

# **Local Plan Update 2023-2040: Proposed Submission Plan September 2024 Representation form**

**Please return to Wokingham Borough Council by:  
5pm Wednesday 13 November 2024**

## Data Protection Notice

The personal information you provide on this form will be processed in accordance with General Data Protection Regulations 2018 (GDPR). The information you provide will only be used for the purposes of the preparation of the Local Plan Update as required by the Planning and Compulsory Purchase Act 2004 (as amended) and may be used by the council to contact you if necessary, regarding your submission.

Your name, name of organisation, and comments, will be made available for public inspection when displaying and reporting the outcome of the consultation and cannot be treated as confidential. You will not be asked for any unnecessary information, and we will not publish any personal data beyond what is stated in this declaration.

Your details will be kept in accordance with the council's Privacy Notice. Processing is kept to a minimum and data will only be processed in accordance with the law. We will take all reasonable precautions to protect your personal data from accidental or deliberate loss or unauthorised disclosure.

The council's Privacy Notice can be found on the council's website  
[Wokingham Borough Council Privacy Notice](#)

This form has two parts:

Part A - Personal details and those of your agent (if applicable)–this need only be completed once.

Part B - Your representation(s) – please fill in a separate sheet for each representation you wish to make.

## Part A.1 - personal details

Please enter your details here.

If an agent is appointed, please enter the client details here. The details of the agent should be completed in Part A.2.

First name

N/A

Surname

N/A

Job title

Land Management Director

Organisation (where relevant)

The University of Reading

Email address

N/A

Telephone number

N/A

Address line 1

University of Reading

Address line 2

Building 50, Shinfield Road

City/town

Reading

Postcode

RG6 6DQ

Are you represented by an agent? Please put a X against in the appropriate box.

Yes	X
No	

## Part A.2 –agent details

First name

Phil

Surname

Brown

Job title

Director, Planning

Organisation

Savills

Email address

████████@savills.com

Telephone number

██████████

Address line 1

Savills

Address line 2

One Forbury Square, The Forbury

City/town

Reading

Postcode

RG1 3BB

## Part B - Your representation(s)

### 1. To which part of the Plan does this representation relate?

**Please specify the relevant policy/ paragraph/ figure/ table/ Policies Map**

We support the following Chapters and Policies:

Chapters 1 - 3: Introduction, Context and Challenges, Vision and Objectives

Chapter 4: The Spatial Strategy 2023-2040

Chapter 5: Delivering the Spatial Strategy

- Policy SS1: Sustainable development principles
- Policy SS2: Spatial strategy and settlement hierarchy
- Policy SS8: Meeting employment needs
- Policy SS10: Meeting our housing needs

### 2. Do you consider that the Plan is legally compliant? Please put a X against in the appropriate box.

Yes	X
No	

### 3. Please give details of why you consider the Plan is not legally compliant. If you wish to support the legal compliance of the Plan, please also use this box to set out your comments.

--

### 4. Do you consider that the Plan complies with the Duty to Cooperate? Please put a X against in the appropriate box.

Yes	X
No	

### 5. Please give details of why you consider the Plan fails to comply with the duty to cooperate. If you wish to support the Plans compliance with the duty to cooperate, please also use this box to set out your comments.

--

### 6. Do you consider that the Plan is sound? Please put a X against in the appropriate box.

Yes	X
No	

### 7. Please give details of why you consider the Plan is unsound. If you wish to support the soundness of the Plan, please also use this box to set out your comments.

--

### 8. Please set out the modification(s) you consider necessary to make the Plan legally compliant and sound, in respect to the matters you have identified above. You will need to say why each modification(s) will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see the accompanying representations that are made on behalf of the University of Reading, comprising a suite of documents as listed in our covering letter.

## Participation in hearing sessions

**If your representation is seeking a modification to the Plan, do you consider it necessary to participate in the examination hearing sessions? Please put a X against in the appropriate box**

Yes, I wish to participate in the hearing session(s).	
No, I do not wish to participate in the hearing session(s) / I am not seeking modifications to the plan	X

**If you wish to participate at the examination hearing session(s), please outline why you consider this to be necessary.**

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## Part B - Your representation(s)

### 1. To which part of the Plan does this representation relate?

Please specify the relevant policy/ paragraph/ figure/ table/ Policies Map

SS13: Loddon Valley Garden Village

### 2. Do you consider that the Plan is legally compliant? Please put a X against in the appropriate box.

Yes	X
No	

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Yes	X
No	

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Yes	
No	X

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There are aspects of Policy SS13, that are not supported by the evidence base and thus are not justified, or which would not be effective. In these instances, amendments to the wording of the policy are put forward for consideration.

The objection is in relation to:

- Part 1 (beautifully and imaginatively)
- Affordable housing
- Custom/Self-build
- Gypsy / Travellers
- School provision
- River Loddon Valued Landscape
- Policies Map C1

Please see the accompanying representations for a full explanation.

**8. Please set out the modification(s) you consider necessary to make the Plan legally compliant and sound, in respect to the matters you have identified above. You will need to say why each modification(s) will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

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## Part B - Your representation(s)

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Please specify the relevant policy/ paragraph/ figure/ table/ Policies Map

We support the following Policies:

Chapter 6: Climate Change and Energy

- Policy CE1: Design principles for efficient buildings
- Policy CE2: Environmental standards for non-residential development
- Policy CE3: Environmental standards for residential development
- Policy CE4: Supporting a circular economy
- Policy CE5: Embodied carbon
- Policy CE6: Reducing energy consumption in existing buildings
- Policy CE7: Low carbon and renewable energy generation
- Policy CE8: Low carbon & renewable energy infrastructure

Chapter 7: Connections

- Policy C1: Active and sustainable transport and accessibility

### 2. Do you consider that the Plan is legally compliant? Please put a X against in the appropriate box.

Yes	X
No	

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## Part B - Your representation(s)

### 1. To which part of the Plan does this representation relate?

Please specify the relevant policy/ paragraph/ figure/ table/ Policies Map

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

### 2. Do you consider that the Plan is legally compliant? Please put a X against in the appropriate box.

Yes	X
No	

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Yes	
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## Part B - Your representation(s)

### 1. To which part of the Plan does this representation relate?

**Please specify the relevant policy/ paragraph/ figure/ table/ Policies Map**

We support the following Policy:

Policy ER1: Core Employment Areas

### 2. Do you consider that the Plan is legally compliant? Please put a X against in the appropriate box.

Yes	X
No	

### 3. Please give details of why you consider the Plan is not legally compliant. If you wish to support the legal compliance of the Plan, please also use this box to set out your comments.

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Yes	X
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## Part B - Your representation(s)

### 1. To which part of the Plan does this representation relate?

Please specify the relevant policy/ paragraph/ figure/ table/ Policies Map

Policy H1: Housing mix, density and standards  
Policy H3: Affordable housing  
Policy H9: Gypsies, Travelers, Travelling Showpeople provision

### 2. Do you consider that the Plan is legally compliant? Please put a X against in the appropriate box.

Yes	X
No	

### 3. Please give details of why you consider the Plan is not legally compliant. If you wish to support the legal compliance of the Plan, please also use this box to set out your comments.

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Yes	X
No	

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## Part B - Your representation(s)

### 1. To which part of the Plan does this representation relate?

**Please specify the relevant policy/ paragraph/ figure/ table/ Policies Map**

We support the following Policies:

Chapter 10: Flooding and Drainage

- Policy FD1: Development and flood risk (from all sources)
- Policy FD2: Sustainable drainage
- Policy FD3: River corridors and watercourses

Chapter 11: Natural Environment

- Policy NE1: Biodiversity and geodiversity
- Policy NE2: Biodiversity net gain
- Policy NE3: Thames Basin Heaths Special Protection Area

### 2. Do you consider that the Plan is legally compliant? Please put a X against in the appropriate box.

Yes	X
No	

### 3. Please give details of why you consider the Plan is not legally compliant. If you wish to support the legal compliance of the Plan, please also use this box to set out your comments.

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### 4. Do you consider that the Plan complies with the Duty to Cooperate? Please put a X against in the appropriate box.

Yes	X
No	

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## Part B - Your representation(s)

**1. To which part of the Plan does this representation relate?**

**Please specify the relevant policy/ paragraph/ figure/ table/ Policies Map**

Policy NE6: Valued landscapes

**2. Do you consider that the Plan is legally compliant? Please put a X against in the appropriate box.**

Yes	X
No	

**3. Please give details of why you consider the Plan is not legally compliant. If you wish to support the legal compliance of the Plan, please also use this box to set out your comments.**

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**4. Do you consider that the Plan complies with the Duty to Cooperate? Please put a X against in the appropriate box.**

Yes	X
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Yes, I wish to participate in the hearing session(s).	X
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## Part B - Your representation(s)

### 1. To which part of the Plan does this representation relate?

**Please specify the relevant policy/ paragraph/ figure/ table/ Policies Map**

We support the following Policies:

Chapter 12: Design, Heritage and the Built Environment

- Policy DH1: Place making and quality design
- Policy DH5: The historic environment
- Policy DH6: Archaeology

Chapter 13 Healthy and Safe Communities

- Policy HC1: Promoting healthy communities
- Policy HC2: Community infrastructure
- Policy HC4: Open space, sports, recreation and play facilities

### 2. Do you consider that the Plan is legally compliant? Please put a X against in the appropriate box.

Yes	X
No	

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## Part B - Your representation(s)

**1. To which part of the Plan does this representation relate?**

**Please specify the relevant policy/ paragraph/ figure/ table/ Policies Map**

Policy HC8: Noise pollution

**2. Do you consider that the Plan is legally compliant? Please put a X against in the appropriate box.**

Yes	X
No	

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## Part B - Your representation(s)

### 1. To which part of the Plan does this representation relate?

**Please specify the relevant policy/ paragraph/ figure/ table/ Policies Map**

We support the following the General provisions under Chapter 14: Monitoring and Implementation

### 2. Do you consider that the Plan is legally compliant? Please put a X against in the appropriate box.

Yes	X
No	

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# Loddon Valley Garden Village

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Wokingham Borough Local Plan Update  
Proposed Submission Plan (Regulation 19)

Representations on behalf of the University of  
Reading



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## Appendices

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## 1. Introduction

- 1.1.1. This document provides representations on behalf of the University of Reading ('the University') in response to Wokingham Borough Council's (WBC's) Regulation 19 pre-submission consultation on the Local Plan Update (LPU), focusing on Policy SS13 which allocates the Loddon Valley Garden Village (LGV). The LGV is the largest proposed allocation in the LPU, and comprises a new Strategic Development Location for housing, employment, local centres, schools, other community facilities, and a large Country Park.
- 1.1.2. The University, acting as Trustee for the National Institute for Research in Dairying (NIRD), is the principal landowner within the LGV site boundary and is working in close co-operation with Hatch Farm Land Limited (HFLL) and Gleeson Land ('Gleeson'), which control and are promoting other parts of the allocation site.
- 1.1.3. These representations have the overall purpose of confirming that the University **SUPPORTS** the Local Plan Update and the aims of Policy SS13 (including Appendix C). Overall, the University believes that Policy SS13 provides a clear basis for addressing all key issues for Loddon Garden Village, subject to certain focussed amendments which are proposed in the interest of clarity and effectiveness.
- 1.1.4. There are also a number of other policies relevant to the delivery of LGV, including those relating to climate change, the economy, housing, the environment, design, heritage, and communities. Again, the aims of these policies are broadly **supported** by the University subject to focussed amendments which are again proposed in the interest of clarity and effectiveness.
- 1.1.5. The LGV represents an exceptional opportunity to create a new Garden Community and the University has worked extensively with WBC, HFLL, and Gleeson, to establish the suitability of the location for this purpose. This work has demonstrated that the LGV is the most sustainable and deliverable option for a new Garden Community in Wokingham Borough as it benefits from a set of unique locational characteristics, which include:
- it comprises a large site located outside of the Green Belt, the greater part of which is unconstrained by statutory environmental designations and is capable of being brought forward for development;
  - its ability to deliver a new Garden Community comprising new housing, a Country Park and a range of employment opportunities in a highly sustainable location that will not only address the housing and employment needs of the Borough in the next Local Plan period (to 2040), but also contribute significantly towards meeting needs in the period beyond that;
  - the new Country Park will create new habitats and deliver Biodiversity Net Gain in excess of statutory requirements, it will provide Sustainable Alternative Natural Green Space and new recreational routes, for the first time making the Loddon Valley publicly accessible;
  - it includes the University's Thames Valley Science Park (TVSP), which has a proven track record for creating new jobs and for which there is further market demand. It is also within a short distance of other main concentrations of employment in the locality, including the Reading International Business Park and Green Park;
  - it has immediate access to transport infrastructure: the Eastern Relief Road to the west and its associated bridge over the M4 Motorway provide suitable points of access and connection to the principal road network;
  - its proximity to public transport interchanges and networks: Green Park, Winnersh and Reading stations are close by, and there are already well-established bus routes that give access to key

local destinations including Reading and Wokingham;

- its connectivity to existing communities at Shinfield, Arborfield and Sindlesham, with the opportunity to create new and complimentary facilities such as primary and secondary schools, a sports hub, new local and district centres, the new Country Park and new pedestrian and cycle routes;
- its close proximity to the University's Whiteknights campus: creating opportunities for integration with the academic and student bodies, and scope to apply academic research linked to the built environment, sustainability and climate change.

- 1.1.6. The LGV will therefore deliver significant economic, social, environmental and transport and infrastructure benefits that in combination demonstrate the overwhelming contribution that a new community in this location could make to the public interest.
- 1.1.7. The majority of the SDL is in the ownership of the University, who are **fully supportive** of the proposed allocation at the scale proposed, including the expansion of the TVSP, creation of a Country Park in the Loddon Valley and housing on its land at Hall Farm. The extent of the University's land holding and its support of the allocation of the LGV gives certainty to its deliverability. The University is working collaboratively with Wokingham Borough Council as well as with HFLL and Gleeson to ensure that the entire SDL will be delivered in a comprehensive manner as anticipated by Policy SS13. A letter of collaboration is provided in **Appendix 1**.
- 1.1.8. These representations are accompanied by a number of supporting technical documents and a Vision Document (**Appendix 2**). These confirm the extent of site investigation work that has been completed to date and how this has informed the development of a Strategic Framework Plan, which demonstrates how the LGV will mitigate impacts, deliver benefits to local communities, and incentivise sustainable behaviours and travel choices.
- 1.1.9. It is hoped that these representations and the documents that accompany them will be of assistance during the Examination of the LPU, allowing the Plan as well as the LGV allocation to be **found sound** subject to the University's recommended modifications, that focus on matters of practicality and deliverability.

