

Statement of Common Ground

between

Wokingham Borough Council

and

Historic England

in relation to the
Wokingham Borough Local Plan Update 2023-2040

February 2025

1 Introduction

- 1.1 This Statement of Common Ground has been prepared by Wokingham Borough Council (WBC) and Historic England (HE), collectively referred to as “the parties”. It sets out matters that are agreed between the parties in relation to the preparation of the Wokingham Borough Local Plan Update 2023 – 2040: Proposed Submission Plan.
- 1.2 Wokingham Borough Council is preparing a new local plan to manage where and how development is delivered in the borough to 2040 – the Local Plan Update.
- 1.3 The new local plan will include policies and proposals for specific sites to meet housing, employment, environmental and social needs of the area, supported by key infrastructure. Policies and proposals will include the allocation of specific sites for new homes and economic uses. The suitability of sites for any of these uses depends on a wide range of factors, including their potential impact on the integrity of the Borough’s designated (Conservation Areas, Scheduled Monuments, Listed Buildings and Registered Parks and Gardens) and non-designated heritage assets.
- 1.4 Historic England are the government’s advisory body on the historic environment in England.

2 Background

- 1.1 The Duty to Cooperate, introduced by the Planning and Compulsory Purchase Act 2004 (amended by Section 33A of the Localism Act) places a legal duty on local planning authorities to engage constructively, actively and on an ongoing basis in the preparation of development plan documents and other documents. This is a test that local authorities need to satisfy prior to the local plan examination stage and is an additional requirement to the test of soundness.
- 1.2 The Duty to Cooperate specifically relates to ‘strategic matters’ which are defined as follows¹:
- Sustainable development or use of land that has or would have a significant impact on at least two planning areas, (in particular) in connection with sustainable development or use of land for or in connection with strategic infrastructure which has or would have a significant impact on at least two planning areas, and
 - Sustainable development or use of land in a two-tier area if the development or use— (i) is a county matter, or (ii) has or would have a significant impact on a county matter.
- 1.3 Paragraph 20 of the National Planning Policy Framework (NPPF) (2023)² also outlines strategic priorities that a local plan should have strategic policies to cover. They include:
- Conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.
- 1.4 This Statement of Common Ground (SoCG) has been prepared in accordance with paragraph 27 of the NPPF and the section of the Planning Practice Guidance on Maintaining Effective Cooperation.

¹ Per Section 33A of the Planning and Compulsory Purchase Act 2004

² The plan is intended to be examined against the December 2023 NPPF, as enabled by transitional arrangements in the December 2024 NPPF.

3. Context

Local Plan Update

- 3.1 WBC commenced evidence gathering to inform the Local Plan Update in 2016. The plan-making process has been informed by opinions expressed through various consultations, including Issues and Options Consultation (2016), Homes for the Future Consultation (2018), Draft Plan Consultation (2020) and Revised Growth Strategy Consultation (2021). A wide range of technical reports have also been completed, including reports relating to sustainability, landscape character, the historic environment, transport, flood risk, air quality, housing, economic and retail needs, and land supply. A Historic Environment Topic Paper was published in September 2024.
- 3.2 WBC invited representations on the Local Plan Update Proposed Submission Plan between 30th September and 13th November 2024. The plan will be submitted to the Secretary of State after full consideration of the representations received.
- 3.3 The plan is intended to be examined against the December 2023 NPPF, as enabled by transitional arrangements.

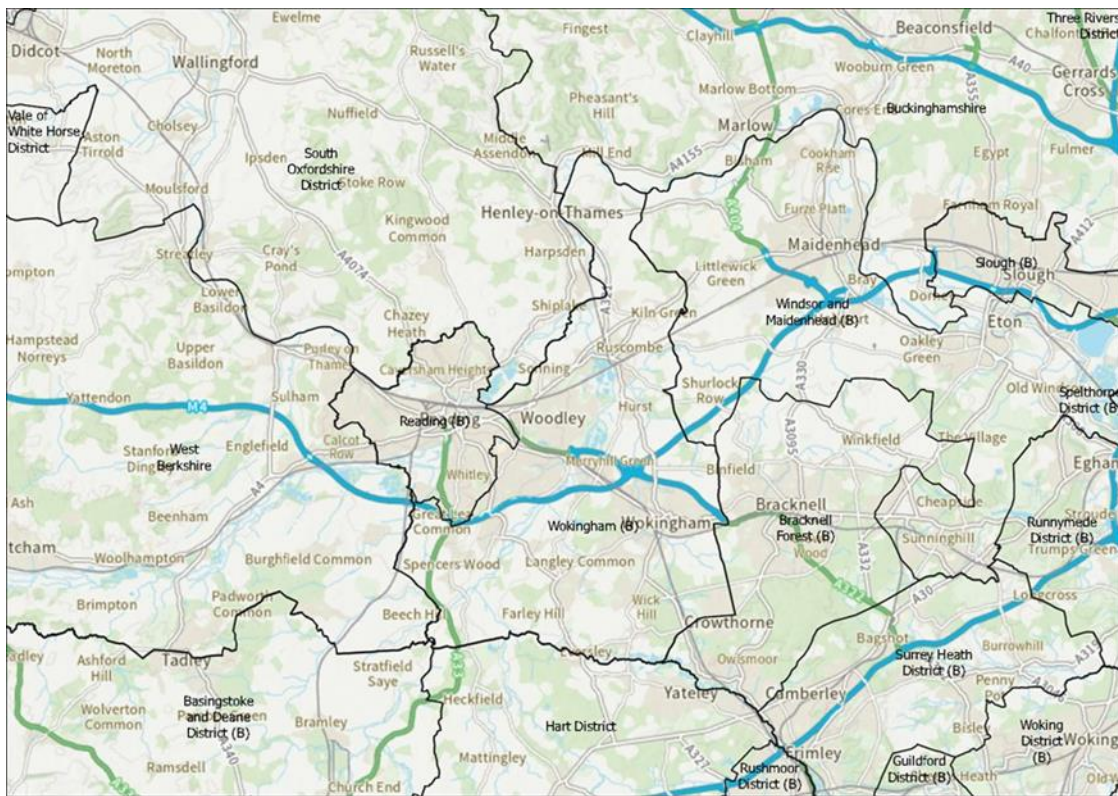
Historic England

- 3.4 Historic England (HE) is a non-departmental public body responsible for identifying and protecting England's heritage and safeguarding its setting within the wider landscape. Historic England provides expert advice on plan-making and applications for planning permission and Listed Building Consent to ensure that potential threats to heritage are understood and appropriate policies are applied.

