therefore considers the policy sets a clear statement for parking to be provided on-site.</p> <p>The plan should also be read as a whole, where development proposals will be assessed in accordance with relevant policies in the development plan, including Policy C5 (Parking and electric vehicle charging).</p>

Detail	Respondent number	Response
		<p>Further guidance is also set out in the council's vehicle and cycle parking standards.</p> <p>The council does not consider a modification to the policy is necessary.</p>
<p>Whether requirements for parking in Policy H8 should be added to requirements for extended family homes.</p>	<p>0204</p>	<p>Policy H8 relates to the conversion and sub-division of buildings. It does not apply to proposals to enlarge single dwellings, which would be considered against other policies, notably for which Policy DH1: Placemaking and quality design and DH2: Safeguarding amenity. The council is satisfied that these policies provide a suitable basis to assess planning applications for domestic extensions.</p>

Policy H9: Gypsies and Travellers and Travelling Showpeople provision

10 respondents

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0132	Bracknell Forest Council	0220	Barkham Village Residents Association
0145	South Oxfordshire and Vale of White Horse	0250	Barkham Parish Council
0148	Gleeson	0297	Williams, Iain
0165	Reading Borough Council	0305	University of Reading
0209	Hart District Council	0309	Royal Borough of Windsor and Maidenhead

Support

Respondents **0145**, 0148, 0305 and **0309** consider the policy to be legally compliant and to comply with the Duty to Cooperate.

Respondents South Oxfordshire and Vale of White Horse (**0145**) and Royal Borough of Windsor and Maidenhead (**0309**) support the policy, with the latter confirming it is not able to meet its own needs in full.

Neighbouring authorities Bracknell Forest Council (**0132**), Reading Borough Council (**0165**), and Hart District Council (**0209**) did not offer a view on legal compliance, Duty to Cooperate, or soundness of the policy. Both Bracknell Forest Council (**0132**) and Reading Borough Council (**0165**) confirmed that they would not be in a position to assist with any unmet needs, with Reading Borough Council expressing the desire to discuss opportunities for its unmet need to be accommodated in Wokingham borough. Hart District Council (**0209**) supported the range of measures included to meet the majority of need, but sought the inclusion of additional assurances in the plan that surrounding authorities will not be expected to accommodate needs.

MAIN ISSUES: SUPPLY OF PITCHES

Detail	Respondent number	Response
That the allocation of pitches at LVGV is not justified based on the evidence. This includes	0148, 0305	The allocation of land provides additional certainty to meeting needs. Allocation based on defined criteria is expected in

Detail	Respondent number	Response
because windfall development based on historic rates would be capable of meeting future need in full and therefore allocation is unnecessary.		national policy (Planning Policy for Traveller Sites). The 'Topic Paper: Housing: Gypsy and Traveller accommodation' (2025) acknowledges that the existing and past plans have not allocated land for Gypsy and Traveller use and therefore windfalls have been the only mechanism to meet need. Past windfall rates are therefore not reflective of future rates when taking a plan led, proactive approach to land allocation.
That the principle of delivering a large number of pitches at single site is inappropriate, given the nature of historic delivery of has been at small sites	0148	It is incorrect that delivery has only occurred at small sites. Permissions have largely involved a small number of net additional pitches, but these have often been extensions / intensifications of existing medium or large sites. A range of site sizes exists across the borough, and the provision of further larger sites would not be inconsistent with the existing nature of provision.
Disproportionate amount of Gypsy and Traveller pitches allocated in Barkham – in excess of provision in policies SS12 and SS13, with Barkham being an unsustainable location for residential development. Therefore, objection to allocations SS14.1 and SS14.2 set out in part 3 of H9.	0220, 0250, 0297	Six of the sites promoted for Gypsy and Traveller pitches were assessed as potentially developable and four proposed for allocation. Limited distribution of available and suitable sites. Proposed provision of Gypsy and Traveller pitches within the SDLs is considered appropriate as part of a mix of uses.
Lack of consideration of the range of supply options identified in the GTAA for meeting need, meaning the plan is therefore unsound as not based on proportionate evidence.	0297	The range of options identified in the GTAA have been investigated and concluded not to provide a demonstrably deliverable source of supply. Please refer to the updated 'Topic Paper: Housing: Gypsy and Traveller accommodation' (2025) for additional detail.

MAIN ISSUES: CLARITY OF POLICY

Detail	Respondent number	Response
That a statement is included in the plan to clarify that no unmet need exists for adjoining authorities to address and that opportunities to address the 8 pitch shortfall from allocations should be explored on the strategic sites.	0209	<p>While the Duty to Cooperate: Statement of Compliance (2025) makes clear there is no unmet need for surrounding authorities to address, it is agreed that clarification to this effect within the Plan itself would be beneficial. A recommended modification to supporting text is set out in the Schedule of proposed modifications.</p> <p>Historically, windfall development has occurred by expanding existing sites as families grow, and it is considered that flexibility to allow similar development over the plan period to meet need is deliverable and reflective of the evidence base on need from household formation.</p>

MAIN ISSUES: POLICIES, DECISION TAKING AND IMPLEMENTATION

Detail	Respondent number	Response
That the wording preventing the splitting up of large sites to circumvent provision should be lifted into the policy itself, if this is a particular local issue.	0132	The council is satisfied that this wording is appropriately placed in supporting text, consistent with the similar provision in relation to affordable housing policy (H3).

Policy H10: Traveller sites

One respondent.

Respondent number	Name/Organisation
0355	Environment Agency

MAIN ISSUES

Detail	Respondent number	Response
Seek clarity on the classification in paragraph 9.102 of gypsy and caravan sites as 'more vulnerable' regarding flood risk, compared to classification as 'highly vulnerable' in Appendix 3 of the NPPF	0355	Agree. The wording was intended to be a comment on caravans being generally at greater risk of flooding and AWE impacts than bricks and mortar accommodation. It was not intended to be a specific reference to the vulnerability classification in Appendix 3 of the NPPF and the council notes that the wording is confusing, especially given caravans are classed as 'highly vulnerable' in Appendix 3. A recommended modification to paragraph 9.102 of the supporting text is set out in the council's Schedule of proposed modifications for clarification.

Policy H11: Houseboat moorings

Two respondents

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0355	Environment Agency	0358	Remenham Parish Council

Support

The Environment Agency (**0358**) consider the policy to be legally compliant and to comply with the Duty to Cooperate. Remenham Parish council did not comment on legal compliance or the Duty to Cooperate.

Remenham Parish Council support the policy, specifically its requirement for 14 day limit on temporary boat moorings.

MAIN ISSUE: CONSISTENCY WITH NATIONAL POLICY AND GUIDANCE

Detail	Respondent numbers	Response
The policy does not meet the requirements of NPPF section 14 by not referring to flood risk.	0355	Not considered to be a soundness issue, rather one of clarity. Notwithstanding, a modification has been recommended as detailed in the Schedule of proposed modifications to aid clarity. This position will shortly be confirmed in a signed Statement of Common Ground with the Environment Agency.

OTHER ISSUES

- Clarification provided on the definition of transit moorings (**0355**)

Policy H12: Residential development of existing private gardens

Two respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0144	John, James	0270	Rokeby Homes Limited

MAIN ISSUE: CONSISTENCY WITH NATIONAL POLICY

Detail	Respondent numbers	Response
The policy does not positively respond to significantly boosting housing	0144	The policy provides conditional support for development proposal on private residential gardens subject to meeting set criteria. Other policies are also included in the local plan that positively respond to significantly boosting housing supply.
The policy is not positively worded	0270	The policy includes a list of criteria that very clearly sets out the circumstances where development of private residential gardens will be supported. The approach to the policy is therefore positively worded.

REQUESTED MODIFICATIONS

Detail	Respondent number	Response
Requirement 1 should be removed because this duplicates Requirement 2. Requirement 2 is more positively worded and therefore meets the tests of soundness.	0144, 0270	Not agreed. Paragraph 1 of the policy aligns with the wording in paragraph 75 of the NPPF, which states that ' <i>Plans should consider the case for setting out policies to resist inappropriate development of residential gardens</i> '

Detail	Respondent number	Response
		The policy also includes a list of criteria that clearly set out the circumstances where development proposals of private residential gardens will be supported.
Requirement 2d should be removed for a similar reason to Requirement 1 (i.e. it duplicates 2a and 2b). Requirement 2a and 2b are more positively worded and therefore meets the tests of soundness.	0144, 0270	Not agreed. The council does not consider that paragraph 2d of the policy duplicates the requirements of 2a and 2b. The policy sets out circumstances where development will be supported and is therefore positively worded.

Policy H13: Retention of mobile home parks

No respondents commented on this policy.

Chapter 10: Flooding and Drainage

One respondent.

Respondent number	Name/Organisation
0087	Poulter, William

Support

Respondent 0087 did not comment on legal compliance but considers the policy to comply with the Duty to Cooperate

While respondent 0087 welcomed the chapter and its various statements about what will be expected of developers, specific concerns were raised about flooding impacts on existing areas which are covered below.

MAIN ISSUE: IMPACT OF FLOODING

Detail	Respondent number	Response
Chapter contains no statement on the impact of flood mitigation measures on flooding elsewhere, particularly Winnersh.	0087	Incorrect, policy FD1 Part 2 states: <i>“Development proposals should ensure flood risk is not worsened for the application site and elsewhere, and ideally that betterment of existing conditions is achieved.”</i>

Policy FD1: Development and flood risk (from all sources)

12 respondents

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0228	Ladds Garden Centre	0280	Bewley Homes
0240	Hallam Land and Wilson Enterprises Ltd	0301	City & Country
0246	Hurst Neighbourhood Plan Group	0305	University of Reading
0268	Wates Developments Ltd	0314	Vistry Group
0271	Holdstock, Michael	0354	Ashridge Wokingham Ltd
0272	Helmsley Land Ltd	0355	Environment Agency

Support

Respondents 0246, 0305, and **0355** consider the policy to be legally compliant.

Respondents 0228, 0240, 0268, 0271, 0272, 0301, 0305, **0355** consider the policy to comply with the Duty to Cooperate.

Respondents 0280, 0305 and 0314 support the policy.

While respondent 0354 supports the policy in principle, they raise specific concerns with aspects of the policy which are covered below.

LEGAL COMPLIANCE

Detail	Respondent numbers	Response
The sustainability appraisal has not considered all reasonable alternatives	0240	Please refer to Sustainability Appraisal section of this statement.

MAIN ISSUE: CONSISTENCY WITH NATIONAL POLICY / GUIDANCE

Detail	Respondent numbers	Response
<p>The policy fails to recognise current National Flood Risk Standing Advice for Local Planning Authorities which includes further instances where the Sequential Test may not be required.</p>	<p>0354</p>	<p>The council is satisfied that the policy wording fully recognises the exceptions to the Sequential Test set out at NPPF paragraph 174 (and footnote 60) and elaborated on in the associated Planning Practice Guidance on sequential testing. The referred to standing advice guidance states <i>'You may not need a sequential test if development can be laid out so that only elements such as public open space, biodiversity and amenity areas are located in areas at risk of any source of current or future flooding'</i>. This is less definitive than the defined exceptions at Paragraph 174. The council is satisfied that this wording should not be incorporated into the policy, and that it will remain open to applicants through the planning application process to present a case for the Sequential Test not being required on these grounds.</p>

MAIN ISSUE: POLICY WORDING

Detail	Respondent numbers	Response
<p>That the criteria for defining whether a site is at 'low risk' of flooding in section 2.2 of the Sequential and Exception Test (2024) is incorporated into the policy wording for clarity and to ensure decision making is consistent with the approach taken to considering suitability of sites for allocation</p>	<p>0228, 0240, 0268, 0271, 0272, 0301</p>	<p>Noted. It is agreed that incorporating this definition into the plan would aid clarity for decision making. It is proposed to incorporate this into supporting text as per the suggested change in the Schedule of proposed modifications.</p>

Detail	Respondent numbers	Response
Part 1 of the policy should refer to other relevant evidence, including Section 19 Flood Investigation Reports, to inform decision making.	0246	Part 1 of the policy requires historic flooding to be taken into account at all stages of development. Section 19 Flood Investigation Reports are an important source of information and detail in relation to historic incidents of flooding. The council is satisfied that specific reference within the policy is unnecessary, given they are already an important factor in the assessment of proposals subject to historic flooding, in particular informing the advice of the Lead Local Flood Authority on applications. The policy refers to the SFRA, which reflects the specific NPPF requirement for strategic policies to be informed by Strategic Flood Risk Assessment.
Part 2 of the policy should reiterate the requirements of NPPF paragraph 165 for development in areas at risk of flooding to be made safe for their lifetime and avoid increasing flood risk elsewhere.	0246	Noted. It is agreed that incorporating reference to development being safe for its lifetime without increasing risk elsewhere would aid clarity and reflect national policy. An associated modification is set out in the Schedule of proposed modifications.
The policy does not adequately consider the cumulative impact of multiple minor developments within or adjacent to minor settlements (specific reference to Hurst).	0246	Noted. The council is satisfied that cumulative impacts are addressed by part 1 of the policy, which requires consideration of flooding from all sources, both historic and projected, as well as cumulative impacts.
Reference is made to the provision of +40% climate change allowance within the supporting text, whereas Environment Agency guidance provides variable allowances for climate change. This should be reflected in the plan.	0354	Reference in supporting text paragraph 10.11 relates specifically to below ground stormwater storage. This is a particular requirement of the Lead Local Flood Authority and does not affect how EA climate change uplifts should otherwise be applied through the application process. Reference to 40% in Policy FD2 and supporting text reflects the Wokingham SuDS Strategy (2017) which is adopted

Detail	Respondent numbers	Response
		guidance and a material planning consideration that introduced local standards which have been appropriately consulted upon.
Lack of reference to functional floodplain in the policy, particularly part 2.	0355	The policy refers to FZ3 which includes functional flood plain, and the policy requires consideration of the vulnerability of development as set out in national policy. The council therefore consider this to be a clarity rather than a soundness issue. Notwithstanding, a change is recommended in the Schedule of proposed modifications for improved clarity.

OTHER ISSUES

- Respondents 0228, 0240, 0268, 0271, 0272, 0280, and 0301 consider the policy not to be legally compliant.
- Respondents 0280 and 0314 welcome the flexibility in part 6 of the policy for ‘appropriately detailed’ FRAs, which recognises not all sites require the same level of detail
- Respondent 0305 notes that the Sequential Test requirements for planning applications do not apply to sites allocated in the plan which have already been subject to a whole plan Sequential Test
- Respondent 0355 raised specific concerns with the SFRA – these have been addressed through Duty to Cooperate discussions with the Environment Agency.

Policy FD2: Sustainable drainage

4 respondents

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0305	University of Reading	0316	Thames Water
0314	Vistry Group	0355	Environment Agency

Support

Respondents 0305 and **0355** consider the policy to be legally compliant and to comply with the Duty to Cooperate.

Respondents 0305 and 0314 support the policy. Respondent 0305 notes that SuDS can be incorporated into the Loddon Valley Garden Village proposals.

Respondent 0314 welcomes the flexibility provided by the wording in Part 3 of the policy.

LEGAL COMPLIANCE

Detail	Respondent numbers	Response
The supporting text references the Flood and Water Management Act 2010 without reference to Schedule 3 of the Act not having been implemented. Without implementation, Thames Water cannot prevent the connection of development to public sewers. Modifications suggested to ensure the policy is legally compliant and effective both with or without the implementation of Schedule 3.	0316	Noted. The policy wording and supporting text are proposed to be modified to reflect suggestion as set out in the Schedule of proposed modifications.

MAIN ISSUE: POLICY WORDING

Detail	Respondent numbers	Response
<p>The supporting text references the Flood and Water Management Act 2010 without reference to Schedule 3 of the Act not having been implemented. Without implementation, Thames Water cannot prevent the connection of development to public sewers. Modifications suggested to ensure the policy is effective both with or without the implementation of Schedule 3.</p>	<p>0316</p>	<p>Modifications recommended as covered under legal compliance above.</p>
<p>The policy does not consider the limitations of infiltration SuDS where there may be contamination present from previous uses or where the geology is unsuitable. Modification suggested to avoid the use of infiltration SuDS.</p>	<p>0355</p>	<p>The council considers this to be a clarity rather than a soundness issue. There will be a need for site specific FRAs at the application stage and separate SuDS guidance exists that will need to be considered, which prioritises use of infiltration SuDS first in the SuDS train in order to manage surface water runoff. Without certainty that infiltration SuDS are not appropriate for development sites to manage development, it is not considered reasonable to preclude their use in principle in this policy. The current wording allows for a flexible approach to drainage solutions, which is essential given the variability in site conditions across the borough. The suitability of infiltration SuDS can only be accurately determined through detailed site investigations, including geotechnical and hydrogeological assessments. These assessments are typically carried out during the planning application stage. The EA and other relevant bodies provide input during the planning application process, ensuring that drainage solutions are appropriate and do not pose a risk to the environment. Further, the recommended modification does not take account of circumstances where infiltration SuDS are</p>

		<p>appropriate to manage flood risk, so WBC questions whether the recommended approach is sound.</p> <p>It is however noted that from a water quality perspective, it is important to protect groundwater sources as appropriate. An addition to policy FD2 and to supporting text is recommended in the Schedule of proposed modifications.</p>
--	--	--

OTHER ISSUES

- Respondent **0316** considers the policy not to be legally compliant.

Policy FD3: River corridors and watercourses

4 respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0256	Historic England	0318	Bloor Homes
0305	University of Reading	0355	Environment Agency

Support

Historic England (**0256**), University of Reading (0305) and Bloor Homes (0318) consider the policy to be legally compliant. The Environment Agency (**0355**) did not specifically comment on legal compliance, but comments indicate broad agreement.

Historic England (**0256**), University of Reading (0305) and Bloor Homes (0318) consider the policy to comply with the Duty to Cooperate. The Environment Agency (**0355**) did not specifically comment on the duty, but comments indicate broad agreement.

The Environment Agency (**0355**), Historic England (**0256**) and the University of Reading (0305) consider the policy to be sound. Bloor Homes (0318) whilst stating the policy was unsound strongly supported the principle of the policy and proposed modifications to address issues.

MAIN ISSUE: DECISION TAKING AND IMPLEMENTATION

Detail	Respondent number	Response
Whether the term watercourse should be defined.	0318	The council is satisfied that the policy provides an appropriate basis for assessing planning applications and that the further advice on the meaning of watercourse or minimum distance is unnecessary.
Whether the term 'undeveloped' should be clarified.	0318	The policy refers to an undeveloped buffer from the bank of watercourses. Whilst not stated, a buffer provides access to

		maintain the watercourse as well as an area of transition between the watercourse and built form. The council is satisfied that the policy provides a suitable basis for assessing planning applications. Suggestions regarding the exclusion of footpaths, soft landscaping and sustainable drainage are unnecessary.
Whether the circumstances of when culverting would be acceptable should be set out.	0355	The policy states that the culverting of watercourses should be avoided where possible. The council is satisfied that the policy provides an appropriate basis for assessing planning applications and that the further advice on the circumstances where culverting would be acceptable is unnecessary.
Reference to the Thames Waterway Plan is unclear	0355	Agreed. A modification is proposed to remove this reference.

Chapter 11: The Natural Environment

One respondent.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0305	University of Reading		

Support

Respondent 0305 supported the plan's approach to conservation, maintenance and enhancement of the natural environment, in particular policies NE1, NE2 and NE3.

Policy NE1: Biodiversity and geodiversity

Six respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0123	NatureSpace Partnership	0330	Swifts Local Network, Swifts & Planning Group
0256	Historic England	0341	Watt, Suzanne
0314	Vistry Group	0355	Environment Agency

Support

The Environment Agency (0355) supported the policy, as it references the importance of connectivity, buffers, invasive species, local biodiversity action plans or Local Nature Recovery Strategies.

Historic England (0256) broadly supported the policy but suggested an amendment to the supporting text to recognise that the natural and historic environment are integral to each other.

Respondent 0123 supported the principle of the policy but sought amendments to the policy, supporting text and glossary that provide additional detail on the Great Crested Newt Organisational Licencing Scheme.

Some respondents disagreed that the plan was legally compliant or met the duty to co-operate, however did not provide any reasoning. Other comments did not state whether the plan was legally compliant or met the duty to co-operate.

MAIN ISSUE: POLICIES, DECISION TAKING AND IMPLEMENTATION

Detail	Respondent numbers	Response
The degree of protection should be proportionate to the status of the site or species	0314	This wording is explicitly stated at the end of paragraph 1 of Policy NE1.
Biodiversity enhancements only mentioned in respect of Biodiversity Net Gain. Bird boxes/bricks	0330	A separate policy (NE2) covers Biodiversity Net Gain.

Detail	Respondent numbers	Response
are excluded from BNG and require their own policy.		Policy NE1 includes a list of criteria through 3a) to e) that (amongst other factors), support the incorporation of beneficial biodiversity and/or geodiversity conservation features. Features such as bird boxes/bricks would be considered under this policy.
Disagree with identification of Vine Cottage, Hurst as a Local Wildlife Site	0341	Vine Cottage, Hurst is proposed as a Local Wildlife Site, until such time that it is formally surveyed by TVERC and considered at the local wildlife site selection panel. The precautionary principle means it should be treated by the council as a Local Wildlife Site for local planning policy purposes.
Additional detail regarding the Great Crested Newt Organisational Licence to raise awareness of the scheme	0123	The council consider additional detail in the supporting text and glossary on organisational licencing for protected species would provide useful clarity.
Further clarity that the natural and historic environment are integral to each other. Newly created or altered habitats will sit within a historical landscape and may have both positive and negative impacts on setting as well as the physical and chemical conditions of heritage assets.	0256	WBC agrees additional text would provide useful clarity. A proposed modification has been agreed through a signed Statement of Common Ground with Historic England. The proposed change is set out in the council's Schedule of proposed modifications.

REQUESTED MODIFICATIONS

Detail	Respondent number	Response
<p>Include reference to the council’s Great Crested Newt Organisational Licence in policy, supporting text and glossary.</p>	<p>0123</p>	<p>Agreed. The council has proposed a modification to the supporting text of Policy NE1 and the glossary that provides additional detail on organisational licencing for protected species, whilst recognising that other licencing schemes may come forward in the future.</p> <p>The proposed change is set out in the council’s Schedule of proposed modifications.</p>
<p>Additional detail in supporting text that recognises the natural and historic environment are integral to each other.</p>	<p>0256</p>	<p>Agreed. The council consider reference to the natural and historic environment being integral to each other would be a useful addition to the supporting text.</p> <p>The proposed change to paragraph 14.7 of the supporting text is set out in the Schedule of proposed modifications.</p>
<p>Modification to Policy NE1 that requires universal nest bricks for small bird species to be installed in new developments.</p>	<p>0330</p>	<p>Not agreed. The council does not consider a modification to the policy is necessary, as this matter is sufficiently covered through the set of criteria listed in paragraph 3.</p>

Policy NE2: Biodiversity net gain

11 respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0221	Mac Mic Group	0305	University of Reading
0225	Catesby Estates	0309	Royal Borough of Windsor and Maidenhead
0234	Thakeham Homes Ltd	0314	Vistry Group
0274	Bridge House of Twyford	0354	Ashridge Wokingham Ltd
0276	David Wilson Homes Southern	0355	Environment Agency
0280	Bewley Homes		

Support

The Environment Agency (**0355**) did not raise any issues of soundness, and were broadly supportive of the policy.

The Royal Borough of Windsor and Maidenhead (**0309**) welcomed and supported the requirement for all development proposals to demonstrate a minimum biodiversity net gain of 10%.

Respondents 0221 and 0305 supported the policy.

Respondents 0225, 0234 and 0280 were interpreted as supporting the policy.

MAIN ISSUE: VIABILITY

Detail	Respondent numbers	Response
Whether the quantum of housing to be delivered will allow biodiversity net gain to be achieved	0274, 0280	The council is confident that the 10% biodiversity net gain sought in the policy can be delivered.