### 1.2. Structure of representation

#### 1.2.1. The structure of these representations are as follows:

- **Section 2:** About the University of Reading

*Describes the University's core values, its history in the local community, and how its values are guiding and shaping the proposals for Loddon Garden Village.*

- **Section 3:** Proposals for Loddon Garden Village

*Outlines the proposals for the Loddon Garden Village, how these have evolved, and key features of the spatial framework submitted in the accompanying Vision Document.*

- **Section 4:** Response to overarching LPU policies

*Outlines the contribution of Loddon Garden Village to the LPU as a whole.*

- **Section 5:** Response to policies for Loddon Garden Village (SS13)

*Sets out proposed modifications to Policy SS13 that the University considers necessary.*

- **Section 6:** Response to other detailed LPU policies

*Provides detailed commentary, context, and (in some cases) proposed modifications to the Policies referred to. For clarity and consistency with the consultation representations pro-forma, these are set out as follows:*

- i) Description of the relevance of the policy to the Loddon Garden Village;*
- ii) The University's stance on the soundness of the policy (Question 6 of the pro-forma);*
- iii) Explanation and reasoning for this stance (Question 7 of the pro-forma);*
- iv) Where relevant, any proposed modifications to the policy (Question 8 of the pro-forma).*

- **Section 7:** Conclusion and next steps

*Outlines how the University, working closely with WBC and the other landowners, envisages bringing the site forward for development through the plan period.*

### 1.3. Table of Policy Responses

1.3.1. Table 1.1 below lists the policies that these representations provide responses to on behalf of the University.

Policy / chapter within the draft LPU	Stance	Take part in hearings
<b>Preliminary sections (Chapters 1- 4)</b>		
Chapters 1- 3: Introduction, Context and Challenges, Vision and Objectives	Support	No
Chapter 4: The Spatial Strategy 2023-2040	Support	No
<b>Chapter 5: Delivering the Spatial Strategy</b>		
SS1: Sustainable development principles	Support	No
SS2: Spatial strategy and settlement hierarchy	Support	No
SS8: Meeting employment needs	Support	No
SS10: Meeting our housing needs	Support	No
SS13: Loddon Valley Garden Village	Object in relation to: - Part 1 (beautifully and imaginatively) - Affordable housing - Custom/Self-build - Gypsy / Travellers - School provision - River Loddon Valued Landscape - Policies Map C1	Yes
<b>Chapter 6: Climate Change and Energy</b>		
CE1: Design principles for efficient buildings	Support	No
CE2: Environmental standards for non-residential development	Support	No
CE3: Environmental standards for residential development	Support	No
CE4: Supporting a circular economy	Support	No
CE5: Embodied carbon	Support	No
CE6: Reducing energy consumption in existing buildings	Support	No
CE7: Low carbon and renewable energy generation	Support	No
CE8: Low carbon & renewable energy infrastructure	Support	No
<b>Chapter 7: Connections</b>		
C1: Active and sustainable transport and accessibility	Support (with changes)	No
C2: Mitigation of transport impacts and highways safety and design	Object with Changes	Yes
<b>Chapter 8: Economy, Employment and Retail</b>		
Policy ER1: Core Employment Areas	Support	No
<b>Chapter 9: Housing</b>		
Policy H1: Housing mix, density and standards	Object with Changes	Yes
Policy H3: Affordable housing	Object with Changes	Yes
Policy H9: Gypsies, Travelers, Travelling Showpeople provision	Object with Changes	Yes
<b>Chapter 10: Flooding and Drainage</b>		
Policy FD1: Development and flood risk (from all sources)	Support	No
Policy FD2: Sustainable drainage	Support	No
Policy FD3: River corridors and watercourses	Support	No
<b>Chapter 11: Natural Environment</b>		
Policy NE1: Biodiversity and geodiversity	Support	No
Policy NE2: Biodiversity net gain	Support	No
Policy NE3: Thames Basin Heaths Special Protection Area	Support	No
Policy NE6: Valued landscapes	Object with Changes	Yes
<b>Chapter 12: Design, Heritage and the Built Environment</b>		
Policy DH1: Place making and quality design	Support (with changes)	No

# Wokingham Borough Local Plan Update

## Representations on Regulation 19 Submission Plan



Policy / chapter within the draft LPU	Stance	Take part in hearings
Policy DH5: The historic environment	Support	No
Policy DH6: Archaeology	Support	No
<b>Chapter 13 Healthy and Safe Communities</b>		
Policy HC1: Promoting healthy communities	Support	No
Policy HC2: Community infrastructure	Support	No
Policy HC4: Open space, sports, recreation and play facilities	Support	No
Policy HC8: Noise pollution	Object with changes (of a technical nature)	No
<b>Chapter 14 Monitoring and Implementation</b>		
General provisions	Support (subject to consequential changes to Appendix M)	No

Table 1.1: List of policies commented on and overall stance taken.

## 2. About the University of Reading

### 2.1. Purpose and values

- 2.1.1. The University's long-term goal is to be a force for good in the region and across the world through education and research. Founded in 1860 and receiving Royal Charter in 1926, it is ranked 26th in the UK<sup>1</sup> and is world ranked and recognised internationally for its research and expertise in the field of Climate Change. It has a tradition of academic excellence and entrepreneurship, and these characteristics are demonstrated through its ownership and management of the Thames Valley Science Park (TVSP).
- 2.1.2. The University has been at the heart of the community for more than a century and its Strategy highlights the core values that underpin its mission, these being:
- Community;
  - Excellence,
  - Sustainability; and
  - Engagement.
- 2.1.3. These same values have shaped the University's proposals for the LGV.

### 2.2. Ownership of land

- 2.2.1. The land proposed for allocation as the LGV includes the TVSP, the Centre for Dairy Research at Hall Farm ('CEDAR'), and the majority of the section of the Loddon Valley between the TVSP and Hall Farm. These areas comprise the majority of the land required to deliver the LGV and fall within the ownership of the University and NIRD (for which the University acts as Trustee).
- 2.2.2. Some other smaller areas of land and private properties fall within the site allocation boundary for the LGV but are in separate ownership. The University has worked with WBC, HFLL and Gleeson to ensure that a comprehensive masterplan for the LGV is deliverable.
- 2.2.3. Recognising its duty to the wider community, the University will continue to work with WBC, HFLL and Gleeson, local stakeholders and the wider community to ensure the LGV delivers housing, new employment floorspace, ecological enhancement, strategic public transport, recreation, and other community facilities as anticipated by Policy SS13.

### 2.3. Previous successful delivery

- 2.3.1. The University has a strong track record in delivering on its commitments through the planning process, which can be seen through many successful developments within Wokingham Borough and more widely. Key examples of this include the following in the immediate vicinity of the LGV:
- **South of M4 Strategic Development Location (SDL):** a previous Development Plan allocation by WBC. Here, the University's partnership with WBC and developers has secured around 1,350 homes, a new bridge over the M4, the Shinfield Eastern Relief Road, and an array of new open spaces including Suitable Alternative Green Space (SANG). This SDL, known as 'South of the M4', was influenced by similar considerations to the LGV in terms of delivering complex infrastructure and achieving high-quality development in a sensitive environment. Through positive partnership working, the SDL has delivered within the timescales required in the previous Local Plan.

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<sup>1</sup> <https://www.reading.ac.uk/news/2023/University-News/Reading-at-26-in-the-UK-in-THE-World-University-Rankings-2024>

- **Thames Valley Science Park (TVSP):** a highly successful campus-style environment host to around 80 companies in a diverse range of sectors, attracted by the dynamic modern environment, flexible accommodation and connections to world-class institutions including the British Museum. TVSP is continuing to grow and evolve, with recent key projects including:
  - Natural History Museum's Science and Digitisation Centre (approved May 2024) c. 25,000m<sup>2</sup>
  - Royal Botanical Gardens (Kew) herbarium, c. 16,000m<sup>2</sup>
  - Thames Valley Science and Innovation Park Gateway 4 (approved August 2024), c. 5,000m<sup>2</sup>
- **Shinfield Studios:** a world-leading facility which offers nearly 1 million square feet of studio space with an array of stages and associated supporting facilities which are now used by major international film and television producers.

2.3.2. The above examples demonstrate the University's commitment to excellence and delivery, through partnership working with WBC and the local community. Through the same principles, the LGV will be equally successful.



### 3. Proposals for Loddon Garden Village

#### 3.1. Summary

3.1.1. The LGV will incorporate the best principles of sustainable and climate resilient development, underpinned by the University's world leading research in Climate Change and long-term management and care for the environment. It will be a distinctive and sustainable community, for all generations, providing choice for its residents in terms of options for living, working, socialising as well as for education and leisure. It will deliver:

- around 3,930 new homes, with at least 2,700 in the plan period to 2040;
- 40% affordable homes;
- custom and self-build serviced plots;
- gypsy and traveller pitches;
- specialist accommodation, including for older people;
- around 100,000 sqm of employment floorspace through the expansion of the TVSP;
- two 3-form entry primary schools (including appropriate onsite early years provision);
- an 8-form entry secondary school, with land reserved to enable expansion to 12-form entry with sixth form;
- a district centre providing services and facilities in a central location, to include retail, leisure, employment, cultural, and health uses; and
- two local centres providing day-to-day retail and other local community uses.

3.1.2. A landscape-led approach has been adopted, incorporating a network of multifunctional green and blue infrastructure connecting to green infrastructure in the wider locality. The LGV will deliver:

- a multi-functional country park, measuring around 200 hectares, one of the largest in the region;
- circa 33 hectares of SANG;
- ecological enhancements to achieve Biodiversity Net Gain of at least 20%;
- comprehensive drainage and flood alleviation measures; and
- new pedestrian, cycleway, and greenway infrastructure.

3.1.3. LGV will comprise of a series of walkable neighbourhoods, each with a range of accessible services and facilities, linked by a network of connected green travel routes and high-quality open spaces that provide opportunities for local food growing and natural play. Advantage will be taken of the recreational and wildlife opportunities of the River Loddon, to create a Country Park and an enhanced ecological network. Sustainable drainage systems will be integrated into the wider landscape as part of a comprehensive green and blue infrastructure strategy.

3.1.4. The expansion of the TVSP will help to grow the local economy, building on the success of its existing clusters and creating new opportunities for inward investment. The additional 100,000sqm of new employment floorspace will create a diverse range of new employment and training opportunities across a wide range of sectors, with it expected to generate some 2,600 new jobs (**Appendix 3**).

3.1.5. The LGV will also be supported by comprehensive new transport infrastructure, including public transport priority routes, a new link over the M4 to Lower Earley Way, a new link to Hatch Farm Way and the partial closure of Mill Lane. Advantage will be taken of existing transport infrastructure and public transport networks, such as the well-established bus routes to Reading and Wokingham, Green Park, Winnersh and Reading Stations.

#### 3.2. Selection of Loddon Garden Village through the LPU process

##### *Initial stage of LPU*

3.2.1. WBC commenced a review of its adopted Development Plan (comprising the Core Strategy 2010 and Managing Development Delivery Local Plan 2014) in August 2016, through the publication of an Issues and Options Consultation Document in August 2016.

3.2.2. Between November 2018 and February 2019 WBC published its 'Homes for the Future' Consultation

Document which consulted on a range of spatial options, which included a new Garden Village at Grazeley, located on the western edge of Wokingham Borough and partially in West Berkshire.

- 3.2.3. In February 2020 WBC published its Draft Local Plan entitled '*Right Homes, Right Places*', which included a proposed site allocation, via Policy SS3, for the Grazeley garden town, comprising of a minimum of 15,000 new homes.
- 3.2.4. However, a significant change in circumstances occurred in March 2020 when the Detailed Emergency Planning Zone (DEPZ) for the Atomic Weapons Establishment Burghfield was significantly extended for reasons of public safety. As a result, the DEPZ covered the proposed Grazeley allocation in its entirety, preventing it from coming forward as a new settlement.

### ***Selection of Loddon Garden Village at the Regulation 18 stage***

- 3.2.5. WBC therefore conducted a Revised Growth Strategy Consultation between November 2021 and January 2022, which introduced as an alternative to Grazeley, the Hall Farm / Loddon Valley Strategic Development Location (SDL) via Policy SS3.
- 3.2.6. This early draft proposal comprised a minimum of 4,500 new homes (of which 2,200 were to be completed by then end of 2037/38) and the phased expansion of the TVSP comprising: 85,000sqm for film and television use; and a further 100,000sqm for research and development. In conjunction with this consultation, WBC published a *Strategic Sites Report* that, at Figure 18, provided a Framework Masterplan for the LGV prepared on behalf of WBC by David Lock Associates. That Masterplan incorporated the expansion of the TVSP, a new Country Park along the Loddon Valley, some 4,500 new homes, and associated services and facilities.
- 3.2.7. In response to the Revised Growth Strategy consultation, the University progressed work on its own masterplan for the LGV, building on the principles established by the David Lock Associates Framework Masterplan, including a Vision Document. This was submitted to WBC in January 2022 as part of the University's response to the Revised Growth Strategy consultation.

### ***Current consultation***

- 3.2.8. The WBC Proposed Submission (Regulation 19) Plan was published for consultation in September 2024, confirming the proposal to allocate the LGV, via Policy SS13. As set out in Chapter 5 of these representations, the University **supports** Policy SS13 subject to their proposed soundness modifications.
- 3.2.9. WBC's decision to allocate the LGV is consistent with government guidance, particularly paragraph 74 of the NPPF, which supports planning for sustainable large-scale developments that are well located and designed and supported by the necessary infrastructure and facilities.
- 3.2.10. It is also supported by the LPU evidence base, with Table 1 of the Housing: Site Allocations Topic Paper (September 2024) confirming the following in relation to the LGV:

*"The location is in proximity to major employment hubs and located on key transport corridors, providing an opportunity for enhanced public transport and active travel. In designing the country park, there is an opportunity to deliver flood risk attenuation to currently affected areas downstream of the site.*

*Whilst constraints do exist across the site, work undertaken to date indicates that these can be addressed and appropriately mitigated.*

*The opportunity has been explored through the sustainability appraisal. The site is treated as a variable but is noted to perform better than other strategic site options."*

- 3.2.11. The Sustainability Appraisal (SA September 2024) also clearly supports the Council's decision to allocate the LGV following a robust assessment of the reasonable alternatives, based on 7 growth scenarios for the borough, with the LGV included within 6 out of the 7 scenarios and with the highest performing scenarios being those that include the LGV.
- 3.2.12. In the context of the above, the selection of the LGV for allocation in the LPU is an entirely appropriate and robust approach that is in accordance with government guidance and is supported by the Council's evidence base.
- 3.2.13. Accompanying these representations is a Vision Document prepared on behalf of the University and in close collaboration with HFL and Gleeson. This has evolved the proposals for the LGV and shares a high degree of alignment with the WBC Concept Plan for the LGV (Figure 8 of the Proposed Submission Plan).
- 3.2.14. Importantly however, the University's proposals also take account of a wide body of technical assessment work undertaken over the past 3 years, including on the following topics:
- Affordable housing;
  - Agricultural land;
  - Air quality;
  - Archaeology;
  - Design;
  - Ecology;
  - Economics (Employment Land Needs Assessment);
  - Education;
  - Flooding, hydrology and drainage;
  - Ground conditions;
  - Heritage;
  - Landscape;
  - Lighting;
  - Noise;
  - Sports and leisure;
  - Transportation;
  - Trees; and
  - Utilities.
- 3.2.15. This body of work, undertaken by appropriately qualified specialists, has explored a wide range of environmental, social, and economic matters relevant to the delivery of the LGV. In support of WBC's proposal to allocate LGV, and to provide further evidence on the sustainability and deliverability of the site as sought by SS13 and other policies, these representations are supported by summaries of the site assessment and technical assessment work carried out to date.

### ***Work towards planning applications***

- 3.2.16. As noted in Chapter 2 of these representations, there has been considerable progress in the delivery of additional development within the TVSP, which falls under the SS13 allocation, but there has not yet been a planning application prepared in relation to the delivery of the LGV.
- 3.2.17. However, the University has worked closely with WBC, HFL and Gleeson to explore how the LGV can most appropriately be taken through the planning application process. This has had particular regard to:
- ensuring any application is shaped by an **overarching Vision, Masterplan and Strategic Design Code** sought under policy SS13;

- undertaking **comprehensive public engagement** at each stage;
- taking a **holistic approach** to infrastructure, both in terms of how it is configured, designed and laid out across the LGV, but also how it is secured via the appropriate legal (S106) agreements;
- undertaking a comprehensive **Environmental Impact Assessment** for the project as a whole;
- the **phasing** of development on the site, to ensure the timely completion of homes in line with the housing trajectory of the LPU as set out in Appendix F, and the delivery of key facilities and infrastructure such as schools, roads, and bridges; and
- undertaking a thorough pre-application process, and ensuring appropriate resourcing for WBC as planning authority, via a Planning Performance Agreement.