Strategic Geography

- 3.5 Wokingham Borough is located approximately 50km west of London, in the heart of the Thames Valley and within the Royal County of Berkshire. The borough covers an area of 17,892 hectares and is characterised by a variety of settlements with the largest being Earley, Winnersh and Woodley, which are in proximity to Reading Borough, and Wokingham.
- 3.6 The population in the borough recorded through the 2021 census was 177,500 people. Between 2011 and 2021 the population of the borough grew by 15.0%, the third highest in the Southeast (average 7.5%) and one of the highest in England (average 6.3%).

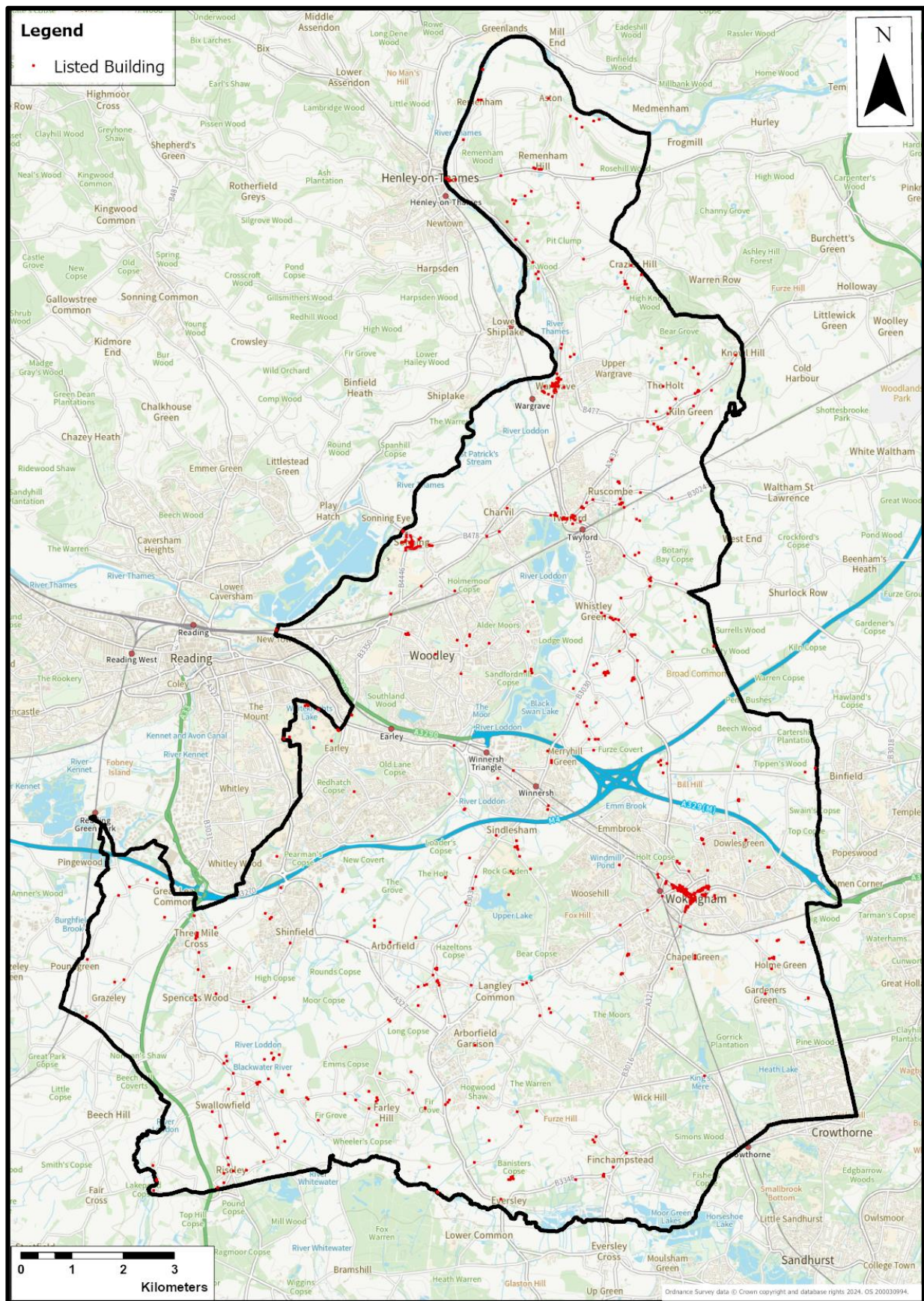
Figure 1: Wokingham Borough and neighbouring local authorities



Wokingham Borough's Historic Environment

- 3.7 Wokingham Borough contains both designated heritage assets such as Listed Buildings, Scheduled Monuments, Registered Parks and Gardens and Conservation Areas along with non-designated heritage assets, including Buildings of Traditional Local Character, Areas of Special Character and non-designated archaeological assets. There are no World Heritage Sites or Historic Battlefields within Wokingham Borough.
- 3.8 According to Historic England's 'Live List' Wokingham Borough contains 652 Listed Buildings and structures - see Figure 2 below. Of these 9 are Grade I, 40 Grade II* with the remaining 603 being Grade II. The highest concentration of Listed Buildings is found within or in close proximity to older settlements of the Borough, including Wokingham and the northern settlements of Hurst, Wargrave and Twyford.
- 3.9 The Borough contains 18 Scheduled Monuments and 16 Conservation Areas. There are a total of seven Registered Parks and Gardens located either fully or partially within the Borough.
- 3.10 Some buildings, structures, monuments and open spaces, while not statutory listed or scheduled, may nevertheless be of architectural and historic interest or may make a significant contribution to the character and appearance of an area, and may therefore be considered non-designated heritage assets.
- 3.11 In Wokingham Borough this includes Locally Listed 'Buildings of Traditional Local Character', Areas of Special Character, Locally Listed Parks and Gardens and Archaeological Priority Areas.
- 3.12 There are currently 61 Buildings of Traditional Local Character within the Borough, as well as 23 Areas of Special Character and 7 Local Historic Parks and Gardens and over 100 Areas of High Archaeological Potential.