Detail	Respondent numbers	Response
		The viability of development, including the requirement for 10% biodiversity net gain, has been tested through the 'Local Plan and Community Infrastructure Levy Viability Study'.
Whether the site capacities calculated have taken account the 10% biodiversity net gain requirement	0354	<p>The council expects, in most circumstances, biodiversity net gain to be delivered on site in the first instance. Where this is not possible, it will be expected to be provided off-site.</p> <p>The supporting text to Policy SS14 clarifies that the number of dwellings identified on proposed allocations is indicative and encourages proposals to produce the most appropriate design-led solution, taking into account local and national policies.</p>
Viability implications if the percentage of biodiversity net gain is higher	0225	Noted. The viability of the development, including the requirement for 10% biodiversity net gain, has been tested through the 'Local Plan and Community Infrastructure Levy Viability Study'. It is anticipated that most development proposals will be capable of delivering 10% biodiversity net gain.

MAIN ISSUE: POLICIES, DECISION TAKING AND IMPLEMENTATION

Detail	Respondent numbers	Response
The policy is unnecessary as it replicates the Environment Act and national policy requirements	0276, 0354	The council is satisfied the policy is necessary and is fully consistent with the NPPF and the Environment Act.

REQUESTED MODIFICATIONS

Detail	Respondent number	Response
Modify policy to acknowledge that wider habitat creation can be considered as part of biodiversity net gain	0234	<p>Not agreed. Supporting text at paragraph 14.18 qualifies that biodiversity net gain will principally be achieved through a combination of the retention of important features and by making on site biodiversity enhancements.</p> <p>Submission of a Biodiversity Gain Plan will help to measure net gain achieved on site or loss that would need to be compensated. DEFRA’s guidance is clear that any net gain coming from wider habitat creation or enhancements outside a scheme should be explained clearly in the Biodiversity Gain Plan.</p> <p>Policy NE1 (Biodiversity and geodiversity) provides conditional support for development proposals subject to meeting criteria. Criteria include providing coherent ecological connectivity and permeability, integrated and links to wider green and blue infrastructure network.</p>
Modify requirement to recognise that where net gain cannot be achieved on site, it can be provided off-site	0274, 0280, 0314	Not agreed. The final part of the policy, and paragraph 14.22 of the supporting text clarifies that the mitigation hierarchy will be applied as part of the biodiversity accounting process. If any residual harm remains after avoidance and mitigation, as a last resort, compensation should be sought through biodiversity off-setting.
Remove the policy	0276	The council is satisfied the policy provides a suitable framework for biodiversity net gain.

Policy NE3: Thames Basin Heaths Special Protection Area

7 respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0132	Bracknell Forest Council	0305	University of Reading
0268	Wates Development Ltd	0314	Vistry Group
0276	David Wilson Homes Southern	0355	Environment Agency
0301	City & County		

Support

Respondent 0305 considers the policy to be legally compliant. Whilst respondents 0268 and 0301 expressed the policy was not legally compliant, no details were provided as to why.

Respondents 0268, 0301, and 0305 consider the policy complies with the Duty to Cooperate. No respondent stated the duty had not been met.

Respondents 0305, 0314 and **0355** which includes the Environment Agency consider the policy sound.

Natural England whilst not specifically comment on Policy NE3 confirmed they had no challenge on the soundness of the plan. They also welcomed the identification of the Rooks Nest SANG extension.

MAIN ISSUE: SANG PROVISION

Detail	Respondent number	Response
Whether the threshold of 50 dwellings for requiring bespoke SANG is justified.	0268, 0301	Proposed residential development within the sphere of influence around the Thames Basin Heaths SPA are expected to mitigate potential impact through the provision of SANG and payment towards SAMM.

Detail	Respondent number	Response
		<p>The council is satisfied that the development promoted by the plan can be effectively mitigated/</p> <p>The council SANG strategy includes the provision of strategic SANG which can be used to mitigate the impacts from smaller developments. Larger proposed residential development proposals, including those within Strategic Development Locations, are expected to mitigate their impacts through onsite provision or through buying into SANG facilitated by a third party.</p> <p>The 50 dwelling threshold reflects the planned capacity of the strategic SANG, enabling people proposing larger schemes to understand that an alternative solution is required.</p>

MAIN ISSUE: DECISION TAKING AND IMPLEMENTATION

Detail	Respondent number	Response
Whether Natural England has the resources to agree measures to avoid or mitigate impacts on the SPA.	0276	The council is satisfied that avoidance and mitigation measures should be agreed with Natural England, who are a statutory consultee. Natural England have reviewed and supported the soundness of the plan and continue to actively engage in current development proposals.
Clarification should be provided that SANG capacity loss should be replaced on an equivalent basis and in the vicinity of the existing SANG.	0132	Policy NE3(8) already requires that sufficient alternative avoidance measures must be available taking account of Natural England's advice on SANGs. This will require matters such as the vicinity of the alternative to be acceptable. The

Detail	Respondent number	Response
		council is satisfied that this approach is provides a suitable basis to assess planning applications.
Clarification should be provided of the need for an air quality assessment for sites in proximity to the SPA.	0132	Policy NE3 2 already states “Development proposals for larger residential development may need to undertake an air quality assessment of the likely significant effects on the SPA and other habitats sites.” The council is satisfied that this approach is provides a suitable basis to assess planning applications.

Policy NE4: Trees, woodland, hedges and hedgerows

13 respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0148	Gleeson	0269	Cirrus Land Ltd
0221	Mac Mic Group	0280	Bewley Homes
0231	Willson Developments Ltd	0305	University of Reading
0235	The Old Redingensians Association	0314	Vistry Group
0254	Croudace Homes	0318	Bloor Homes
0256	Historic England	0354	Ashridge Wokingham Ltd
0265	Shinfield Studios		

Support

Respondents 0221 and **0256** (Historic England) supported the policy.

Respondents 0280 and 0314 broadly supported the policy but sought some additional flexibility in the policy wording.

Respondents 0148, 0231, 0235, 0254, 0265, 0269, 0305 and 0318 objected to the policy.

Some respondents disagreed that the plan was legally compliant or met the duty to co-operate, however did not provide any reasoning. Other comments did not state whether the plan was legally compliant or met the duty to co-operate.

MAIN ISSUE: POLICIES, DECISION TAKING AND IMPLEMENTATION

Detail	Respondent numbers	Response
Policy is overly prescriptive and should provide additional flexibility	0148, 0231, 0235,0254, 0265, 0269, 0354	The council is satisfied that the policy provides flexibility in decision-making. Paragraph 14.42 of the supporting text refers to surveys and assessments being undertaken in accordance with the British Standard (5837:2012). Annex B of the British Standard provides further guidance on the nature and level of information required.
Lack of distinction or recognition of value, significance or quality of trees, woodland etc.	0231, 0235, 0265, 0269, 0305, 0318	<p>Recognition of a tree, woodland, hedge or hedgerow's value is qualified in paragraph 5 of the policy, which states:</p> <p>'The loss, threat or damage to any tree, woodland, hedge or hedgerow <u>of visual amenity, heritage or nature conservation value</u>, will not be permitted unless all the following criteria are met.'</p> <p>Paragraph 4 of the policy requires applicants to assess the health of all trees, woodland, hedges and hedgerows, describing and assessing their value and impact through submission of an Arboricultural Method Statement.</p>

REQUESTED MODIFICATIONS

Detail	Respondent number	Response
Modify paragraphs 1 and 2 of the policy to provide additional flexibility on the protection and incorporation of existing trees, woodland, hedges and hedgerows in development proposals.	0148, 0221, 0231, 0235, 0254, 0265, 0280, 0305, 0318	Not agreed. The council is satisfied the policy wording appropriately seeks to ensure the protection and integration of trees, woodland, hedges and hedgerows in development proposals.

Detail	Respondent number	Response
Modify paragraph 1 of the policy to recognise the quality and value of trees, woodland, hedges and hedgerows.	0269, 0280, 0305, 0318	Not agreed. The recognition of the quality and value of trees, woodland, hedges and hedgerows is clearly stated in paragraph 5 of the policy.
Modify paragraph 4 of the policy to introduce a requirement for applicants to provide information that is proportionate to the scale and nature of the development proposal.	0231, 0235, 0265, 0318	Not agreed. Paragraph 14.42 of the supporting text qualifies that surveys and assessments must be undertaken in accordance with the requirements of British Standard (5837:2012). Annex B of the BSI provides further guidance and recommendations on the nature and level of information required at stages of the planning process.

Policy NE5: Landscape and design

Nine respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0199	Thames Valley Police	0267	Stanlake Park
0221	Mac Mic Group	0290	Monopro Ltd.
0245	Crest Nicholson Partnership and Strategic Land	0314	Vistry Group
0256	Historic England	0354	Ashridge Wokingham Ltd
0266	Haines Hill Estate		

Support

Historic England (**0256**) supported the policy, whilst seeking a reference to the East Berkshire Historic Landscape Characterisation in the policy or supporting text.

Respondents 0221 and 0314 also supported the policy.

Respondent 0245 broadly supported the policy but sought acknowledgement that loss of lower quality trees should not be unduly resisted.

Some respondents disagreed that the plan was legally compliant or met the duty to co-operate, however did not provide any reasoning. Other comments did not state whether the plan was legally compliant or met the duty to co-operate.

MAIN ISSUE: POLICIES, DECISION TAKING AND IMPLEMENTATION

Detail	Respondent numbers	Response
Blanket protection of countryside contrary to national policy	0266, 0267	<p>The council considers that Policy NE5 of the plan provides a suitable policy framework for managing landscape change, by utilising the most up-to-date landscape studies.</p> <p>Paragraph 2 of the policy is clear that development proposals should respond to the distinctive character, which provides a degree of flexibility to take account local circumstances and for planning decisions to be made on a case-by-case basis.</p>
Terminology in policy inconsistent with paragraph 180 of the NPPF. Part 1 of the policy requires development to protect and enhance the character and distinctiveness of landscape, which is not consistent with the approach envisaged in the NPPF	0354, 0266, 0267	<p>The council has proposed a modification to paragraph 1 of the policy that would align closer with paragraph 20 of the NPPF, with respect to the conservation and enhancement of landscapes.</p> <p>The proposed modification is set out in the Schedule of proposed modifications.</p>
Protection and enhancement of landscape may not be achievable depending on scale of development proposals	0354	<p>Paragraph 2 of the policy is clear that development proposals should respond to the distinctive character. The policy therefore provides a degree of flexibility to take account local circumstances and for planning decisions to be made on a case-by-case basis.</p>
Lack of recognition in designing out crime, including defining public and private spaces	0199	<p>The plan should be read as a whole. Policy DH1 ensures development proposals achieve high quality design and sets out a series of design principles. Criteria q) refers to creating safe spaces that are designed to encourage positive social interaction and to discourage crime and disorder, and the fear of crime. Development proposals will be expected to create</p>

Detail	Respondent numbers	Response
		<p>places with strong levels of natural surveillance and active frontages.</p> <p>The delineation of private and public spaces is covered by criteria p) of Policy DH1.</p>
<p>Blanket protection of trees along green routes is unjustified. Policy should recognise the value and quality of trees and hedges.</p>	<p>0290, 0354</p>	<p>Policy NE4 (Trees, woodland, hedges and hedgerows) requires the submission of an Arboricultural Impact Assessment to assess the health of all trees, woodlands, hedges and hedgerows that are affected either on-site or nearby. Paragraph 5 of Policy NE4 considers visual amenity, heritage and nature conservation value.</p>

REQUESTED MODIFICATIONS

Detail	Respondent number	Response
<p>Modify policy to recognise the role of landscaping features in designing out crime and creating secure environments, including public and private spaces.</p>	<p>0199</p>	<p>Not agreed. The plan should be read as a whole. Policy DH1 ensures development proposals achieve high quality design and sets out a series of design principles. Criteria q) refers to creating safe spaces that are designed to encourage positive social interaction and to discourage crime and disorder, and the fear of crime. Development proposals will be expected to create places with strong levels of natural surveillance and active frontages.</p> <p>The delineation of private and public spaces is covered by criteria p) of Policy DH1.</p>

Detail	Respondent number	Response
Modify the policy to acknowledge that the loss of lower quality trees should not be unduly resisted	0245	<p>Not agreed. This detail is sufficiently covered by Policy NE4 (Trees, woodland, hedges and hedgerows) which requires an Arboricultural Impact Assessment to assess the health of all trees, woodland, hedges and hedgerows affected by development.</p> <p>The council does not consider a modification to the policy is necessary.</p>
Reference the East Berkshire Historic Landscape Characterisation in the policy or supporting text	0256	<p>Agreed. The council agrees modification to paragraph 14.47 of the supporting text to make reference to the East Berkshire Historic Landscape Characterisation.</p> <p>The recommended change is set out in the Schedule of proposed modifications.</p>
Modify requirement to align with paragraph 180 of the NPPF	0266, 0267	<p>Agreed. The council is proposing a modification to paragraph 1 of the policy to align with national policy. Paragraph 20 of the NPPF is clear that strategic policies should make provision for the conservation and enhancement of the natural, built and historic environment, including landscapes.</p> <p>The recommended change to the policy is set out in the council's Schedule of proposed modifications.</p>
Re-frame the policy to focus on preserving qualities of Green Routes, rather than retention of individual trees, hedges etc	0290, 0354	<p>Not agreed. Policy NE4 provides appropriate detail for assessing the health of trees, woodlands, hedges and hedgerows.</p> <p>Part 5 of Policy NE4 provides flexibility as proposals are able to demonstrate a loss, threat or damage to any tree, woodland, hedge or hedgerow through mitigation measures that provide</p>

Detail	Respondent number	Response
		equivalent character, visual amenity, heritage value and habitat connectivity.

Policy NE6: Valued landscapes

40 respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0100	Humphreys, Peter	0261	Moss, Stephen (representing multiple landowners)
0111	Hallam Land Management	0265	Shinfield Studios
0119	Cooper Estates Strategic Land Limited	0266	Haines Hill Estate
0134	Singh, Raphael	0267	Stanlake Park
0184	O'Connor Properties Ltd	0269	Cirrus Land Ltd
0196	A&O Property Ltd	0272	Helmsley Land Ltd
0206	Mr and Mrs Cunningham	0276	David Wilson Homes Southern
0215	Maverick Property Investments Ltd	0277	Croudace Homes, Vortal Homes Ltd and Falcon Developments (SE) Limited
0222	Richborough	0278	Hill Residential Ltd
0225	Catesby Estates	0281	Vortal Homes Ltd
0228	Ladds Garden Centre	0286	Mac Mic Group
0231	Willson Developments Ltd	0287	Englefield Estate
0232	Shorewood Homes Ltd	0290	Monopro Ltd.
0233	Dutton, Chris and Shirley Gallagher, Karen and Brian Dutton, Lucas Geering, Wendy, Timothy and Laura	0298	Nicholas King Homes
0234	Thakeham Homes Ltd	0301	City & Country
0239	University College of Estate Management	0305	University of Reading
0240	Hallam Land and Wilson Enterprises Ltd	0306	Loddon Mill Enterprises Ltd
0251	Hollis, Jeff	0317	Hatch Farm Land Limited
0254	Croudace Homes	0318	Bloor Homes
0256	Historic England	0354	Ashridge Wokingham Ltd

Support

Respondents 0234 and 0318 support the policy.

Historic England (**0256**) supported the policy, with changes sought to the policy wording to consider the contribution and significance of heritage assets. They also supported the plan's legal compliance and that it had met the duty to cooperate.

Respondents 0119, 0231, 0239, 0261, 0265, 0269, 02782, 0290, 0298, 0305, 0306, 0317 and 0318 supported the plan's legal compliance.

Respondents 0100, 0111, 0119, 0196, 0228, 0231, 0231, 0232, 0239, 0240, 0265, 0269, 0272, 0278, 0290, 0298, 0301, 0305, 0317, 0318 stated the plan met the duty to cooperate.

Some respondents did not state whether the plan was legally compliant or met the duty to cooperate.

Except for those matters raised to the methodology below, there were no substantive issues raised in relation to the Billingbear, Bowsey Hill, Remenham Chalk, Riseley Woods, River Blackwater or River Thames valued landscapes.

The following tables set out the issues raised regarding the duty to co-operate, legal compliance, and soundness.

LEGAL COMPLIANCE

Detail	Respondent number	Response
Land to the north of London Road and east of A329(M), which has planning permission for housing is included in the Alexander Pope valued landscape and is therefore incompatible with its designation.	0100	<p>Paragraph 4.20 of the Valued Landscapes Assessment clearly states that development proposals within a valued landscape are expected to protect and enhance the valued landscapes as a whole.</p> <p>The policy approach in Policy NE6 also ensures that where development is proposed, sensitive design and planning enhances important features or attributes that contribute to making a valued landscape.</p> <p>The approach to sensitive design and planning within a valued landscape was recognised by the Inspector at a planning appeal</p>

Detail	Respondent number	Response
		at Land at West Street, Coggeshall, Braintree, where they recognised that the paragraph 109 requirement of the NPPF did not necessarily prohibit development, but required <i>'careful consideration to ensure development protects and enhances what is valued'</i> .
Insufficient consultation on proposed extended areas of some valued landscapes during the plan's preparation.	0196	<p>The Landscape Institute's Technical Guidance Note (02/21) 'Assessing landscape value outside national designations' recognises that assessments of landscape value may be required at different stages of the planning process, such as evidence-gathering and plan-making stages.</p> <p>The Valued Landscape Assessment (2024) was published alongside the Proposed Submission Plan for a minimum 6-week consultation (Regulation 19) in accordance with the council's Statement of Community Involvement and relevant legislation.</p>

MAIN ISSUE: METHODOLOGY

Detail	Respondent numbers	Response
Inconsistency with national planning policy and latest guidance by restricting development that is deemed acceptable within a valued landscape.	0286	<p>The purpose of the designation is to recognise landscapes in the borough that have particular value, and exhibit specific attributes and characteristics that lift them above the rest.</p> <p>The identification of the valued landscapes followed a comprehensive methodology having regard to national planning policy and guidance, and current best practice. The Valued Landscapes Assessment was prepared with</p>

Detail	Respondent numbers	Response
		<p>engagement from council's specialist officers, including landscape, heritage and ecology.</p> <p>The policy approach in Policy NE6 ensures that where development is proposed, sensitive design and planning enhances important features or attributes that contribute to making a valued landscape.</p> <p>The council is satisfied the approach is appropriate and consistent with national planning policy.</p>
<p>Judgements of landscape value should be assessed via the planning application process</p>	<p>0261</p>	<p>Paragraph 2.2.4 of the Landscape Institute's Technical Guidance Note 02/2021, titled 'Assessing landscape value outside national designations' is clear that where value has been placed on a landscape by a local planning authority, this should be defined in a development plan document, e.g. a local plan.</p> <p>The identification of the valued landscapes in the plan has evolved through comprehensive analysis and recent appeal decisions in the borough.</p> <p>It is therefore wholly appropriate for the council to identify valued landscapes in the local plan.</p>
<p>Principle of designation would constrain development and supply of homes and considered a blanket protection of countryside, contrary to national planning policy and case law</p>	<p>0254, 0261, 0265, 0266, 0267, 0269, 0277, 0298, 0305, 0354</p>	<p>The council does not agree the policy approach would constrain development and supply of homes. Paragraph 4.20 of the Valued Landscapes Assessment clearly states that development proposals within a valued landscape are expected to protect and enhance the valued landscapes as a whole.</p>

Detail	Respondent numbers	Response
		<p>The policy approach in Policy NE6 also ensures that where development is proposed, sensitive design and planning enhances important features or attributes that contribute to making a valued landscape.</p> <p>The approach to sensitive design and planning within a valued landscape was recognised by the Inspector at a planning appeal at Land at West Street, Coggeshall, Braintree, where they recognised that the paragraph 109 requirement of the NPPF did not necessarily prohibit development, but requires <i>'careful consideration to ensure development protects and enhances what is valued.'</i> The council is satisfied the policy approach is consistent with national planning policy and case law.</p>
Supporting landscape evidence not sufficiently robust	0134, 0228, 0251, 0254, 0266, 0267, 0272, 0276, 0301	<p>The Valued Landscape Assessment, follows a comprehensive process and methodology, taking into account national planning policy and guidance, technical evidence (e.g. Landscape Character Assessment), current best practice and guidance, appeal decisions and recent case law.</p> <p>The assessment therefore demonstrates a robust approach in identifying the 13 valued landscapes across the borough.</p>
Extensions to boundaries beyond previous consultations are not justified nor appropriately based on features on the ground	0251, 0265, 0305, 0354	<p>The extensions to the boundaries of valued landscapes are justified in Table 2 of the Valued Landscape Assessment, with any additional features or attributes of the landscape covered in their respective narratives (See Appendix 3 of assessment). Paragraph 6.64 of the assessment is clear that to make the valued landscapes clearer, the review of boundaries has</p>

Detail	Respondent numbers	Response
		followed, wherever possible, identifiable features on the ground such as field boundaries or roads.
Some land does not inherit the key characteristics or attributes of the landscape	0184, 0265, 0269	<p>The council’s approach to valued landscapes is consistent with national planning policy, recent case law and appeal decisions, including the Wendover appeal decision. This appeal decision gives valuable guidance on how to address the issue of the character, quality and extent of a given ‘landscape; in the context of plan-making. The Inspector stated:</p> <p><i>‘When assessing what constitutes a valued landscape, I consider it more important to examine the bigger picture in terms of the valued of the site and its surroundings. That is not to borrow the features of the adjoining land but to assess the site in situ as an integral part of the surrounding land rather than divorcing it from its surroundings and then to conduct an examination of its value.’</i></p> <p>Paragraph 6.64 of the Valued Landscape Assessment clarifies that whilst some areas may not ‘exhibit any of the demonstrable physical features’, they formed an integral part of the wider valued landscape, consistent with paragraph 65 of the Aylesbury Road, Wendover decision.</p>
Landscape Character Assessments should be used as the basis for decision-making	0277	Work on the borough’s valued landscapes builds on Landscape Character Assessments (LCA) (2019) and (2004). The LCAs offer an objective description of the landscape, including its features and attributes. The key features and attributes of landscape character have informed the production of the accompanying narratives that sit behind

Detail	Respondent numbers	Response
		<p>each proposed valued landscape (see Appendix A of the valued landscape assessment).</p> <p>The Valued Landscape Assessment is, however, different from Landscape Character Assessment (LCA), and as landscape is a continuum, with zones of transition, the valued landscape boundaries do not always coincide with LCA boundaries. Paragraph 6.44 of the Valued Landscape Assessment qualifies that this is particularly true where valued landscapes have attributes that cross LCA boundaries.</p> <p>Paragraph 2 of Policy NE5 ensures development proposals are informed by, and respond to, the distinctive characters set out in the Landscape Character Assessment and other relevant assessments.</p>
<p>Methodology does not reflect current / adopted approaches, e.g. Fareham Local Plan examination</p>	<p>0240, 0269, 0276</p>	<p>Valued landscapes are particular and special to each locality, where each case must be considered on its merits. What may be considered or not considered a valued landscape in one borough/district, may not make the grade in another. This was recognised in the Landscape Institute’s Technical Guidance Note:</p> <p><i>“The character and quality of landscapes across England are variable and what may be defined as reaching the ‘valued landscape’ threshold/criteria in one part of the Country may be considered to be an ‘everyday landscape’ in another”</i></p> <p>The council is satisfied that the identification of valued landscapes has followed a robust methodology, consistent with national planning policy and guidance, current best</p>

Detail	Respondent numbers	Response
		practice, appeal decisions (e.g. Wendover) and recent case law.
The methodology is based on a scoring system that layers multiple attributes with no regard to Landscape Character Assessments, contrary to best practice	0269, 0305	<p>The method builds on the Landscape Character Assessments (LCA) (2019) and (2004). The LCAs offer an objective description of the landscape, including its features and attributes. The key features and attributes of landscape character have informed the production of the accompanying narratives that sit behind each proposed valued landscape (see Appendix A of the valued landscape assessment).</p> <p>The Valued Landscape Assessment is, however, different from Landscape Character Assessment (LCA), and as landscape is a continuum, with zones of transition, the valued landscape boundaries do not always coincide with LCA boundaries. Paragraph 6.44 of the Valued Landscape Assessment qualifies that this is particularly true where valued landscapes have attributes that cross LCA boundaries.</p>
Conflict between valued landscape and settlement boundary	0287	<p>The extent of settlements has been carefully considered in the drafting of the plan. The Settlement Boundaries Review (2024) topic paper for details of how the settlement boundaries – and by definition, the extent of countryside – have been determined.</p> <p>Valued landscapes and settlement boundaries are clearly defined on the Policies Map.</p>