3.2.18. In light of the above, it is envisaged that proposals for the LGV will be submitted in 'hybrid' form; comprising full details of key access points and infrastructure and SANG, with outline parameter plans over the remainder of the site. It is expected that the first application will be submitted during 2025, enabling determination at or around the time the LPU Examination in Public is concluded. In turn, this would enable timely progress through the Reserved Matters stage and the discharge of conditions, to permit commencement and occupations within the early years of the plan period.

## 4. Response to overarching LPU policies

### 4.1. Chapter 1: Introduction

#### *Legal compliance and Duty to Co-operate*

- 4.1.1. Following a detailed review of the LPU and its associated supporting documents and evidence base, the University considers that **the LPU is legally compliant**, with the relevant documents having been prepared at the appropriate stage. The Plan has been through four stages of public consultation since 2016, prior to the current Regulation 19 consultation taking place, with the appropriate bodies notified on each occasion.
- 4.1.2. Similarly, the Duty to Cooperate Interim Statement of Compliance ('DTCS', September 2024) provides clear evidence that WBC has met its duty in respect of the LPU as a whole. The Council has:
- Recognised the strategically important location of Wokingham Borough and the likely cross-boundary issues that are relevant across a wide area, including the eight directly adjoining local authorities. These neighbouring authorities have been consistently engaged at each key stage of the preparation of the LPU since early 2016, alongside other national and local prescribed bodies. The list of consultees engaged with by the Council is therefore comprehensive and meets statutory requirements.
  - Worked with neighbouring authorities on six strategic matters: Housing, Employment and economic development; Infrastructure provision; and Natural and historic environment, Biodiversity and climate change. The DTCS demonstrates that there has been joint working in relation to these matters between WBC and the duty to cooperate bodies throughout the preparation of the LPU.
  - Considered unmet housing need, in particular with Reading Borough Council (RBC) and it has been confirmed that there is no unmet need from RBC for the LPU to accommodate.
- 4.1.3. Paragraph 5.51 of the DTCS relates to the allocation of the LGV, and confirms that:
- No neighbouring authority has raised any objections in principle to the strategic approach to growth; noting that there will be some impact on strategic infrastructure such as transport, education, health, water supply and wastewater, telecommunications and green infrastructure, which may cross administrative boundaries.
  - It has been agreed with the Environment Agency, through a signed Memorandum of Understanding, that there are no flood risk matters that would prevent the delivery of the LGV, including the delivery of road infrastructure through the floodplain, linking the site internally and with Lower Earley Way to the north.
- 4.1.4. The DTCS at paragraphs 5.52 sets out how WBC has proactively approached engagement with RBC in relation to public transport improvements as they relate to Reading Borough. Paragraph 5.53 confirms that RBC is confident that the necessary on-site and off-site mitigations can be secured. Appendix C of the DTCS contains a comprehensive record of the Council's key engagement efforts, including stakeholder workshops in respect of the emerging LGV allocation, to which a wide range of local prescribed bodies were able to attend.
- 4.1.5. The University therefore considers that **WBC has fulfilled the Duty to Co-operate** in relation to the LPU.

### *Other overarching matters*

- 4.1.6. For the avoidance of doubt, the **University is satisfied** that the draft LPU fulfils relevant regulations, policy and guidance in respect of:
- Sustainability Appraisal;
  - Habitats Regulations;
  - Health Impact Assessment;
  - Equalities Impact Assessment;
  - The National Planning Policy Framework 2023 (NPPF).

## **4.2. Chapter 2: Plan Context**

- 4.2.1. Chapter 2 considers the context and challenges facing Wokingham Borough across 7 topic areas, which provide a context for the LPU's Vision and Objectives (Chapter 3), the Spatial Strategy (Chapter 4), and the remainder of the LPU. For the reasons set out below, the University is generally **supportive** of the approach taken by the Council.

### *Population*

- 4.2.2. At Paragraph 2.4 the LPU confirms that between 2011 and 2021, the population of Wokingham Borough grew by 15%, the third highest in the South East and one of the highest levels in England. Paragraph 2.31 goes on to confirm that like much of the South East, average property prices in the Borough are substantially higher than the average across England and that as a result, the affordability of housing remains a key issue, particularly for the young. In this context, the University **agrees** with the key opportunities and challenges set out at paragraph 2.34, in terms of the urgent need to provide a sufficient supply of new homes to cater for needs, which the LGV can play an important role in addressing.

### *Climate change*

- 4.2.3. In July 2019 WBC declared a climate emergency and since then has been proactive in taking steps towards becoming carbon-neutral by 2030. The LPU, through the allocations it proposes to make and the policies provided within it, has a key role to play in achieving this aim. As a world leader in climate science, and consistent with its overarching values, the University **supports** the Council's strategy to address the climate emergency. The contribution that the LGV will make towards WBC achieving this is set out in **Appendix 4** to these representations (Climate Emergency Response).

### *'Getting Around'*

- 4.2.4. Paragraph 2.11 explains that public transport and accessibility vary across Wokingham Borough, with the Wokingham Local Transport Plan (LTP4) dividing the Borough into 4 broad areas, based on whether they are urban or more rural. Of particular note is that Earley and Shinfield, adjacent to the LGV, are identified as having a high draw to Reading, good public transport, local services and walking and cycling. This is an important part of the rationale for selecting the LGV allocation, as it enables new development to connect effectively with existing patterns of movement. The transport and accessibility of the LGV is considered in greater detail by the Public Transport (**Appendix 5**), Active Travel (**Appendix 6**) and Access (**Appendix 7**) Technical Notes prepared by the Abley Letchford Partnership (ALP) that accompany these representations.



### *Natural, built and historic environment*

- 4.2.5. Paragraphs 2.14 - 2.18 explain that Wokingham Borough has a rich and varied natural environment that is important to its residents. Key features of this are its rivers and watercourses, including the River Loddon, its habitats and its heritage assets. As set out in paragraph 2.19, a key issue for the LPU is to meet development needs in a way that respects the important aspects of its environment and protects its distinctiveness. The University **supports** this approach. These representations are accompanied by Ecology (**Appendix 8**) and SANG (**Appendix 9**) Technical Notes prepared by Ecological Planning and Research Ltd (EPR) and Archaeology (**Appendix 10**) and Built Heritage (**Appendix 11**) and Arboriculture (**Appendix 18**) Technical Notes, prepared by RPS, that consider the implications of the LGV for the natural and historic environment.

### *Employment and Retail*

- 4.2.6. As confirmed by paragraph 2.20 and 2.21, Wokingham Borough is an attractive location for a range of business sectors and services, in part due to its proximity to London and Reading, its location on the M4 corridor and rail connections. The Borough also benefits from a well-qualified and economically active workforce and accordingly has attracted a number of major employers across a variety of sectors. The University therefore **supports** the objectives expressed in paragraph 2.24, in terms of supporting, protecting and growing the employment base of the Borough. A detailed justification for the expansion of the TVSP, as part of the LGV, is provided in the Employment Land Needs Assessment (**Appendix 12**) prepared by Savills Economics that accompanies these representations.

### *Health and wellbeing*

- 4.2.7. Paragraph 2.25 confirms that whilst the population of Wokingham Borough is largely in good health, there are areas that experience higher levels of deprivation and where health is poorer. Mindful of this, the University fully **supports** the aim of reducing health inequalities, encouraging healthier lifestyles, improving opportunities for active travel, and providing access to the countryside and green spaces. These objectives are fully consistent with the University's own Strategic Plan, and have been fully integrated into the draft proposals for LGV as set out in the accompanying Vision Document and discussed in greater detail in the responses to Policies HC1 below.

### *Housing*

- 4.2.8. Paragraph 2.28 confirms that most of the recent housing growth in Wokingham Borough has been within the four Strategic Development Locations (SDLs) located at North Wokingham, South Wokingham, South of the M4 and at the former Arborfield Garrison. However, despite recent high levels of housebuilding, paragraph 2.31 explains that average house prices in the borough are substantially higher than the average across England, making affordability of housing a key issue, particularly for the young.
- 4.2.9. The University is a significant employer of more than 4,000 academic and professional services staff in and around Reading, a significant proportion of which wish to live close to where they work, and for whom the availability of a range of different types and sizes of housing is essential. The University therefore **supports** the aim of planning positively to deliver a sufficient supply of land for new homes, and of continuing the SDL approach to achieve this in a comprehensive manner.

### *Delivering infrastructure*

- 4.2.10. Paragraph 2.37 confirms that housing delivery in Wokingham Borough has been accompanied by nearly £1 billion in infrastructure, largely funded by development, but also supported by the Council. This has included new primary schools, a secondary school, new major relief roads, 240 hectares of public open space and 5

new community centres. The University **supports** partnership working with utility and service providers to deliver infrastructure, and would again highlight its recent success in delivering the South of M4 SDL and the associated eastern relief road. Through the allocation of the LGV, this success will be repeated.

### ***Significance of Loddon Garden Village in addressing the challenges facing WBC***

4.2.11. Overall, the LGV has a critical role to play in addressing the opportunities and challenges identified in Chapter 2 of the LPU:

- **Climate change:** LGV will be a highly sustainable and fully integrated community that will provide new homes, employment opportunities and a Country Park. It will balance building emissions against renewable energy generated within the LGV, to make it carbon neutral. It will make a significant contribution to WBC achieving its goal of being carbon neutral by 2030.
- **Getting about:** LGV will be a connected place that has significant potential to provide new transport benefits. Active travel will be promoted through an interconnected network of walking and cycling routes linking key destinations within the LGV and in the wider area. Roads and streets will be designed to provide dedicated walking and cycling infrastructure. Bus stops will be located within easy walking distance and will be served by regular bus services.
- **Natural, built and historic environment:** LGV will be fully integrated into the landscape, working with the existing topography, trees and hedgerows. It will incorporate the River Loddon and existing heritage assets. The new Country Park will deliver biodiversity enhancements and SANG, as well as opportunities for improved riverside access and recreational walking and cycling routes. Enhanced management of the grassland, water courses, hedgerows and woodlands along the Loddon Valley will also help restore the historic meadows and manage flooding.
- **Employment and retail:** LGV will provide opportunities to live close to a wide range of employment opportunities, delivered through the expansion of the TVSP, an existing employment destination which attracts globally and nationally significant occupiers.
- **Health and wellbeing:** LGV will be a community that helps to address inequalities across the Borough, through the delivery of a variety of housing types and tenures, including 40% affordable housing. It will encourage healthy lifestyles by prioritising and enabling active travel and creating opportunities for food growing.
- **Housing:** LGV will provide new homes for people with a variety of different economic circumstances, ages, and needs. It will be a balanced community providing a wide range of housing types, tenures and sizes.
- **Delivering infrastructure:** LGV will be a sustainable new community supported by new infrastructure, services and facilities that will be to the benefit of existing residents of the Borough as well as the new residents of the LGV.

### **4.3. Chapter 3: Vision and Objectives**

4.3.1. The three strands of the Vision for Wokingham Borough provided in the boxed text at Paragraph 3.1 are **supported**. The LGV will assist the Council in delivering all aspects of the Vision, being a central element to the proposed growth strategy in the LPU for the reasons as set out in table 4.1 below.



Paragraph from the LPU	Commentary
3.3 <i>“The needs of communities will be at the heart of the places that are built. This means that new homes will respond to the diverse needs of residents, including the local demographic need, as well as meeting our overall requirement for housing. Providing affordable housing and specialist homes which allow people to live independently will be at the heart of development, with housing also offered for people who require support.”</i>	The LGV will provide a range of housing types and sizes, including older persons accommodation and policy-compliant levels of affordable housing and an element of custom and self-build plots.
3.3 <i>“Meeting the needs of communities also means taking account of the evolving needs of employers both in terms of providing an environment in which businesses can evolve with changing needs and workforce expectations, and in enabling people to work from home.”</i>	The expansion of the TVSP to provide another 100,000 square metres of new employment floor space is an integral element of the LGV that will build on the existing strengths of the local economy and provide further employment opportunities for a growing and highly skilled workforce, creating opportunities for the residents of the LGV and existing residents in the local area to work close to where they live.
3.5 <i>“Open green spaces should be easily accessible and opportunities for walking and cycling will allow them to be the mode of choice for short journeys, helping people to lead healthier lives”</i>	The LGV has been designed to prioritise active travel by providing a comprehensive network of cycle and pedestrian routes and by incorporating a new Country Park, which will provide a dedicated and managed area of public open space (including SANG) alongside the River Loddon.
3.8: <i>“Key to that will be locating most of the new development in locations that reduce car dependency and provide opportunities to make walking, cycling and public transport a viable, attractive and easy option”.</i>	As well as the Active Travel provision, the LGV has been designed with public transport in mind with a central spine road linking neighbourhoods via bus services. Every home will be located within convenient walking distance of a bus stop.
3.9: <i>“All new development will be designed and constructed to achieve sustainable building, to secure lower carbon emissions levels.... Innovation aimed at improving sustainability both for the construction and operation of the development will be welcomed. Renewable energy generation and adaptation of homes will be supported.”</i>	The LGV is designed to be a carbon-neutral development throughout, aiming for up to a 93% reduction in carbon emissions against current Building Regulations through sustainable construction and the use of on-site renewable energy sources.
3.12 <i>“The valued, green environment and waterways will be protected, expanded and improved by integrating soft landscaping and habitat creation into the design of developments. This will support biodiversity and nature.”</i>	The LGV will adopt a landscape-led approach, the River Loddon and its valley will be a central feature, existing trees and hedgerows will be integrated into green and blue infrastructure and a network of wider green spaces throughout. There will be substantial opportunities for habitat creation and enhancement. Across the development as a whole, a biodiversity net gain in excess of 20% will be achieved.

Paragraph from the LPU	Commentary
3.15: <i>"Most development will be directed to places where people of all ages are able, or will be able, to access a wide range of local services and facilities. The use of appropriate higher development densities will help secure the ongoing viability of services and facilities."</i>	The LGV is designed to be a thriving community with each neighbourhood well-served by accessible facilities. Higher-density development will be focussed on the centres and a range of facilities will be provided to meet the everyday needs of the entire community, including shops, medical services, schools, a sports hub and transport hubs.
3.18: <i>"The emphasis will be on sustainable economic development, of the right type and in the right place to meet employment needs both within settlements and in rural areas."</i>	The extension of TVSP is an integral part of the LGV, connecting this key employment site with the new community to make the LGV a highly sustainable location where people can live and work.

Table 4.1: Commentary on provisions within LPU Chapter 3

- 4.3.2. The University has reviewed the 10 Objectives of the LPU which stem from the Vision and consider them appropriate in the context of the opportunities and challenges introduced in LPU Chapter 2. As described above, the LGV will contribute positively to achieving all of them.

#### 4.4. Chapter 4: The Spatial Strategy

- 4.4.1. The Spatial Strategy as set out in Chapter 4 of the LPU is **supported** by the University. Paragraph 4.2 confirms, *"The spatial strategy directs the majority of growth to locations that are already sustainable or that can be made sustainable. ... [with a] Preference for large scale developments, where infrastructure can be planned, funded and provided alongside,"*

- 4.4.2. Through previous Core Strategy allocations, WBC has demonstrated that a strategy based on fewer, larger, SDL's is **effective** and delivers benefits for the Borough and local communities, in a way that would not be achieved through a disaggregated approach across many smaller sites. In this context a Spatial Strategy that continues to be based on the delivery of larger sites is wholly appropriate.