Figure 2: Distribution of Listed Buildings as of September 2024.



4 Current position

- 4.1 Historic England has been engaged throughout the preparation of the LPU. This includes consultation at key milestones during the course of plan preparation, including the four Regulation 18 consultations. Additional detailed engagement has taken place outside formal consultations, through initial drafts and thus informing the published evidence.
- 4.2 HE has responded to the Regulation 19 publication as well as three of the four Regulation 18 consultations undertaken. A summary of the comments to the Draft Plan (2020), Revised Growth Strategy (2021) and Proposed Submission Plan (2024) is provided below.

Draft Plan (Regulation 18) consultation: 3 February – 3 April 2020

- 4.3 Historic England's response to the Draft Plan consultation welcomed and supported a number of issues, opportunities, objectives and policy direction, though concern was expressed that the Draft Plan was not supported by appropriate evidence and did not set out a positive strategy for conservation and enjoyment of the historic environment. The response recommended the preparation of a Historic Environment Topic Paper.
- 4.4 Development requirements were suggested for some of the non-strategic site allocations to improve certainty where heritage assets could be affected. Broad support was given to the policy approach to the South Wokingham SDL, but it was suggested that additional guidance should include development principles that give due consideration to heritage assets. Similarly, broad support was indicated for the policy approach to the Arborfield Garrison (now known as Arborfield Green) SDL, with suggested amendments to the policy wording/guidance to provide clarity and consistency with national policy.

Revised Growth Strategy (Regulation 18) consultation: 22 November 2021 – 24 January 2022

- 4.5 Historic England's response to the Revised Growth Strategy consultation provided specific comments on proposed site allocations. It requested that the Loddon Valley Garden Village development proposal should include a requirement to assess the significance of any affected heritage assets and their setting. It also required any masterplan to be supported by an appropriate historic environment evidence base.

Proposed Submission Plan (Regulation 19): 30 September 2024 – 13 November 2024

- 4.6 HE commented on the Proposed Submission Plan in relation to specific policies and site allocations. These comments are outlined in Appendix A.
- 4.7 The comments included support for the intentions and specifics of multiple policies. Other comments recommending modifications to aid clarity and resolve issues of soundness in relation to HE's representations are also set out in Appendix A.

5 Areas of Agreement

- 5.1 The parties have engaged effectively and on an on-going basis during the plan making process and WBC has fulfilled its duty to co-operate with HE.
- 5.2 The parties agree the following statements of common ground:
- a) The parties agree the strategy promoted in the Proposed Submission Plan is sound, subject to the modifications outlined in e). In its response at Regulation 19, Historic England had raised soundness concerns about Policy CE7: Low carbon and renewable energy generation; Policy ER8: Wokingham town centre; and Policy DH5: The historic environment. These concerns have been addressed through the changes proposed.
 - b) The parties agree that the heritage evidence supporting the Plan is adequate and proportionate.
 - c) Historic England is satisfied that the strategic implications of proposals in the LPU have been considered and addressed. There is no in principle objection to any of the sites allocated in the LPU.
 - d) No heritage constraints have been identified that would prevent the delivery of the strategy promoted in the Proposed Submission Plan.
 - e) The parties have engaged on the modifications to policies suggested by HE which result in WBC proposing modifications to policies (see Appendix A).
 - f) Necessary engagement in relation to plan making will continue as appropriate and necessary.

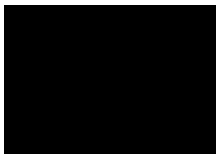
6 Focus of further engagement


- 6.1 WBC recognises Historic England's comments in relation to St Bartholomew's Church and the Loddon Valley Garden Village development proposal. WBC will continue working with Historic England, landowners and other parties to maximise opportunities to improve the condition and setting of the heritage asset. WBC has accepted the changes proposed by Historic England to policy SS13 regarding criterion 3 and Appendix C. Both parties recognise that further engagement is needed on detailed plans going forward, noting the site represents both a challenge and a significant opportunity for the future of this Scheduled Monument.

7 Governance Arrangements Including Future Review

- 7.1 The parties agree to:
- Keep a dialogue open on matters arising which are likely to have significant impacts and implications for the delivery of the local plan;
 - Work collaboratively to ensure that any necessary mitigations are secured, funded and delivered at the appropriate time
 - Review and update this Statement of Common Ground in the light of any material change in circumstance; and
 - Maintain positive principles of cooperation.

8 Signatories

Signed on behalf of Historic England	
	
By:	Guy Robinson
Title:	Historic Environment Planning Adviser
Date:	18 February 2025

Signed on behalf of Wokingham Borough Council	
	
By:	Trevor Saunders
Title:	Assistant Director, Planning
Date:	19 February 2025

Appendix A: Summary of HE representations on the Proposed Submission Plan

Summary of HE comments	WBC response	Agreement or need for further discussion
2. Context and Challenges		
<p>Request acknowledgment of the opportunity and challenge of adapting existing buildings, to be more energy and carbon efficient:</p> <p>Para 2.9: <i>“To encourage adaptation of existing buildings to become more carbon and energy efficient. Historic buildings require a whole building approach, informed by heritage expertise.”</i></p>	<p>WBC accepts the principle of this additional text. It is acknowledged that existing buildings make up a large part of the borough’s carbon emissions which can be referenced.</p>	<p>Agree, modifications proposed.</p>
3. Vision and Objectives		
<p>The vision and objectives are sound.</p>	<p>Support noted and no changes required.</p>	<p>Further discussion not required.</p>
4. The Spatial Strategy 2023-2040		
<p>Concerned by the absence of a strategic heritage policy. The plan should include strategic heritage policy to align with NPPF (paragraph 20). The Inspector may consider this a matter of soundness. The LPU contains policies DH5 and DH6, both of which are non-strategic. These policies should be re-classified as strategic.</p>	<p>WBC does not consider it necessary to re-classify policies DH5 and DH6 as strategic policies given a number of strategic policies in the Plan reference heritage matters, including SS1: Sustainable development principles, SS5: Development in the countryside, SS9:</p>	<p>Further discussion not required.</p>