MAIN ISSUE: ALEXANDER POPE VALUED LANDSCAPE

Detail	Respondent numbers	Response
Inclusion of land allocated for housing within the valued landscape boundary	0100	<p>Paragraph 4.20 of the Valued Landscapes Assessment clearly states that development proposals within a valued landscape are expected to protect and enhance the valued landscapes as a whole.</p> <p>The policy approach in Policy NE6 also ensures that where development is proposed, sensitive design and planning enhances important features or attributes that contribute to making a valued landscape.</p> <p>The approach to sensitive design and planning within a valued landscape was recognised by the Inspector at a planning appeal at Land at West Street, Coggeshall, Braintree, where they recognised that the paragraph 109 requirement of the NPPF did not necessarily prohibit development, but required <i>'careful consideration to ensure development protects and enhances what is valued'</i>.</p>
Assessment should have been undertaken by an independent body	0278	The Valued Landscape Assessment was produced with input from the council's planning and specialist officers, including ecology, heritage, trees and landscape. The Assessment was also undertaken by a qualified landscape architect, and informed by current best practice, national guidance and case law.
Including areas of lower quality landscape	0278	The council's approach to valued landscapes is fully consistent with national planning policy, recent case law and appeal decisions, including the Wendover appeal decision. This appeal decision gives valuable guidance on how to address

Detail	Respondent numbers	Response
		<p>the issue of the character, quality and extent of a given 'landscape; in the context of plan-making (see paragraph 65) of decision).</p> <p>Paragraph 6.64 of the Valued Landscape Assessment clarifies that whilst some areas may not 'exhibit any of the demonstrable physical features', they formed an integral part of the wider valued landscape, consistent with the Aylesbury Road, Wendover decision.</p>
Limited evidence to justify designation	0278	<p>The council is satisfied that the identification of valued landscapes has followed a robust methodology, consistent with national planning policy and guidance, current best practice, appeal decisions (e.g. Wendover) and recent case law.</p> <p>Valued landscape assessments were produced at key stages of the plan's preparation. The assessment has evolved through comprehensive desktop analysis, knowledge and experience of specialist officers; and an understanding of recent case law and appeal decisions. Comments made by individuals, landowners and organisations through earlier stages of plan-making, and through planning appeals, have helped to inform and redefine the boundaries of the recommended valued landscapes.</p>

REQUESTED MODIFICATIONS

Detail	Respondent number	Response
Modify boundary of the Alexander Pope valued landscape to remove land north of London Road which has resolution to grant planning permission	0231	<p>Not agreed. The land north of London Road is included in the Alexander Pope valued landscape on the basis that it demonstrates a number of attributes, notably its clear visual and landscape character links with the wider valued landscape, which will be further enhanced when landscaping between the site and the land at Amen Corner to the east, matures.</p> <p>The land's exclusion from the valued landscape would be considered anomalous, as concluded by the Inspector in paragraph 65 of their decision letter for the Aylesbury Road, Wendover public inquiry (2017).</p>

MAIN ISSUE: BARKHAM AND BEARWOOD VALUED LANDSCAPE

Detail	Respondent numbers	Response
<p>The extent of countryside designated as a valued landscape</p>	<p>0290</p>	<p>Paragraph 4.20 of the Valued Landscapes Assessment clearly states that development proposals within a valued landscape are expected to protect and enhance the valued landscapes as a whole.</p> <p>The policy approach in Policy NE6 ensures that where development is proposed, sensitive design and planning enhances important features or attributes that contribute to making a valued landscape.</p> <p>The approach to sensitive design and planning within a valued landscape was recognised by the Inspector at a planning appeal at Land at West Street, Coggeshall, Braintree, where they noted that the paragraph 109 requirement of the NPPF did not necessarily prohibit development, but required <i>'careful consideration to ensure development protects and enhances what is valued'</i></p> <p>Further, through the methodology, the council has had regard to recent case law and appeal decisions, such as Wendover appeal decision which provides valuable guidance on how to address the issue of the character, quality and extent of a given 'landscape; in the context of plan-making.</p> <p>Paragraph 6.64 of the Valued Landscape Assessment clarifies that whilst some areas may not 'exhibit any of the demonstrable physical features', they formed an integral part of the wider valued landscape, consistent with paragraph 65 of the Aylesbury Road, Wendover decision.</p>

Detail	Respondent numbers	Response
		<p>The council does not therefore consider the Valued Landscape Assessment to be the blanket protection of countryside, and the policy approach is consistent with national planning policy and case law.</p>
<p>Inappropriate use of designation to prevent development and maintain settlement separation</p>	<p>0290</p>	<p>Maintaining the separate identity of settlements and places is addressed in criteria 1f) of Policy SS1.</p> <p>The purpose of the designation is to recognise landscapes in the borough that have particular value and exhibit specific attributes and characteristics that lift them above the rest of the landscape. The policy approach in Policy NE6 ensures that where development is proposed in a valued landscape, sensitive design and planning enhances important features or attributes that contribute to making it a valued landscape.</p> <p>The approach to sensitive design and planning within a valued landscape was recognised by the Inspector at a planning appeal at Land at West Street, Coggeshall, Braintree, where they recognised that the paragraph 109 requirement of the NPPF did not necessarily prohibit development, but required <i>'careful consideration to ensure development protects and enhances what is valued'</i></p> <p>The council therefore considers the valued landscape to be wholly appropriate and consistency with national planning policy and guidance.</p>

REQUESTED MODIFICATIONS

Detail	Respondent number	Response
Modify boundary of Barkham and Bearwood valued landscape to remove land at Limmerhill Road	0290	<p>Not agreed. The land at Limerhill comprises two fields in a high-quality valley landscape, forming part of the setting of a historic route from Swallowfield Park, via Arborfield Cross. The land exhibits many of the features and attributes representative of the Barkham and Bearwood valued landscape, being the presence of mature hedgerows and trees providing a wooded character and visual interest, loose sense of enclosure and pattern of arable and pastoral fields providing a rural character away from settlement.</p> <p>The area also provides important separation of Barkham and Wokingham and, adjacent to the fields is Ye Olde Leathern Bottel public house, a feature in this landscape since at least 1790.</p> <p>Residential development of the land was found to result in a prominent negative and detrimental impact on the landscape and character and appearance of the area, by reason of the loss of a sizeable section of open and attractive undulating landscape in the countryside, in the council's refusal of outline planning permission on the land (ref: 232621) in August 2024.</p>

MAIN ISSUE: FARLEY HILL VALUED LANDSCAPE

Detail	Respondent number	Response
The designation is not necessary as the Courts have confirmed that land does not need to be designated for it to be considered as a valued landscape.	0286	The purpose of the designation is to recognise landscapes in the borough that have particular value and exhibit specific attributes and characteristics that lift them above the rest of the landscape.
Disagree with the inclusion of land to the south east of Swallowfield Road, Arborfield Cross as it exhibits different and lesser qualities than the remainder of the Farley Hill valued landscape.	0286	The council considers the land has strong merit as a valued landscape. As shown in the outputs of the hot-spot analysis in Appendix 2 of the Valued Landscapes Assessment (2024), the promoted area to the southeast of Swallowfield Road scores highly as indicated by a concentrated hotspot around Arborfield Court and Farleyhill Court. The narrative for the Farley Hill valued landscape recognises that there is a concentration of different types of listed buildings and country houses in the area.

REQUESTED MODIFICATIONS

Detail	Respondent number	Response
Modify the extent of the Farley Hill valued landscape to remove land south of Swallowfield Road, Arborfield Cross.	0286	<p>Not agreed. The council considers the land exhibits many of the features and attributes representative of the Farley Hill valued landscape, as evident from the hotspot analysis output (Appendix 2) in the Valued Landscape Assessment (2024).</p> <p>The Farley Hill valued landscape gains much of its identity from the wooded hills, recreation and agriculture, with a number of notable large house, timber-framed brick-built cottages and</p>

Detail	Respondent number	Response
		<p>farmhouses, linked by a network of rural lanes. It occupies slopes and high wooded ground centred on Farley Hall. The council has followed a comprehensive approach in the identification of valued landscapes, informed by local planning appeal decisions and case law.</p> <p>Most notably, the Wendover appeal decision (in paragraph 65) provides valuable guidance on character, quality and extent of a given landscape in the context of plan-making. The inclusion of this land within the Farley Hill valued landscape is therefore consistent with the Wendover appeal decision.</p>

MAIN ISSUE: FOREST AND RIDES VALUED LANDSCAPE

Detail	Respondent number	Response
<p>Inclusion of site allocations / promoted land that does not exhibit key characteristics or attributes of valued landscape</p>	<p>0233, 0281</p>	<p>The council's approach to valued landscapes is fully consistent with national planning policy, recent case law and appeal decisions, including the Wendover appeal decision. This appeal decision (paragraph 65) gives valuable guidance on how to address the issue of the character, quality and extent of a given 'landscape; in the context of plan-making</p> <p>Paragraph 6.64 of the Valued Landscape Assessment clarifies that whilst some areas may not '<i>exhibit any of the demonstrable physical features</i>', they formed an integral part of the wider valued landscape, consistent with paragraph 65 of the Aylesbury Road, Wendover decision.</p>

Detail	Respondent number	Response
The policy is too onerous and pre-determines review of Chilterns National Landscape	0233	<p>The council consider the policy approach provides sufficient flexibility in managing development proposals within or affecting valued landscapes.</p> <p>Paragraph 3 of Policy NE7 ensures development proposals protect, <u>and where appropriate</u>, integrate with and/or enhance the special features, characteristics and qualities of the landscape, unless the benefits of development in that location clearly outweigh the harm. This enables the policy to be applied on a case-by-case basis and to take account local circumstances.</p> <p>The Chilterns National Landscape review is a separate process not undertaken by the council.</p>

REQUESTED MODIFICATIONS

Detail	Respondent number	Response
<p>Modify the boundary of the Forest and Rides valued landscape to remove land at:</p> <ul style="list-style-type: none"> • Land to the rear of 166 Nine Mile Ride, Finchampstead (ref: 5FI015) • Land at Finchampstead Road, Finchampstead (ref: 5FI038) • Tintagel Farm, Sandhurst Road, Finchampstead (ref: 5FI001) 	0111, 0233, 0281	<p>Not agreed. The council considers the land exhibits many of the features and attributes representative of the Forest and Rides valued landscape, as shown in the hotspot analysis output (Appendix 2) of the Valued Landscapes Assessment.</p> <p>The Forest and Rides valued landscape gains much of its identity through the existence of the historic straight rides most often lined with woodland or development.</p>

Detail	Respondent number	Response
<ul style="list-style-type: none"> Heartwood Lodge, Sandhurst Road, Finchampstead (ref: 5FI002) 		<p>The council has followed a comprehensive approach in the identification of valued landscapes, informed by local planning appeal decisions and case law.</p> <p>Most notably, the Wendover decision (in paragraph 65) provides valuable guidance on character, quality and extent of a given landscape in the context of plan-making.</p> <p>The council's approach to include this land within the Forest and Rides valued landscape is therefore consistent with the Wendover appeal decision.</p>

MAIN ISSUE: HAINES HILL VALUED LANDSCAPE

Detail	Respondent number	Response
<p>Including the land at Hogmoor Lane, Hurst is not supported by the recommendations in the site promoter’s Landscape and Visual Impact Assessment submitted alongside a live planning application, which is under consideration by the council (ref: 240583). The extension of the valued landscape to include this land is also not justified.</p>	<p>0232</p>	<p>Appendix 2 of the Valued Landscape Assessment shows a concentrated hotspot along the A321 (Broadwater Lane).</p> <p>The inclusion of this area within the Haines Hill valued landscape reflects further engagement with heritage specialists undertaken post-Revised Growth Strategy (November 2021).</p> <p>The Housing and Economic Land Availability Assessment (HELAA) concludes that part of the area provides a visual break between Whistley Green and Hurst and comprises a number of designated and non-designated heritage assets.</p> <p>The land at Hogmoor Lane does constitute a valued landscape as shown in the hotspot analysis where the area holds an overlay of multiple attributes, notably the green route along A321 (Broadwater Lane), Grade II listed buildings and Buildings of Traditional Local Character, high concentration of 16th and 17th century rural buildings, and open land preserving the separation of Whistley Green and Hurst.</p> <p>The extension of the valued landscape is fully justified and reflects a change in circumstances following further advice from the council’s heritage specialists, recent appeal decisions and ground truthing.</p>
<p>Misuse of designation as valued landscapes cover approximately 72% of the borough’s countryside and</p>	<p>0232</p>	<p>The purpose of the designation is to recognise landscapes in the borough that have particular value, and exhibit specific attributes and characteristics that lift them above the rest.</p>

Detail	Respondent number	Response
<p>the council is seeking to over-use the designation, contrary to Landscape Institute guidance.</p>		<p>The identification of the valued landscapes followed a comprehensive methodology having regard to national planning policy and guidance, and current best practice. The Valued Landscapes Assessment was prepared with engagement from council's planning and specialist officers, including landscape, heritage and ecology.</p> <p>The council considers the policy to be wholly appropriate and consistent with national planning policy.</p>

MAIN ISSUE: RIDGE AND RIVERS VALUED LANDSCAPE

Detail	Respondent number	Response
Including the land at Stanbury House, Spencers Wood, which has planning permission is not justified and consistent with national planning policy, and further does not inherit the features or attributes of the valued landscape	0119	<p>The approach to valued landscapes is fully consistent with national planning policy, recent case law and appeal decisions, including the Wendover appeal decision. This appeal decision gives valuable guidance on how to address the issue of the character, quality and extent of a given 'landscape; in the context of plan-making.</p> <p>Paragraph 6.64 of the Valued Landscape Assessment clarifies that whilst some areas may not '<i>exhibit any of the demonstrable physical features</i>', they formed an integral part of the wider valued landscape, consistent with paragraph 65 of the Aylesbury Road, Wendover decision.</p>
Lack of consultation on the extension to valued landscape boundary	0196	<p>The Landscape Institute's Technical Guidance Note (02/21) 'Assessing landscape value outside national designations' recognises that assessments of landscape value may be required at different stages of the planning process, such as evidence-gathering and plan-making stages.</p> <p>The Valued Landscape Assessment (2024) was published alongside the Proposed Submission Plan for a minimum 6-week consultation (Regulation 19) in accordance with the council's Statement of Community Involvement and relevant legislation.</p>
Limited justification for extended area to include land north of M4	0196, 0287	Appendix 2 of the Valued Landscape Assessment shows a concentrated hotspot around land to the north of the M4.

Detail	Respondent number	Response
		<p>The previous absence of this area from the valued landscape designation should not be taken as read that the landscape is not a valued landscape for the purposes of paragraph 180a) of the NPPF. Paragraph 7.4 of the Valued Landscape Assessment recognises this as an iterative process, where boundaries can be reviewed following ground truthing and responses from local plan consultations.</p> <p>The extension of the valued landscape is fully justified and reflects a change in circumstances following further advice from the council's specialist, recent appeal decisions and ground truthing.</p>
<p>Inhibit objectives of the Green Park Core Employment Area</p>	<p>0287</p>	<p>The council does not consider the policy approach in NE6 would act as a barrier to achieving the objectives of the Green Park Core Employment Area. The policy approach provides sufficient flexibility in managing development proposals within or affecting valued landscapes.</p> <p>Paragraph 3 of Policy NE7 ensures development proposals protect, <u>and where appropriate</u>, integrate with and/or enhance the special features, characteristics and qualities of the landscape, unless the benefits of development in that location clearly outweigh the harm. This enables the policy to be applied on a case-by-case basis and to take account local circumstances.</p> <p>Recent appeal decisions have provided further clarity in the interpretation of paragraph 109 of the NPPF (2024), where the Inspector's decision to Land at West Street, Coggeshall, Braintree implied that the requirement did not necessarily</p>

Detail	Respondent number	Response
		prohibit development but rather taking ' <i>careful consideration to ensure development protects and enhances what is valued</i> '

REQUESTED MODIFICATIONS

Detail	Respondent number	Response
<p>Modify boundary of the Ridge and Rivers valued landscape to remove land:</p> <ul style="list-style-type: none"> At Stanbury House, Spencers Wood which benefits from planning permission (ref: 5SH015, planning application ref: 143279) Land east of Basingstoke Road, Shinfield (ref: 5SH013) North of the M4 at Smallmead Cottages, Kirtons Farm Road, Shinfield (ref: 5SH021, 5SH060) 	0119, 0196, 0222	<p>Not agreed. The council considers the land exhibits many of the features and attributes representative of the Ridge and Rivers valued landscape, as shown in the hotspot analysis output (Appendix 2) of the Valued Landscapes Assessment (2024).</p> <p>The Ridge and Rivers valued landscape gains much of its identity from its variability, with the north and east being more settled and urbanised, strengthening its character as a high-quality landscape.</p> <p>The council is satisfied that the boundary of the valued landscape is appropriate and follows identifiable features on the ground. Further information is set out in the Valued Landscapes Assessment.</p>

MAIN ISSUE: RIVER LODDON VALUED LANDSCAPE

Detail	Respondent number	Response
The inclusion of Land promoted at Park Farm, Carter's Hill (5AR029) and Shinfield Grange, Shinfield (5SH049) and at the Loddon Valley Garden Village does not inherit the features or attributes of the	0206, 0239, 0305	The council's approach to valued landscapes is fully consistent with national planning policy, recent case law and appeal decisions, including the Wendover appeal decision. This appeal decision gives valuable guidance on how to address

Detail	Respondent number	Response
valued landscape, due to structural changes to landscape and context		<p>the issue of the character, quality and extent of a given 'landscape; in the context of plan-making. The Inspector stated:</p> <p><i>'When assessing what constitutes a valued landscape, I consider it more important to examine the bigger picture in terms of the valued of the site and its surroundings. That is not to borrow the features of the adjoining land but to assess the site in situ as an integral part of the surrounding land rather than divorcing it from its surroundings and then to conduct an examination of its value.'</i></p> <p>Paragraph 6.64 of the Valued Landscape Assessment clarifies that whilst some areas may not <i>'exhibit any of the demonstrable physical features'</i>, they formed an integral part of the wider valued landscape, consistent with paragraph 65 of the Aylesbury Road, Wendover decision.</p>
There are other relevant policies in the local plan to manage development and landscape change	0239	Noted. Policy NE6 specifically recognises landscapes in the borough that have particular value, and exhibit specific attributes and characteristics that lift them above the rest.
Extent of River Loddon valued landscape is too great and restricts development	0306	<p>The council considers that the identification of the River Loddon as a valued landscape is wholly appropriate.</p> <p>As recognised in the narrative supporting the Valued Landscapes Assessment (2024), key attributes and features of the landscape are identified along the River Loddon and represent a significant green and blue infrastructure corridor. The river is valued for its character, biodiversity, history, perceptual qualities, recreational value and associations.</p>

Detail	Respondent number	Response
		<p>The council does not consider the policy designation restricts development, as set out in paragraph 3 of Policy NE6. The policy approach therefore expects development proposals to be sensitively designed and planned, enhancing important features or attributes that contribute to making a valued landscape.</p> <p>The Inspector at a planning appeal at Land at West Street, Coggeshall, Braintree, recognised that the paragraph 109 requirement of the NPPF did not necessarily prohibit development, but required <i>'careful consideration to ensure development protects and enhances what is valued'</i></p> <p>The council consider the policy approach provides sufficient flexibility in managing development proposals within or affecting valued landscapes and allows planning decisions to be made on a case-by-case basis and regard had to local circumstances.</p>
<p>Limited justification for extended area to north and west of Swallowfield</p>	<p>0306</p>	<p>The land north and west of Swallowfield exhibits many of the features and attributes that are representative of the Ridge and Rivers and River Loddon valued landscapes, as is evident from the hotspot analysis output (Appendix 2) in the Valued Landscapes Assessment (2024).</p> <p>Further justification is set out in the council's Valued Landscapes Assessment report and accompanying narratives.</p>

REQUESTED MODIFICATIONS

Detail	Respondent number	Response
<p>Modify boundary of the River Loddon valued landscape to:</p> <ul style="list-style-type: none"> • Be compatible with the Loddon Valley Garden Village concept plan • Follow physical and permanent features on the ground, by removing land at South Avenue and land west of the woodland at Shinfield Studios 	<p>0265, 0305</p>	<p>Not agreed. The council is satisfied that, on the whole, the proposed River Loddon valued landscape is compatible and consistent with the Loddon Valley Garden Village concept plan. The boundary of the valued landscape follows identifiable features on the ground. Further information is set out in the Valued Landscapes Assessment (2024).</p> <p>The valued landscape designation does not necessarily preclude development, the policy approach ensures proposals that affect valued landscapes appropriately respond to the landscape through location, layout and high-quality design.</p> <p>Paragraph 6b) of Policy SS13 ensures development proposals devise and implement a comprehensive strategic landscape and green and blue infrastructure strategy that protects and enhances the identified attributes of the River Loddon and Barkham and Bearwood valued landscapes.</p>

MAIN ISSUE: POLICY WORDING

Detail	Respondent number	Response
<p>Inconsistency between supporting text (para 14.60) and Part 3 of policy</p>	<p>0305</p>	<p>The council is satisfied that the policy approach and supporting text provide an appropriate policy basis to consider development proposals that may affect valued landscapes.</p>

Detail	Respondent number	Response
Policy wording is too onerous and does not provide sufficient flexibility	0184, 0215, 0269, 0301	The council considers the policy approach in NE6 does provide sufficient flexibility. The policy expects development proposals affecting valued landscapes to demonstrate they are sensitively designed and planned, and enhance the important features that contribute to the valued landscape. The approach is consistent with the Inspector's appeal decision at Land at West Street, Braintree, who concluded that the requirement in paragraph 109 of the NPPF did not prohibit development but required careful consideration to ensure it protects and enhances what is valued.
Overlap between policy requirements in the local plan, e.g. countryside (Policy SS5) and valued landscapes (Policy NE6)	0206, 0215, 0233, 0286	The council does not consider there to be an overlap between policies NE6 and SS5. The purpose of policy NE6 is to recognise landscapes in the borough that have particular value and exhibit specific attributes and characteristics that lift them above the rest. Policy SS5 sets a positive framework for development that may be acceptable in the countryside. Both designations are clearly defined on the Policies Map.
Lack of clarity on circumstances where development is deemed appropriate	0305	The supporting text to Policy NE6 (paragraph 14.60) qualifies that development will normally only be supported where the attributes and characteristics of a valued landscape are protected. The policy approach therefore provides a degree of flexibility and for decisions to be made on a case-by-case and reflect local circumstances. The policy expects development that is deemed appropriate to respond to the landscape through location, layout and high-quality design.

REQUESTED MODIFICATIONS

Detail	Respondent number	Response
Remove policy and designations from the Policies Map	0134, 0184, 0228, 0232, 0240, 0254, 0266, 0267, 0269, 0272, 0277, 0286, 0298, 0305	Not agreed. The council is satisfied that the identification of valued landscapes in the plan has followed a robust methodology, consistent with national planning policy and guidance, current best practice, appeal decisions (e.g. Wendover) and recent case law. Further information is contained in the Valued Landscapes Assessment (2024).
Modify policy to allow flexibility for development to present mitigation measures and integration into the wider landscape and reflect current landscape assessment standards	0215, 0222, 0233, 0239, 0287	<p>Not agreed. The policy and supporting text are clear that development proposals within or affecting a valued landscape should appropriately respond to the landscape through location, layout and high-quality design, this could include mitigation measures such as landscaping and planting.</p> <p>Paragraph 3 of Policy NE6 is clear that development proposals integrate with and/or enhance the special features, characteristics and qualities of the landscape.</p>
Undertake a detailed fine-grained review of identified valued landscapes and quality in line with para 180 of the NPPF	0228, 0240, 0286, 0301	Not agreed. The council is satisfied that the identification of valued landscapes in the plan has followed a robust methodology, consistent with national planning policy and guidance, current best practice, appeal decisions (e.g. Wendover) and recent case law. Further information is contained in the Valued Landscapes Assessment (2024).
Remove land around existing settlement boundaries from countryside and valued landscape	0306	Not agreed. The extent of settlements has been carefully considered in the drafting of the plan. Settlement Boundaries Review (2024) topic paper offsets out how the settlement boundaries – and by definition, the extent of countryside – have

Detail	Respondent number	Response
		been determined. The policy designations are clearly defined on the Policies Map.
Revisit the assessment, to be undertaken by an independent and qualified body	0232, 0276, 0278	<p>Not agreed. The council is satisfied that the identification of valued landscapes in the plan has followed a robust methodology, consistent with national planning policy and guidance and current best practice.</p> <p>The Valued Landscape Assessment was produced with input from the council’s specialist officers, including ecology, heritage, conservation and landscape. The Valued Landscape Assessment was also undertaken by a qualified landscape architect with over 30 years’ experience, and informed by current best practice, national guidance and case law.</p> <p>Further information is contained in the Valued Landscapes Assessment (2024).</p>

Policy NE7: Sites of Urban Landscape Value

Two respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0125	Yeardeley, Andrew and Mary	0307	Cairney, Paul

Support

Both respondents were landowners who did not support the policy with regard to the proposed SULV at Woosehill Meadows.