- 4.4.3. LPU Paragraph 4.16 refers to the TVSP, which is owned by the University, and confirms:

*"Major new economic development has also come forward at the Thames Valley Science and Innovation Park, including Shinfield Studios, the British Museum and the Natural History Museum. These significant new developments highlight the recent changes to the economy, and how the borough is well placed to take advantage of these new opportunities."*

- 4.4.4. LPU Table 3 shows the Borough has an over-supply of office space but a clear need for industrial floorspace. Paragraph 4.37 sets out WBC's strategy for meeting the Borough's employment needs, stating:

*"...the strategy seeks to optimise the use of the current Core Employment Areas and town centres. The existing stock will be regenerated and improved in quality to better meet needs. Diversification will also be supported, where suitable. In addition, new employment floorspace will come forward as part of Loddon Valley Garden Village in the form of an extension to the Thames Valley Science and Innovation Park."*

- 4.4.5. The further expansion of the TVSP is a highly sustainable and deliverable option for addressing the Borough's employment needs, offering the opportunity to provide homes, alongside jobs, as part of the LGV. Paragraphs 4.49 and 4.50 refer specifically to the LGV, explaining the significant role that it will play in delivering the spatial strategy. Paragraph 4.49 confirms that:

*"Land between Shinfield, Sindlesham and Arborfield has significant potential to create a sustainable*

*new garden village...This is the largest new planned development within the Local Plan Update with the potential to deliver around 3,930 new homes. Of these, around 2,700 of the homes would be built in the period to 2040, with the remainder built in the following years."*

4.4.6. Paragraph 4.50 continues:

*"New settlements such as this are supported by the NPPF. It will be a sustainable and infrastructure rich new community that will help to diversify supply and boost delivery rates. The new settlement will need to be as self-contained as reasonably possible by including a village centre with a sufficient range of facilities and services to ensure that the community's day to day needs can be met locally without the need to travel further. It will also have its own identity and character which is strongly informed by its rural location. There are opportunities to prioritise active travel and integration into the public transport network. A new country park will be provided, benefitting the residents of the garden village as well as the existing communities in the wider area including Shinfield and Lower Earley."*

4.4.7. The accompanying Vision Document for LGV demonstrates how it will deliver the new housing, employment floorspace, Country Park, services and facilities alongside necessary infrastructure. The location and scale of the LGV means that there will be excellent opportunities to provide new facilities to address the needs of the new community and for it to be supported by a package of infrastructure focussed on sustainable behaviours and travel choices, including opportunities for walking and cycling both within the new community and beyond via connections to existing communities at Shinfield, Arborfield, Sindlesham and Reading.

4.4.8. The LGV will also deliver important social infrastructure, including primary schools and a secondary school, and neighbourhood centres to meet the needs of the new community and add to and compliment the facilities already available in Shinfield and Arborfield. The Loddon River corridor provides a significant opportunity to enhance public accessibility to the countryside and deliver Biodiversity Net Gain to offset the impacts of the built components of the LGV, to enhance habitat provision for wildlife, to provide SANG and for comprehensive habitat management, restoration and enhancement.

4.4.9. Accordingly, the LPU spatial strategy is **supported**. The land necessary to deliver all of the component parts of the LGV is available and deliverable and the University will work with WBC and the other landowners to bring the LGV forward as anticipated by the LPU.

### 4.5. Chapter 5: Delivering the Spatial Strategy

4.5.1. LPU Chapter 5 sets out a set of overarching Strategic Policies (SS1-SS10), policies relating to strategic allocations (SS11-SS13), and a further policy relating to smaller sites (SS14). Within these, Policy SS13 is wholly dedicated to the LGV, which is addressed in detail below in Section 5 of these Representations.

4.5.2. In relation to Policies SS2-SS10, the University offers the following additional comments beyond those made in relation to LPU Chapters 1-4 in the sections above.

#### ***Policy SS2: Spatial Strategy and Settlement Hierarchy***

4.5.3. The approach to the distribution of growth as set out in part 2 of the policy is supported, particularly as stated by part 2d), which confirms, *"The delivery of a new sustainable garden village on land between Shinfield, Sindlesham and Arborfield, known as Loddon Valley Garden Village"*.

4.5.4. The confirmation provided by part 4, that the Green Belt will be protected from inappropriate development and that the Green Belt is not a location where additional development is planned, is appropriate in the context of the guidance provided by Part 13 of the NPPF, and in the context of LPU paragraph 4.53, which concludes that the Council does not consider there to be exceptional circumstances to release land from the Green Belt.

- 4.5.5. Part 8 confirms that the TVSP already forms part of a Modest Settlement and that the western portion of the LGV will be expected to be a Modest Settlement and the north eastern portion a Minor Settlement. The related Modest / Minor Settlement boundaries are provided by Policies Map C1 and a detailed response to this is provided in Section 5.18 of these representations below.

### ***Policy SS8: Meeting Employment Needs***

- 4.5.6. Part 3 a) confirms that approximately 100,000sqm of research and development floorspace, or equivalent trip generating activity within Class E(g), B2 and B8 uses will be delivered through the expansion of the TVSP. The provision of additional employment floorspace in this location is appropriate given the TVSP's designation as a Core Employment Area, where recent developments have included the Shinfield Studios and the British Museum. There are further proposals for the Natural History Museum that have already granted planning permission, and other schemes identified to come forward in the near future.
- 4.5.7. As the owner of the TVSP, Policy SS8 is **supported** by the University. It also supports the reference in paragraph 5.74 of the supporting text to the policy, to the extension to the TVSP supporting the long-term vision for the LGV as a sustainable community.
- 4.5.8. However, as set out in the accompanying ELNA by Savills Economics, we consider that the Local Plan does not provide sufficient land to meet the full aspiration (71 ha) set out in the relevant evidence. We note that the only other site identified for new development in the LPU is Hogwood Farm Industrial Estate which has capacity for approximately 6,000 sq m of floorspace for B2 uses, and that no further additional employment land is made available to attract inward investment including foreign direct investment (FDI).
- 4.5.9. Whilst we do not raise this as a soundness objection, this serves to underline the importance of the proposed expansion of the TVSP.

### ***Policy SS10: Meeting Housing Needs***

- 4.5.10. The approach of the Council to meeting the housing needs of the borough, as outlined in Policy SS10 is supported. The Council intends to meet its housing need in full within the confines of the Borough with no unmet need from Reading Borough identified through the duty to cooperate.
- 4.5.11. Policy SS10 confirms that provision will be made for a minimum of 12,763 net additional dwellings for the period 1 April 2023 to 31 March 2040, at an average of 751 dwellings per annum. This is an appropriate housing target in the context of the LPU being progressed to the submission of the Plan in advance of Government publishing an updated NPPF<sup>2</sup> and its associated new standard method for assessing housing need.
- 4.5.12. The methodology for calculating the housing target, as set out in the supporting text at paragraphs 5.82 - 5.89, is agreed with. Although it is of note that the end date of the LPU is set at 2040, which will be less than 15 years after the adoption of the Plan, anticipated in 2026.
- 4.5.13. Table 6 sets out the housing land supply that will be relied on during the plan period in order for WBC to be able to address its housing target in full, a key component of which is the LGV, which will deliver at least 2,700 new homes (out of the total allocation for 3,930) in the plan period.
- 4.5.14. The housing trajectory is provided at Appendix F of the LPU and this sets out the anticipated rate of housing delivery during the plan period. The element of the trajectory that relates to the LGV has been reviewed, with the assessment establishing that it is achievable. Further detailed commentary relating to the delivery of the LGV is provided in section 5.18 of these representations.

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<sup>2</sup> <https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system#chapter-12--the-future-of-planning-policy-and-plan-making>

## 5. Policy SS13: Loddon Valley Garden Village

### 5.1. Introduction

- 5.1.1. As noted throughout these representations, the University **Supports** the allocation of the LGV within the LPU via Policy SS13. There are, however, aspects of Policy SS13, that are not supported by the evidence base and thus are not justified, or which would not be effective. In these instances, amendments to the wording of the policy are put forward for consideration.

### 5.2. Paragraph 1: Beautifully and imaginatively designed

**Response:** Object

**Explanation**

- 5.2.1. The University is committed to achieving a high-quality development at the LGV, which will be secured through the development of a single agreed Vision and Masterplan and a Strategic Design Code, as required by paragraph 5 of Policy SS13. The reference in Part 1 to '*beautifully and imaginatively...*' could, however, be unduly exposed to subjective interpretation, and therefore an amendment is proposed to ensure SS13 is more effective in decision-making. The proposed amendment below will align Part 1 of Policy SS13 with the equivalent wording for Policies SS11 (Arborfield Green), and SS12 (South Wokingham), and therefore provides a greater level of consistency across the LPU. Part B4.1 in Appendix C should be amended accordingly.

**Proposed Change**

1. The area identified as Loddon Valley Garden Village Strategic Development Location, as shown on the policies map, is allocated for ~~a beautifully and imaginatively~~ **a sustainable, well-designed, mixed use** community including housing, employment, social and physical infrastructure.

### 5.3. Development principle (a): Phased delivery of homes

**Response:** Support

**Explanation**

- 5.3.1. As demonstrated by the Concept Plan for the LGV at LPU Figure 8, and the Vision Document accompanying these representations, the LGV has sufficient land available to deliver 3,930 new homes taking account of environmental and technical constraints and with an appropriate and sensitive approach to masterplanning, design and density. The LPU housing trajectory provided at Appendix F demonstrates how the LGV will deliver at least 2,700 new homes in the period to 2040, consistent with the University's own delivery trajectory for the LGV, taking account of opportunities for there to be multiple sales outlets and a variety of types and tenures of housing.
- 5.3.2. Accordingly, the LGV will make a vital contribution towards achieving the LPU housing target, spatial strategy and delivery strategy. Planning applications will ultimately refine the delivery targets established by part a) and so the references to '*around*' and '*at least*' in this part of Policy SS13 is appropriate.

**Proposed Change:** None



### 5.4. Development principle (a)(i): 40% affordable homes

**Response:** Object

#### **Explanation**

- 5.4.1. The objective of securing 40% affordable housing at the LGV is supported, with the University's emerging proposals having been formulated on this basis. The LGV creates the opportunity to deliver Social Rented accommodation and subsidised housing for essential local workers, including employees of the University, as a component of the affordable housing to be provided. Given the scale of the LGV, the timescales for its delivery will extend beyond 2040. There must therefore be flexibility to respond appropriately to the most up-to-date evidence of housing needs and market conditions, which will inevitably change over that period.
- 5.4.2. This conclusion is supported by the *Community Infrastructure Levy Viability Study* (BNP Paribas, August 2024), which identifies the need for ongoing flexibility and the re-testing of assumptions around viability over the Plan period:
- **Paragraph 1.7:** That scheme-specific testing may be required at the development management stage.
  - **Paragraph 1.7 (bullet point 8):** That the Council's appraisals "*indicate that the strategic sites are viable and deliverable, although some flexibility on the timing and/or percentage of affordable housing may be required in the short term.*"
  - **Paragraph 2.2:** That "*due to the extent and range of financial variables involved in residual valuations, they can only ever serve as a guide. Individual site characteristics (which are unique), mean that the conclusions may need to be moderated by a level of flexibility in application of policy requirements at the development management stage.*"
  - **Paragraph 2.4:** That the Council's assessment makes *overall* judgements as to viability of development "*and does not account for individual site circumstances which can only be established when work on detailed planning applications is undertaken. The assessment should not be relied upon for individual site applications.*"
- 5.4.3. An amendment to part (a)(i). is therefore required as set out below:

#### **Proposed Change**

(a)(i). 40% affordable homes in accordance with Policy H3 **and taking account of evidence of housing need and market conditions;**

### 5.5. Development principle (a)(ii): Custom and self-build plots

**Response:** Object

#### **Explanation**

- 5.5.1. The University has no in-principle objection to providing for some custom and self-build plots at the LGV, however the proposed allocation of 100 plots has not been justified by the evidence.
- 5.5.2. Paragraph 4.24 of the Self-build and Custom Housebuilding Topic Paper (September 2024) confirms that '*H6 is likely to be 128 plots, ...*'. This is significantly below the supply of 150 plots confirmed at table 6 of the topic paper. In addition, no rationale is provided within the topic paper for the apportionment in table 6 of 25 plots each to the Arborfield Green and South Wokingham SDL's and 100 plots to the LGV. There is no

evidence provided to demonstrate a locational demand at the LGV, much less a case for the site to deliver the majority of plots across the Borough as a whole.

- 5.5.3. Accordingly the approach should be revisited, with the allocation of 100 plots being replaced with the following wording.

### ***Proposed Change***

(a)(ii). ~~100~~ custom and self-build serviced plots, **subject to up-to-date evidence of demand**

## **5.6. Development principle (a)(iii): Gypsy and Traveller pitches**

**Response:** Object

### ***Explanation***

- 5.6.1. The University has no in-principle objection to provision being made for some Gypsy and Traveller plots within the LGV given the strategic role of the site as the largest single allocation in the Plan. However, the proposed allocation of 20 pitches has not been justified by the LPU evidence base comprising the *Gypsy and Traveller and Travelling Showperson Accommodation Assessment* ('GTAA', August 2023) and the Gypsy and Traveller Accommodation Topic Paper (September 2024).
- 5.6.2. At page 10, the GTAA identifies an overall cultural need for 86 additional pitches across the whole of Wokingham Borough between 2022/23 and 2039/40, which is also confirmed in Table 1 of the Topic Paper. At Table 2 and at paragraph 4.8, the Topic Paper further confirms that a total of 7 pitches have been granted planning permission or are expected to be granted planning permission. Paragraph 4.14 goes onto identify that a total of 4 new sites have been identified by the WBC Housing and Employment land Availability Assessment, with Table 4 confirming that their allocation would deliver a total of 43 pitches. Paragraphs 4.18 and 4.19 go onto confirm that the remainder of the need will be addressed via the strategic sites at a rate of 1 pitch per 200 homes, with Table 5 confirming that of the 3.930 new homes to be delivered at the LGV, 20 will be Gypsy and Traveller pitches.
- 5.6.3. The Topic Paper however does not appear to reflect the findings of the GTAA at page 11, which identifies the following opportunities to provide between 63 and 83 additional pitches:
- Regularising of sites that are not permanently authorised (11 pitches);
  - Regularising the occupation of pitches by non-Gypsy and Traveller Households (29 pitches); and
  - Additional pitch provision through expanding/intensifying existing sites (23-43 pitches).
- 5.6.4. When taking into account the above, as well as planning permissions referred to in the Topic Paper (50 pitches), the allocation of 20 pitches at the LGV would appear to be wholly unnecessary on the basis of there being an identified supply of at least 113 pitches; well in excess of the requirement for 86. It is therefore not clear why additional pitches are required at the LGV, given that the need appears capable of being met as explained above.
- 5.6.5. Accordingly, the approach should be revisited, with the allocation of 20 pitches being replaced with the following wording.