Summary of HE comments	WBC response	Agreement or need for further discussion
	Whiteknights Campus, SS11: Arborfield Green SDL, SS12: South Wokingham SDL and SS13: Loddon Valley Garden Village.	
<i>SS1: Sustainable development principles</i>		
Broadly support this policy, though the word “wider” is unnecessary and should be deleted: <i>“l) Conserve and enhance the significance of heritage assets, including their wider settings”</i>	WBC accepts this minor change.	Agree, modifications proposed.
<i>SS2: Spatial Strategy and Settlement Hierarchy</i>		
Support this policy	Support noted and no changes required.	Further discussion not required.
<i>SS5: Development in the countryside</i>		
<p>Recommend adding reference to heritage significance in the opening criterion, helping to embed from early in the plan a key point that the natural and historic environments are integral to each other.</p> <p><i>“1. The countryside, as shown on the Policies Map, will be recognised for its intrinsic character, and beauty and heritage significance, and the wider benefits from natural capital and ecosystem services, in accordance with national policy.</i></p> <p><i>2. e) The re-use or conversion of existing buildings of permanent and substantial construction which would not require extensive reconstruction <u>and would sustain heritage significance.</u>”</i></p> <p>Ideally this would also be supported by a minor edit to paragraph 5.31 of the supporting text: <i>“Where buildings are to be converted, they should be of permanent and substantial construction. Locally distinctive features such as ventilation openings, large cart doors and stable joinery should be retained, to maintain the character of the building, <u>its heritage significance</u> and its setting within the surrounding area...”</i></p>	<p>WBC accepts the principle of the additional text requested for 2.e) and in supporting text paragraph 5.31 as it would add clarity.</p> <p>WBC does not agree with the additional text requested for point 1 of the policy as it would deviate from NPPF (2023) paragraph 180(b).</p>	<p>Agree, modifications proposed to 2e) and supporting text paragraph 5.31.</p>

Summary of HE comments	WBC response	Agreement or need for further discussion
<i>SS6: Development in the Green Belt</i>		
<p>Recommend integration of heritage significance as a consideration in adapting and re-using existing historic buildings in criteria 5 c)i and d)i. Character is not synonymous with heritage significance.</p> <p><i>“5. c) For extensions and alterations to existing buildings:</i> <i>i. The existing building is of permanent and substantial construction and would not require extensive reconstruction or unacceptable loss of heritage significance; and</i> <i>d) For the re-use of buildings:</i> <i>i. The existing building is of permanent and substantial construction and its form is in keeping with its surroundings and would not require extensive reconstruction or unacceptable loss of heritage significance, or a material change in size or scale;”</i></p> <p>In the supporting text para 5.51, additional wording is suggested below: <i>“When considering proposals for re-use, it is important to ensure the form of the proposed use is in keeping with the character of the surrounding area, <u>sustains heritage significance</u> and does not require re-construction or a material change in size or scale. Locally distinctive features such as ventilation openings, large cart doors and stable joinery should be retained in proposals to maintain an appropriate character for the building and its setting within the surrounding area.”</i></p>	<p>WBC does not consider the additional wording requested in c)i and d)i is required as this is already covered in Policy DH5.</p> <p>However, the additional wording suggested for the supporting text is considered to provide useful clarity.</p>	<p>Agree modification proposed to supporting text paragraph 5.51.</p>
<i>SS9: Whiteknights Campus</i>		
<p>The supporting text gives minimal detail about the heritage significance of the site’s assets, especially Foxhill House (Grade 2* Listed). Given the presence of several designated heritage assets, including Foxhill House and areas associated with historic parkland, policy SS9 should include a requirement for heritage impact assessment, in common with several of the plan’s development guidelines in Appendix E for residential sites covered by policy SS14.</p> <p>Suggest the following modifications: <i>“4 a) Conserve, and where possible enhance, the historic parkland landscape, heritage assets and their settings, <u>informed by heritage impact assessment;</u>”</i></p> <p>In paragraph 5.80: <i>“...A number of heritage assets, including listed buildings are located on the site, <u>including (but not limited to) Foxhill House, which is Grade II* listed.</u> As the campus...”</i></p>	<p>WBC accepts the principle of this additional text in 4a) which provides clarity.</p> <p>Reference to Foxhill House in the supporting text to Policy SS9 is considered acceptable</p>	<p>Agree, modifications proposed.</p>

Summary of HE comments	WBC response	Agreement or need for further discussion
<i>Heritage Topic Paper</i>		
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.	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.	Further discussion not required.
<i>SS11: Arborfield Green Strategic Development Location</i>		
<p>Recommend explicit reference to heritage impact assessment in policy SS11:</p> <p><i>“4. c) Incorporate measures to conserve and enhance heritage assets and their settings, through appropriate design and the provision of sufficient space, <u>informed by heritage impact assessment; and”</u></i></p>	WBC accepts this minor change would improve clarity.	Agree, modifications proposed.
<i>SS12: South Wokingham Strategic Development Location</i>		
<p>Recommend including in the policy a requirement for heritage impact assessment where appropriate. The approach appears to be silent on archaeological matters, when the allocated area includes large areas of high archaeological potential. The following wording is recommended:</p> <p><i>“4. d) Incorporate measures to conserve and enhance heritage assets and their settings, through appropriate design and the provision of sufficient space, <u>informed by heritage impact assessment and archaeological desk-based assessment where appropriate.”</u></i></p>	WBC accepts the principle of this additional text.	Agree, modifications proposed.