There were no substantive issues raised by respondents to the other SULVs identified in the policy.

MAIN ISSUE: IMPACT ON LANDOWNERS

Detail	Respondent numbers	Response
No prior engagement or consultation with landowners	0125, 0307	<p>The council has undertaken an extensive consultation programme across several local plan consultations, including the Proposed Submission Plan. Consultations were undertaken in accordance with national legislation, national planning policy and the council's Statement of Community Involvement.</p> <p>The council's approach to consultation and engagement is set out in the Regulation 22 Consultation Statement. The proposed SULV at Woosehill Meadows was included in the plan at all key stages of its preparation.</p>
Additional burdens placed on applicants due to commissioning of landscape evidence, public liability insurance and maintenance	0125, 0307	The designation does not place any additional burdens or restrictions on applicants.

Detail	Respondent numbers	Response
		<p>Paragraph 3 of Policy NE5 (Landscape and design) is clear that the level of information provided in a landscape and visual impact assessment should be proportionate to the scale and nature of the development proposed.</p> <p>Policy NE7 is a criteria-based policy that ensures development proposals within or affecting a SULV demonstrate they have followed an appropriate design response, taking into account the special landscape features and qualities, visual impact and capacity for informal recreation. Development proposals will therefore be decided on a case-by-case basis and reflecting local circumstances.</p>
<p>Securing access to private land for recreational use through planning mechanisms contrary to legislation and national planning policy</p>	<p>0125, 0307</p>	<p>Similarly to a Local Green Space designation, the designation of land as SULV does not convey any public access rights over privately or publicly owned land. The future of the land is controlled by the landowner.</p> <p>Whilst the land has no public access, the vegetation on the eastern edge of the Emmbrook contributes towards the character of the area and its visual amenity of the Emmbrook.</p>

MAIN ISSUE: POLICY APPROACH

Detail	Respondent numbers	Response
Lack of clarity in mapping of designation	0307	The council considers the mapping of designations in the plan is clear. Maps of the proposed SULVs were identified in Appendix J and on the Policies Map. The policy designations were also made publicly available to view on the council's interactive map during the consultation.
Flexibility for householder or other minor applications to come forward on land adjoining the SULV	0125	<p>The designation does not place any additional burdens or restrictions on applicants.</p> <p>Paragraph 3 of Policy NE5 (Landscape and design) is clear that the level of information provided in a landscape and visual impact assessment should be proportionate to the scale and nature of the development proposed.</p> <p>Policy NE7 is a criteria-based policy that ensures development proposals within or affecting a SULV demonstrate they have followed an appropriate design response, taking into account the special landscape features and qualities, visual impact and capacity for informal recreation. Development proposals will therefore be decided on a case-by-case basis and reflecting local circumstances.</p>

REQUESTED MODIFICATIONS

Detail	Respondent number	Response
<p>Modify the boundary of the Woosehill Meadows SULV to remove the land/properties at 6 and 8 Meadow Walk and 15 Meadow Road from the designation</p>	<p>0125, 0307</p>	<p>Not agreed. The land at 6 and 8 Meadow Walk and 15 Meadow Road comprises vegetation that provides a natural buffer from residential development to the east and the Emmbrook. The land surrounding the edge of the Emmbrook also contributes to the prevailing character of the area and visual amenity of the brook.</p> <p>The land's inclusion within the SULV does not necessarily preclude development, but the policy approach requires an appropriate design response, taking into account the features and qualities of the Woosehill Meadows SULV.</p>
<p>Modify requirement to remove 'affecting' from the policy to provide flexibility for development proposals adjoining the SULV</p>	<p>0125, 0307</p>	<p>Not agreed. Policy NE7 is a criteria-based policy that ensures development proposals within or affecting a SULV demonstrate they have followed an appropriate design response, taking into account the special landscape features and qualities, visual impact and capacity for informal recreation. Development proposals will therefore be decided on a case-by-case basis and reflecting local circumstances.</p> <p>The council does not consider a modification to the policy requirement is necessary, as it provides sufficient flexibility in decision-making.</p>

Chapter 12: Design, heritage and the built environment

No respondents commented on this chapter.

Policy DH1: Place making and quality design

12 respondents

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0132	Bracknell Forest Council	0269	Cirrus Land Ltd
0148	Gleeson	0274	Bridge House of Twyford
0199	Thames Valley Police	0305	University of Reading
0231	Willson Developments Ltd	0314	Vistry Group
0235	The Old Redingensians Association	0318	Bloor Homes
0256	Historic England	0354	Ashridge Wokingham Ltd

Support

Respondents 0148, 0231, 0235, **0256**, 0269, 0305 and 0318 consider the policy to be legally compliant and to comply with the Duty to Cooperate.

Respondents 0148 and **0256** support the policy. Respondent 0148, one of the promoters of Loddon Valley Garden Village, particularly supported the recognition in the policy of the need to not prejudice comprehensive development and that this is consistent with the masterplan requirements of SS13 for the site.

While respondent 0199 supports the consideration of safety and security in relation to public open space, they raise concern over the lack of consideration elsewhere in the policy, which is covered below.

While respondents 0231, 0235, 0269, 0274, 0314, 0318, and 0354 support the general principles of the policy to deliver high quality design, each raise specific concerns with aspects of the policy which are covered below.

MAIN ISSUES: CLARITY OF POLICY

Detail	Respondent number	Response
Greater clarity should be provided under the movement section that links to walking and cycling networks need to extend beyond the borough boundary.	0132	The council is satisfied the policy wording is appropriate. In addition, a proposed modification to Policy C1 includes reference to connectivity beyond the borough boundary.
The policy unnecessarily repeats the requirements of other policies within the plan, causing confusion, and is overly long and complex.	0274, 0305, 0354	The policy sets out the principles for good design, which by definition encompasses many varying elements. The council is satisfied that the comprehensive nature of the policy, with signposts to other policies, is appropriate to ensure all aspects of design are considered when applicants are devising proposals.
Internal conflict within the policy between optimising densities and taking a landscape led approach to development. Clarity required from the council on which ambition takes precedence.	0354	The council is satisfied that clarification is not required as development proposals vary on a case by case basis and different considerations will be more important depending on the circumstance. Prescribing which elements are more important would inhibit flexibility in decision making.

MAIN ISSUES: POLICY ACHIEVABILITY

Detail	Respondent number	Response
The policy fails to consider the importance of viability and appropriateness when it comes to design.	0274	The council is satisfied that the policy is consistent with national policy which requires high quality design, and that it will not adversely impact on viability. The Local Plan and Community Infrastructure Levy Viability Study (2024) considered all policies and concluded the requirements of

		DH1 could be achieved without additional costs to development. In addition, higher quality developments are likely to have greater return for developers than poor quality development.
--	--	---

MAIN ISSUES: POLICY WORDING

Detail	Respondent number	Response
Lack of consideration of safety and security under the 'Built form' and 'Homes and buildings' sections of the policy, including matters of access control and security measures for the latter.	0199	The principle of safety and security is considered under the 'Public spaces' section of the policy. The council is satisfied that this, as well as detail within the Borough Design Guide SPD, is sufficiently detailed. There will be a degree of overlap between achieving these principles through design of public spaces and the design of the built form, with public spaces being informed by the built development around them. The suggested modification are not considered to be necessary.
Requirement to enhance local natural, cultural and historic character (parts 1a and 1d) is overly onerous as it may not be practical or possible to achieve this for all developments. Modification suggested to relevant parts of the policy to add flexibility.	0231, 0235, 0269, 0305, 0318	Noted. While the council expects all opportunities to be taken to enhance local natural, cultural and historic character, it is agreed that there may be circumstances where enhancement is not achievable. Modifications are suggested in the Schedule of modifications for additional flexibility.
Part 1k) is too onerous in requiring the protection of all natural features without consideration of their value.	0231, 0235, 0269, 0305, 0318	The council is satisfied that the approach of part 1k) is appropriate and consistent with relevant natural environment policies within the plan. A minor change is proposed to wording for additional consistency with Policy NE4, as set out in the Schedule of modifications.

<p>The wording 'weather attractively' in part 1aa) is ambiguous and should be deleted.</p>	<p>0231, 0235, 0269, 0305, 0318</p>	<p>The National Design Guide recognises detailing and materials as key components of good design. It specifically acknowledges that detailing affects how well a building weathers and lasts over time. The council is satisfied that the principle of requiring materials to be of high quality in order to weather well over time, and the specific wording included in the plan to achieve this aim, is justified.</p>
--	-------------------------------------	---

OTHER ISSUES

- Respondent 0274 consider the policy not to be legally compliant
- Respondents 0274 and 0314 highlight that specific concerns with policies C5, NE2, CE1, CE2, and CE3 should also be reflected in updated wording to DH1
- Respondent 0354 notes that the proposal for the Land at Ashridge would be for a high quality, sustainable new community, consistent with the overriding principle of the policy

Policy DH2: Safeguarding amenity

Three respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0274	Bridge House of Twyford	0354	Ashridge Wokingham Ltd
0314	Vistry Group		

Support

Respondents 0274, 0314 and 0354 supported the policy.

MAIN ISSUES

- No issues were raised.

Policy DH3: Shopfronts

One respondent.

Respondent number	Name/Organisation
0256	Historic England

Support

Historic England (**0256**) consider the policy to be sound, legally compliant and to comply with the duty to co-operate.

MAIN ISSUES

- No issues were raised.

Policy DH4: Advertisements and signage

One respondent.

Respondent number	Name/Organisation
0256	Historic England

Support

Historic England (**0256**) consider the policy to be sound, legally compliant and to comply with the duty to co-operate.

MAIN ISSUES

- No issues were raised.

Policy DH5: The historic environment

Eight respondents.

Respondent number	Name/Organisation	Respondent number	Name/organisation
0231	Willson Developments Ltd	0256	Historic England
0235	The Old Redingensians Association	0269	Cirrus Land Ltd
0083	Berkshire Gardens Trust	0305	University of Reading
0341	Watt, Suzanne	0318	Bloor Homes

Support

All respondents: 0231, 0235, 0083, 0341, 0269, 0318, University of Reading (0305) and Historic England (**0256**) consider the policy to be legally compliant and to comply with the Duty to Cooperate.

One respondent (0083) supports the policy, welcoming the inclusion of Local Historic Parks and Gardens in Policy DH5.

Six respondents (0231, 0235, 0269, 0305, 0318, 0256) support the policy on condition of a number of modifications.

MAIN ISSUE: CLARITY OF POLICY

Detail	Respondent numbers	Response
Lack of clarity on which parts of the policy relate to designated or non-designated heritage assets.	0231, 0235, 0269, 0305, 0318, 0256	Acknowledge further clarity is needed about how the policy applies to designated/non-designated assets. Changes to criteria 6 and 7 are set out in the Schedule of proposed modifications.

MAIN ISSUE: NON-DESIGNATED HERITAGE ASSETS

Detail	Respondent numbers	Response
Identify additional 5 properties as non-designated heritage assets.	0083	The council is satisfied that Policy DH5 provides an appropriate mechanism for identifying non-designated heritage assets.
Concern expressed regarding the consideration of The Old School House, Hurst in terms of local buildings of traditional character and Areas of Special Character - lack of complete and up to date information.	0341	The council is satisfied that The Old School House AoSC meets the requirements for designation. Further information can be found in the Heritage Topic Paper, which the council is satisfied is up to date.

MAIN ISSUE: INCONSISTENT WITH NATIONAL POLICY/LEGISLATION

Detail	Respondent number	Response
Recommend adding reference to the 'medium term' in criterion 4b to fully align with paragraph 214b of the NPPF.	0256	The council is minded to accept modifications to the wording of criterion 4. This matter has been discussed with Historic England and agreed in a signed Statement of Common Ground. The proposed modification is set out in the Schedule of proposed modifications.
Inconsistencies with the NPPF. Criterion 5 introduces a test for "clear and convincing justification" to demonstrate the public benefits of a proposal which causes less than substantial harm to a designated heritage asset. This	0305, 0318, 0269, 0235, 0231	The council is satisfied that the wording of criterion 5 is consistent with the requirements of Paragraph 208 of the NPPF.

Detail	Respondent number	Response
exceeds the requirement of Paragraph 208 of the NPPF.		
Criterion 7 sets a higher test than Paragraph 209 of the NPPF in respect of non-designated heritage assets, requiring the need to demonstrate preservation and enhancement. National policy requires LPAs to take account of the desirability of sustaining and enhancing the significance of heritage assets but does not require preservation and enhancement of non-designated assets.	0305, 0318, 0269, 0235, 0231	<p>Ongoing engagement has led to the signing of a Statement of Common Ground with Historic England where a modification is proposed to combine Criteria 6 and 7. The council agrees this would provide further clarity on designated and non-designated heritage assets.</p> <p>The proposed modification is set out in the Schedule of proposed modifications.</p>
Inconsistencies between Policy DH5 supporting text paragraphs 12.18 and 12.23 and the PPG and Planning and Listed Buildings Act 1990.	0256	<p>The council accepts modifications to the wording of the supporting text, to align with the PPG and reflect representations from Historic England. This has led to the signing of a Statement of Common Ground with Historic England.</p> <p>The proposed modifications are set out in the Schedule of proposed modifications.</p>

Policy DH6: Archaeology

Two respondents

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0256	Historic England	0305	University of Reading

Support

Historic England (0256) and University of Reading (0305) consider the policy to be legally compliant and to comply with the Duty to Cooperate.

University of Reading (0305) supports the policy as archaeological impacts have been a key focus of the Loddon Valley Garden Village proposals to date.

Historic England (0256) conditionally supports the policy subject to amendments.

MAIN ISSUE: SCHEDULED MONUMENTS

Detail	Respondent numbers	Response
Modify the supporting text to clarify the policy approach to Scheduled Monuments.	0256	Agreed. Modifications are proposed to supporting text to clarify the approach towards Scheduled Monuments. This is set out in the Schedule of proposed modifications and the Historic England Statement of Common Ground.

Policy DH7: Equestrian Development

One respondent

Respondent number	Name/Organisation
0243	British Horse Society

Support

The British Horse Society (0243) state it is beyond their remit to comment on whether the Plan is legally compliant or if it complies with the Duty to Cooperate. The Society (0243) does not consider Policy DH7 to be sound. However, it acknowledges Policy DH7 recognises the popularity of horse-riding in Wokingham Borough. No proposed modifications to policy wording.

MAIN ISSUES

Detail	Respondent numbers	Response
More bridleways needed to help horse-riders avoid using busy, dangerous roads and support rural businesses and local recreational opportunities. If safe countryside walks were provided locally, horse owners could avoid unsustainable car/trailer journeys elsewhere.	0243	The council is satisfied references to the need for safe, accessible bridleways in policies DH7 and C4 are sufficient.

Chapter 13: Healthy and Safe Communities

One respondent.

Respondent number	Name/Organisation
0108	Sport England

Support

Sport England (0108) supported the plan and sought changes to the supporting text that refers to sports lighting rather than floodlighting.

MAIN ISSUE: TERMINOLGY

Detail	Respondent numbers	Response
Refer to sports lighting in paragraph 13.36 of supporting text to reflect latest terminology	0108	Agree. The council agrees the suggested modification would provide useful clarity. The proposed modification to the supporting text is set out in the council's Schedule of proposed modifications.

Policy HC1: Promoting healthy communities

12 respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0108	Sport England	0280	Bewley Homes
0224	Home Builders Federation	0303	Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board
0238	Reading Blue Coat School	0305	University of Reading
0254	Croudace Homes	0308	NHS Property Services
0256	Historic England	0314	Vistry Group
0274	Bridge House of Twyford	0354	Ashridge Wokingham Ltd

Support

Respondents 0305 and 0354 supported the policy.

NHS Property Services (0308) and the Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board (**0303**) support the policy. The Integrated Care Board sought a dedicated policy on health care provision, including setting out how mitigations for primary care should be provided.

Sport England (0108) and Historic England (**0256**) broadly support the policy approach but suggest modifications to the policy wording or supporting text.

MAIN ISSUE: POLICY REQUIREMENTS

Detail	Respondent numbers	Response
The threshold for triggering need for Health Impact Assessments (HIA) is too low and onerous. Modification proposed for HIAs to only be provided for larger-scale new communities (e.g. SDLs).	0224, 0254, 0274, 0280, 0314, 0409	The plan is supported by a plan-wide viability study, which concludes that the cost implications of requirements in Policy HC1 are de-minimis. Costs for preparing Health Impact Assessments are absorbed within the allowance for professional fees.

Detail	Respondent numbers	Response
		Paragraph 13.6 of the supporting text clarifies that the scope of an HIA will vary depending on the size and location of the development. The policy therefore provides a degree of flexibility for planning decisions to be made on a case-by-case basis.
Lack of support for adaption, change and growth of schools as per paragraph 99 of the NPPF	0238	<p>Paragraph 13.7 of the plan classifies the types of facilities that are covered by Policy HC2. The list is not exhaustive. The glossary defines a community facility as services and facilities which are of benefit to the wider community.</p> <p>On this basis, Policy HC2 provides a suitable policy framework for supporting the retention, improvement or enhancement of existing provision, consistent with paragraph 99 of the NPPF.</p>

REQUESTED MODIFICATIONS

Detail	Respondent number	Response
Modify the policy to include an additional requirement for major development proposals to have regard to Sport England's Active Design Principles	0108	<p>Agreed. The council considers a modification to the supporting text of Policy DH1 (Place making and quality design) would be better placed to address this matter to provide useful clarity.</p> <p>The proposed modification to the supporting text of Policy DH1 is set out in the council's Schedule of proposed modifications.</p>

Detail	Respondent number	Response
Modify the policy to include an additional requirement that supports the creation, expansion or alteration of schools	0238	<p>Not agreed. The council's interpretation of Policy HC2 (Community infrastructure) would classify school/education provision as a community facility.</p> <p>The policy therefore provides a suitable framework for improvements or enhancements to be made to such provision.</p>
Modify the policy to remove the 10 dwelling threshold for a Health Impact Assessment, and for it to apply only to Strategic Development Locations and larger scale new communities or non-residential development proposals	0254, 0274, 0280, 0314	<p>Not agreed. The plan is supported by a plan-wide viability study, which concludes that the cost implications of requirements in Policy HC1 are de-minimis. Costs for preparing Health Impact Assessments are absorbed within the allowance for professional fees.</p> <p>Further, paragraph 13.6 of the supporting text clarifies that the scope of a HIA will vary depending on the size and location of the development, which provides a degree of flexibility for planning decisions to be made on a case-by-case basis.</p>
Modify paragraph 13.2 of supporting text to refer to the built, <u>historic</u> and natural environment	0256	<p>Agreed. The council is minded in recommending a modification to the supporting text (paragraph 13.2) to recognise that the historic environment also has a direct impact on the health and wellbeing of people and communities. This would provide useful clarity and set a positive strategy for the enjoyment of the historic environment.</p> <p>The proposed modification is set out in the Schedule of proposed modifications.</p>
Remove criteria 3b and include a new policy (HC2A) related to health care provision	0303	Not agreed. The local plan includes a policy on 'Securing infrastructure' (Policy SS15), which states that proposals will only be supported where impacts are mitigated through timely

Detail	Respondent number	Response
		<p>provision of necessary local or strategic infrastructure. The council is of the view that this type of local or strategic infrastructure would include health care provision.</p> <p>The policy ensures development proposals secure necessary new and/or improvements to existing infrastructure through an appropriate mechanism. It is considered that the policy requirements suggested by the ICB are covered by Policy SS15. The council does not consider an additional policy is therefore necessary.</p> <p>Paragraph 2 of Policy SS15 ensures that the necessary improvements or provision of infrastructure is secured to the required standard.</p> <p>A modification to the supporting text of Policy SS15 is proposed regarding early and timely engagement with developers and infrastructure/service providers. The recommended modification is set out in the Schedule of proposed modifications.</p>
Modify policy or supporting text to provide clarity on the purpose of HIAs in the planning application process	0305	Not agreed. The local plan is supported by a Health Impact Assessment (HIA) which provides further detail on the purpose of HIAs in decision-making.

Policy HC2: Community infrastructure

Eight respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0108	Sport England	0305	University of Reading
0154	Theatres Trust	0308	NHS Property Services
0275	Oxford Diocesan Board of Finance	0314	Vistry Group
0291	London and Regional	0354	Ashridge Wokingham Ltd

Support

Sport England (**0108**) support the policy and suggest that a reference could be made to their accessible and inclusive sports facilities guidance.

NHS Property Services (0308) supported the principle of the policy but suggest the current approach is too inflexible.

Respondents 0275, 0305 and 0314 support the policy.

Respondent 0154 is interpreted as broadly supporting the policy but suggest deletion of the requirement relating to economic viability of a facility.

MAIN ISSUE: POLICY REQUIREMENTS

Detail	Respondent numbers	Response
Lack of clarity/definition in the policy. Seek confirmation that hotels are not defined as a community use.	0291	Noted. Hotels and conference facilities are defined as main town centre uses under Policy ER7 of the plan (Strengthening the role of centres). Paragraph 13.7 classifies the types of facilities that Policy HC2 would apply to.
Support the principle of alternative uses for NHS sites	0308	Paragraph 13.8 of the supporting text recognises the need for existing services and facilities to be made 'fit for purpose' and

Detail	Respondent numbers	Response
		to keep pace with new development so that needs of existing and new communities can be met. It is considered the policy approach can support alternative uses coming forward on NHS sites, subject to meeting the relevant criteria.
Current approach is too inflexible and limits the ability to dispose of sites	0308	Policy HC2 requires development proposals to demonstrate that at least one of the criteria from 4a) to d) is met. Not all criteria must be met for this requirement to be satisfied, thereby providing sufficient flexibility to reflect local circumstances.

REQUESTED MODIFICATIONS

Detail	Respondent number	Response
Modify policy or supporting text to clarify that hotel uses are not classified as community facilities	0291	Not agreed. The council does not consider a modification to the policy is necessary. Hotels are considered main town centre uses, which are covered in Policy ER7. The glossary qualifies this further by including hotels in the definition of main town centre uses.
Remove part d of policy	0154	Not agreed. Policy HC2 provides sufficient flexibility as development proposals are only required to demonstrate that at least one criterion from 4a) to d) is met.
Modify requirement to reference Sport England's Accessible and Inclusive Sports Facilities (ASIF) guidance	0108	The council considers a modification to the supporting text of Policy DH1 (Place making and quality design) would be better placed to address this matter to provide useful clarity.

Detail	Respondent number	Response
		The proposed modification to the supporting text of Policy DH1 is set out in the council's Schedule of proposed modifications.
Modify policy to provide sufficient support for alternative uses to come forward on NHS sites with no requirement for retention of a community facility	0308	<p>Not agreed. Paragraph 13.8 of the supporting text recognises the need for existing services and facilities to be made 'fit for purpose' and to keep pace with new development so that needs of existing and new communities can be met. It is considered the policy approach can support alternative uses coming forward on NHS sites, subject to meeting the relevant criteria.</p> <p>The policy provides sufficient flexibility as development proposals are only required to demonstrate that at least one criterion from 4a) to d) is met.</p>

Policy HC3: Local Green Space

12 respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0083	Berkshire Gardens Trust	0212	Jorgensen, Pauline
0125	Yeardeley, Andrew and Mary	0238	Reading Blue Coat School
0149	Earley Town Council	0239	University College of Estate Management
0155	Baguley, Chris	0305	University of Reading
0191	National Trust	0307	Cairney, Paul
0204	ACER The Whitegates Resident's Association	0309	Royal Borough of Windsor and Maidenhead

Support

Royal Borough of Windsor and Maidenhead (**0309**) welcomed the council's revised approach to the assessment and methodology, particularly in relation to extensive tracts of land.