### ***Proposed Change***

~~(a)(iii). 20 Gypsy and Traveller Pitches~~

**(a)(iii). Gypsy and Traveller pitches, subject to evidence of demand and locational need**

### 5.7. Development principle (b): Employment floorspace

**Response:** Support (with changes)

#### **Explanation**

- 5.7.1. In principle this provision within SS13 is **supported** by the University. The TVSP is owned and has been developed by the University, and was partly included within the adopted *Managing Development Delivery Local Plan*, under policies TB13 and SAL07.
- 5.7.2. Phase 1 of the TVSP delivered highway infrastructure, the Gateway Building and Rutherford Centre. Planning permission for phase 2 was approved in outline in 2018, at which point the vision for the TVSP and the planning policies relevant to it envisaged a science park focused on research and development, laboratories and other high-tech uses. In the intervening period, market demand has changed, resulting in only limited implementation of the Phase 2 outline planning permission.
- 5.7.3. On 13 December 2021, full planning permission was granted for 85,000 sqm of floor space for use as a film and television studio campus at the TVSP on the Phase 2 land, which has now been fully implemented by Shinfield Studios. Other recent development at the TVSP includes an archive facility for the British Museum, granted planning permission in 2019 and that is now developed and operational. In September 2024 planning permission was granted by Wokingham Borough Council for the development of a further archive and research facility for the Natural History Museum (NHM) and an associated access road from the TVSP. Importantly, the access road to the NHM building serves as part of the highway infrastructure that will support the LGV. Discussions are in progress between the University and the Royal Botanic Gardens, Kew, in relation to its development of a Herbarium at the TVSP.
- 5.7.4. Accompanying these representations is an Employment Land Needs Assessment (ELNA) (**Appendix 12**) prepared by Savills Economics. The ELNA presents the findings of a review of WBC's Employment Land Needs Review (ELNR 2023) and presents an assessment of the sub-region, including a review of the employment and property market, supply and demand characteristics and potential growth sectors, including:
- Industrial and Logistics;
  - Film and Media;
  - Health and Life Sciences;
  - Innovation and Technology;
  - Culture and Technology;
  - Culture and Heritage;
  - Climate Change and Sustainability.
- 5.7.5. The ELNA confirms that the TVSP will play a critical role in meeting the need for well-located employment premises within a recognised and growing cluster of research and development-related activity. It confirms that the range of employment uses proposed by paragraph (b) is appropriate.
- 5.7.6. The evidence provided by the ELNA demonstrates there is sufficient demand in the Property Market Area for around 100,000m<sup>2</sup> of new additional employment floorspace at the TVSP **in addition to** the already developed Gateway Buildings, Shinfield Studios, British Museum archive buildings, and the recently approved Natural History Museum archive building. To reflect this, a change to the wording of paragraph (b) is recommended below.
- 5.7.7. The WBC Concept Plan provided at figure 8 identifies the existing extent of the TVSP and identifies areas for its expansion in accordance with paragraph (b). The Concept Plan is, however, inconsistent with the boundary identified by the LPU Policies Map, which defines the TVSP and its expansion area in part as a



Modest Settlement and in part as a Core Employment Area. Furthermore, the boundaries in the Concept Plan and Policies Map C1 are inconsistent with the LGV Framework Plan as presented in the Vision Document accompanying these representations. The boundaries of the Concept Plan and the Policies Map must therefore be reviewed in discussion with the University in order to establish an agreed and consistent boundary for the expansion of the TVSP. A change to the wording of paragraph (b) is recommended accordingly.

### ***Proposed Change***

(b) Around 100,000 m2 of **additional** research and development floorspace or equivalent trip generating activity within use class E(g), B2, B8 and other complimentary uses, through an extension to the Thames Valley Science and Innovation Park.

**The LPU Figure 8 Concept Plan and Policies Map C1 must also be reviewed in discussion with the University of Reading in order to establish an agreed and consistent boundary for the expansion of the Thames Valley Science and Innovation Park.**

### **5.8. Development principle (c): Schools**

**Response:** Support (with changes)

#### ***Explanation***

- 5.8.1. Discussions between WBC and the University's consultants *Education Facilities Management* (EFM) have established that the form entry requirement for the secondary school arising from the 3,930 homes to be delivered by the LGV is only 5 forms. The University is however content, at this early stage, to allow for a full 12 forms of secondary provision on the basis that the schools (and particularly the secondary school) will be important community facilities and serve the surrounding existing communities as well as LGV.
- 5.8.2. Given the scale of the LGV, timescales for the delivery will extend well beyond 2040. There must therefore be flexibility to respond appropriately to the most up-to-date evidence of educational need, which will inevitably change over that period. An amendment to paragraph (a)(i). is therefore required as set out below.
- 5.8.3. Once delivered, there will be opportunities for the new schools to partner with the University's Institute of Education. This already has partnerships with over 400 nursery, infant, junior, primary, and secondary schools, academies and special schools across the Thames Valley region and beyond. This will be beneficial to the teachers and students at the new schools through the creation of enhanced learning and training opportunities for them.

### ***Proposed Change***

(c) Schools, **taking account of evidence of educational needs**, including:

(i). Two 3-form entry primary schools (including appropriate onsite early years provision); and

(ii). An 8-form entry secondary school, with additional land reserved to enable expansion to 12-form entry with sixth form.

### 5.9. **Development principle (f): Multifunctional country park**

**Response:** Support

#### ***Explanation***

- 5.9.1. A 200 hectare Country Park is to be created as a key component of the open space strategy for the LGV, forming the principal green-blue corridor through the LGV and providing a recreational resource for residents and the wider community, with opportunities for a range of activities and accompanying facilities, including spaces for play, sports, walking and cycling.
- 5.9.2. Enhanced management of the grassland, water courses, hedgerows and woodlands along the Loddon Valley will help restore the historic meadows and manage flooding. It will enable a high-quality network of native habitats to strengthen the landscape character of the area and be the focus for informal recreation for users of the TVSP and residents of the LGV, as well as for the residents of adjacent communities. The Country Park may also be able to accommodate areas of flood water attenuation related to seasonal flooding, these areas creating opportunities for enhanced habitats for wading birds such as the snipe. Routes through the Country Park will be sensitively located to minimise their impact on natural assets, whilst providing linear routes along the river as well as connections across the Loddon Valley.
- 5.9.3. In addition to their land in the Loddon Valley, the University also owns land to the southwest of the Country Park that includes the Ridge and Langley Mead SANG's, and to the northeast between the northern extent of the LGV allocation boundary and Dinton Pastures Country Park. In combination the University's land within the LGV Country Park, their SANG's and their other green spaces would amount to in the region of 200 hectares (500 acres), which would create the 2nd largest Country Park in Berkshire.
- 5.9.4. The LGV will deliver an extensive network of new footpaths and cycleways that will link to the wider communities of Reading, Shinfield, Arborfield and Sindlesham. The Country Park will therefore be accessible to settlements beyond the LGV, creating an extensive network of open greenspace within the local area, and making the Country Park an asset not only for the residents of the LGV, but also for its surrounding communities.
- 5.9.5. As noted by the LPU Sustainability Appraisal, it is highly unlikely that the Country Park as envisaged by Policy SS13 will be delivered in isolation from the wider LGV.

5.9.6. ***Proposed Change:*** None

### 5.10. **Development principle (g): Thames Basins Heaths SPA and SANG**

**Response:** Support

#### ***Explanation***

- 5.10.1. Parts of the LGV will fall within the 5-7 km buffer zone for the Thames Basins Heath (TBH) Special Protection Area (SPA). Assessment work completed by EPR and Savills Landscape on behalf of the University has confirmed the opportunity to deliver SANG as an integral part of the new Country Park.
- 5.10.2. In accordance with LPU Policy NE2, it has been calculated that there is a need for between 31.56 ha and 34.54 ha of new SANG to mitigate the impacts arising from the new homes that fall within the buffer zone. This will be provided to the east of the River Loddon, in the form of a linear SANG directly adjacent to residential development, allowing for immediate access to open greenspace as well as providing an attractive river valley walking route. It will link with the network of established Langley Mead and Ridge SANG's.

- 5.10.3. With the delivery of this quantum of new SANG as outlined above, the LGV would not result in adverse effects on the TBH SPA from increased recreational pressure. A SANG Technical Note prepared by EPR (**Appendix 9**) accompanies these representations and is discussed in further detail in the response to Policy NE3 below.

**Proposed Change:** None

**5.11. Place-shaping principles (3): Siting, design, layout and form of development**

**Response:** Support

**Explanation**

- 5.11.1. The University, in response to the proposed allocation of the LGV at the earlier LPU Regulation 18 stage has developed a Vision for the LGV, and further to that, undertaken site analysis and masterplanning work to develop a Framework Plan for the LGV. This is presented in the Vision Document that accompanies these representations, and demonstrates how the LGV can be delivered in accordance with the place-shaping principles set out in Parts 5 onwards of Policy SS13.
- 5.11.2. The place-shaping principles provided by Policy SS13 are therefore **supported** subject to the proposed changes to aspects of the policy wording set out below.

**Proposed Change:** None

**5.12. Place shaping principle 3(g): Local and district centres; and Development principle (d)**

**Response:** Object

**Explanation**

- 5.12.1. Part 3(g) of the place-shaping principles duplicates the requirement of part (d) of the Development Principles, which is unnecessary. The University has no objection to provision being made for a foodstore within the District Centre. However, in the absence of evidence of need in the Wokingham Retail & Leisure Study - 2022 Update (September 2023), the reference to a foodstore of around 2,500m<sup>2</sup> is unnecessarily prescriptive at this stage.
- 5.12.2. It is therefore recommended that part (d) is retained and that part 3(g) is deleted. In addition, that an amendment is made to part d) to identify that foodstore provision should be considered at the appropriate point of the delivery process.

**Proposed Change**

~~3(g) Locate district and local centres where they are accessible to the planned housing, and are of an appropriate scale to meet the day-to-day needs with a range of retail (including food store of around 2,500m<sup>2</sup>), leisure, cultural, community, health and service facilities;~~

[...]

(d) A district centre providing a range of services and in a location central to the planned housing, to include retail (**including foodstore provision at an appropriate scale**), leisure, employment, cultural and health uses;

### 5.13. Masterplanning (5): Single agreed vision and masterplan

**Response:** Support

**Explanation**

- 5.13.1. Part 5 of Policy SS13 sets out a number of masterplanning requirements, including that the LGV should be delivered in a comprehensive manner,

*“led by a single agreed vision and masterplan for the whole garden village that addresses the principles set out in the policy and supporting guidance provided by LPU Appendix C”.*

- 5.13.2. Part 5 goes onto confirm that:

*“The masterplan must be produced in partnership between the council, developers, landowners and key stakeholders, and involve consultation with the local community. Development proposals on individual land parcels must accord with the principles and requirements set out in the agreed vision and masterplan.”*

- 5.13.3. The Vision Document that accompanies these representations provides a Vision Statement and a Framework Masterplan. These provide the basis for the required engagement between the University, WBC, the other landowners and key stakeholders to reach agreement on a single agreed vision and masterplan as required by Part 5.

**Proposed Change:** None

### 5.14. Landscape and Green and blue infrastructure (6)(b): River Loddon Valued Landscape

**Response:** Object

**Explanation**

- 5.14.1. The requirements of Part 6 are generally supported and are considered achievable. There is, however, an inconsistency between the wording of part 6b), relating to the River Loddon Valued Landscape and Barkham and Bearwood Valued Landscape, and the wording in Policy NE6, which also relates to Valued Landscapes.

- 5.14.2. Part 6b) requires a strategic landscape and green and blue infrastructure strategy to be devised, that:

*“protects and enhances the identified attributes of the River Loddon Valued Landscape and Barkham and Bearwood Valued Landscape”.*

- 5.14.3. However, Part 3 of Policy NE6, states:

*“Development proposals affecting Valued Landscapes will only be supported where they protect, and where appropriate, integrate with and / or enhance the special features, characteristics and qualities of the landscape, unless the benefits of the development in that location clearly outweigh the harm.”*

- 5.14.4. The wording of Policy NE6 is more appropriate as it provides a greater degree of clarity about how proposals affecting Valued Landscapes will be assessed. Part 6b should therefore be amended to make it consistent with the wording of Policy NE6.

- 5.14.5. A further detailed response is made in relation to the boundary of the River Loddon Valued Landscape later in these representations, in response to Policy NE6, informed by the Landscape and Visual Review

(Appendix 13) that accompanies these representations.

### **Proposed Change**

(b) ~~Protects and enhances~~ **Responds to** the identified attributes of the River Loddon Valued Landscape and Barkham and Bearwood Valued Landscape **in accordance with the requirement of Policy NE6**

#### **5.15. Drainage and flood alleviation (7)(b): Management of flood risk**

**Response:** Support

#### **Explanation**

- 5.15.1. These representations are supported by a Drainage (**Appendix 14**) and Flooding (**Appendix 15**) Technical Reports prepared by the University's consultants Abley Letchford Partnership (ALP), which provides a summary of the site analysis and baseline conditions assessment work carried within the LGV allocation boundary over the past 2 years. That report sets out a strategy for surface water drainage, water quality provision and measures to effectively drain the LGV, and will provide the basis for the development of the drainage and flood alleviation strategy required by Part 7.
- 5.15.2. In relation to Part 7b), which requires opportunities as appropriate to improve the management of flood risk and reduce the risk of flooding to areas beyond the LGV to be considered, the Technical Report identifies potential opportunities for this to be explored in greater detail as the drainage and flood strategy is developed.

**Proposed Change:** None

#### **5.16. Biodiversity (8)(a): Biodiversity Net Gain**

**Response:** Support

#### **Explanation**

- 5.16.1. These representations are accompanied by an Ecology Technical Paper prepared by the University's ecological consultants EPR (**Appendix 8**). This confirms the extensive ecological survey work carried within the LGV allocation boundary over the past 2 years, and the opportunities that the LGV presents for delivering ecological enhancements, including BNG.
- 5.16.2. The requirement for the LGV to demonstrate a BNG of at least 20% is above and beyond the 10% mandatory requirement of the BNG Regulations 2024. However, there are excellent opportunities for the LGV to achieve BNG of at least 20%, given that the University owns some 200 hectares of land in the Loddon Valley, which will remain undeveloped. This land will deliver the new Country Park in accordance with the Development Principles and provide opportunities for BNG.
- 5.16.3. In particular, EPR have identified opportunities to restore habitats along the Loddon corridor with a view to recreating likely historic habitats, including wet grasslands and woodlands, reedbeds and meadow. The newly created habitats will link up with existing greenspace to create a landscape-scale green corridor of semi-natural habitats of value to biodiversity, aligned with the targets of the Loddon Valley South Biodiversity Opportunity Area (BOA). In addition, further BNG opportunities will be incorporated into the wider LGV where suitable, in line with the requirements of LPU Policy NE1.
- 5.16.4. Given the land and opportunities available within LGV, it is anticipated that a 20% BNG for habitats, linear habitats and watercourses **will be achievable** in excess of the mandatory requirement.

**Proposed Change:** None

**5.17. Sustainable Design and Construction (11): Energy and sustainability strategy  
Policies CE1 - CE8: Climate Change and Energy**

**Response:** Support

***Explanation***

5.17.1. The University is a world leader in climate science. The selection of the LGV, in part because of its potential to help with tackling climate change, is therefore well aligned with the University's own capabilities and objectives, including its commitment to reach Carbon Net Zero by 2030.