Summary of HE comments	WBC response	Agreement or need for further discussion
<i>SS13: Loddon Valley Garden Village</i>		
<p>Plans for Loddon Valley Garden Village (Policy SS13) need to take a more active approach to the site of former St. Bartholomew’s Church. We do not consider SS13 to be fundamentally unsound, though we do emphasise the need for plans to be informed by an understanding of potential impacts on the setting of the former church. The inclusion of the site of St Bartholomew’s Church within the concept plan is welcomed, but the policy itself does not mention this former church, nor does it recognise its perilous state as a Scheduled Monument on the national Heritage at Risk Register. Key matters are:</p> <ul style="list-style-type: none"> a) Conserving the asset: currently policy SS13 fails to engage in the positive steps needed to conserve the church and thus risks conflict with NPPF paragraphs 195 and 196. b) The setting of the former church: as the site comes forward, plans need to be informed by an understanding of impacts on the significance of the former church. This should be achieved through the means of a heritage impact assessment, taking into account the contribution of setting to significance. We recommend explicit reference to heritage impact assessment as a key mechanism to identify measures that would deliver the policy’s heritage aims. The HIA should include a stepped approach to ‘setting’ assessment that aligns with our Good Practice Advice on setting: https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/ <p>Suggested wording:</p> <p><i>SS13:3. “f) Incorporate measures to conservation and enhancement of heritage assets, including listed buildings, through appropriate design and the provision of sufficient space, informed by heritage impact assessment and desk-based archaeological assessment as appropriate. Development proposals will need to demonstrate how they will safeguard and maintain the site of St Bartholomew’s Church, enabling its historic interest to be better understood and appreciated. Contributions towards the repair, interpretation and maintenance of the site of St Bartholomew’s Church will be sought where necessary;...”</i></p> <p>While the Scheduled Monument was excluded from the promoted allocation, given the SDL entirely</p>	<p>WBC accepts the principle of Historic England’s response regarding SS13.3.</p> <p>WBC does not agree changes are necessary to 11b), which are suitably clarified in proposed modifications to Policy CE6.</p>	<p>Agree, modifications proposed to SS13.3.</p>

Summary of HE comments	WBC response	Agreement or need for further discussion
<p>surrounds the site it will significantly change its setting. For the purposes of effective place-shaping and to deliver a positive strategy for this asset, the site needs to be treated positively rather than passively as is currently the case. The policy appears to be silent on archaeological matters, when the allocated area includes large areas of high archaeological potential and a possible Roman Road running south-east of Reading.</p> <p>A fabric first approach is not appropriate for traditionally constructed buildings. As stated in our published guidance <i>“In a historic building, this [a fabric first approach] is often neither practical nor desirable.”</i> This point can be resolved by referring to new development in criterion 11b, as below: <i>“11. b) Implements the energy hierarchy at all scales and demonstrates a fabric first approach <u>for new development</u>”</i></p>		
<i>Sustainability Appraisal</i>		
<p>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”.</p>	Noted.	Further discussion not required.
<i>SS14: Sites allocated for residential, including residential as part of mixed-use development</i>		
<p>As the Council may have spotted, there is a typo in the table column headers in policy SS14: “wellings” rather than “dwellings”.</p>	WBC will amend this	Further discussion not required

Summary of HE comments	WBC response	Agreement or need for further discussion
<i>CE1: Design principles for efficient buildings</i>		
<p>Recommend clarifying in the title that this policy refers to new developments, rather than conversions and other alterations. This is implied but not made explicit. It may not always be possible or appropriate to meet some of the requirements when dealing with existing buildings.</p>	<p>WBC does not consider the requested change is necessary. The policy is intended to cover new and existing buildings and extensions/alterations.</p>	<p>Further discussion not required.</p>
<i>CE2: Environmental standards for non-residential development</i>		
<p>Recommend clarifying that this policy refers to new development. While this is done in criterion 1, it would be clearer if this is embedded also in the policy title:</p> <p><i>“Policy CE2: Environmental standards for <u>new</u> non-residential development”.</i></p> <p>As noted in our response to policy SS13, a fabric first approach is not appropriate for the retrofit of traditionally constructed buildings, which merit a “whole building approach”. A fabric first approach can result in maladaptation of historic buildings.</p>	<p>WBC does not consider the requested change is necessary. The policy is intended to cover new and existing buildings and extensions/alterations.</p>	<p>Further discussion not required.</p>
<i>CE3: Environmental standards for residential development</i>		
<p>Recommend clarifying that this policy refers to new development, rather than conversions and other alterations. While this is done in the opening line of criterion 1, it would be clearer if this point is embedded also in the policy title:</p> <p><i>“Policy CE3: Environmental standards for <u>new</u> residential development”.</i></p>	<p>Noted, but WBC considers the policy wording is clear that it relates to new residential development.</p>	<p>Further discussion not required.</p>

Summary of HE comments	WBC response	Agreement or need for further discussion
<i>CE5: Embodied Carbon</i>		
<p>Support the policy and recommend referring explicitly to policy DH5 in criterion 4:</p> <p><i>“4. Applications within the countryside relating to the re-use or conversion of existing buildings will only be acceptable where they also meet the requirements of Policy SS5, or ER3 <u>and/or</u> DH5 as applicable.”</i></p> <p>Suggest highlighting in supporting text the heritage benefits of retaining and repairing historic buildings.</p>	<p>WBC does not consider it is necessary to reference Policy DH5 specifically in this policy. Moreover, once the small amendment to Policy SS5 is made in accordance with Historic England’s request to reference heritage significance, the reference to SS5 is considered sufficient.</p>	<p>Further discussion not required.</p>
<i>CE6: Reducing energy consumption in existing buildings</i>		
<p>Welcomes this policy. The supporting text would benefit from further guidance on the need for a “whole building approach” for the sensitive adaptation of historic buildings and, in most cases, heritage expertise.</p> <p>Refer to the guidance below: Whole Building Approach for Historic Buildings Historic England</p>	<p>WBC agree reference to the whole building approach guidance document could be added to the supporting text to strengthen this policy.</p>	<p>Agree, modifications proposed.</p>
<i>CE7: Low carbon and renewable energy generation</i>		
<p>Reference should be made to the setting of heritage assets in the policy, which may be implied but should be made explicit to avoid confusion in the policy’s implementation.</p> <p>Strongly recommend referring in the supporting text to the assessments that will typically be required by the Council i.e. landscape / townscape visual impact assessments and heritage impact assessments, where heritage significance could be impacted, to assist in the decision-making process.</p>	<p>WBC accepts the principle of this request as it adds additional clarity.</p>	<p>Agree, modifications proposed.</p>