Earley Town Council (**0149**) supported the policy, in particular the areas proposed in Earley.

Berkshire Gardens Trust (0083) did not raise any issues with soundness but sought further recognition in the Local Green Space Assessment of an area's historic value. Modifications were proposed to the assessment of some nominated areas.

Respondents 0212, 0238 and 0307 also supported the policy.

Respondent 0155 supported the principle of the policy but disagreed with the recommendations in the Local Green Space Assessment, with respect to the nominated area at Laurel Close, Wokingham (ref: LGS191).

The following tables set out the issues raised regarding the duty to co-operate, legal compliance, and soundness.

DUTY COOPERATE

Detail	Respondent numbers	Response
Lack of cooperation with residents regarding suitability of nominated land at Laurel Close (ref: LGS191) as Local Green Space.	0155	<p>The council is satisfied the nominated area at Laurel Close does not meet the relevant criteria for designation, as required by paragraph 107 of the NPPF (December 2024), mainly meeting criteria b) in being demonstrably special to a local community and holding a particular local significance.</p> <p>Residents were invited to comment on the suitability of the nominated area during public consultation (Regulation 19) on the Proposed Submission Plan, which was widely publicised.</p>

LEGAL COMPLIANCE

Detail	Respondent numbers	Response
Nominated land at Laurel Close (ref: LGS191) was removed from the initial scoping phase of assessment with limited justification. Columns in the spreadsheet were not clearly labelled and included more tests.	0155	<p>The council is satisfied the nominated area at Laurel Close does not meet the relevant criteria for designation, as required by paragraph 107 of the NPPF (December 2024), mainly meeting criteria b) in being demonstrably special to a local community and holding a particular local significance.</p> <p>Headers for each test are marked clearly in Appendix 3 of the Local Green Spaces Assessment (2024).</p> <p>The criteria identified in Table 2 of the Local Green Space Assessment corresponds to the paragraph 107b) of the NPPF (December 2024). The scoping assessment (Appendix 3) also covers paragraph 107a) and 107c) of the NPPF, which</p>

Detail	Respondent numbers	Response
		together form the tests for meeting a Local Green Space designation.

MAIN ISSUE: NOMINATED AREAS

Detail	Respondent numbers	Response
Disagree with assessment of Laurel Close amenity greenspace (ref: LGS191). The area should be proposed as a Local Green Space because the area meets relevant criteria to demonstrate its local significance. Examples cited include social gatherings.	0155	<p>The council is satisfied the nominated area at Laurel Close does not meet the relevant criteria for designation, as required by paragraph 107 of the NPPF (December 2024), mainly meeting criteria b) in being demonstrably special to a local community and holding a particular local significance.</p> <p>Whilst the area is identified as an area of amenity greenspace in the Open Spaces Assessment Report (2012), the site scored low quality and is a modest area of incidental space within an existing housing estate. The examples of social events cited in the response are not distinctive to its location and do not have a particular association with Laurel Close amenity greenspace.</p> <p>It is recognised in the response that the nominated area has some wildlife present, but this information is not sufficient to meet the necessary criteria.</p> <p>Table 2 of the Local Green Spaces Assessment (2024) highlights key attributes. The nominated area is not identified as a Local Wildlife Site nor does it comprise significant areas of semi-natural or natural priority habitats or important</p>

Detail	Respondent numbers	Response
		landscape features, such as ancient woodland or veteran or mature trees.
Disagree with assessment of Finchampstead Ridges and Simon's Wood and The Ridges and Wellingtonia Avenue, Finchampstead (ref: LGS065)	0191	<p>The examiner of the Finchampstead Neighbourhood Plan concluded that a proposed Local Green Space at Finchampstead Ridges was an extensive tract of land, contrary to paragraph 102 of the NPPF (2024), and recommended removal of the area from the Neighbourhood Plan.</p> <p>The council does not therefore consider the area meets the relevant criteria for designation, as shown in the recommendation set out in Appendix 8 of the Local Green Spaces Assessment Report.</p>
<p>Disagree with excluding land owned by Bulmershe /Addington School from the proposed Local Green Space at land south of Reading Road, Bulmershe (North) (ref: LGS007A) as could lead to piecemeal development and encroachment into the Bulmershe SULV. Current approach inconsistent with paragraph 35d of NPPF (2023).</p> <p>Modification proposed to paragraph 14.66 of supporting text to require development briefs for any future proposals.</p>	0149, 0204	<p>The council is satisfied with the proposed boundary. The inclusion of surrounding land owned by Bulmershe / Addington School within the Local Green Space could restrict any future operational and education changes of both institutions and, therefore, the green space would not be capable of enduring beyond the end of the plan period.</p> <p>Policy NE7 sets out how development proposals within or affecting SULVs would need to demonstrate that they retain and enhance the SULVs special landscape features and qualities, and minimise the visual impact of the development site on the SULV.</p> <p>The council is satisfied a modification to the policy or supporting text is not necessary as there are policies in the local plan to manage this type of development proposal coming forward.</p>

Detail	Respondent numbers	Response
<p>Disagree with assessment of Ali's Pond, Sonning (ref: LGS223) as part of the land benefits from planning permission. Blue Coat School may also require land for future use.</p>	<p>0238</p>	<p>Noted. National planning policy and guidance states that Local Green Space will rarely be appropriate where the land has planning permission for development. The land benefits from planning permission for the change of use from vacant land to sports field and has been implemented.</p> <p>The council contacted Reading Blue Coat School on several occasions during the preparation of the local plan, to seek their views on the suitability of the land for designation and the proposed boundary, however no response was received.</p> <p>Whilst the area's designation as Local Green Space would be compatible with its intended use, it is recognised that designation would likely restrict any future operational and educational changes and would therefore not be capable of enduring beyond the end of the plan period.</p> <p>The council therefore proposes to remove LGS223 (Land adjacent to Ali's Pond) as a proposed Local Green Space. This is set out in the Schedule of proposed modifications. LGS113 (Ali's Pond Nature Reserve) is retained unchanged.</p>
<p>Disagree with assessment of Land south of River Thames (ref: LGS029) as land is occupied by rowing club and the designation is not justified by evidence, such as being demonstrably special to the community. Modification proposed to remove the land westwards from the Waterside Centre to Horseshoe Bridge from the Policies Map.</p>	<p>0305</p>	<p>The site is an important amenity resource, frequently used by walkers, cyclists and commuters for recreational and leisure activities.</p> <p>The land west of Thames Valley Park provides connectivity to Kings Meadow and the Coal Woodland, an important open space and Local Green Space in Reading Borough's adopted Local Plan.</p>

Detail	Respondent numbers	Response
		<p>The proposed area excludes the built development and land benefiting from planning permission at the Waterside Centre and Dreadnought boathouse.</p> <p>Whilst part of the land is safeguarded through Policy SS16 of the local plan to support sustainable transport improvements, notably a Third Thames crossing bridge, any proposals would need to demonstrate compatibility with the Local Green Space designation. Transport infrastructure is not necessarily considered inappropriate development in the Green Belt, and therefore Local Green Spaces in the NPPF.</p> <p>The proposal for a dedicated public transport route along the A4 and A329(M) / A3290 corridors was refused by the council's planning committee. The scheme is not currently actively supported or funded by either Reading Borough Council or Wokingham Borough Council.</p> <p>The land's identification as Local Green Space would not conflict with Policy SS16 and is fully consistent with national planning policy and guidance.</p>
<p>Further recognition in the Local Green Space Assessment of the historic value for California Country Park and Longmoor Bog (ref: LGS064), South Lake (ref: LGS108), Nores Hill Woods (ref: LGS130) and Joel Park and Holt Copse (ref: LGS010). Modifications proposed to the assessment of some nominated areas.</p>	<p>0083</p>	<p>Noted. The council considers that, whilst suggested updates to detailed assessments for California Country Park and Longmoor Bog, Finchampstead (ref: LGS064) and South Lake, Woodley (ref: LGS108) in the Local Green Spaces Assessment report would provide additional detail, it would not change the overall recommendation of the assessment</p> <p>The detailed assessment for Nores Hill Woods (ref: LGS130) in the Local Green Spaces Assessment recognises the site once</p>

Detail	Respondent numbers	Response
		formed part of Windsor Great Park and the royal hunting grounds and its association with King Henry VIII. The detailed assessment for Joel Park and Holt Copse (ref: LGS010) also recognises its historic associations.

REQUESTED MODIFICATIONS

Detail	Respondent number	Response
Revisit assessment of Laurel Close amenity green space, Wokingham (ref: LGS191) in light of information in response.	0155	Not agreed. The council remains of the view that the nominated area at Laurel Close does not satisfy the relevant criteria for designation, as required by paragraph 107 of the NPPF (December 2024), mainly meeting criteria b) in being demonstrably special to a local community and holding a particular local significance.
Update site assessments for Joel Park, South Lake, California Country Park and Nores Hill Wood and with respect to their historic attributes	0083	Not agreed. The council does not consider modifications are required to the detailed assessments for Joel Park and Nores Hill Wood, as sufficient detail is provided on their historical value. The suggested modifications to the detailed site assessments for California Country Park and South Lake would not impact on the council's overall recommendation.
Exclude land at Meadow Walk from the Woosehill Meadows Local Green Space (ref: LGS040) as it is not publicly accessible.	0307	The map in Appendix K of the Proposed Submission Plan clearly shows that the land in question at Meadow Walk is excluded from the proposed Woosehill Meadows Local Green Space (ref: LGS040).

Detail	Respondent number	Response
		The boundary of the Local Green Space can also be viewed on the council's interactive map.
Revisit assessment of Simon's Wood, Brooks Heath and The Ridges, Finchampstead (ref: LGS065) for their suitability as Local Green Space	0191	Not agreed. The council remains of the view that the nominated area at Finchampstead Ridges and Simon's Wood and The Ridges and Wellingtonia Avenue, Finchampstead does not satisfy the relevant criteria for designation, as required by paragraph 107c) of the NPPF (December 2024), with respect to being local in character and not an extensive tract of land. This conclusion was similarly reached by the examiner of the Finchampstead Neighbourhood Plan.
Remove the western parcel of land at Ali's Pond, Sonning (ref: LGS223) from the Policy, Policies Map and Appendix K	0238	<p>Agreed. The council recommends a modification to remove LGS223, which benefits planning permission (ref: 052392). The parcel of land known as Ali's Pond located to the east is still considered to meet the relevant criteria and its designation is therefore retained in the local plan.</p> <p>The Schedule of proposed modifications sets out the proposed change.</p>
Modify the boundary of Land south of River Thames (ref: LGS029) to remove land westwards from the Waterside Centre to the Horseshoe Bridge (confluence of River Kennet and River Thames)	0305	<p>Not agreed. Built development around the Waterside Centre and Dreadnought boathouse was excluded from the Local Green Space designation.</p> <p>The contribution that the land makes to the local community is set out in the detailed assessment of the Local Green Spaces Assessment, notably its connectivity to an adjacent, important open space in Reading Borough.</p>
Additional supporting text after para 14.76 to clarify that further development at Addington School	0149	Not agreed. The council does not consider a modification to the policy or supporting text is necessary as there are policies in the

Detail	Respondent number	Response
<p>should be contained within the existing site and not result in loss of adjoining public open space. Qualify in supporting text that development briefs will be required for any future planning applications.</p>		<p>local plan to manage this type of development proposal coming forward.</p> <p>Policy NE7 addresses any potential impacts from development proposals on SULVs by demonstrating they have met specific criteria.</p>

Policy HC4: Open space, sport, recreation and play facilities

12 respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0010	Wheat, Peter	0235	The Old Redingensians Association
0108	Sport England	0291	London and Regional
0149	Earley Town Council	0305	University of Reading
0224	Home Builders Federation	0314	Vistry Group
0231	Willson Developments Ltd	0318	Bloor Homes
0234	Thakeham Homes Ltd	0354	Ashridge Wokingham Ltd

Support

Sport England (**0108**) support the policy, and comment that the plan is supported by a robust evidence base.

Respondents 0305 and 0314 also support the policy.

Respondent 0354 supports the principle of the policy but seeks changes to the wording.

MAIN ISSUE: POLICY REQUIREMENTS

Detail	Respondent numbers	Response
Undersupply of allotment plots to meet demand., with a high waiting list.	0010	<p>Policy HC4 of the plan sets out the standards regarding allotment provision. The policy approach ensures new development proposals provide sufficient allotment space for the residents of those proposals.</p> <p>The standard for allotment provision proposed in Policy HC4 is based on the evidence set out in the Open Spaces Assessment Report (2012). At the time of the publication of this report,</p>

Detail	Respondent numbers	Response
		<p>the council took a precautionary approach by retaining a standard of 0.52ha per 1000, reflecting that demand for allotments fluctuates. However, the council's experience is that demand for allotment space has been lower than expected, thereby proposing a lower standard of 0.39ha per 1,000.</p> <p>The council considers this is a robust approach to delivering against the needs arising from new development proposals.</p> <p>It is clear that both existing provision in the borough and the proposed standard for new developments are well above the advisory standard promoted by the National Society of Allotment & Leisure Gardeners Ltd. Which would equate to 0.20ha per 1000 population based on applying latest household occupancy rates.</p>
Support facilities coming forward on the proposed Loddon Valley Garden Village	0149	Noted.
Higher requirements for open space than Fields in Trust standard	0231, 0235, 0305, 0318	The table in Policy HC4 has been informed by the standards in the Open Spaces Assessment Report. The approach has been successful in securing open space for new residential development proposals under Policy TB08 of the Managing Development Delivery (MDD) local plan.
Lack of support for alternative forms of management of open space	0231, 0235, 0305, 0318	Supporting text (para 13.25) is clear that in the first instance, new public open spaces should be transferred to the council or relevant town/parish council for adoption. Other forms of management, such as through Private Management companies would be agreed by the council under exceptional circumstances. The council considers this provides some

Detail	Respondent numbers	Response
		flexibility for alternative forms of managing public open spaces to come forward where justification is provided by the developer.
The interaction between different open space requirements challenging, as civic space and cemeteries are provided via off site contribution	0354	Paragraph 5 of Policy HC4 is clear that where it is not possible or achievable to provide open space, sports, recreation and play facilities on-site, a financial contribution will be sought towards off-site provision.

MAIN ISSUE: EVIDENCE

Detail	Respondent numbers	Response
Evidence is out of date, not an accurate basis for recreational needs to 2040, and therefore inconsistent with national planning policy	0224, 0231, 0234, 0235, 0305, 0318	The council considers that the policy is supported by an up-to-date evidence base, as confirmed by Sport England in their response to consultation on the Proposed Submission Plan. The policy approach has been successful in securing open space for new residential development proposals under the existing Policy TB08 of the Managing Development Delivery (MDD) local plan. Policy HC4 updates the existing policy.
Playing Pitch Strategy and Built Facilities Study not publicly available to support proposed standards	0224, 0234	The Playing Pitch Strategy was made publicly available on the council's website during the consultation on the Proposed Submission Plan. The Built Sports Facilities Study forms part of the submission documentation.

REQUESTED MODIFICATIONS

Detail	Respondent number	Response
Retain the standard for allotments in Policy TB08 of the Managing Development Delivery (MDD) local plan	0010	Not agreed. The council considers that the proposed standard for allotment provision in Policy HC4 reflects latest demand and household occupancy rates. It is clear both existing provision in the borough and the proposed standard for new development proposals are above the advisory standard promoted by the National Society of Allotment & Leisure Gardeners Ltd.
Modify the policy to qualify that indoor or outdoor sports provision should be achieved through design briefs for major development proposals. NPPF does not promote standards for this type of provision.	0108	Not agreed. Paragraph 2 of Policy DH1 (Place making and quality design) requires larger (major) developments to be accompanied by a masterplan, which outlines proposals for buildings, spaces, movement and land uses to align with a strategy for its implementation. The masterplan will provide detailed guidance for subsequent planning applications.
Modify the open space standards in the policy to reflect the Fields in Trust standards	0231, 0305, 0318	Not agreed. The table in Policy HC4 has been informed by the standards in the Open Spaces Assessment Report. The approach has been successful in securing open space for new residential development proposals under the existing Policy TB08 of the Managing Development Delivery (MDD) local plan. The playing pitch standards have been adapted following the Playing Pitch Strategy, and the council is satisfied the evidence base for the other typologies is robust.
Modify the policy to provide flexibility in the management of public spaces	0231, 0235, 0305, 0318	Not agreed. Supporting text (para 13.25) is clear that in the first instance, new public open spaces should be transferred to the council or relevant town/parish council for adoption. Other forms of management, such as through Private Management companies would be agreed by the council

Detail	Respondent number	Response
		<p>under exceptional circumstances. The council considers this does provide some flexibility for alternative forms of managing public open spaces to come forward provided justification is provided by the developer.</p>
<p>Clarify in the policy that sports facilities contained within private institutions (e.g. hotels) are not defined as sport and recreation uses</p>	<p>0291</p>	<p>Not agreed. Policy HC4 is supported by a robust evidence base, including an up-to-date Playing Pitch Strategy Assessment Report (2023). The report acknowledges that any spare capacity in existing sports or recreational provision is discounted if they are not available for community use.</p> <p>On this basis, the policy would not apply to those types of sports or recreational facilities within private institutions that are not available for community use.</p>

Policy HC5: Environmental protection

One respondent

Respondent number	Name/Organisation
0256	Historic England

Support

Respondent **0256** considers the policy to be legally compliant, to comply with the Duty to Cooperate, and to be sound. They requested a minor modification for additional clarity (see below).

MAIN ISSUE: POLICY WORDING

Detail	Respondent numbers	Response
Other sensitive receptors can include the historic environment, modification suggested to this effect.	0256	Agreed. A modification is proposed as set out in the Schedule of proposed modifications.

Policy HC6: Air pollution and air quality

Five respondents

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0254	Croudace Homes	0314	Vistry Group
0274	Bridge House of Twyford	0354	Ashridge Wokingham Ltd
0280	Bewley Homes		

Support

No respondents state the policy is legally compliant or complies with the Duty to Cooperate.

No respondents support the policy.

All respondents recognise the need to protect and enhance air quality, with respondent 0354 particularly welcoming the clarity provided by part 3 of the policy, but all five respondents raise specific concerns with aspects of the policy which are summarised below.

MAIN ISSUE: POLICY WORDING

Detail	Respondent numbers	Response
It is difficult to set thresholds for Air Quality Assessments given every site is unique and some of the measures will not be feasible for specific development proposals. Therefore, there is a lack of clarity about how viability assessments would be considered against the requirements of the policy.	0254, 0274, 0280, 0314	Development proposals need to comply with the development plan, unless material considerations indicate otherwise. Applications should not seek to avoid compliance with HC6 unless there are legitimate viability concerns, which in the majority of cases will not apply. If there are legitimate grounds preventing an application from providing the necessary air quality evidence / mitigation, this will need to be robustly justified at the application stage.

OTHER ISSUES

- Respondents 0254, 0274, 0280 and 0354 consider the policy not to be legally compliant
- Respondent 0354 considers the policy not to comply with the Duty to Cooperate
- Respondent 0314 notes that the M4 AQMA (among others) is due to be revoked, and that development proposals relating to their site at Home Farm, Winnersh (5WI007) would not be required to provide an Air Quality Assessment on that basis
- Respondent 0354 notes that an Air Quality Assessment may be required for applications relating to their site Land at Ashridge (5HU009group) at present, but similarly highlights that the M4 AQMA (among others) is due to be revoked

Policy HC7: Light pollution

One respondent

Respondent number	Name/Organisation
0355	Environment Agency

Support

Respondent **0355** did not comment on legal compliance or the Duty to Cooperate in relation to policy HC7. However, they express support for the policy, particularly the requirements for applicants to submit a Lighting Appraisal and to protect wildlife corridors.

MAIN ISSUES

- No issues were raised.

Policy HC8: Noise pollution

Four respondents

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0305	University of Reading	0317	Hatch Farm Land Limited
0314	Vistry Group	0354	Ashridge Wokingham Ltd

Support

Respondents 0305 and 0317 consider the policy is legally compliant and complies with the Duty to Cooperate.

Respondent 0314 is interpreted as supporting the policy. The respondents notes that development proposals for their site Home Farm, Winnersh (5WI007) will incorporate noise mitigation measures

While respondent 0354 supports the principle of protecting sensitive receptors from noise impacts, they raise specific concerns with aspects of the policy which are covered below.

MAIN ISSUE: POLICY WORDING

Detail	Respondent numbers	Response
Errors in the labelling and layout of Table 11 meaning strict compliance with the policy would not be possible without the suggested modifications being made.	0305	Noted. Modifications are proposed to Table 11 in the Schedule of proposed modifications.
The final sentence of paragraph 13.45 lacks specificity as it does not identify where noise is to be assessed from, fails to recognise that continuous and tonal noises are different in	0305	Noted. Modifications proposed as set out in the Schedule of proposed modifications. Noise would be measured at 1m external to the nearest noise sensitive receptor, and absolute noise level would be appropriate. This is consistent other local

Detail	Respondent numbers	Response
<p>nature, and lacks reference to 'impulsive noise'. In any event, the statement is unnecessary as these matters are already covered by national guidance.</p>		<p>authorities across the country. This covers the potential for exceedances, weather conditions, impulsivity, intermittency, tonality, and uncertainty to ensure that the new noise source (it is new noise sources) do not exceed background noise levels and become obtrusive.</p>
<p>Concern expressed that Policy HC8 suggests that noise impact will still weigh against a proposal even when mitigation measures are acceptable. Criterion 3c) should be amended to clarify that proposals which, subject to mitigation, can avoid adverse impacts from noise pollution should do so.</p>	0317	<p>Noted. The council do not agree with the interpretation that noise will be treated as an adverse material consideration even where appropriate mitigation is in place. Part 2 states the opposite is true – that where there is no observed effect level then noise pollution will not be a material consideration. It does not state that noise pollution will weigh against a proposal regardless of mitigation, instead it requires noise pollution to be assessed and addressed as necessary in accordance with Part 3. The council consider the hierarchical approach to considering noise impacts is justified, and that criterion 3c) already acknowledges that where mitigations can be provided these should be implemented to avoid adverse impact. The council notes that policy HC8 effectively rolls forward the policy requirements of CC06 of the current development plan.</p>
<p>The policy lacks clarity as there is no threshold or criteria against which to assess whether a proposal should be subject to an assessment of noise impacts, instead it assumes all developments will be subject to a noise impact assessment.</p>	0354	<p>The council notes that policy HC8 effectively rolls forward the policy requirements of CC06 of the current development plan. The policy does not prescribe circumstances where noise assessment is required, as while detailed technical assessment will not be required in the majority of cases, all development proposals will nevertheless need to consider potential noise impacts to a greater or lesser degree in order to safeguard amenity. Notwithstanding, a modification is suggested to paragraph 13.42 of supporting text to aid clarity.</p>

OTHER ISSUES

- Respondent 0354 considers the policy not to be legally compliant or to comply with the Duty to Cooperate.

Policy HC9: Contaminated Land and Water

Two respondents

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0355	Environment Agency	0360	South East Water

Support

Respondent **0355** did not comment on legal compliance or the Duty to Cooperate in relation to policy HC7. However, they express support for the policy, particularly the policy requirement that development proposals will not be supported where unacceptable risk or harm from contamination would arise.

MAIN ISSUE: ADVICE TO BE NOTED

Detail	Respondent numbers	Response
<p>The South East region is classed as ‘seriously water stressed’ by the EA. Source Protection Zones (SPZs) have been established by the EA to protect public and private groundwater abstractions used for potable water supply.</p> <p>South East Water is not statutory consultees for planning but wish to work with local authorities and the EA, to ensure that SPZs are considered in planning decisions to safeguard water supplies in a local area.</p>	0360	Noted. WBC takes into account local drainage matters when determining land use planning applications regarding livestock and farming. WBC also ensures Sustainable urban drainage systems (SuDS) are incorporated into all appropriate forms of developments.

OTHER ISSUES

Respondent 0360 did not comment on the legal compliance, Duty to Cooperate or soundness of Policy HC9.

Policy HC10: Odour, fumes, and dust

Four respondents

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0231	Willson Developments Ltd	0305	University of Reading
0235	The Old Redingensians Association	0318	Bloor Homes

Support

All respondents consider the policy is legally compliant and complies with the Duty to Cooperate.