5.17.2. A Climate Emergency Response report prepared by Savills Earth (**Appendix 4**) accompanies these representations and provides the basis for the development of the energy and sustainability strategy required by Part 11. It sets out a range of measures to ensure that the LGV will make a positive contribution towards reducing carbon emissions, as summarised below:

- **Energy:** Be built to a carbon neutral standard, through a 'fabric first' approach, energy-efficient systems and LED lighting with smart controls, while fossil fuel free heating and hot water systems will further reduce consumption. Renewable energy generation technologies will generate clean energy on-site, offsetting the site's energy demand.
- **Whole Life Carbon:** Assess and minimise whole life carbon, comprising regulated, unregulated and embodied carbon emissions. Carbon sequestration through planting will be prioritised, drawing from the knowledge by the University's research on the subject. The LGV will offset carbon dioxide (1,912 tCO<sub>2</sub>) over a 100-year timeframe.
- **Resources:** Resource efficiency will be prioritised, and circular economy principles will be facilitated. Waste management and water conservation strategies will be implemented. The masterplan will focus on protecting green spaces, preventing soil erosion, and promoting sustainable transportation to reduce environmental impact.
- **Human centric design:** Prioritise residents' wellbeing, with a human-centric approach. Accessibility and safety will be promoted. Sustainable food production and green infrastructure to improve air quality will also be encouraged. The plan will include a range of housing options supporting diverse socio-economic backgrounds and multigenerational living.
- **Landscape and Ecology:** Integrate sustainable drainage and account for flood risk, including an allowance for climate related changes to rainfall patterns. A biodiversity strategy will promote biodiversity net gain, enhance ecosystems by creating diverse habitats and using drought-resistant plants. Native species will be prioritised to support local wildlife.
- **Sustainable Transport:** Maximise active travel with services within walking or cycling distance. EV charging infrastructure will be integrated and EV ownership will be encouraged, through strategically placed charging stations. Public transport hubs and a cycling network will reduce the need for private car ownership.

5.17.3. Further detail is provided later in these representations, in relation to the opportunities for carbon reduction and sustainability, in the responses to Policies CE1-CE8.

**Proposed Change:** None



### 5.18. Policies Map C1: Loddon Garden Village area

**Response:** Object

#### **Explanation**

5.18.1. Accompanying the LPU are a series of Policies Maps which serve the purpose of illustrating policies in the plan geographically. As explained in the relevant national planning guidance<sup>3</sup>, a policies map does not have status as a Development Plan Document and that:

*“...if the geographical illustration of a policy is flawed, the policy will be unsound. In such circumstances, therefore, the Inspector will ask the LPA to draw up a proposed change to what is shown on the submission policies map”*

5.18.2. Whilst supporting the delivery of the LGV under Policy SS13, for the reasons set out earlier in these representations, taking account of national planning guidance, the University **objects** to the parts of Policies Map C1 that relate to the LGV for the reasons set out below.

5.18.3. Firstly, rather than clearly labelling and outlining the allocation area of the LGV, Policies Map C1 extends the same approach as other parts of Wokingham Borough, in terms of defining settlement boundaries. As currently indicated on the map, four discrete areas within the LGV would become part of defined settlements in the Settlement Hierarchy (as established under Policy SS2). These are listed below and illustrated in Figure 5.1:

1. The area around Hall Farm and Newland Farm which would include much of the residential development in Loddon Garden Village as well as the Village Centre and secondary schools. This is outlined in light blue as a ‘modest settlement’;
2. The area around the TVSP, also outlined in light blue as a ‘modest settlement’;
3. The area around Hatch Farm, outlined in green as part of the ‘minor settlement’ of Sindlesham; A smaller detached area to the northwest of Carter’s Hill, outlined in green as an apparent standalone ‘minor settlement’.

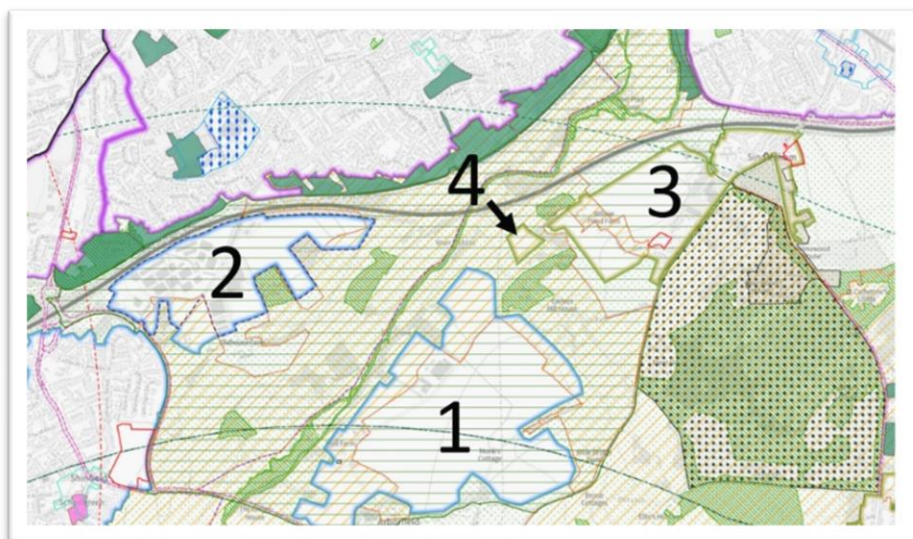


Figure 5.1: Excerpt from Policies Map C1

<sup>3</sup> <https://www.gov.uk/government/publications/examining-local-plans-procedural-practice/procedure-guide-for-local-plan-examinations> , paragraph 6.6

5.18.4. Secondly, the definition of the settlement boundaries applied to the LGV allocation by Policies Map C1 are inappropriate for the following reasons:

- i. **Inconsistency with Settlement Hierarchy.** The inclusion of four discrete areas within the LGV, of two different categories ('Modest' and 'Minor' settlement), is inconsistent with the proposal in SS2 to define Loddon Garden Village as a singular 'modest settlement'. As drafted, the map implies that the north-east part of the SDL would function as an extension to Sindlesham, rather than being included in the new settlement. Whilst the connections with Sindlesham are important, this discrepancy would cause confusion and would therefore be **ineffective**.
- ii. **Pre-determining the edges of development.** A sufficiently detailed assessment of potential settlement boundaries has not yet been undertaken, and that to do so in the map would be unsound as it would not be **justified**. The LGV is a large and complex site, and although significant progress has been made by the University, other landowners and WBC in framing the overall approach, more work is needed to formally define the parameters of development. This will include developing the 'Vision and Masterplan' and Design Code documents provided for under policy SS13, and further work at the planning application stage.
- iii. **Inconsistency of boundaries.** Broadly, the settlement boundaries shown on the Policies Map within the Loddon Garden Village area have a similar footprint to areas shown in the Concept Plan (LPU Figure 8) as being developed. However, there are some discrepancies, such as in the area around Oldhouse Farm, which the Concept Plan indicates for commercial development (contiguous with TVSP), but which is omitted from the Settlement Boundary. LPU Policies SS3 and SS4 seek to explicitly restrict development outside of defined settlements, and hence the discrepancies potentially cause confusion at the decision-making stage in terms of determining where development would or would not be acceptable. We therefore believe the Policies Map is unsound as it would not be **effective**.

5.18.5. It is considered therefore that Policies Map C1 should be amended to simply identify the boundary of the LGV.

### ***Proposed Change***

***Amend Policies Map C1 to delete the settlement boundaries within the LGV allocation boundary.***

## **5.19. Appendix C: B4.1 Loddon Garden Village**

***Response:*** Object

### ***Explanation***

5.19.1. The need for an amendment to Paragraph 1 of Policy SS13, and the related part of its supporting text (paragraph 5.109), is identified in section 5.2 of these representations. This deletes the term 'beautifully and imaginatively designed' in order to make the wording of the policy effective for decision making and for consistency with the policy wording for the South Wokingham and Arborfield Cross site allocations.

5.19.2. An associated amendment to B4.1 is also therefore required.



### *Proposed Change*

B4.1. Policy SS13 identifies the area between Arborfield, Shinfield and Sindlesham for a holistically planned, ~~beautifully and imaginatively well~~-designed sustainable new community for around 3,930 dwellings (at least 2,700 dwellings to be delivered by 31st March 2040) and expanded employment opportunity, supported by appropriate retail facilities and transport, social and physical infrastructure.

### 5.20. Appendix F: Housing Trajectory

**Response:** Support

#### **Explanation**

- 5.21. The University has no objection to the housing trajectory for the LGV as set out at page 80 of Appendix F, but would make the following observations:
- (i) The year of **first completions in 2027/2028** aligns with the University's expectations. This will entail proposals being submitted into the planning application process in 2025, concurrent with the LPU Examination process, and then being determined promptly.
  - (ii) Completion rates are then capable of **significantly accelerating year on year**, as additional parcels come forward. These would be located in different areas of LGV, on land controlled by the University, Gleeson and HFLL, enabling several different outlets to be active at any given time.
  - (iii) The target of completing at least 2,700 dwellings by 2040 (approximately 19% of the borough-wide total) is **realistic**, based on the long-term program devised by the University working closely with HFLL and Gleeson.
  - (iv) The overall trajectory reflects a **cautious** level of delivery, with maximum delivery in any year given as **250**. The University believes that by the mid-2030s this could be significantly exceeded, based on the number of outlets and the variety of different types of accommodation that this would include.
- 5.22. The University therefore considers that LPU has taken an appropriate and realistic, albeit cautious stance to the LGV in terms of how it contributes towards overall housing delivery in the plan area. This is consistent with relevant provisions of the NPPF, particularly paragraphs 75-77.

**Proposed Change:** None

## 6. Response to other detailed LPU policies

### 6.1. Chapter 7: Connections

#### ***Policy C1 : Active and sustainable transport and accessibility***

6.1.1. Paragraph 4 of the policy sets out a list of 9 criteria to enhance sustainable travel, all of which must be met. Whilst it is not considered that the policy wording is an impediment to the delivery of LGV, it could be unduly onerous in respect of development more generally across the Borough and we draw it to the Council's attention for that reason.

6.1.2. It is also inconsistent with the relevant provisions of the NPPF (paragraph 114(a)), which in contrast states, *"appropriate opportunities to promote sustainable transport modes can be – or have been – taken up"*.

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

6.1.3. The policy requires development to *"Ensure that any material adverse impacts on existing and forecast traffic conditions are mitigated"*. From this, there are two concerns to draw to the attention of the Council.

6.1.4. Firstly, the requirement to address any material impacts is more onerous than the NPPF requires, which refers instead to "severe" impacts (paragraph 115).

6.1.5. Secondly, it is unclear what the intention is with regards to the wording *"existing and forecast traffic conditions"* as again this is not a requirement of the NPPF (either in the extant version or in the emerging draft).

### 6.2. Chapter 8: Economy, Employment and Retail

6.2.1. The University supports the policies in this chapter, particularly Policy ER1, which identifies the TVSP as a Core Employment Area and is aligned with Policy SS13 (as discussed in section 5.7 of these representations above).

6.2.2. Under Policy ER1, Core Employment Areas are protected for their continued use, and development proposals should provide a range of different employment premises that accommodate a range of different types of tenants. Start-ups and premises for grow on space should also be accommodated.

6.2.3. On behalf of the University, an Employment Land Needs Assessment (ELNA) (**Appendix 12**) has been prepared by Savills Economics and accompanies these representations. The ELNA identifies that the council's principal evidence base document, the 2023 Employment Land Needs Review, concludes that no new land is needed to be allocated for offices, and that there is strong demand for industrial uses, albeit for primarily traditional uses such as storage and logistics. However, the policy aspirations for TVSP, as set out in Policy SS13, is oriented towards R&D activities.

6.2.4. Whilst this could suggest an inconsistency between policy aspirations and the evidence base, the ELNA accompanying these representations demonstrates that there are considerable growth opportunities across a wide range of sectors at the TVSP.

### 6.3. Chapter 9: Housing

6.3.1. This section is based on a review undertaken by Pioneer Property Services Ltd.

6.3.2. The University welcomes and supports the broad approach taken towards housing in Wokingham Borough, as set out in Chapter 9 of the LPU, by Policies H1 to H13. Through these policies, the LPU will ensure that the housing delivered under the Spatial Strategy will have appropriate characteristics in terms of mix and

type.

- 6.3.3. Notwithstanding the above, a number of detailed **objections** relating to points of detail are raised in the section below.

### ***Policy H1: Part 1: Appropriate mix of housing types, tenures, densities and sizes***

#### ***Response: Object***

#### ***Explanation***

- 6.3.4. Paragraph 1 of Policy H1 requires development proposals to provide, an appropriate mix of housing types, tenures, densities and sizes, which is not consistent with paragraph 9.8 of the supporting text that confirms that the final mix of dwelling types will be subject to negotiation.
- 6.3.5. Part 1 should therefore be amended as follows to ensure consistency between the policy and the supporting text:

#### ***Proposed Change***

1. Residential development proposals will contribute to the delivery of sustainable, inclusive and mixed communities by providing ~~an negotiated appropriate~~ mix of housing types, tenures, densities and sizes having regard to site specific circumstances, to meet the existing and future housing needs of all sectors of the community, including those with specialist requirements."

### ***Policy H1: Part 2: Housing Mix***

#### ***Response: Object***

#### ***Explanation***

- 6.3.6. Part 2 should also be amended to ensure that housing mix proposals are deliverable, having regard to site-specific circumstances and any market housing demand dynamics which the development industry are best placed to confirm.
- 6.3.7. The supporting text to Policy H1, in paragraph 9.7, refers to the indicative mix in Table 7 as a '*starting point*' for development proposals. The concern is that despite this not being within the policy wording itself and notwithstanding the reference to this being 'indicative', the Council will seek to secure these proportions without having regard to market housing demand. This has been the experience in local authorities elsewhere, where similar 'indicative' proportions are included in Development Plans, even as supporting text.
- 6.3.8. It is not in a developer's interest to deliver market housing that it cannot sell and it is therefore essential that flexibility is retained within policy and development control decisions, particularly in terms of market housing mix, allowing developers to react quickly to changes in demand for different open market housing types and sizes. Any attempt to stifle this reactive approach, particularly, based on a long-range local housing needs assessment, which relies on a significant number of variables, some or all of which may or may not transpire, will risk slowing or even preventing delivery and, therefore, act to frustrate overall housing delivery objectives.

- 6.3.9. This view is acknowledged in the Callcutt Review of Housebuilding Delivery (published in November 2007) which says on page 20 that:

*“...local planning authorities should be very cautious about assuming that they are better able than developers to judge what the local housing market demands. It is true that the developer is concerned with making a return, not with serving the public interest; but the developer’s judgement on what will best satisfy market demand is very likely to be better than the planning authority’s”*  
(emphasis added)

- 6.3.10. It is notable that the Callcutt Review reached this conclusion during the peak of the market prior to recession, when market housing transactions were numerous. Any prescription of such matters should, therefore, be of significant concern. Market housing remains undefined in national planning policy, but it is clear that such housing is provided in an environment influenced by household choice and a household’s financial capacity to realise housing preferences as opposed to needs. Market housing provided to reflect the minimum dwelling size requirements of households will prove undeliverable where this does not align with the choices that households purchasing / renting on the open market will seek to make, given their financial resources.
- 6.3.11. A further point of concern is that the imposition of the First Homes requirement through Policy H3 may result in a dampening of appetite by First Time purchasers for 1 and 2-bedroom open market dwellings. The income caps specified in the First Homes National Guidance issued by the Government in May 2021 governing eligibility mean that some households with savings or family support who would have been able and opted to purchase a home on the open market will use the First Homes route instead. This is an impact which was absent from the Help to Buy Equity Loan scheme given that the relevant homes were purchased as open market (as opposed to Discount Market Sale Affordable Housing) units from developers.
- 6.3.12. As such, any inflexible requirements imposed on market housing mix where First Homes are also required will fetter developers’ abilities to adjust their open market housing mix to provide more larger homes (less likely to be impacted due to the First Homes price caps at £250,000 outside of Greater London) for which demand will remain strong.
- 6.3.13. In respect of affordable housing, over the last 5 years, Housing Waiting List data<sup>4</sup> suggests that the requirement for more than 3 bedrooms across the borough has varied between 5% and 6%, whilst the need for 1 and 2 bedrooms has routinely formed more than 70% of the overall households on the Waiting List. Numerically, the unmet need for more than 3 bedrooms (at 145 in 2022/23) is extremely small compared to the need for 1 and 2 bedrooms (at 1,734 in 2022/23).
- 6.3.14. The 12% 4+ bedroom proportion for affordable housing in LPU Table 7, which is based on secondary data analysis, employing a number of variables within the Council’s 2023 Local Housing Need Assessment (“LHNA”), as opposed to the Housing Waiting List, which reflects the number of households actually waiting for affordable housing in real terms, therefore looks to be questionable.
- 6.3.15. Whilst reference is made in paragraph 5.21 of the LHNA to the ‘ORS Housing Mix Model’ and that this uses a ‘range of secondary data sources to build on existing household projections and profile how the housing stock will need to change in order to accommodate the projected future population’, it is thereon difficult to identify the process by which the housing mix requirements within different affordable housing tenures has been derived.
- 6.3.16. Notably, the ‘Berkshire (including South Bucks) Strategic Housing Market Assessment’ published in February 2016 (“SHMA16”) Table 108 concludes a need for 3.1% of affordable housing to have more than three bedrooms in Wokingham Borough up to 2036. We are still well within this timeframe and yet the LHNA has concluded a markedly different 12% indicative requirement to 2040. If nothing else this demonstrates that

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<sup>4</sup> Local Authority Housing Statistics 2018/19 to 2022/23, Tab ‘c’, Wokingham Borough Council

housing mix estimates based on secondary data analysis are prone to significant fluctuations.