Summary of HE comments	WBC response	Agreement or need for further discussion
<p>The Arup study (2022) does not exclude any areas on purely heritage grounds for ground solar PV, such as Scheduled Monuments or Registered Parks and Gardens. This heightens the need for clarity in how the Council will approach decision-making for related proposals. Suggested wording:</p> <p><i>“1.a) They are of an appropriate size and scale, and do not give rise to unacceptable impacts on landscape, biodiversity, agricultural land quality and food production, heritage assets (<u>including their setting</u>), and the character of the area”</i></p>		
<p><i>C1: Active & sustainable transport and accessibility</i></p>		
<p>Welcome the plan’s policy support for active and sustainable transport.</p>	<p>Support noted and no changes required.</p>	<p>Further discussion not required.</p>
<p><i>C4: Green & Blue Infrastructure and Rights of Way</i></p>		
<p>Recommend adding reference to heritage significance within the opening clause of policy C4, to acknowledge the fact that the natural environment and historic environment are integral to each other e.g. Park Place and Temple Combe Registered Park and Garden (Grade II*):</p> <p>1. <i>“Green and blue infrastructure will be protected and enhanced for their biodiversity, recreational, amenity, health, <u>heritage significance</u>, townscape and landscape value, and their contribution towards mitigating and adapting to climate change.”</i></p>	<p>WBC agrees this additional reference to heritage significance strengthens the policy.</p>	<p>Agree, modifications proposed.</p>

Summary of HE comments	WBC response	Agreement or need for further discussion
<i>C7: Digital Infrastructure and communications technology</i>		
<p>Welcome the reference to heritage assets in this policy and recommend tightening the focus of the requirements to impacts on heritage significance:</p> <p><i>“3a) Minimise adverse impacts on local character, amenity, <u>the significance of heritage assets, the quality of the public realm or pedestrian / highway safety</u>”.</i></p> <p>While we welcome paragraph 7.57 of the supporting text, we recommend tightening the language to include reference to setting:</p> <p><i>“New apparatus should be sited away from heritage assets and other local landmarks wherever possible, <u>taking account of their impacts on the setting of such assets</u>, and seek to minimise unnecessary and visually obtrusive clutter of the public realm.”</i></p>	<p>WBC agree this additional wording would improve the effectiveness of this policy.</p>	<p>Agree, modifications proposed.</p>
<i>C8: Utilities</i>		
<p>Supportive of the policy, but recommend referring to the avoidance of harm to archaeological remains:</p> <p><i>“4. Development proposals for new utilities infrastructure, or the extension or upgrading of existing utilities infrastructure, will be supported provided that any adverse impacts on amenity, character and the highway network can be minimised. <u>Harm to archaeological remains should be avoided where possible and minimised or mitigated where it is unavoidable.</u>”</i></p>	<p>WBC does not consider that additional wording is needed here. Policy DH6 ‘Archaeology’ already adequately addresses this matter.</p>	<p>Further discussion not required.</p>
<i>ER3: Supporting the Rural Economy</i>		
<p>Recommend editing criterion c of this policy to cross-refer to policy DH5 and avoid the implication that historic buildings can just be removed if they are derelict. This is especially important when taking a positive approach to historic rural buildings at risk. We suggest:</p> <p><i>“2.c) The reuse or adaptation of existing buildings has been incorporated into the development, and where appropriate buildings which are derelict or offer no opportunity for beneficial use have been removed (<u>subject also to compliance with policy DH5 for historic buildings</u>);”</i></p>	<p>WBC does not consider this change necessary as the Plan should be read as a whole. A modification to the supporting text of Policy DH5 is considered appropriate.</p>	<p>Agree modification proposed to supporting text.</p>

Summary of HE comments	WBC response	Agreement or need for further discussion
<i>ER8: Wokingham Town Centre</i>		
<p>Elements of this policy are supported; however, wording that connects only with “heritage quality and interest” might imply heritage assets that are not perceived by the applicant as “high quality” and assets of archaeological, artistic or architectural interest should be given less protection than their significance merits.</p> <p>Given the number of heritage assets in the town centre, the potential for archaeological remains, and the requirements of national policy, this wording in ER8 needs to be changed, suggest:</p> <p>1.g) <i>“Conserving and enhancing <u>the historic townscape, its heritage assets and their settings</u> quality and interest.”</i></p> <p>Reference should be made to the Conservation Area Appraisal in the supporting text, including its identified opportunities for enhancement. The Appraisal would benefit from updating.</p>	<p>WBC accepts the principle of the additional wording for point 1g) of the Policy.</p> <p>WBC agree the Wokingham Town Centre Conservation Area Appraisal should be referred to in the supporting text of this policy.</p> <p>The council has a rolling programme of updates to Conservation Area Appraisals.</p>	<p>Agree, modifications proposed.</p>
<i>H1: Housing Mix, density and standards</i>		
<p>Recommend the relevant Conservation Area Appraisal should be referenced in paragraph 9.9 of the supporting text as an important document to inform future proposals for intensification of Wokingham Town Centre.</p>	<p>WBC does not consider this change necessary as the Plan should be read as a whole, with several other policies highlight the roll of Conservation Area Appraisals.</p>	<p>Further discussion not required.</p>
<i>H8: Conversion and subdivision of dwellings</i>		
<p>Recommend referring to heritage significance in the policy criterion that refers to character and appearance:</p> <p><i>“1. a) <u>The character, and appearance and heritage significance of the existing building is respected in terms of materials, design, and principal architectural features;</u></i></p>	<p>WBC does not consider this change necessary as the Plan should be read as a whole.</p>	<p>No need for further discussion.</p>