Respondent 0318 supports the policy. Notwithstanding, they raise specific concerns with aspects of the policy which are covered below.

MAIN ISSUE: POLICY WORDING

Detail	Respondent numbers	Response
The wording does not contain sufficient flexibility to recognise that some development proposals / sites may not result in material impacts and therefore detailed assessments are unnecessary. Modification suggested to ensure mitigation measures are only applied where proportionate and justified.	0231, 0235, 0305, and 0318	Noted. A modification to add 'where relevant to the development' to the start of part 1 has been included in the Schedule of proposed modifications.

Chapter 14: Monitoring Framework

No respondents commented on this chapter.

Appendix A: Arborfield Green SDL Development Guidelines

Two respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0256	Historic England	0355	Environment Agency

Support

Historic England (**0256**) broadly supported the development guidelines but sought clearer heritage requirements to acknowledge nearby heritage assets and to utilise existing buildings and structures associated with the military.

REQUESTED MODIFICATIONS

Detail	Respondent numbers	Response
Modification requested to provide additional detail on key heritage requirements for the SDL and clearer guidance in the development guidelines that connects to the Supplementary Planning Document (SPD)	0256	Agreed. The council considers this suggested change would provide useful clarity, as agreed through a Statement of Common Ground with Historic England. The proposed change to part 1.7 c) of the development guidelines is set out in the council's Schedule of proposed modifications.
Modification requested to place shaping principles to acknowledge that the most vulnerable development should be located in lowest areas of all sources of flood risk	0355	Following further engagement with the Environment Agency, both parties agree that the flood risk policies in the local plan provide a suitable policy framework, and require all sources of flooding to be taken into account.

Appendix B: South Wokingham SDL Development Guidelines

Three respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0256	Historic England	0355	Environment Agency
0263	Lightwood Strategic		

Support

Historic England (**0256**) broadly supported the development guidelines but sought clearer heritage requirements to acknowledge nearby heritage assets and archaeological potential.

Environment Agency (**0355**) supported providing high quality green and blue infrastructure with associated recreational, flood risk and ecological benefits in part B3.8c) of the Concept Rationale.

One of the site promoters (0263) broadly supported the development guidelines in providing further clarity that the masterplanning process will take into account the permitted area of the SDL.

MAIN ISSUES: KEY PLACE MAKING PRINCIPLES

Detail	Respondent numbers	Response
Further clarification on the setting of Holme Green Lane as this an amenity rather than heritage value or identity matter	0263	Although there are no identified designated or non-designated heritage assets on Holme Green Lane, the Grade II Listed Holme Grange School is nearby and the setting of the rural lane, with mature trees and hedgerows should be respected. The concept plan further shows undeveloped areas of land around the Holme Green Lane, which reflects Development Guideline B3.9(e).

MAIN ISSUES: INFRASTRUCTURE REQUIREMENTS

Detail	Respondent numbers	Response
Lack of justification for requiring a 1-form entry primary school and further clarification on reserving space for playing pitches	0263	It is important land is identified for the provision of a primary school to ensure the impact of development on education can be appropriately mitigated. Engagement with the council's school place planners has helped to identify this requirement.

MAIN ISSUES: POLICIES, DECISION TAKING AND IMPLEMENTATION

Detail	Respondent numbers	Response
Lack of clarity between the permitted area and the area proposed for extension	0263	Part B3.5 of the Development Guidelines is clear that the comprehensive masterplan relates to the expanded / extended area of the SDL to ensure that the new community is delivered in a cohesive and sustainable manner, and forms an integrated part of the overall major development of the South Wokingham SDL.

REQUESTED MODIFICATIONS

Detail	Respondent numbers	Response
Modify the guidance on heritage matters in Appendix B, especially regarding the area's designated heritage assets.	0256	WBC accepts the principle of this additional text, as agreed through a Statement of Common Ground with Historic England. It should also be noted that earlier phases of South Wokingham SDL already have planning permission.

Detail	Respondent numbers	Response
		The proposed change to part 3.9 e) of the development guidelines is set out in the council's Schedule of proposed modifications.

Appendix C: Loddon Valley Garden Village SDL Development Guidelines

Seven respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0148	Gleeson	0305	University of Reading
0181	Stevens, Paul (SOLVE)	0317	Hatch Farm Land Limited
0195	Powley, Andrew	0355	Environment Agency
0256	Historic England		

Support

Historic England (**0256**) broadly supported the development guidelines but sought clearer heritage requirements to acknowledge nearby heritage assets as well as archaeological potential.

MAIN ISSUES: CONCEPT RATIONALE

Detail	Respondent numbers	Response
Helpful to explain which flood zones are included as 'higher flood risk' and 'lower flood risk'. We would expect that all new development is located in Flood Zone 1, please detail.	0355	<p>Part 3i) of Policy SS13 and part B4.4b) of the development guidelines are clear that new buildings should be located outside areas of flood risk, with development planned for sequentially, placing the most vulnerable development in the lowest areas of flood risk.</p> <p>The Sequential and Exception test provide assurance that no development classified as 'more vulnerable' is proposed within Flood Zone 2, which accords with national policy.</p> <p>A modification is proposed to part B4.4b) of the development guidelines to provide additional clarity.</p>

Detail	Respondent numbers	Response
To be a climate positive development, the proposal should utilise large scale battery storage, heat networks, export more power and maximise onsite solar PV	0181	<p>The council is satisfied that the policy and development guidelines ensure proposals utilise renewable energy generation.</p> <p>Part 11 of Policy SS13 requires a comprehensive energy and sustainability strategy, and includes a list of requirements including c) <i>ensuring that the total operational energy demand at completion of the Loddon Valley Garden Village is met from renewable or low-carbon sources on site, prioritising opportunities for heat networks, community energy initiatives or other solutions which take advantage of the scale of the development.</i></p>
Lack of consideration of alternative options to housing, such as community farms and utilising the heritage of the area as a cultural asset	0181	<p>Strategic scale development opportunities have been considered as part of plan making, including through technical work and the sustainability appraisal. The council has reviewed the representations and remains of the opinion that the Loddon Valley Garden Village is the most suitable and sustainable option.</p> <p>Part 5a) and e) of Policy SS13 require a strategy for creating a distinctive and sustainable community, embracing the best of town and country; and a strategy for integrating and implementing arts and cultural activities. The masterplan for the Loddon Valley Garden Village must be produced in partnership with key stakeholders.</p> <p>The site promoter’s latest vision for Loddon Valley Garden Village sets out a series of key design and spatial principles, including identifying an area for integrating heritage, culture</p>

Detail	Respondent numbers	Response
		and local food growing within shared open spaces to encourage active lifestyles.

MAIN ISSUES: KEY PLACE MAKING PRINCIPLES

Detail	Respondent numbers	Response
Opportunities to reduce off-site flooding (e.g. natural flood management, attenuation, etc.). Minimise number of bridges and any crossings over functional flood should consider and mitigate impacts on storage and flow routes, including climate change impacts. Design of new crossing should be discussed with the Environment Agency as early as possible.	0355	Part 7c of Policy SS13 ensures development proposals devise and implement a comprehensive drainage and flood alleviation strategy that considers and takes opportunity to improve flood risk management and reduce the risk of flooding to areas beyond the garden village. Whilst the design of any new bridges and crossings will be a matter for consideration through detailed design, a proposed modification to part B4.7y) of the development guidelines to acknowledge that the design should require early and detailed engagement with the Environment Agency and National Highways to ensure flood risk is not worsened and explore opportunities to reduce risk of flooding beyond the garden village.
Part B4.4 j) is too generic and further clarity is required as to whether it would apply to the Scheduled Monument at St Bartholomew's Church	0256	Noted. Ongoing engagement has led to the signing of a Statement of Common Ground with Historic England, where both parties agree that a modification to this part of the development guidelines would provide useful clarity on notable heritage assets and their settings.

Detail	Respondent numbers	Response
Proposal is in breach of the Arborfield and Barkham Neighbourhood Plan due to impact on valued local heritage assets.	0181	All made Neighbourhood Plans have been considered in preparing the local plan. It is important to note the strategic nature of the local plan and that it sets out a development strategy for the whole borough.

MAIN ISSUES: INFRASTRUCTURE REQUIREMENTS

Detail	Respondent numbers	Response
Arborfield Sewage Treatment Works is operating at capacity and uncertainty over upgrades to infrastructure by Thames Water. Discharge of sewage into Barkham Brook.	0181, 0195	<p>The Water Cycle Studies consider the impact of development on the sewage and sewerage network and were prepared in consultation with Thames Water.</p> <p>Thames Water's representation acknowledges that the development proposed is likely to require upgrades to existing infrastructure.</p> <p>Following consultation with Thames Water, the IDP identifies that an upgrade of the Arborfield STW is planned, which is capable of mitigating the impact of the development proposed. A Statement of Common Ground with Thames Water agrees that there are no known significant water supply, waste water, or sewage treatment capacity issue that would be likely to prevent, or delay the delivery of the site allocations proposed in the plan. Engagement with Thames Water will continue on an ongoing basis.</p>
Loss of mature trees and illegal loss of SANG to facilitate delivery of a link road from Mill Lane to Hatch Farm Way.	0181	The council is satisfied that the link road from Mill Lane to Hatch Farm Way can be delivered.

Detail	Respondent numbers	Response
		<p>Part B4.5 o) of the development guidelines for Loddon Valley Garden Village ensures the proposal embeds and integrates natural features such as trees, hedgerows and woodland into scheme layouts and designs. Appropriate landscaping measures will also be required.</p> <p>Policy NE4 provides a suitable policy framework considering trees, woodland, hedges and hedgerows in development proposals.</p>
Whether the scale of the proposal would require a dedicated Travel Plan in addition to My Journey contributions	0148	The council agrees that a modification to part B4.7(p) would provide useful clarity in stating that a Travel Plan would be required in addition to appropriate contributions to the borough's My Journey initiative or any successor scheme.
Water companies have a statutory duty to serve new development. Supporting text should recognise constraints to providing water network upgrades and working with statutory consultees	0148	<p>Noted. Infrastructure / service providers, such as water companies are required to be consulted at the planning application stage.</p> <p>The council has worked positively and collaboratively with infrastructure and service providers during the local plan process. Engagement with water companies such as Thames Water and South East Water have identified any necessary future upgrades to water and wastewater infrastructure.</p> <p>Thames Water's representation to the Proposed Submission Plan acknowledges that the development proposed is likely to require upgrades to existing infrastructure. Following consultation with Thames Water, the IDP identifies that an upgrade of the Arborfield STW is planned, which is capable of mitigating the impact of the development proposed.</p>

Detail	Respondent numbers	Response
		<p>A Statement of Common Ground with Thames Water agrees that there are no known significant water supply, waste water, or sewage treatment capacity issues that would be likely to prevent, or delay the delivery of the site allocations proposed in the plan. Engagement with Thames Water will continue on an ongoing basis.</p>

MAIN ISSUES: POLICIES, DECISION TAKING AND IMPLEMENTATION

Detail	Respondent numbers	Response
<p>Duplication between development guidelines and policy making it difficult to implement in decision-making</p>	<p>0148, 0317</p>	<p>The policy and development guidelines have largely evolved through the existing Strategic Development Location (SDL) policies in the Core Strategy. This followed a successful approach in achieving large-scale mixed-use developments, that can build a cohesive community with the necessary infrastructure alongside.</p> <p>The council is satisfied that this approach facilitates the delivery of new development in a timely and coordinated manner and has been effective in their implementation during the decision-making process.</p>
<p>Use of 'beautifully and imaginatively designed' is ineffective</p>	<p>0305</p>	<p>Loddon Valley Garden Village will be a holistically planned and sustainable new community. As recognised in paragraph 5.109 of the supporting text, the proposal will align to the principles of garden communities.</p>

Detail	Respondent numbers	Response
		<p>A core principle in assisting the delivery of successful garden cities/communities is creating beautifully and imaginatively designed homes, with gardens, combining the best of town and country to create healthy communities.</p> <p>The wording in policy and development guidelines is therefore appropriate, and reflects national guidance and current best practice.</p>

REQUESTED MODIFICATIONS

Detail	Respondent numbers	Response
Request clearer heritage requirements to acknowledge nearby heritage assets. Seek explicit mention of St Bartholomew's Church, a Scheduled Monument on the national Heritage at Risk Register.	0256	Agreed. The proposed change to part B4.5 n) of the development guidelines is set out in the council's Schedule of proposed modifications.
Add a buffer around Flood Zone 2 to allow for any inaccuracies in flood modelling. Include reference to opportunities to de-culvert watercourses.	0355	<p>The Sequential and Exception test provide assurance that no development classified as 'more vulnerable' is proposed within Flood Zone 2, which accords with national policy.</p> <p>Notwithstanding, a modification is proposed to part B4.4b) of the development guidelines to provide additional clarity, is set out in the Schedule of proposed modifications.</p>
Amend part B4.5j) to ensure consistency with paragraph 11c) of Policy SS13, with respect to total operational regulated emissions targets	0148	Agreed. A modification to part B4.5 of the development guidelines to align with the requirements in Policy SS13 with respect to operational regulated emissions, and would

Detail	Respondent numbers	Response
		provide additional clarity and is set out in the council's Schedule of proposed modifications.
Given limitations of providing infrastructure off site over third party land, amend the wording of part q) to recognise delivering a comprehensive network of Greenways within the site and encouraging connections to parts of the Greenways network	0148	<p>Not agreed. National guidance and current best practice recommend that new garden communities should consider how places are connected physically (by road, active travel and public transport), economically (through economic and travel-to-work patterns) and socially (through provision of services between settlements).</p> <p>The new community will be supported by a comprehensive package of infrastructure to incentivise sustainable behaviours and travel choices, by maximising opportunities for active travel within the new community and between surrounding places.</p>
Alternatives to housing, including green burial, leisure, and utilising the heritage of the area as a cultural asset	0181	Not agreed. The proposed development will include very large areas of open space, providing opportunities for leisure. The council will work with stakeholders, including Historic England to appropriately utilize the heritage assets of the site.
Modify the route of the spine road to enter the site further along Reading Road, through existing access before the River Loddon or at Thames Valley Science Park	0181	Not agreed. The council is satisfied that appropriate vehicular access can be achieved from Reading Road. A route is also proposed from the Eastern Relief Road through Thames Valley Science and Innovation Park, as shown on the Concept Plan.
Re-route the link road	0181	Not agreed. The council is satisfied that a link road from Mill Lane to Hatch Farm Way can be delivered.

Detail	Respondent numbers	Response
Undertake immediate upgrades to the Arborfield Sewage Treatment Works	0181	<p>Following consultation with Thames Water, the IDP identifies that an upgrade of the Arborfield STW is planned for the AMP8 period (2025-30).</p> <p>A Statement of Common Ground with Thames Water agrees that there are no known significant water supply, waste water, or sewage treatment capacity issues that would be likely to prevent, or delay the delivery of the site allocations proposed in the plan. Engagement with Thames Water will continue on an ongoing basis.</p>

Appendix D: Sites allocated for residential: Maps

Comments on this appendix have been considered as part of Policy SS14.

Appendix E: Sites allocated for residential: Development Guidelines

Three respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0122	Industrial Property Investment Fund	0282	Taylor Wimpey Strategic Land
0256	Historic England		

Support

Historic England (0256) support the development guidelines and consider them to be sound. Minor comments are dealt with in the table below.

Respondents 0282 and 0256 (Historic England) consider the development guidelines to be legally compliant and to comply with the duty to co-operate.

MAIN ISSUES

Detail	Respondent number	Response
SS14.29 (5WK029) Station Industrial Estate – Wokingham Town Centre Masterplan SPD is outdated, the site is not included in it and it should be applied flexibly.	0122	Noted. The development guidelines state that development should be integrated and guided by the SPD – the council is satisfied that this allows for flexibility.
SS14.29 (5WK029) Station Industrial Estate – the capacity has been reduced, which doesn't link with the opportunity to utilise gateway development into the town.	0122	A capacity review undertaken in July 2021 advised a reduction in capacity on the site from 92 to 40 dwellings based on constraints. Policy SS14 supporting text states that the number of dwellings is indicative and does not represent a fixed requirement for each site.

Detail	Respondent number	Response
SS14.4 (5CV002) Land west of Park Lane – the site intersects with archaeological potential and would require reference to at least a desk based archaeological assessment.	0256	Land West of Park Lane, Charvil has been granted planning permission subject to a s.106 legal agreement under ref. 232704. The proposed change is therefore not necessary.
SS14.18 (5SW019) Land west of Trowes Lane – note the planning permission, but if separate guidelines are prepared they need to refer to archaeological potential.	0256	The site is to be developed in accordance with the full planning permission. The council is satisfied that separate guidelines are not required for this site.
SS14.30 (5WK054) WBC offices Shute End – suggest explicit reference to the conservation area appraisal. If field-based evaluation is likely to be needed this should be mentioned.	0256	Agree. A modification is proposed as set out in the Schedule of proposed modifications.
SS14.21 (5WI006) Land off Poplar Lane and Watmore Lane – the guideline referring to policy FD3 is unnecessary and should be removed.	0282	Agree. A modification is proposed as set out in the Schedule of proposed modifications.

Appendix F: Housing trajectory

7 respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0085	JoHe Developments LLP	0305	University of Reading
0086	Devonshire Metro Limited	0311	Berkeley Strategic Land Limited
0128	Cowan, Gary	0317	Hatch Farm Land Limited
0245	Crest Nicholson Partnership and Strategic Land		

Support

Respondents 0245 and 0317 consider the plan to be legally compliant, complies with the duty to cooperate, and that the policy is sound.

No representations provided information regarding the duty to cooperate.

LEGAL COMPLIANCE

Detail	Respondent number	Response
The separate Housing Trajectory spreadsheet was not available at the start of the consultation period.	0311	The housing profile included in Appendix F was available throughout the consultation period. The separate Housing Trajectory spreadsheet was made available to provide additional information regarding Appendix F.

MAIN ISSUES

Detail	Respondent number	Response
Site 59 Nine Mile Ride (5FI053) was granted planning permission in November 2023 and should be included in the housing trajectory.	0085	Planning permission was granted for 4 units, so delivery forms part of the small sites and windfall in the housing trajectory
Site 19-21 Market Place, Wokingham has planning permission and should be included in the housing trajectory	0086	Planning permission was granted for a mixed used development, including 60 dwellings. The site is located in Wokingham town centre, and therefore forms part of the 'Wokingham town centre broad area' allowance and has not been included within the capacity of sites with planning permission.
Unrealistic timescales for housing completions	0128	The council is satisfied the timescales for housing delivery are realistic.
Land at Barkham Square (SS11(3a)(i) can be delivered earlier than the housing trajectory suggests	0245	Noted.
First completions at Loddon Valley Garden Village in 2027/28 is achievable, and completion rates could be accelerated significantly year on year above the 250 dwellings per annum stated in the housing trajectory.	0305, 0317	Noted.
The housing trajectory for Loddon Valley Garden Village is unrealistic	0311	The council is satisfied the timescales for housing delivery at Loddon Valley Garden Village are realistic.

Detail	Respondent number	Response
Modify the trajectory to only include units from Loddon Valley Garden Village that can be delivered without the bridge over the M4	0311	Not agreed. There is no justification for excluding housing delivery based on the timing of delivery of the M4 bridge. The council is therefore satisfied the timescales for housing delivery at Loddon Valley Garden Village are realistic.

Appendix G: Safeguarded routes: Maps

No respondents commented on this appendix.

Appendix H: Core Employment Area: Maps

No respondents commented on this appendix.

Appendix I: Valued Landscapes: Maps

Comments on this appendix have been considered as part of Policy NE6.

Appendix J: Sites of Urban Landscape Value: Maps

Comments on this appendix have been considered as part of Policy NE7.

Appendix K: Local Green Space: Maps

Comments on this appendix have been considered as part of Policy HC3.

Appendix L: Schedule of policies to be superseded

No respondents commented on this appendix.

Appendix M: Monitoring Framework

Two respondents

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0256	Historic England	0305	University of Reading

Support

There were no comments of support received from respondents to the monitoring framework.

MAIN ISSUE: MONITORING INDICATORS

Detail	Respondent numbers	Response
Future removal of St Bartholomew's Church Scheduled Monument from the Heritage at Risk Register would be picked up in the monitoring framework	0256	Noted. Ongoing engagement has led to the signing of a Statement of Common Ground with Historic England, where both parties agree that this matter is covered under the indicators and targets for Policy DH5 (The historic environment) set out in the Monitoring Framework (Appendix M).
Objections under Policy SS13 with respect to self-build and custom building and gypsy and traveller pitches will require subsequent amendments to the monitoring framework	0305	Not agreed. No modifications are proposed to part 2a ii) and iii) of Policy SS13.

Appendix N: Glossary and abbreviations

One respondent.

Respondent number	Name/Organisation
0123	NatureSpace Partnership

Support

There were no comments of support received from respondents to the glossary.

REQUESTED MODIFICATIONS

Detail	Respondent numbers	Response
Reference to the council's Great Crested Newt District License Scheme	0123	Agree. A modification is set out in the Schedule of proposed modifications.

Policies Map

Seven respondents

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0013	Whitebread, Richard	0268	Wates Development Ltd
0196	A&O Property Ltd	0305	University of Reading
0244	Woolf Bond Planning	0336	Pleace, Deborah
0256	Historic England		

Support

Respondents 0013, 0256, 0305, 0321, 0336 consider the policies map to be legally compliant.

Respondents 0013, 0196, 0244, 0256, 0268, 0305, 0321, 0336 consider the policies map to comply with the duty to co-operate.

Respondent 0013 considers the policies map to be sound.

MAIN ISSUES

Detail	Respondent numbers	Response
Unclear why local historic parks and gardens and Areas of Special Character are included on the policies map	0256	The council considers it important these non-designated heritage assets are identified on the Policies Map to support consistent decision taking on development proposals located within and around the areas.
The online interactive map should not be relied upon as websites change over time – inconsistent with guidance (Planning Inspectorate’s Procedure Guide on Planning Appeals. Suggest a full re-consultation is necessary	0244, 0268	PDF versions of the policies map were published as part of the Proposed Submission Plan consultation. It is acknowledged that small areas of the borough were missing from the PDF policies maps.

Detail	Respondent numbers	Response
		<p>The interactive map allowed the viewing of all Proposed Submission Plan layers and was also available on the website. These layers demonstrate a point in time for the Reg 19 consultation and are clearly labelled – they were not edited during the consultation.</p>
<p>Inappropriate to define settlement boundaries for Loddon Valley Garden Village on policies map C1 prior to more detailed work on the parameters of development</p>	<p>0305</p>	<p>The settlement boundaries within the Loddon Valley Garden Village SDL area have been drawn using latest information on planning commitments, masterplans and constraints such as flood zones and woodland.</p> <p>Future masterplanning and other detailed work may alter exact extents of where development is delivered. However, the council considers it necessary to designate settlements at this stage and is satisfied that the boundaries are appropriate. It is noted that a future local plan review, when development is at a more advanced stage, will be able to undertake a review of settlement boundaries and propose alterations – as has taken place with the previous Core Strategy SDLs.</p>
<p>Inconsistencies between the Loddon Valley Garden Village concept plan and the settlement boundaries e.g. at Thames Valley Science and Innovation Park</p>	<p>0305</p>	<p>The purpose of the concept plan is to provide a visual interpretation of the broad concepts and themes of the proposal. The settlement boundaries within the Loddon Valley Garden Village SDL area have been drawn using latest information on planning commitments, masterplans and constraints such as flood zones and woodland and as such the council is satisfied that the boundaries are appropriate.</p>
<p>Inconsistency with Policy SS2 which defines LVGV as a singular modest settlement</p>	<p>0305</p>	<p>Policy SS2 defines Loddon Valley Garden Village as a modest settlement – this is a smaller designated area than the wider SDL designation. The Settlement Boundaries Review topic</p>

Detail	Respondent numbers	Response
		paper (2024) gives an overview and explanation of the settlement boundary proposals for the Loddon Valley Garden Village SDL, including a new settlement called Loddon Valley Garden Village, a new settlement called Thames Valley Science and Innovation Park and an expansion of Sindlesham. The council is satisfied that the settlements are accurately set out within Policy SS2.