- 6.3.17. The LHNA should provide a transparent explanation of how the housing mix is modelled and, given that the process is presumably based on a variety of variables, include sensitivity testing of housing mix outcomes - this should then be reflected in indicative mix 'range' recommendations for both market and affordable housing as opposed to fixed proportions within Table 7.
- 6.3.18. The four-bedroom affordable housing proportion in Table 7 should range up to 5% given the wider context in terms of current unmet affordable housing need and the huge concentration of this need being within a requirement for one and two bedroom housing as opposed to three and four bedroom housing. It can be subject to review after 5 years in accordance with National Planning Policy and Guidance in respect of evidence base material.
- 6.3.19. On the basis of the above a change to the wording in paragraph 2 and to paragraph 9.5 of the supporting text to Policy H1 and to Table 7 is necessary.

### **Proposed Change**

2. The mix of housing provided should **be negotiated and** reflect and respond to the identified housing needs and demands as set out in the council's most up to date evidence of housing need **and any site specific circumstances and local characteristics, including having regard to developer led insight in respect of market housing demand.**"

**Supporting text in paragraph 9.5 should be amended to refer to having regard to market housing 'demand', as well as simply referencing meeting existing and future need.**

**Table 7 should be amended to include indicative mix 'range' recommendations for both market and affordable housing as opposed to fixed proportions within Table 7. The four-bedroom affordable housing proportion in Table 7 should range up to 5%.**

### **Policy H1: Part 4: Accessible and adaptable homes**

**Response:** Object

### **Explanation**

- 6.3.20. Under Part 4, the LHNA conclusion in Figure 73 suggests that a minimum of 3,116 adapted homes are needed between 2021 and 2040. The LHNA states in paragraph 7.108 that this need equates to 18% of the dwellings target. The LHNA acknowledges that:

*"There is inevitably uncertainty about how many households will be able to meet their housing needs without moving and how many will move to existing homes rather than new housing."*  
(paragraph 7.95, LHNA)

- 6.3.21. It is, therefore, inappropriate to require from developers that every new home is delivered to M4(2) standards. Furthermore, doing so will increase floor area requirements beyond the Nationally Described Space Standard minimums, require the installation of lifts within above ground apartments, thus pushing up purchase / rent and service charge costs for occupants negatively impacting on affordability for both the social and open market sectors.
- 6.3.22. Anecdotally, Registered Providers are, in particular, less likely to purchase flatted social housing which includes a lift; this is of significant concern given the current market in which securing Registered Provider interest in purchasing s106 affordable housing is proving extremely challenging (as noted by the House Builders Federation in their home building blueprint 'Homebuilding: An engine for growth, prosperity and

opportunity' and subsequent manifesto (July 2024).

6.3.23. An amendment to Part 4 is therefore required as set out below.

### **Proposed Change**

4. **All Subject to scheme economics and design constraints 20% of homes on** residential development proposals, including those providing a form of specialist accommodation for older people (including extra care housing) will be accessible and adaptable in line with M4(2) of the Building Regulations, unless it is built in line with M4(3) (see below).

**Should the above amendment not be included, the wording should, at a minimum, be amended to exclude above ground apartments (market or affordable) from being expected to be constructed to M4(2) standards.**

### **Policy H1: Parts 5 and 6: Wheelchair accessibility**

**Response:** Object

### **Explanation**

6.3.24. The *Wokingham Borough Council: Local Plan and Community Infrastructure Levy Viability Study* ("LPVS") tests M4(3) on the basis this is applied to 5% of dwellings (see paragraph 4.21 of the LPVS). As such, policy wording should not seek an open-ended target for M4(3) housing such as currently indicated by the 'at least' wording. The LHNA states in paragraph 7.109 that a 5% M4(3) target as a proportion of the overall dwelling target can be supported by the housing needs evidence.

### **Proposed Change**

**Paragraphs 5 and 6 of Policy H1 wording should be amended to remove the wording 'at least' from the proportion of M4(3) standard housing sought on development proposals.**

**Wording should also be included within Policy H1 stating that the targets sought are subject to scheme viability and design constraints.**

### **Policy H1: Part 8: Internal space standards**

**Response:** Object

### **Explanation**

6.3.25. Policy H1 requires that all residential development is built to Nationally Described Space Standards ("NDSS"). However, the evidence supporting the need for NDSS to be imposed on new residential development proposals is not presented within the LHNA or anywhere else in the supporting documents.



6.3.26. National Planning Practice Guidance (“NPPG”) states the following:

*“Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:*

- *need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.*
- *viability – the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.*
- *timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions.”*

*(Housing: Optional Technical Standards, NPPG, paragraph 20 – emphasis added)*

6.3.27. It is not evident that the Council have demonstrated the need basis for seeking to impose NDSS and, whilst the floor areas tested in the LPVS evidence achieve NDSS, the assessment should also ensure that the larger floor areas, whilst increasing build costs, do not necessarily translate into higher values per dwelling.

6.3.28. The evidence needed to support the introduction of NDSS has been considered by the examining Inspector for the North Hertfordshire Local Plan 2011 - 2031, the Inspector stated in a letter to the Council dated 9th August 2019 that for such policies to be found sound they needed to be supported by ‘clear evidence’ of both need and viability. The Inspector considered that inadequate evidence (for increased water efficiency and the application of nationally described space standards) had been presented and stated that the policy should be deleted unless the local authority could produce the evidence required.

6.3.29. Unless additional evidence is presented justifying a blanket application of NDSS, Part 8 should either be deleted or be amended as set out below.

### **Proposed Change**

8. Residential development proposals **must are encouraged to** meet the up to date nationally described space standard for minimum internal space.

### **Policy H3: Part 1: Affordable housing**

**Response:** Object

### **Explanation**

6.3.30. The LPVS does not test viability on the basis of bedspaces, but only on the basis of units. The above approach is therefore not underpinned by the Council’s evidence base. The LPVS also tests the above affordable housing proportions but does not test higher proportions. The inclusion of the word ‘minimum’, which could mean any proportion up to 100%, is not supported by the Council’s evidence base, provides no certainty to the decision maker on how the policy should be applied, and should be deleted. We therefore propose that the wording in Part 1 of Policy H3 should be amended as set out below.

### Proposed Change

1. All residential development proposals for at least 5 units of accommodation (gross) ~~or 5 bedspaces (gross)~~, or covering a site area of at least 0.16 ha, will provide affordable housing ~~or affordable bedspaces~~, where viable. The ~~minimum~~ percentages of affordable housing ~~or bedspaces~~ sought are:...

### Policy H3: Part 5: First Homes

**Response:** Object

### Explanation

- 6.3.31. The LHNA conclusion that First Homes should start at a 50% discount to open market value ("OMV") is unjustified given that 'at least 30%' is a minimum discount not a cap and its own conclusions demonstrate that a significant proportion (c.36%) of the households in need of Affordable Home Ownership are suggested in Figure 41 the LHNA to be able to afford First Homes at a 30% discount.
- 6.3.32. Where Affordable Housing is provided as First Homes the evidence base suggests that provision should be sought in line with the nationally-set minimum 30% discount to open market value will assist with addressing the needs of a significant proportion of households for whom this will be affordable. This nationally-set discount will not prohibit deeper discounts being applied as necessary to accommodate the house price caps applicable to First Homes.
- 6.3.33. The Council's evidence base does not justify that the starting point should be a minimum 50% discount. This will have the effect of a) over subsidising a significant proportion (36%) of eligible households potentially impacting on scheme viability and the ability to provide housing and affordable housing and b) the approach is counter to that taken by Homes England in the *Capital Funding Guide for Shared Ownership* (Section 1 'Shared Ownership, paragraph 6.1.6), which encourages households to buy the maximum equity share that they can reasonably afford and which, ultimately, enables households to recoup a greater share in any value uplifts that may apply at re-sale.
- 6.3.34. The proposed amendments set out above reflect that applicants should not be required to demonstrate what level of discount to open market value is 'affordable'. This analysis is already undertaken within the Council's evidence base as set out above.
- 6.3.35. There is no specific legislative requirement to deliver First Homes and the Government's proposed planning reforms, if applied, will remove the 25% First Homes requirement. The First Homes requirement could result in slow sales of similar open market units, increased sales risks and additional planning costs (due to a need to re-plan sites with an alternative mix focussed on large open market homes) to developers and increased difficulties in respect of securing contracts for the delivery of the remaining affordable housing via a Registered Provider (due to a reduction in traditional AHO products impacting on Registered Provider business plans / ability to secure funding). These impacts are not tested within the LPVA as a sensitivity.
- 6.3.36. The inclusion of wording enabling forms of Affordable Home Ownership other than First Homes to be agreed with the Council is therefore a sensible addition enabling flexible approaches to affordable housing delivery to be implemented; this is particularly important given widely acknowledged ongoing issues around securing Registered Provider interest in procuring s106 affordable housing and given current proposed planning reforms.
- 6.3.37. Part 1 should therefore be amended as set out below and related supporting text in LPU paragraph 9.35 should be deleted.



### *Proposed Change*

5. An affordable home ownership product should be delivered as part of all applicable development proposals. First Homes **provided in accordance with national planning policy and guidance** should provide 25% of the affordable housing **unless another form of affordable home ownership product is agreed with the Council** proposed ~~where it is demonstrated that a discount of 50% makes the homes affordable. Where this level of discount does not make First Homes affordable, another form of affordable ownership product should be delivered.~~

**Supporting text in paragraph 9.35 should be deleted.**

### ***Policy H6: Self-build and custom housebuilding***

- 6.3.38. As noted in the response above to Policy SS13, the University **objects** to the provision of around 100 custom and self-build plots at Loddon Garden Village, which it does not consider is justified by the evidence. Correspondingly it also **objects** to criterion (1) of policy H6 insofar as it may require a specific amount to be provided. However, the University does not otherwise object to Policy H6 in terms of how self-build and custom housing would come forward where it is considered appropriate.

### ***Policy H7: Specialist accommodation***

- 6.3.39. Proposed educational provision at LGV under Policy SS13 includes provision for the integrated teaching of pupils with special educational needs and disabilities. We note that there is a direct and positive connection between this and Policy H7 (Specialist Accommodation) in terms of aligning neurodiversity-friendly design features, linking places and spaces, and building greater resilience and support to families.

### ***Policy H9: Gypsies and Travellers and Travelling Showpeople***

- 6.3.40. As noted in the response above to SS13, the University **objects** to the provision of around 20 Gypsy and Traveller pitches at Loddon Garden Village, which it does not consider is justified by the evidence. Correspondingly it also **objects** to criterion (1) of policy H9 insofar as it tabulates a specific amount to be provided.

## **6.4. LPU Chapter 10 - Flooding and Drainage**

- 6.4.1. The requirements to take account of flood risk and incorporate sustainable drainage into new developments, as set out by these policies, are supported by the University.

### ***Policy FD1: Development and Flood Risk***

- 6.4.2. Part 3 of Policy FD1 sets out Sequential Test requirements which have the purpose of guiding development to areas of lowest flood risk. It should be noted, however this does not apply to sites the subject of an allocation in the LPU (the LGV for example), as they have been the subject of the WBC Strategic Flood Risk Assessment.

### ***Policy FD2: Sustainable Drainage***

- 6.4.3. The objectives under this policy to manage surface water arising from development in a sustainable manner, are also supported. An explanation of how SuDS can be incorporated in the LGV is provided in the response to Policy SS13 above and in the Drainage Technical Report (**Appendix 14**) prepared by ALP, included with this submission.

### ***Policy FD3: River Corridors***

- 6.4.4. This policy focuses on conserving and enhancing the natural, ecological, and cultural value of river corridors and watercourses. Development proposals near rivers must respect the setting, improve public access, and protect the biodiversity associated with these environments.
- 6.4.5. These principles have been instrumental in the development of the proposals for LGV. The provision of site-wide attenuation features, coupled with significant blue-green infrastructure as part of the overall landscaping strategy across the scheme, introduces many opportunities for ecological and visual interest alongside the need to accommodate surface water at pre-stipulated greenfield run-off rates. The overarching Drainage Strategy will build upon these principles under any future application, to ensure full compliance with Policies, particularly SS13, to provide a robust and technically viable, deliverable scheme.

### **6.5. Chapter 11: Natural Environment**

- 6.5.1. The University supports the approach taken to the conservation, maintenance and enhancement of the Natural Environment as described in Chapter 11 of the LPU, and in particular by Policies NE1, NE2 and NE3. The University is a significant landowner in Wokingham Borough and has considerable experience of proactively managing and improving parts of its land holding to protect and enhance biodiversity.
- 6.5.2. In relation to the natural environment and the approach taken by the University, reference should be made to the accompanying Ecology Technical Paper prepared by EPR and the related responses to Policy SS13 earlier in these representations.

### ***Policy NE1: Biodiversity and geodiversity***

- 6.5.3. The University has no detailed comments in relation to Policy NE1 but can confirm that the proposals for the LGV take account of and responds to its objectives in all important respects for the reasons set out below.
- **Ecological surveys.** EPR has undertaken comprehensive baseline ecological surveys across the LGV allocation site, beginning in April 2022 and which will continue into 2025. The results of the surveys have informed the LGV Framework Plan as presented in the Vision Document accompanying these representations, to ensure the preservation, and where possible enhancement, of biodiversity.
  - **Irreplaceable habitats, Local Wildlife Sites and Priority Habitats.** These will be retained and protected, including the implementation of suitable buffer zones where appropriate.
  - **Green corridors.** These are an integral part of the LGV Framework Plan, and will include semi-natural habitats, which will maintain connectivity to the wider landscape, avoiding the fragmentation and isolation of retained and newly created habitats.
  - **Enhancements for biodiversity.** Throughout the LGV, on-site opportunities to provide enhancements for biodiversity will be identified and incorporated such as native planting, diverse habitat creation, new bat roosting features and wildlife boxes.
- 6.5.4. With the implementation of suitable impact avoidance, mitigation and compensation measures, none of the ecological features identified by the comprehensive site surveys prevent the delivery of the LGV. The LGV Framework Plan has been developed to incorporate ecological features and maintain permeability to the wider landscape, ensuring compliance with Policies NE1, NE4 and FD3.