Summary of HE comments	WBC response	Agreement or need for further discussion
<i>FD3: River Corridors and watercourses</i>		
Consider the policy is sound and welcome reference to historical significance in this policy, though supporting text could be strengthened. As a minor change, we encourage adding supporting text that gives examples in the Borough of river corridor and watercourse areas that are particularly important in terms of heritage significance, such as Sonning/Wargrave conservation areas. This could be done within paragraph 10.34.	WBC does not consider this change is necessary to identify specific examples of the river corridor.	Further discussion not required.
<i>NE1: Biodiversity and Geodiversity</i>		
Recommend adding text into paragraph 14.7 of the supporting text that makes clear 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.	WBC agrees additional text would support the policy.	Agree, modifications proposed.
<i>NE4: Trees, Woodland, Hedges and Hedgerows</i>		
Support expressed for this policy.	Support noted and no changes required.	Further discussion not required.
<i>NE5: Landscape and design</i>		
Recommend reference to the East Berkshire Historic Landscape Characterisation in the policy or supporting text.	WBC agrees reference is necessary.	Agree, modifications proposed.
<i>NE6: Valued Landscapes</i>		
Considering the overlap between heritage designations and valued landscapes, it is recommended that reference to contribution of heritage significance be added: “2. g) <i>Perceptual aspects; and</i> h) <i>Heritage significance; and</i> i) <i>Associations.</i> ”	WBC does not consider this change necessary as the historical significance of a landscape is already addressed in Policy NE6, which reflects GLVIA Box 5.1 and explained further in the Valued Landscapes Topic Paper.	Further discussion not required.

Summary of HE comments	WBC response	Agreement or need for further discussion
<i>Policy DH1: Place making and quality design</i>		
Support expressed for this policy.	Support noted and no changes required.	Further discussion not required.
<i>Policy DH3: Shopfronts</i>		
Support expressed for this policy.	Support noted and no changes required.	Further discussion not required.
<i>Policy DH4: Advertisements and Signage</i>		
Support expressed for this policy.	Support noted and no changes required.	Further discussion not required.
<i>DH5: The Historic Environment</i>		
<p>Recommend fully aligning with the NPPF in criterion 4 to avoid potential conflict in the local implementation of national policy:</p> <p><i>“4 b) No viable use of the heritage asset can be found in <u>the medium term</u> through appropriate marketing that will enable its conservation;”</i></p> <p>To support effective implementation of this policy, amendments are needed to criteria 6 and 7. Might these two criteria usefully be combined?</p> <p>Point to consider:</p> <ul style="list-style-type: none"> • The opening of criterion 7 does not specify that the requirement applies only to non-designated heritage assets, but we infer that is the intention. Might “non-designated” be added before “building, area, park or garden”? • Are all non-designated heritage assets (NDHAs) identified on the council’s website? Where does that occur and is there value in stating that in policy, implying this is a static endeavour? It would be better to state that the Council will continue to identify all NDHAs on its website, noting this is an evolving list and part of the Council’s strategic approach. <p>Suggested wording:</p>	<p>WBC accepts the principle of these requests.</p> <p>The additional wording proposed for 4b) is accepted as it would be in accordance with paragraph 214b of the NPPF.</p> <p>Combining criteria 6 and 7 is helpful as it provides clarity that non-designated heritage assets are being referred to.</p> <p>The proposed changes to</p>	<p>Agree, modifications proposed.</p>

Summary of HE comments	WBC response	Agreement or need for further discussion
<p><i><u>“6. Development proposals should demonstrate how the traditional, historical, local and special character of a non-designated building, area, park or garden and its setting has been preserved and enhanced. This will enable an assessment of the degree of harm to, or loss of, the significance of the asset(s), balanced against their significance, the positive contribution made by the development and the extent to which any harm can be justified or mitigated. Local Historic Parks and Gardens and Areas of Special Character are included on the Policies Map. All non-designated heritage assets will continue to be identified and recorded on the council’s website.</u></i></p> <p><i>7. Development proposals should demonstrate how the traditional, historical, local and special character of a building, area, park or garden and its setting has been preserved and enhanced. This will enable an assessment of the degree of harm to, or loss of, non-designated heritage assets, balanced against their significance, the positive contribution made by the development and the extent to which any harm can be justified or mitigated.”</i></p> <p>Paragraph 12.21 of the supporting text seems to imply that assets identified through the decision-making process are not NDHAs. Should paragraph 12.18 align with Planning Practice Guidance on the different routes through which non-designated heritage assets may be identified?</p> <p>Suggested wording:</p> <p>Para 12.18: <i>“Non-designated heritage assets are those identified by the council as local planning authority (including local listing), and in made neighbourhood development plans, <u>conservation area appraisals and through the decision-making process on planning applications</u>. The heritage interest may be archaeological, architectural, artistic or historic <u>or a combination of these</u>.”</i></p> <p>Paragraph 12.23 mainly relates to Listed Buildings, so advise aligning it with the Council’s Duty to preserve Listed Buildings as articulated in the 1990 Act. In the related footnote, not all Scheduled Monuments have internal features.</p> <p>Suggested wording:</p>	<p>supporting text paragraphs 12.18 and 12.23 are accepted.</p>	

Summary of HE comments	WBC response	Agreement or need for further discussion
<p>Para 12.23: <i>“Retaining and conserving original and/or features of special historic architectural or historic interest, features both external and internal(18) features, finishing and plan form of the heritage asset”(Footnote 18 Internal features apply only to Listed Buildings and <u>some</u> Scheduled Monuments).”</i></p>		
<i>Policies Map</i>		
<p>Unclear about the merits in referring only to local historic parks and gardens and Areas of Special Character as being available via the policies map.</p>	<p>WBC 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.</p>	<p>Further discussion not required.</p>
<i>Policy DH6: Archaeology</i>		
<p>Recommend adding a new paragraph in the supporting text, before paragraph 12.27 referring to cases where preservation in situ is not warranted, regarding the need for Scheduled Monument Consent and non-designated archaeological assets of national importance: <u>“Scheduled Monument Consent is needed for works affecting a Scheduled Monument and early engagement with Historic England is advised. Non- designated archaeological assets which are demonstrably of equivalent importance to Scheduled Monuments should be considered subject to the policies for designated heritage assets.”</u></p>	<p>WBC agree the additional wording adds clarity to the policy.</p>	<p>Agree, modifications proposed.</p>