MAIN ISSUE: REQUESTED MODIFICATIONS

Detail	Respondent numbers	Response
Modify policies map D1 to include the missing area south of Swallowfield	0244, 0268	Agreed. A related change is set out within the Schedule of proposed modifications. It is noted that during the public consultation these areas could be viewed on the interactive map on the website where all layers were available to view in full.
Modify policies map D1 to include the missing area north-west by Green Park	0196, 0244, 0268	Agreed. A related change is set out within the Schedule of proposed modifications. It is noted that during the public consultation these areas could be viewed on the interactive map on the website where all layers were available to view in full.
Modify policies map D1 to include area of safeguarded land for potential Alder Grove Primary School expansion to a 3FE school	0305	Not agreed. The use of the land for an expansion of the primary school would be acceptable in principle in the countryside. The planning permission covers a larger area

Detail	Respondent numbers	Response
		including the sports pitches and there is no natural boundary to follow for the potential proposed school expansion area. The council is satisfied that the approach towards the settlement boundary including the existing built school facility.
Modify policies map C2 to include promoted site Land adjacent to Whistley Green Cottage (5HU002) and Whistley Green Cottage, Hurst	0336	Not agreed. Land adjacent to Whistley Green Cottage is not proposed for allocation. Policy SS4 sets out circumstances where appropriate development may be supported adjacent to minor settlements. Whilst previously proposed for allocation, the council is satisfied that Policy SS4 provides an appropriate level of support for suitable unallocated sites on the edge of defined minor settlements to come forward through the planning application process. The council is satisfied with the approach not to extend the Hurst settlement boundary to include this area of land.

Late Representations

Name	Respondent ID	Date received	Accepted
Pleace, Deborah	0336	14 November 2024	Yes
Environment Agency	0355	19 November 2024	Yes – to supplement their response dated 13 November 2024
Tott, Darryl	0356	13 November 2024	Yes – due to connectivity and technical issues meaning it was not possible to submit representation within stated deadline
Brannan, James	0357	13 November 2024	Yes
Remenham Parish Council	0358	14 November 2024	Yes – extension agreed for the parish council
Rubix Land Limited	0359	13 November 2024	Yes
South East Water	0360	17 December 2024	Yes

Omission Sites

The following representations were received promoting sites that have not been proposed for allocation in the local plan

Respondent number	Name/Organisation	Site name and location	Promoted use	Was the site included in the HELAA (2024) (If yes add HELAA reference)
0085	JoHe Developments LLP	59 Nine Mile Ride, Finchampstead	Housing	5FI053
0089	Prior, Nicholas	Silverstock Manor, Sandhurst Road, Finchampstead	Housing, residential institutions, Gypsy and Traveller pitches	5FI005
0111	Green, Mr and Mrs (Shanly Homes)	166 Nine Mile Ride, Finchampstead	Housing	5FI015
0119	Cooper Estates Strategic Land Limited	Land at Stanbury House, Basingstoke Road, Spencers Wood	Housing	5SH015
0120	Cox, Mr A and Mr C	Land opposite Kingsclere, Forest Road,	Housing	No
0124	Joyner, Ross	Land on the north west side of A4 New Bath Road, Twyford	Housing	5WA010
0143	Singh, Raphael	Pinewood, Nine Mile Ride	Housing, Residential institutions	5WW002 (smaller area of the site)
0144	John, James	65 Hyde End Lane, Ryeish Green	Housing	5SH059
0196	A&O Property Limited	Smallmead Cottages, Kirtons Farm Road	Housing	5SH060
0206	Cunningham, Mr and Mrs	Land at Park Farm, Carters Hill	Housing, residential institutions	5AR029
0207	Frankham, John	Sutton Court Farm, Easthampstead Road	Housing, residential institutions	5WW029
0211	Legal and General Assurance (Pensions Management) Ltd	Pinewood Campus,	Housing	No
0215	Maverick Property Investments Ltd	Land adjacent to Sulby Croft, Heathlands Road	Housing	5WW010
0219	Anwyl Land Limited	Land off Langley Common Road,	Housing	5BA030

Respondent number	Name/Organisation	Site name and location	Promoted use	Was the site included in the HELAA (2024) (If yes add HELAA reference)
0221	Mac Mic Group	Land to the east of Lodge Road, Hurst	Housing	5HU016
0222	Richborough	Body's Farm, Spencers Wood	Housing	5SH013
0223	Helmsley Land Ltd and Penelope Clayden	Land on the north side of Orchard Road, Hurst	Housing	5HU006
0225	Catesby Estates	Land east of Longwater Road, Finchampstead	Housing	5FI047
0228	Ladds Garden Centre	Ladds Garden Centre, Hare Hatch	Housing	No
0229	Wyvols Court Farm Ltd	Land at Wyvols Court Farm, Swallowfield	Employment	5SW023
0232	Shorewood Homes Ltd	Land north of Hogmoor Lane, Hurst	Housing	5HU030
0233	Dutton, Chris and Shirley Gallagher, Karen and Brian Dutton, Lucas Geering, Wendy, Timothy and Laura	Tintagel Farm, Finchampstead	Housing	5FI005
0233	Dutton, Chris and Shirley Gallagher, Karen and Brian Dutton, Lucas Geering, Wendy, Timothy and Laura	Heartwood Lodge, Finchampstead	Housing	5FI002
0234	Thakeham Homes Ltd	White Cottage, Forest Road, Binfield	Housing	5HU039
0235	The Old Redingensians Association	Old Redingensians Sports Ground, Bath Road, Sonning	Housing	5SO010
0239	University College of Estate Management	Shinfield Grange, Cutbush Lane East, Shinfield	Employment	5SH049
0240	Hallam Land and Wilson Enterprises Ltd	Land at Grazeley	Employment	5SH029

Respondent number	Name/Organisation	Site name and location	Promoted use	Was the site included in the HELAA (2024) (If yes add HELAA reference)
0244	Woolf Bond Planning	Sonning Golf Club, Duffield Road,	Housing	No
0245	Crest Nicholson Partnerships and Strategic Land	Land at Grazeley	Employment	5SH040
0252	Gladman	Land east of Finchampstead Road	Housing	5WK037
0252	Gladman	Woodcray Manor, Finchampstead Road	Housing	5WK038
0253	Wrenbridge (FRELD Reading) LLP	Shinfield Park (formerly Shire Hall)	Employment	No
0254	Croudace Homes	Land east of Basingstoke Road and south of Swallowfield Street, Swallowfield	Housing	5SW006
0261	Moss, Stephen (representing multiple landowners)	Land at Sandhurst Road, Finchampstead	Housing	5FI002, 5FI009, 5FI031 (including a wider area than promoted)
0268	Wates Development Ltd	Lockey Farm, Sindlesham Road	Housing	5AR020
0268	Wates Development Ltd	Land east of Hayes Drive and north of Church Lane, Three Mile Cross	Housing	5SH016
0269	Cirrus Land Ltd	Land at Grazeley (exact location unclear)	Employment	
0270	Rokeby Homes Ltd	Pearmans Glade, Shinfield	Housing	No
0271	Holdstock, Michael	Merry Hill Green Farm, Winnersh	Housing, employment	5WI004
0272	Helmsley Land Ltd	Land east of Maidenhead Road	Housing	5HU056
0275	Oxford Diocesan Board of Finance	Shinfield Glebe, Church Lane, Shinfield	Housing	5SH062
0276	David Wilson Homes Southern	Ducks Nest and Chamberlains Farms	Housing	5AR012
0276	David Wilson Homes Southern	Riverways Farm, Twyford	Housing	5TW007/011

Respondent number	Name/Organisation	Site name and location	Promoted use	Was the site included in the HELAA (2024) (If yes add HELAA reference)
0277	Croudace Homes, Vortal Homes Ltd and Falcon Developments (SE) Limited	Land north of School Road, Arborfield Cross	Housing	5AR007, 5AR009
0278	Hill Residential Ltd	Land at Stokes Farm	Housing (with associated commercial and community uses)	No
0280	Bewley Homes	Land at Church Lane, Finchampstead	Housing	5FI049
0280	Bewley Homes	Land at Edneys Hill, Barkham	Housing	5BA004
0281	Vortal Homes Ltd	Land at Finchampstead Road, Finchampstead	Housing	5FI038
0286	Mac Mic Group	Land at Cross Lanes Farm, Arborfield	Housing	5AR031
0287	Englefield Estate	Land west of Kirtons Farm Road, Green Park	Employment	5SH021
0290	Monopro Ltd	Land at Limmerhill Road, Woosehill	Housing	5WK044
0291	London and Regional	St Annes Manor, London Road, Wokingham	Housing	No
0301	City & Country	Land east of Trowes Lane, Swallowfield	Housing	5SW005
0301	City & Country	Land west of Basingstoke Road,	Housing, residential institutions, employment	5SW004

Respondent number	Name/Organisation	Site name and location	Promoted use	Was the site included in the HELAA (2024) (If yes add HELAA reference)
0302	Dandara Southern Ltd and Elstree Land	Land north of Reading Road, Arborfield	Housing	5AR001, 5AR003, 5AR004, 5AR005
0305	University of Reading	Bill Hill	Renewable energy	5HU053
0305	University of Reading	The Manor, Church Lane, Shinfield	Housing	5SH022
0306	Loddon Mill Enterprises Ltd	Land at Swallowfield	Housing	5SW021
0311	Berkeley Strategic Land Limited	Land east of Twyford/Ruscombe	Strategic scale housing-led development	5RU001 - 006
0311	Berkeley Strategic Land Limited	Land at Blagrove Lane, Wokingham	Housing	5WK028
0314	Vistry Group	Home Farm, Winnersh	Housing	5WI007
0323	Obsidian Strategic	Land at Highlands, Basingstoke Road, Spencers Wood	Housing, residential institutions, retail	5SH035
0326	French, Mrs A and Mr K	Land at Wood Lane	Housing	5AR034
0329	Waingels College	Land at Waingels College, Waingels Road, Woodley	Housing	5WO005
0336	Pleace, Deborah	Land adjacent to Whistley Green Cottage, Hurst	Housing	5HU002

Respondent number	Name/Organisation	Site name and location	Promoted use	Was the site included in the HELAA (2024) (If yes add HELAA reference)
0337	McCarthy, Maya	Land adjacent to Whistley Green Cottage, Hurst	Housing	
0343	Darcliffe Homes	Land at Holmewood House, Sindlesham	Housing	5WI017
0354	Ashridge Wokingham Ltd	Land at Ashridge	Strategic scale housing-led development	5HU009Group
0359	Rubix Land Limited	Land at Blackcroft Farm, Farley Hill	Housing, residential institutions, retail, employment	5FI054

Duty to Co-operate

11 respondents

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0009	Hatherell, Karl	0234	Thakeham Homes Ltd
0132	Bracknell Forest Council	0277	Croudace Homes, Vortal Homes Ltd and Falcon Developments (SE) Limited
0165	Reading Borough Council	0299	West Berkshire Council
0207	Frankham, John	0305	University of Reading
0224	Home Builders Federation	0354	Ashridge Wokingham Ltd
0233	Dutton, Chris and Shirley Gallagher, Karen and Brian Dutton, Lucas Geering, Wendy, Timothy and Laura		

Support

West Berkshire Council (**0299**) and the University of Reading (0305) consider the plan complies with the Duty to Co-operate.

Specifically, West Berkshire Council (**0299**) considers that the council has engaged with West Berkshire Council throughout the preparation of the plan and notes support for the overall approach of the plan.

The University of Reading (0305) consider there is clear evidence the Duty to Co-operate has been fulfilled, with all relevant cross boundary issues identified and comprehensive engagement on these evidenced.

Bracknell Forest Council (**0132**) and Reading Borough Council (**0165**) did not comment specifically on whether the Duty to Co-operate had been complied with, but instead provided comments which are considered below.

MAIN ISSUE: LACK OF EVIDENCE

Detail	Respondent numbers	Response
Lack of engagement with education authorities on secondary school places.	0009	There has been extensive internal engagement between the council's planning and education departments throughout plan preparation. Likewise, engagement with surrounding authorities on school places has informed plan making. Please refer to the Duty to Cooperate: Statement of Compliance (2025)
Lack of evidence of cooperation with Basingstoke or Buckinghamshire who are alleged to be struggling to meet their housing needs	0207, 0233	Please refer to the Duty to Cooperate: Statement of Compliance (2025) and associated agreed Statement of Common Ground with each respective authority.
The Statement of Common Ground with the west of Berkshire authorities is out of date and will need to be updated prior to submission	0224, 0234, 0277, 0354	Noted. The Statement of Common Ground with the West of Berkshire local authorities (2021) is now superseded by individual Statements of Common Ground with each authority, which have been included in the submission documents.
Lack of engagement with all surrounding authorities within the housing market area and beyond, including lack of agreed Statements of Common Ground.	0207, 0224, 0233, 0234	Incorrect. Statements of Common Ground have now been agreed with all surrounding authorities as well as authorities further afield, which have been included in the submission documents.

MAIN ISSUE: INTERIM STATEMENT OF COMPLIANCE

Detail	Respondent numbers	Response
That the meeting of 28 th August 2024 recorded in the Duty to Cooperate: Interim Statement of Compliance (2024) was a high level discussion and did not involve detailed discussion about the highways impact of the South Wokingham SDL extension on Bracknell Forest.	0132	Noted. This was an initial meeting to discuss principles prior to the Proposed Submission Plan publication, with relevant transport colleagues present. Additional meetings, which did include detailed discussion between officers from the respective highways authorities, occurred during and after the Proposed Submission Plan publication period. These are captured in the Duty to Cooperate: Statement of Compliance (2025). Notwithstanding, the principle was agreed that impacts on the highways network were capable of resolution, as acknowledged in the representation.

MAIN ISSUE: UNMET NEEDS

Detail	Respondent numbers	Response
Discussions have not addressed government's planned increases to housing need and therefore the LPU housing requirement does not adequately reflect unmet need from surrounding authorities, including Reading and West Berkshire.	0207, 0224, 0233, 0234, 0277, 0354	The plan has been submitted under the transitional arrangements set out in the 2024 NPPF and accordingly will be examined against the 2023 NPPF and associated housing expectations. West Berkshire's local plan is currently being examined and the 2024 NPPF is therefore not relevant to those proceedings. Reading Borough Council intends to submit its plan under the transitional arrangements similar to the council. On this basis there are no unmet needs from surrounding authorities, please refer to the Duty to Cooperate: Statement of Compliance (2025).
Reading Borough Council's latest Duty to Cooperate Statement (November 2024) is clear	0277	Incorrect. Correspondence from Reading Borough Council has not requested comment on the 2024 consultation on

Detail	Respondent numbers	Response
that Wokingham has been asked to consider the implication of the proposed Standard Method to Reading Borough Council's need (an increase from 825dpa to 1,023dpa) and its ability to accommodate.		proposed changes to the National Planning Policy Framework, instead simply stating that RBC would need to consider its approach at the appropriate time. The correct position is that RBC has confirmed that they do not anticipate there being any unmet need arising from Reading borough at this time and that there is no expectation for WBC to make any allowance within their local plan. This is confirmed within RBC's representation to the Proposed Submission Plan.
Existing unmet needs from Reading need to be addressed.	0354	Engagement has confirmed that Reading Borough Council does not consider there to be a need to make any additional allowance for unmet needs from Reading Borough in the Wokingham Borough local plan.

MAIN ISSUE: NPPF 2024

Detail	Respondent numbers	Response
Whether plan preparation has been effective and whether the Duty to Cooperate has been satisfied in absence of proper consideration of emerging NPPF (including standard method changes).	0224	For the purpose of preparing local plans, the policies in NPPF 2024 will apply from 12 March 2025 save in specified circumstances. These include where a plan has been submitted on or before 12 March 2025 in which case the plan will be examined against the previous version of the NPPF. The plan has been submitted under the transitional arrangements, meaning it will be examined against the requirements of the NPPF 2023 and the related housing need. The council is satisfied that the Duty to Cooperate has been discharged against this framework.

MAIN ISSUE: REQUIRED ONGOING COOPERATION

Detail	Respondent numbers	Response
That there is uncertainty regarding the potential relocation of Royal Berkshire Hospital from within Reading borough to a location in Wokingham borough (including within the Loddon Valley Garden Village land) with a preference for this to be retained in Reading borough.	0165	Noted. For the avoidance of doubt, the LPU has not assumed delivery of the hospital as there are no confirmed proposals and the hospital has not presented the technical evidence that would be required to demonstrate relocation is deliverable through the plan making process. The council agrees that ongoing cooperation is needed, given the lack of firm plans from the hospital regarding location of preferred alternative site, meaning there is a high level of uncertainty. It is noted that more recent announcements for government funding for hospitals mean any relocation is unlikely to occur in the short term. This may be an issue that needs to be considered in future local plan reviews.

OTHER ISSUES

- Respondents 0207 and 0233 comment that the council is reliant on outdated SHMA evidence for establishing the housing requirement, with the implication this has led to Duty to Cooperate discussions based on outdated evidence (this is incorrect and addressed under policy SS10 within this statement).

Sustainability Appraisal

27 respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0077	Midwinter, Samantha	0236	Arborfield and Newland Parish Council
0128	Cowan, Gary	0243	British Horse Society
0131	Smith, Catherine	0254	Croudace Homes
0132	Bracknell Forest Council	0256	Historic England
0143	Singh, Raphael	0275	Oxford Diocesan Board of Finance
0137	Thorne, Barry	0278	Hill Residential
0147	Lias, Darrell	0280	Bewley Homes
0158	Steed, Lacey	0298	Nicholas King Homes
0187	Watts, Colin	0305	University of Reading
0200	Luke, Steven	0311	Berkeley Strategic Land Limited
0217	McCurry, Jenny	0314	Vistry Group
0222	Richborough	0336	Pleace, Deborah
0225	Catesby Estates	0354	Ashridge Wokingham Ltd
0231	Willson Developments		

Support

Historic England (**0256**) are generally supportive of the SA, with a few comments regarding specific heritage assets to be noted.

Nicholas King Homes (0298) are supportive of the South Wokingham SDL extension allocation and note that it is a strongly performing site justifiably held constant across the reasonable alternative growth scenarios.

The University of Reading (0305) considers a robust assessment of reasonable alternatives to have been undertaken through the SA, with the highest performing scenarios being those that include Loddon Valley Garden Village.

Representations regarding duty to co-operate and legal compliance are included in the below tables due to the overlap between the issues raised.

MAIN ISSUES

Detail	Respondent number	Response
Broad approach of the SA should be to ascertain sustainability of the sites	0354	<p>The council does not agree. The aim of the SA Report is very simple, which is explained on page 1 of the report and in the Non-technical Summary, and the situation is as per the two Interim SA Reports previously published in 2020 and 2021. Specifically, the fundamental aim is to present an appraisal of “the plan and reasonable alternatives”, and a secondary aim is to present “an outline of the reasons for selecting the alternatives dealt with”.</p> <p>A follow-on question is then in respect of the broad definition of reasonable alternatives, which is presented very clearly in Section 4 of the Report (as per the two ISA Reports). Site options do not equate to reasonable alternatives, and it is important to avoid discussion at crossed purposes regarding the term reasonable alternatives.</p>
Loddon Valley Garden Village (LVGV) features in majority of growth scenarios / unfair weighting	0131, 0137, 0158, 0187, 0200, 0236 , 0278,	<p>The seven reasonable growth scenarios were the outcome of the process reported across Section 5. Taking steps in the process in turn:</p> <p>Section 5.2 (Strategic factors) – begins with a discussion of growth quantum, which is relevant in that LHN is stretching, plus there is the context of the LHN creating an urgency to adopt the LPU (as discussed in Section 2 of the report). Specifically, these points are relevant because LVGV is a large SDL (notably larger than East of Twyford) with strong delivery credentials (stronger than Ashridge and able to deliver faster</p>

Detail	Respondent number	Response
		<p>than East of Twyford) that has been consulted upon (with overall limited objection from key stakeholders and partner organisations) and been the subject of much detailed work. The second half of Section 5.2 then considers broad spatial strategy, with discussion of LVGV only in the sense of its importance for delivering upon employment land objectives.</p> <p>Section 5.3 (Site options) – signposts to key analysis in Appendix IV, which presents an appraisal of competing SDL options (plus one smaller strategic site option). The appraisal does not reach a conclusion on an overall order of preference but, on the basis of the appraisal (and past work / consultation), the conclusion is reached that East of Twyford performs relatively poorly (when viewed in isolation, noting that the key task for the local plan is not to consider sites in isolation, but rather in combination as part of a strategy). Also, within Section 5.3 the point is made that in 2021 detailed appraisal work was presented on SDL options other than LVGV within the ISA Report but few if any comments were received other than from the promoters of the respective sites.</p> <p>Section 5.4 (Sub-area scenarios) – is a key section that draws together the preceding ‘top down’ and ‘bottom up’ analysis. The following statement on LVGV is presented:</p> <p><i>“Loddon Valley SDL (2,700 homes in the plan period, with 4,000 in total; N.B. previously referred to as Hall Farm / Loddon Valley; also now referred to as Loddon Valley Garden Village, LVGV) – a new SDL here was the central proposed allocation in 2021, but its allocation was explored as a variable</i></p>

Detail	Respondent number	Response
		<p><i>across the RA growth scenarios. Since 2021 much further work has been completed, such that confidence in its merits as an SDL has increased significantly. Also, any decision to change tack at this stage by not allocating this site for a new SDL would generate a need for another consultation under Regulation 18 resulting in a major delay to the plan-making process with knock-on implications. However, on balance, it remains appropriate to explore it further as a variable across the RA growth scenarios at this stage.”</i></p> <p>Section 5.5 (Growth scenarios) – combines sub-area scenarios to arrive at the seven reasonable growth scenarios. In light of the preceding stages of the process the decision to feature LVGV within six of the seven scenarios was reasonable, plus the stated aim of minimising the number of scenarios (there were 14 in the 2021 ISA Report, which was too many, including from a perspective of supporting effective consultation) had a bearing. It can also be noted that one of the inputs to Section 5 was SA work and consultation from 2021, at which time LVGV featured in 3 of the 14 scenarios.</p>
Inconsistency within evidence base between scenarios in transport assessment and the SA	0132	This is not uncommon, as whilst the scenarios would ideally align, in practice an issue is the very long lead-in time needed in respect of modelling transport scenarios and also the cost involved with transport modelling of growth scenarios.
Lack of evidence as to why higher levels of housing growth could not be accommodated without significant adverse effects	0222	With regards to higher growth scenarios supported by the development industry, whilst these were appraised as ‘reasonable’, it is important not to conflate a decision on ‘reasonable’ scenarios with a decision on a preferred scenario that is judged to perform best and therefore judged to

Detail	Respondent number	Response
		<p>represent sustainable development. Whilst the appraisal does not predict any ‘significant’ negative effects for Scenarios 5, 6 and 7, it does predict certain ‘uncertain or moderate’ negative effects and, ultimately, the Council is able draw upon the appraisal to reach a clear conclusion that these scenarios perform relatively poorly (Section 7 of the SA Report).</p> <p>On the mitigation point, over the course of the plan-making / SA process, much detailed work has gone into understanding what would or could be delivered / achieved at the competing SDL options (and at other key site options in contention for allocation). Whilst this work must be undertaken with considerable caution (to avoid undue bias and because site-specific proposals are subject to change) it is absolutely not the case that work to explore reasonable alternatives (growth scenarios) has been undertaken blind to ‘mitigation’.</p>
Lack of clarity as to why LVGV appraisal has improved when the capacity has increased	0131, 0137, 0158, 0187, 0200, 0217, 0236	We urge against an undue focus on comparing appraisal findings over time, particularly as the nature of what is being appraised invariably evolves (or changes entirely, as was the case for Hall Farm / LVGV between 2020 and 2021) as does the available the evidence base. The comment that evidence provided through consultation responses in respect of Hall Farm / LVGV has not been taken into account is noted, but we would wish to emphasise that the appraisal work in question (Appendix IV and Section 6) accounted for a very wide range of available evidence including evidence submitted through many consultation responses.