Summary of HE comments	WBC response	Agreement or need for further discussion
<i>Policy HC1: Promoting Healthy Communities</i>		
<p>Recommend reference to the historic environment in paragraph 13.2 of the supporting text, see the following additional words:</p> <p><i>“The built, <u>historic</u> and natural environment has a direct impact on the health and wellbeing of individual people and communities.”</i></p>	<p>WBC consider the additional text is necessary to reflect NPPF paragraph 20(d) a proposed modification will refer to ‘<i>the natural, built and historic environment.</i>’</p>	<p>Agree, modifications proposed.</p>
<i>Policy HC5: Environmental Protection</i>		
<p>Supportive of Policy HC5, but request the historic environment is considered as a sensitive receptor in some cases, along with the natural environment.</p> <p><i>“1. e) Other sensitive receptors, including the natural <u>and historic</u> environment.”</i></p>	<p>WBC consider the additional text would strengthen the policy</p>	<p>Agree, modifications proposed.</p>
<i>Appendix A - Arborfield Green SDL: Development Guidelines</i>		
<p>Appendix A appears to offer no additional detail on key heritage requirements for this SDL, presenting only a slightly different phrasing of the policy criterion. Clearer guidance is needed in Appendix A that connects in more detail with the adopted SPD. We suggest:</p> <p><i><u>A1.7: “c) Conserve and, where appropriate, enhance heritage assets and their settings through appropriate design and provision of sufficient space surrounding these. This includes five Listed Buildings (one of which comprises a group of three buildings) and two Scheduled Monuments (both of which represent opportunities for community engagement). The former Infirmary Stables are currently on the national Heritage at Risk Register. Undesignated buildings and structures associated with the military should be retained where they can be effectively reused or sensitively converted, and place names conceived that connect with the area’s history,”</u></i></p>	<p>WBC accepts the principle of this additional text.</p>	<p>Agree, modifications proposed.</p>

Summary of HE comments	WBC response	Agreement or need for further discussion
<i>Appendix B: South Wokingham SDL: Development Guidelines</i>		
<p>Guidance on heritage matters in Appendix B could be more helpful, especially regarding the area's highly designated assets. Recommend the following for Appendix B, B3.9: <i>"e) Conserve and, where appropriate, enhance heritage assets and their settings through appropriate design and provision of sufficient spaces surrounding these. <u>Special regard should be given to the significance (including the setting) of the highly designated group of buildings associated with the former Lucas Hospital. The allocation includes large areas of archaeological potential, necessitating a desk-based assessment and potentially field evaluation</u></i></p>	<p>WBC accepts the principle of this additional text. It should be noted that earlier phases of South Wokingham SDL already have planning permission.</p>	<p>Agree, modifications proposed, with detailed wording to be prepared.</p>
<i>Appendix C: Loddon Valley Garden Village SDL: Development Guidelines</i>		
<p>In Appendix C, B4.5: <i>"n) Conserve and, where appropriate, enhance heritage assets and their setting through appropriate design and provision of sufficient spaces surrounding these. Layouts and scheme designs should incorporate measures to conserve the separate identity of Carter's Hill and heritage assets, including those at Hall Farm and the site of St Bartholomew's Church. <u>"The site of St Bartholomew's Church is a Scheduled Monument on the national Heritage at Risk Register. The former church is in a very dilapidated state, overgrown with vegetation and unsafe. While it has the potential to be a key focal point for those interested in the heritage of the area and an engaging attraction for the local community, major work is needed for that to happen, beginning with a report on its condition. Proposals will need to be informed by heritage impact assessment, including a stepped approach to setting assessment that aligns with Historic England's Good Practice Advice. Scheduled Monument Consent will be needed for any proposal that constitutes 'works', as defined by the Ancient Monuments and Archaeological areas Act 1979; early engagement with Historic England is recommended. In addition, the allocation includes large areas of archaeological potential and a possible Roman road running south east of Reading, necessitating a desk-based assessment and potentially field evaluation. Much of the eastern edge of the site is immediately adjacent to Bearwood College Registered Park and Garden (Grade II*); a sensitive approach is needed to avoid and minimise harm to its setting"</u></i></p>	<p>WBC accepts the principle of this additional text and will propose appropriate modifications.</p>	<p>Agree, modifications proposed, with detailed wording to be prepared.</p>

Summary of HE comments	WBC response	Agreement or need for further discussion
<i>Appendix E: Sites allocated for residential: Development Guidelines</i>		
<p>More detail is needed in some of the guidelines in Appendix E to address the following matters:</p> <ul style="list-style-type: none"> - SS14.4 (Land West of Park Lane, Charvil): the site intersects with an area of archaeological potential, we suggest: <u>“The allocation intersects with an area of archaeological potential, necessitating a desk-based assessment and potentially field evaluation.”</u> - SS14.18 (Land west of Trowes Lane, Swallowfield): while we note there is extant planning permission, if separate guidelines are worked up for this site, they need to refer to its archaeological potential, we suggest: <u>“The allocation intersects with an area of archaeological potential, necessitating a desk-based assessment and potentially field evaluation.”</u> - SS14.30 (WBC Council Offices, Shute End, Wokingham): welcome reference to heritage impact assessment in the accompanying guidelines. Suggest making explicit reference to the conservation area appraisal as an important source of relevant information. Also, we advise checking with the Council’s archaeological adviser about the likelihood that archaeological field evaluation will be needed for SS14.30. We note the guidelines already refer to archaeological desk-based assessment. If field evaluation is likely to be needed, this should be mentioned in the guidelines in appendix E. - SS14.30: <u>“Undertake a heritage impact assessment, including reference to the Wokingham Town Centre and Langborough Road Conservation Area Appraisal.”</u> 	<p>WBC accepts proposed change to SS14.30.</p> <p>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.</p> <p>Land West of Trowes Lane, Swallowfield has been granted planning permission on appeal, ref. 230422. The proposed change is therefore not necessary.</p>	<p>Agree, modification proposed to SS14.30.</p>
<i>Appendix M – Monitoring Framework</i>		
<p>It is hoped that the Scheduled Monument (St Bartholomew's Church) can be removed from the national Heritage at Risk Register, which would be picked up through one of the Council’s indicators in its monitoring framework in Appendix M.</p>	<p>Noted. It is referred to in the Policy DH5 monitoring framework.</p>	<p>Further discussion not required.</p>