Detail	Respondent number	Response
Lack of clarity as to how LVGV is preferable in comparison to other strategic site options	0077, 0128, 0236, 0311	<p>Appendix IV of the SA Report presents a comparative appraisal of the three primary competing strategic site (SDL) options, as part of the process of defining reasonable growth scenarios (Section 5), and then the merits of these three sites are also explored through the appraisal of reasonable growth scenarios presented in Section 6.</p> <p>All three sites are associated with pros and cons, but on the basis of the appraisal presented in Section 6 the council was able to reach a conclusion that the preferred approach – which includes just one SDL namely LVGV – represents an appropriate strategy / sustainable development.</p>
The SA has not tested scenarios that omit the South Wokingham SDL extension, so the impacts of alternatives cannot be understood	0132	<p>Section 5 of the SA Report ('Defining growth scenarios') works through a process that culminates in Section 5.4 (Sub-area scenarios), where growth scenarios are considered for each of the Borough's sub-areas in turn. It is here that a decision is reached to hold South Wokingham Extension constant across the RA growth scenarios, in light of the preceding analysis in Sections 5.2 (Strategic factors) and 5.3 (Site options). In particular, it should be noted that Section 5.2 signposts to Appendix 4, which presents an appraisal of four competing SDL options, including South Wokingham Extension.</p> <p>The sub-area scenarios are then combined to form reasonable alternative growth scenarios for the borough as a whole in Section 5, and it can be noted that numerous site options are held constant out of practical necessity. It is fully acknowledged that the South Wokingham SDL Extension is comfortably the largest site option held constant, but this approach was evidence based and it can also be noted that</p>

Detail	Respondent number	Response
		<p>this same approach was taken at the Regulation 18 stage (see Section 5 of the Interim SA Report, 2021). The upshot is that South Wokingham Extension is not a focus of the appraisal in Section 6 of the SA Report (Growth scenarios appraisal), but it is a focus of appraisal in Section 9 (Draft plan appraisal).</p>
<p>The SA assessment is generic and does not consider each site in detail</p>	<p>0231</p>	<p>As discussed within Section 4 (under the heading “What about site options?”), whilst site options are not reasonable alternatives, there is naturally a need to give consideration to site options as part of the process of defining reasonable alternatives (growth scenarios).</p> <p>Work to explore site options is not undertaken in order to discharge the requirement to appraise “the plan and reasonable alternatives”, but rather the requirement to present “an outline of the reasons for selecting the alternatives dealt with” [emphasis added].</p> <p>It is Sections 5.3 (Site options) and 5.4 (Sub area scenarios) of the SA Report that then deal with consideration of site options, as part of the process leading to reasonable growth scenarios. Specifically, Section 5.3 deals with work to consider site options in isolation (including by sign-posting to the HELAA), whilst Section 5.4 goes further by considering site options in combination (i.e. to deliver a strategy).</p> <p>Focusing on Section 5.3, it signposts to Appendix III, which presents GIS analysis of site options, and Appendix IV, which presents a detailed appraisal of competing SDL options.</p>

Detail	Respondent number	Response
		<p>Focusing on Appendix III (GIS analysis), it should be noted that equivalent work was presented within an appendix to both the Regulation 18 ISA Reports, and at every stage along the process the work has been introduced in the same way.</p>
<p>Inaccuracies / different views of how specific sites should score in the GIS analysis, and the local plan allocates sites that score lower in the GIS analysis</p>	<p>0143, 0222, 0225, 0254, 0275, 0280, 0305, 0311, 0314, 0336</p>	<p>The GIS analysis is introduced as a simple exercise with clear limitations that is ultimately a minor input to the process of defining reasonable growth scenarios.</p> <p>It is noted that promoters of omission sites that feature little in the SA Report because they perform relatively poorly will wish to focus on the GIS analysis. However, the purpose of the analysis is not to present an appraisal of reasonable alternatives.</p> <p>Whilst much qualitative work has been undertaken to explore the merits of site options, this work has been necessarily targeted. Clearly it would not have been proportionate, appropriate or even possible to undertake extensive analysis for all of the site options that are a focus of GIS analysis in Appendix V.</p> <p>In many instances the suggestion is made that the GIS analysis “concludes that the site is unsuitable for allocation”, which is incorrect. The aim of the analysis is simply to inform Section 5.3, which then feeds into Section 5.4, which then feeds into Section 5.5.</p> <p>There is criticism of the decision to replace an amber category with a colour scale (from light green to light red). There are</p>

Detail	Respondent number	Response
		pros and cons to this approach but it represents good practice.
SA appears to discount the possibility of boosting the housing requirement on account of affordable housing need	0222	<p>This is not the case, and it is important not to quote individual sentences within the SA Report out of context, particularly sentences within Section 5 (which reports a process).</p> <p>The appraisal of RA growth scenarios (Section 6) is clear that one of the benefits of supporting the highest growth scenario – which would involve a boost to the housing requirement – is in respect of providing additional affordable housing.</p>

Habitat Regulations Assessment

Four respondents

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0077	Midwinter, Samanatha	0132	Bracknell Forest Council
0118	Natural England	0236	Arborfield and Newland Parish Council

Support

Respondent 0077 stated the plan is legally compliant and complies with the duty to cooperate.

MAIN ISSUES

Detail	Respondent numbers	Response
The impact on natural habitats has not been effectively considered, including the impacts of sewerage and water infrastructure	0077	The HRA assesses where any aspects of the local plan result in likely significant effects on the integrity of habitats sites, both alone and in combination with other plans and projects. Following consultation with Thames Water, the IDP identifies that an upgrade of the Arborfield STW is planned, which is capable of mitigating the impact of the development proposed. Engagement with Thames Water will continue on an ongoing basis.
Agree with the overall conclusion that there are unlikely to be adverse impacts on the integrity of designation sites from atmospheric solution.	0118	Noted, and reflected in the Statement of Common Ground with Natural England.
Do not agree with the reference to JNCC guidance as air quality has not been assessed at a strategic	0118	Noted, and reflected in the Statement of Common Ground with Natural England.

Detail	Respondent numbers	Response
national scale, but agree impacts of NOx and N can be discounted as contributions made by the local plan will be small.		
Welcome further information on the 35-40m firebreak on the M3.	0118	Following additional air quality modelling and further information the council's HRA consultants, AECOM, Natural England are satisfied with the approach in the HRA. This is set out in the Statement of Common Ground.
Advise that the lower critical load for Nitrogen should be used for the Thames Basin Heaths SPA	0118	Following further information the council's HRA consultants, AECOM, Natural England are satisfied the justification for the approach in the HRA. This is set out in the Statement of Common Ground.
Agree ammonia will not have adverse impacts on designated sites	0118	Noted, and reflected in the Statement of Common Ground with Natural England.
Satisfied with conclusions in the HRA regarding recreation disturbance and adverse effects on SPA can be excluded, along and in combination	0118	Noted, and reflected in the Statement of Common Ground with Natural England.
Anticipate the HRA has been prepared in consultation with Natural England.	0132	Noted, and reflected in the Statement of Common Ground with Natural England.
The assessment does not consider the impact on wildlife, including deer, skylarks and bats.	0236	<p>The HRA assesses where any aspects of the local plan result in likely significant effects on the integrity of habitats sites, both alone and in combination with other plans and projects.</p> <p>The council is satisfied the any impact on wildlife has been appropriately considered as part of the site assessment process. Ecological assessments have been prepared by the</p>

Detail	Respondent numbers	Response
		site promoters, and further information will be provided as part a further planning application.

Evidence base

For clarity, this section only covers the evidence base documents on which representations were specifically made.

Housing and Economic Land Availability Assessment

One respondent

Respondent number	Name/Organisation
0089	Prior, Nicholas

MAIN ISSUES

Detail	Respondent numbers	Response
The HELAA is not an honest account of sites, education needs, environmental protections, flood risk, and refusal to build housing on brownfield sites.	0089	In determining the sites to be taken forward as housing allocations, the HELAA has had regard to a wide ranging, proportionate suite of evidence base studies. The council is satisfied that this is an appropriate and robust process.
The HELAA has not been updated for two years.	0089	Incorrect. Updated HELAA reports have been published alongside each of the last three local plan consultations, most recently in 2024 to support the Proposed Submission Plan consultation.

Infrastructure Delivery Plan

Six respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0070	Green, Dave	0147	Lias, Darrell
0089	Prior, Nicholas	0182	National Highways
0145	South Oxfordshire and Vale of White Horse	0236	Arborfield and Newland Parish Council

South Oxfordshire and Vale of White Horse (**0145**) expressed support for the IDP. Specifically, the respondent noted that IDPs are ‘live’ documents and the current IDP provides a comprehensive overview of the infrastructure required over the plan period. They further welcome the confirmation through Duty to Cooperate discussions that planned development will not generate additional infrastructure needs, specifically in relation to school places and healthcare facilities, in South and Vale. A specific comment about the detail of funding is considered below.

MAIN ISSUES

Detail	Respondent numbers	Response
Lack of clarity about deliverability of certain schemes given coordination required with surrounding authorities and unknowns in costing / funding at present. This includes lack of detail on what the identified ‘other’ sources of funding might be.	0070, 0145 , 0147, 0182 , 0236	Noted. The IDP is a ‘live’ document. The council is confident that the majority of required infrastructure will be funded through development, either through S106 or CIL. Greater clarity will be provided through the anticipated CIL review.
Lack of detail on phasing, including the potential delay to delivery of the local centre and timing of school delivery.	0070, 0147, 0236	The IDP phasing information is based on the best available information available at the time. The IDP is a live document, and will be refined as more up to date information is available on phasing and other matters, for example through the planning application process.

Detail	Respondent numbers	Response
Inadequate provision of school places.	0089, 0147	Engagement with the council’s school place planners has helped to identify the requirement for additional school places as a result of planned development. Strategic developments will be delivering additional schools to accommodate demand: Policy SS12 sets out requirement for two new primary schools; Policy SS13 specifies that the site will include the phased delivery of two primary schools, a secondary school, including land for a sixth form and space for the integrated teaching of pupils with special education needs and disabilities. The secondary school site within the development will contain flexibility to meet wider borough needs, rather than simply need arising from the development itself. The council is satisfied that the education provision proposed is appropriate.
The level of council debt and the inability of the council to pay for infrastructure.	0089	Policy SS15 of the plan, and relevant site specific policies, require developments to provide or fund the infrastructure necessary to make development acceptable. Further work to define the costs, timing of delivery and sources of external funding is ongoing, which will inform further updates to the IDP.
Absence of recycling centre, unlike the adjoining towns of Bracknell and Reading.	0089	The absence of current recycling and waste facilities in the borough is noted. The adopted Joint Minerals and Waste Plan (2023) proactively identifies nine ‘preferred waste areas’ within Wokingham borough where recycling and waste facilities may be acceptable.
Lack of transparency of spend renders the LPU consultation invalid.	0147	The Infrastructure Funding Statement is updated and published annually, with previous iterations for historic financial years available on the council website.

Detail	Respondent numbers	Response
Several identified schemes will have a direct impact on the strategic road network (SRN), including junction improvements to both M4 J10 and J11, and other improvements may impact on congestion on the M4. There is a need for close collaboration with National Highways.	0182	Noted. Ongoing cooperation is agreed to be necessary, as per the emerging Statement of Common Ground between the council and National Highways.
Underestimated infrastructure costs, including the local centre.	0236	The IDP costings are based on the best available information available at the time. The IDP is a live document, and will be refined as more up to date information is available, including costings.
Lack of a costed bridge over the Barkham Brook.	0236	IDP costings for the residential spine road, which will be required to cross the Barkham Brook, incorporate the cost of bridging the water course. Given the comparatively minor nature of the Barkham Brook, bridging it would not lead to an abnormal cost that would warrant specific identification in the IDP.

Local Plan and Community Infrastructure Levy Viability Study

Three respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0147	Lias, Darrell	0324	Churchill Living and McCarthy Stone
0308	NHS Property Services		

Whilst NHS Property Services (**0308**) comment that policy requirements in relation to healthcare infrastructure contributions are deliverable, they highlighted some concerns with the Local Plan and Community Infrastructure Levy Viability Study, which are covered below.

Whilst respondent 0324 welcomed the inclusion of older persons typologies within the Local Plan and Community Infrastructure Levy Viability Study, they raised specific concerns which are covered below.

MAIN ISSUES

Detail	Respondent numbers	Response
That historically S106 money has been spent outside of development boundaries and lack of transparency of spend renders the LPU consultation invalid.	0147	S106 money is secured to mitigate the impact of the development on the local community and infrastructure on or off site, where directly linked to that development. The Infrastructure Funding Statement is updated and published annually, with previous iterations for historic financial years available on the council website.
The costing for the Loddon Valley community infrastructure requirements (Table 7.4.1) are unevidenced and not verifiable.	0147	The cost estimates provided are based on relevant guidance and industry standard costing information. They have been derived through discussions with the landowners. The council is satisfied they are robustly costed for this stage in the development process.

Detail	Respondent numbers	Response
<p>The Viability Study should include a specific reference to required health care mitigation and should include a separate cost input for typologies where a healthcare contribution is expected.</p>	<p>0308</p>	<p>The viability study is a strategic study which tests total developer contributions likely to be generated by typical developments. It does not break this down into specific types of infrastructure contribution, recognising that this will differ on a case by case basis for real life developments. It therefore is not necessary to specifically identify health care requirements (or any other type of infrastructure) within the assumed S106 contributions, as the key point is the figure tested is robustly reflective of likely total contributions necessary from schemes. Specific health care infrastructure improvements are identified in the IDP, which is the appropriate part of the evidence base for specific improvements to be identified. The IDP is a live document and capable of being updated based on updated information from providers.</p>
<p>The nature of older persons accommodation means it has specific characteristics that impact negatively on viability, which include: typically PDL; higher sales and marketing costs (6% compared to 2.5% tested); longer sales period; additional empty property costs; higher returns expected as standard practice compared to typical residential.</p>	<p>0324</p>	<p>Noted that the Local Plan and Community Infrastructure Levy Viability Study (2024) concludes policy requirements for elderly accommodation are not expected to be viable. Viability justification for not meeting policy requirements will need to be advanced at the individual planning application stage.</p>

Sequential and Exceptions Test

One respondent.

Respondent number	Name/Organisation
0355	Environment Agency

MAIN ISSUES

Detail	Respondent numbers	Response
Query whether groundwater flood risk has been appropriately considered prior to determining allocation sites.	0355	The council notes the responsibility for groundwater flooding lies with the Lead Local Flood Authority (LLFA). The LLFA has been actively engaged in the preparation of the Sequential and Exception Test. The LLFA has advised on appropriate development guidelines (Appendix E) to ensure applications relating to relevant allocations are supported by necessary evidence at detailed design stage. Noting the other sustainability credentials of the proposed allocations which may be subject to groundwater flood risk, including use of PDL in some cases, the LLFA has not raised any objections to the allocations within the plan.

Settlement Hierarchy Assessment

One respondent.

Respondent number	Name/Organisation
0232	Shorewood Homes

MAIN ISSUES

Detail	Respondent numbers	Response
Hurst village hall is proposed to be brought into the Hurst settlement boundary – the assessment of Hurst in the Settlement Hierarchy Assessment should therefore include it in the audit of key services	0232	The proximity of the village hall was taken into consideration as part of the qualitative assessment of Hurst settlement in the Settlement Hierarchy Assessment (2024). The council is satisfied with the settlement assessment for Hurst as a minor settlement – the inclusion of the village hall as a key service within the settlement boundary would not alter this.

Strategic Flood Risk Assessment

One respondent.

Respondent number	Name/Organisation
0355	Environment Agency

MAIN ISSUES

Detail	Respondent numbers	Response
Recommend that the plan or supporting evidence state in a logical place that developers will, at the application stage, need to assess whether existing modelling is suitable for use in site specific FRAs.	0355	Agreed that while this is clearly stated in the SFRA, this should also be clarified within the plan itself. The modification is reflected in the Schedule of proposed modifications.
The SFRA interactive maps do not have any layers shown.	0355	Incorrect. Technical issue with the software available to the EA. Issue resolved following duty to cooperate discussions and the EA provided an updated position on relevant sites which is reflected in a soon to be signed Statement of Common Ground.
The need for the SFRA to include an assessment of likely hazard on the site and hazard rating. A route should be identified and where low hazard not available the Level 2 SFRA should demonstrate sites can be delivered safely.	0355	Disagree. The Level 2 SFRA Appendix A contains site summary tables for each allocation with flood risk. This provides detailed description of fluvial flood hazard and the mapping at Appendix D also demonstrates this information, where available with the relevant flood model. The SFRA is a strategic document which comments on likely access / egress points based on promoted use, but does not have access to detailed site design. Therefore, the council considers the SFRA is not the appropriate document to definitively demonstrate how safe access / egress can be achieved. Rather, it provides high level confidence that this is the case, and it is the role of

Detail	Respondent numbers	Response
		site specific FRAs at the application stage to demonstrate definitely that safe / access is achievable.
Whether the SFRA adequately considers groundwater flooding.	0355	It is recognised that there is less technical data available about groundwater flooding than other sources of flooding. The SFRA Level 2 section 3.5 sets out the robust approach taken to assessing risk of groundwater flooding. Additional site specific monitoring and/or modelling is required for certain proposed allocations, recognising that this level of detail is not been possible at the strategic level SFRA.

Transport Assessment

Five respondents.

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0070	Green, Dave	0236	Arborfield and Newland Parish Council
0116	Plume, Aaron	0250	Barkham Parish Council
0182	National Highways		

National Highways (**0182**) have been engaged throughout the preparation of the transport modelling and assessment evidence. Detailed comments on the evidence have been provided outside of the Proposed Submission Plan consultation and as a result are not summarised below, with representations focussed on other matters addressed elsewhere in this document. The ongoing engagement with National Highways has informed a Statement of Common Ground which is shortly to be agreed and signed.

MAIN ISSUES

Detail	Respondent numbers	Response
In relation to key strategic developments, the transport modelling assumptions are incorrect and optimistic, including peak hour trip generation per household, assumptions over trip diversion to public and active transport (and attractiveness of these options), and trip internalisation.	0070, 0236 , 0250	<p>Appropriate to the stage in planning, the transport evidence base follows national guidance.</p> <p>The model assumes some of the journeys generated by future residents of the site will be internalised. This means that for local journeys, for example to local schools and shops, the network of walking and cycling routes, and public transport will provide a realistic alternative to private car journeys. Longer trips, for example to railway stations, and to town and retail centres will also be supported by improvements to the walking, cycling and public transport networks. This approach is considered robust.</p>

Detail	Respondent numbers	Response
Invalid traffic survey data, including the influence of the covid pandemic	0070, 0236	The transport evidence published to support the plan uses traffic modelling calibrated and validated to 2021 as the model base year.
Lack of detail on phasing / timescale of delivery of infrastructure	0070	Appropriate to the stage in planning, the transport modelling work has tested interim periods (2032) to assist in the identification of key trigger points for mitigations. Phasing of key infrastructure will be further tested and refined in updates to the IDP. The IDP phasing information is based on the best available information available at the time. The IDP is a live document, and will be refined as more up to date information is available on phasing and other matters, for example through the planning application process.
Impact and appropriateness of highway mitigations, including access onto unimproved country roads Mill Lane and Mole Road, and access over the M4 on to Lower Earley Way.	0070	<p>Transport modelling and assessments have been undertaken throughout the preparation of the plan.</p> <p>The transport evidence published to support the plan uses traffic modelling calibrated and validated to 2021 as the model base year, which is considered robust.</p> <p>The modelling acknowledges levels of congestion and delay will increase but these will not be severe. Other improvements are identified in the IDP to support the use of alternative modes of transport.</p>
Proposed new growth will need to be considered in the context of already proposed development on the Strategic Road network	0182	<p>Noted. National Highways are responsible for the SRN and act as the highway authority for the Secretary of State.</p> <p>The transport model incorporates existing, committed and planned developments within Wokingham borough and adjoining local authority areas to ensure cumulative impacts are considered. WBC is in the process of agreeing a SoCG with National Highways.</p>

Detail	Respondent numbers	Response
The importance of any identified mitigation needed to support development allocations being deliverable when it is needed	0182	Noted. Appropriate to the stage in planning, transport modelling work has tested interim periods to assist in the identification of key trigger points for mitigations. Phasing of key infrastructure will be further tested and refined in updates to the IDP and when considering planning applications.
The model uses a 'highways only' rather than a 'multi-modal' approach and is therefore not truly representative.	0236	The council is satisfied the transport modelling and assessment is robust. Public transport and active travel projects are set out in the IDP, which support the delivery of active and sustainable communities.
The transport model needs to be updated due to the current evidence not properly assessing the impact on key roads / junctions based on up to date commitments.	0116, 0250	The transport evidence published to support the plan uses traffic modelling calibrated and validated to 2021 as the model base year, which is considered robust.

Water Cycle Study

One respondent.

Respondent number	Name/Organisation
0250	Barkham Parish Council

MAIN ISSUES

Detail	Respondent numbers	Response
The LPU makes provision for around 6,000m ² of employment floorspace at Arborfield Green SDL – the Water Cycle Study Phase 2 report does not account for additional employment floorspace	0250	<p>The 2.3ha extension to Hogwood Industrial Estate for B2 industrial uses was accounted for in the Phase 2 study as part of the employment commitments.</p> <p>A Statement of Common Ground with Thames Water agrees that there are no known significant water supply, waste water, or sewage treatment capacity issues that would be likely to prevent, or delay the delivery of the site allocations proposed in the plan. Engagement with Thames Water will continue on an ongoing basis.</p>
The Water Cycle Study Phase 2 report does not consider all proposed allocations in the LPU – e.g. Arborfield Studios intensification and Barkham Square	0250	<p>The Phase 2 report was largely undertaken in 2022 and as such the Revised Growth Strategy proposed allocations are assessed. The development strategy set out in the Proposed Submission Plan reflects the most of the areas proposed for allocation in the earlier consultation. A Statement of Common Ground with Thames Water agrees that there are no known significant water supply, waste water, or sewage treatment capacity issues that would be likely to prevent, or delay the delivery of the site allocations proposed in the plan.</p>

Detail	Respondent numbers	Response
		Engagement with Thames Water will continue on an ongoing basis.

Topic Papers

Historic Environment Topic Paper

One respondent

Respondent number	Name/Organisation
0256	Historic England

Historic England (**0256**) have been engaged throughout the preparation of the historic environment evidence. The ongoing engagement with Historic England has led to the agreement of a Statement of Common Ground.

MAIN ISSUES

Detail	Respondent numbers	Response
Foxhill House (Grade 2* Listed) which is located within the Whiteknights Campus, does not appear to have been included for assessment in the Historic Environment Topic Paper	0256	Foxhill House is referenced in the Historic Environment Topic Paper as being Grade 2* Listed. It has not been included for assessment in the Topic Paper as no development is proposed in the vicinity of the site

Settlement Boundaries Review Topic Paper

One respondent.

Respondent number	Name/Organisation
0290	Monopro Ltd

MAIN ISSUES

Detail	Respondent numbers	Response
Wokingham settlement boundary does not allow for expansion and future growth beyond sites proposed for allocation	0290	<p>Settlement boundaries identify the main built-up area of a settlement within which development is considered acceptable in principle. Settlement boundaries allow development whilst protecting the character of a settlement.</p> <p>The Settlement Boundary Review topic paper (2024) reviewed the boundaries with regard to a number of guiding principles, completed developments and extant planning permissions and proposed allocations in the LPU.</p> <p>The council is satisfied that the settlement boundaries are appropriate to allow development whilst preventing unrestricted growth in the countryside. Policies SS3 and SS4 contribute to the strategy for growth within and adjacent to settlements.</p>

SANG Topic Paper

One respondent.

Respondent number	Name/Organisation
0118	Natural England

Natural England (**0118**) welcome the proposed extension to the existing Rooks Nest SANG. They request that the extension should be visited by a Natural England Officer at the earliest opportunity to ensure it is developed in line with guidelines, and that the SANG should be operational prior to first occupation of houses using the mitigation.

No issues have been raised.

Local Development Scheme

Two respondents

Respondent number	Name/Organisation	Respondent number	Name/Organisation
0239	University College of Estate Management	0277	Croudace Homes, Vortal Homes Ltd and Falcon Developments (SE) Limited

MAIN ISSUES

Detail	Respondent numbers	Response
Unrealistic timetable from end of consultation to submission of the LPU	0239, 0277	Adoption of the plan within the published Local Development Scheme is May 2026. The council is confident that this is achievable subject to the progression of the examination in public.
Concern the council made a political choice to rush the plan process ahead of a new housing need (OAN)	0277	An appropriate spatial strategy was proposed as part of the LPU Proposed Submission Plan, which was voted on by full Council to be published for a Regulation 19 public consultation. The plan will be submitted under the transitional arrangements set out in the NPPF (2024). The council remains committed to progressing the plan to adoption.