### ***Policy NE2: Biodiversity net gain***

- 6.5.5. The approach to securing Biodiversity Net Gain (BNG), as set out in NE2 is also supported by the University. The LGV includes substantial tracts of land, largely located in the Loddon Valley, which will remain

undeveloped. This land will deliver a new Country Park and provide BNG and SANG alongside other recreational opportunities. Key features of this are:

- **Habitat restoration:** habitats along the Loddon Corridor will be restored with a view to recreating likely historic habitats in this region. Such habitats may include wet grasslands and woodlands, reedbeds, and meadow.
- **Connectivity:** The newly created habitats will link up with existing greenspace to create a landscape-scale green corridor of semi-natural habitats of value to biodiversity. The University's aspirations for the Loddon Valley align with the targets of the Loddon Valley South Biodiversity Opportunity Area (BOA).
- **BNG within development parcels:** BNG opportunities will be incorporated into development parcels where suitable, in line with the requirements of Policy NE1. Retained habitats outside of the Loddon Valley within the LGV will be enhanced and managed through appropriate conservation management as set out in Policy NE1, thereby further increasing opportunities to deliver BNG.
- **BNG within SANG:** Some areas of the Loddon Valley will deliver SANG, and therefore biodiversity net gain within these areas will only be considered where habitat creation/enhancements deliver BNG beyond that required to deliver a functional SANG.

6.5.6. Given the land and opportunities available within the LGV, it is anticipated that a 20% BNG for habitats, linear habitats and watercourses will be achievable in excess of the requirements of Policy NE2, and in accordance with the requirements Policy SS13.

### ***Policy NE3: Thames Basins Heath Special Protection Area***

6.5.7. The requirements for the provision of SANG, as set out by Policy NE3 are also supported, with the LGV able to deliver new SANG to mitigate its impacts on the SPA.

6.5.8. Based on catchment data from visitor surveys undertaken on the SPA, the LPU Habitats Regulation Assessment sets out buffer zones for the TBH, within which suitable mitigation measures are laid out to avoid adverse effects on the integrity of the SPA.

6.5.9. The LGV includes land between the 400m-5km and 5-7km buffer zones. In addition, parts of it lie beyond 7km from the SPA, and therefore require no mitigation measures based on the current recommendations. An estimate of dwellings and populations (based on an average occupancy of 2.4) within each buffer zone is set out in the table below.

SPA Mitigation Zone	Approximate Number of Units	Population (units x 2.4 occupancy)
<i>Within 400m-5km Zone</i>	1,020	2,448
<i>Within 5-7km Zone</i>	2,885	6,924
<i>Beyond 7km</i>	25	60

*Table 6.1: Estimated number of dwellings and populations at LGV by SPA buffer zone*

6.5.10. Policy NE2 requires a SANG capacity of 8ha per 1000 new residents for development within the 400m-5km buffer zone. For new residential development within the 5-7km, this figure may be reduced, subject to agreement from Natural England and Wokingham Borough Council. Based on this, a total of up to **34.54ha** of SANG are considered necessary to mitigate the proposed development at LGV as set out in the table below.

SANG Requirement	WBC Standard SANG requirement	Land Required (ha)
Within 400m-5km Zone	8 ha / 1,000 pop	19.58
Within 5-7km Zone (low range)	1.73 ha / 1,000 pop	11.98
Within 5-7km Zone (high range)	2.16 ha / 1,000 pop	14.96
Total	Low Range:	31.56
	High Range:	34.54

Table 6.2: Estimated quantum of SANG required for mitigation

- 6.5.11. The SANG within the LGV is proposed to be created to the east of the River Loddon, which will provide a linear SANG along the River, directly adjacent to residential development. This will allow for immediate access to open greenspace, as well as providing an attractive waterside walking route.
- 6.5.12. Within the vicinity of the proposed LGV exists a network of established SANG (owned and managed by the University), which have been delivered to mitigate the potential impacts of recreational pressure on the SPA as a result of new development in Shinfield and the surrounding areas. These SANGs include:
- Langley Mead SANG (18.21ha);
  - Ridge SANG (23.65ha); and
  - Ridge SANG Extension (6.58ha).
- 6.5.13. Furthermore, an extension to Langley Mead SANG measuring 21.66ha is proposed. These existing SANG will be linked to the proposed SANG and new Country Park through new and existing footpaths, creating an extensive network of open greenspace within the local area.
- 6.5.14. With the delivery of the quantum of new SANG as outlined above, the proposed development at LGV would not result in adverse effects on the SPA from increased recreational pressure. The proposals would therefore comply with Policy NE1 and NE3 of the WBC's Update Local Plan and the Habitats Regulations.

### **Policy NE6: Valued landscapes**

**Response:** Object

#### **Explanation**

- 6.5.15. The LPU has introduced a new designation, 'Valued Landscapes' within the borough, covered by Policy NE6. These are designated 'in recognition of their distinctive character to the Borough's landscapes' (draft Policy NE6, 1). Supporting paragraph 14.57 states that:
- "All landscapes are important, but some will have particular value and exhibit specific attributes and characteristics that lift them above the rest."*
- 6.5.16. This implies that Valued Landscapes have this elevated value, attributes and characteristics, though this is not expressly stated.
- 6.5.17. There is one Valued Landscape Area within the proposed LGV, the 'River Loddon' (see the figures contained

within the Savills *Landscape and Visual Review* (**Appendix 13**). This covers much of the proposed LGV Country Park area, as well as some of the proposed housing area to the south of the River Loddon. Beyond the site, to the east of Mole Road there is also the 'Barkham and Bearwood' Valued Landscape.

- 6.5.18. Part 2 of Policy NE6 is informed by the Landscape Institute and IEMA's *Guidelines for Landscape and Visual Impact Assessment* (GLVIA3, Box 5.1, page 84). The GLVIA3 therefore provides a little more clarity on the meanings of these attributes, however in reality this is a relatively complex range of characteristics that are difficult to measure in either qualitative or quantitative terms.
- 6.5.19. The boundaries of the Valued Landscapes have been guided by the Borough Landscape Character Assessment and a further WBC topic paper, "*Valued Landscapes Assessment*" (September 2024). An earlier Topic Paper (*Valued Landscapes Topic Paper*, January 2020) also set out draft boundaries and associated 'buffer' areas that required further testing.
- 6.5.20. The boundaries of the River Loddon Valued Landscape have changed and been made larger since the 2020 Topic Paper. This has resulted in the Valued Landscape boundary **overlapping** with some of the proposed built infrastructure elements identified by the LPU Figure 8 Concept Plan. This means that the draft River Loddon Valued Landscape boundaries now include:
- proposed development parcels and parts of the spine road to the north of Reading Road/north-west of Arborfield;
  - proposed development parcels to the immediate south of the River Loddon and north of the existing Centre for Dairy Research;
  - proposed development parcels and spine road to the north of Carter's Hill and along Betty Grove Lane.
- 6.5.21. As with the 2020 Topic Paper, the Valued Landscape still also covers the alignment of the access road that would connect with Lower Earley Way, including the proposed bridge over the M4 motorway and the proposed road crossing the Loddon Valley to the south of the M4 connecting with the northern part of the LGV.
- 6.5.22. Beyond the LGV, the emerging River Loddon Valued Landscape boundary now also covers a potential future area of development to the south of the Thames Valley Science Park at the western end of Cutbush Lane, as well as additional parcels of land to the north of Lower Earley Way.
- 6.5.23. Given that the landscape character of many of these additional areas included in the Valued Landscape boundary have already been compromised by the adjacent road corridors, such as the Lower Earley Way, M4 and London Road, and also have little visual connectivity with the River Loddon, they do not actually have distinctive characteristics that "*lift them above the rest.*" Their inclusion within the designation is therefore questioned.
- 6.5.24. Paragraph 6.64 of the Council's Valued Landscape Assessment (2024) describes the Council's approach to the boundary review (underlining our emphasis):
- "Following review of the responses to the consultation, the boundaries of the proposed valued landscape areas have all been reassessed. It should be noted that landscape is a continuum, and boundaries will often represent zones of transition, but to make the valued landscape designation clearer and to simplify its use, the boundaries have been refined so that, wherever possible, they follow identifiable features on the ground such as field boundaries or roads. A consequence of this is that the valued landscapes may, therefore, include some areas that may not 'exhibit any of the demonstrable physical features' but nonetheless form an integral part of the wider valued landscape."*
- 6.5.25. The changes to the emerging Valued Landscape boundary are in some places significantly different to the 2020 version (see Appendix 2 of the Savills Landscape and Visual review for the 2020 boundaries). These changes go beyond the original 'buffer' areas and generally are not just a result of the area being amended



to follow 'identifiable features on the ground'.

- 6.5.26. To avoid confusion and allow consistency with the LPU Concept Plan for the LGV (LPU Figure 8), the River Loddon Valued Landscape boundaries require further refinement. In particular, where the aims of the policy could create inconsistency with the proposed development shown on the LGV Concept Plan.
- 6.5.27. There is further inconsistency with the wording of the supporting text to Policy NE6, in paragraph 14.60 that creates uncertainty about the circumstances under which development will be allowed within an area designated as a Valued Landscape. Paragraph 14.60 states that "*Where development is deemed appropriate, it should appropriately respond to the landscape through location, layout and high-quality design.*" Part 3 of Policy NE6 is however more prohibitive of development proposals affecting Valued Landscapes, unless the benefits of the development in that location clearly outweigh the harm.
- 6.5.28. This creates an inconsistency between the wording of Part 3 of Policy NE6 and its supporting text that must be addressed. Text should be incorporated to the wording of Policy NE6 text relating to development that is deemed appropriate.

### **Proposed Change**

*Development proposals affecting Valued Landscapes will only be supported where they protect, and where appropriate, integrate with and / or enhance the special features, characteristics and qualities of the landscape. Where development is deemed appropriate, it should appropriately respond to the landscape through location, layout and high-quality design. ~~, unless the benefits of the development in that location clearly outweigh the harm.~~*

***Redraw Valued Landscape Boundary to make consistent and compatible with the LGV Concept Plan***

## **6.6. Chapter 12: Design, Heritage and the Built Environment**

- 6.6.1. This chapter of the LPU rightly attaches a high priority to attaining good design through the development process, and overall the University supports its aims and objectives, many of which are relevant to the LGV, albeit that design requirements for the site are also set out in Policy SS13 and in LPU Appendix C. We would however make a number of comments as set out below.

### **Policy DH1: Place making and quality design**

- 6.6.2. The policy is not drafted in a sufficiently clear way. Currently, it contains 27 criteria and stretches to over 800 words, much of which consists of cross-referencing other policies in the LPU. Whilst this is not a direct objection on soundness, we suggest that the opportunity could be taken to simplify and shorten the policy by removing potential duplication.

### **Policy: DH5: The historic environment**

### **Policy: DH6: Archaeology**

- 6.6.3. Substantial analysis has been undertaken on the heritage assets within and around the LGV by RPS on behalf of the University.
- 6.6.4. The area around Hall Farm with its cluster of historic buildings, and the relationship with the Church at Arborfield, have been a particular focus of this work as explained in the accompanying Archaeology (**Appendix 10**) Built Heritage (**Appendix 11**) Technical Paper prepared by RPS that accompanies these Representations. Through the Environmental Impact Assessment process associated with any future planning application, further archaeological fieldwork and built heritage impact assessments will be undertaken.

- 6.6.5. As set out in the accompanying Vision Document, the University and the other principal landowners have made substantial progress in advancing a Framework Plan for the LGV, consistent with LPU Chapter 12 as a whole.

### 6.7. Chapter 13: Healthy and Safe Communities

- 6.7.1. The University has made progress with assessments on relevant matters (**Appendix 17, 19 & 20**), and these have informed the LGV Framework Masterplan. As a result of this process, the future proposals for Loddon Garden Village will be compliant with relevant policies in this part of the plan.

#### ***Policy HC1: Promoting healthy communities***

- 6.7.2. We note that the LPU has health related matters as a common thread throughout all of its policies, and emphasises that the purpose of planning is to not only prevent health risk, but optimise health promotion and reinforce health and social care. The value of this is clear, where the places we shape, shape us in return, and planning can prevent more disease than the NHS could ever treat. However, delivering this is complex, where health circumstance, priorities and needs vary not just geographically, but between communities, and further still depending upon demography and socio-economic circumstance.
- 6.7.3. The LPU therefore broadly frames health circumstance across the borough, and then sets place-shaping principles at the Spatial Strategy level, tailored to current circumstance, priorities and need. It then builds in additional resilience and flexibility through Policy HC1, which signposts and encourages projects to support the delivery of public health objectives defined in the Health and Wellbeing Strategy (which can be updated), and to engage with key health stakeholders regarding health care provision and enhancements.
- 6.7.4. This means that an approach is built in to keep up with the changing needs of health and social care, but it also sets the basis to how and where health is to be assessed, addressed and reported; and forms the platform for how positive weight can be recognised for health protection, promotion and health care in the planning balance. The latter is essential, as historically, planning has largely only considered health in terms of a risk to be managed, and lacked recognising and attributing positive weight for healthy urban design, or the inclusion of health and social care that extends beyond the needs of the proposed development. If no weight is ascribed to health promotion and health care, then there is no distinction between projects that build in significant and enduring positive health legacies from those that compound local circumstance and need.
- 6.7.5. The LPU provides the platform for this consideration through the requirements of Health Impact Assessment, and it should be clearly stated in the LPU, that HIA will be used as a means to firstly inform healthy urban design, and then test and communicate health protection, promotion and care through the application process.
- 6.7.6. In broad terms, the LPU correctly frames local health circumstance as typically better than the national trend, but notes that disparity exists, and with it, higher burdens of poor health and inequality. This is a critical point, as while life expectancy is high, healthy life expectancy has plateaued, is showing signs of worsening, and the risk of widening health inequality is increasing. The aging population is also rightly raised as a challenge, where the frequency, complexity, and cost of health and adult social care all increase with age. The inclusion of age and dementia friendly urban design principles to prevent, reduce and delay the need for clinical intervention and social care is therefore essential, as is a reasonable mix of appropriate, adaptable and affordable housing.
- 6.7.7. In relation to the LGV, policies in the LPU are geared towards improving affordability, retaining family and social networks, and facilitating healthy independent living for longer. The emphasis on active living to prevent, reduce and delay the need for clinical intervention and social care is welcomed, as is the emphasis on inclusive places and spaces to support age, dementia and neurodiversity friendly design principles.

- 6.7.8. While the housing strategy defining the type, size and tenure are to be evidenced on a project basis, it is also important to consider children's homes as part of housing need (including neurotypical and neurodiverse), as this will aid in rationalising their provision, can help locate them closer to schools and recreation, improve working and living conditions for foster parents and guardians, and reduce the need for external placement. The inclusion on Key Worker Homes as part of the affordable housing mix is also important, as this will help to address underpinning service challenges, and anchor critical care in the community.

***Policy HC2: Community infrastructure; and***

***Policy HC4: Open space, sports, recreation and play facilities***

- 6.7.9. The University supports these policies and the LGV will be a vital component of their success, as a result of providing a new community sports hub which is easily accessible to everyone, including the residents of established nearby communities. These Representations are accompanied by a Sports Facilities Technical Report (**Appendix 16**).
- 6.7.10. The LGV Framework Plan responds to what is directly required to meet the needs of the new population, both for indoor and outdoor sports, where there is not already sufficient provision within an acceptable travel time. The provision of a second artificial turf pitch (3G AGP), which is over and above the needs of the new community at the LGV, will help to meet a Borough-wide shortfall of this type of facility, as identified in the draft Playing Pitch Strategy. The HC2 draft policy also encourages the colocation of facilities, which the shared/dual use sports hub will deliver and make available for both the school use and the community.
- 6.7.11. It is recognised that there may also be justification for some off-site investment, for example into swimming pools, and into existing pitch sites providing for rugby and hockey. These sports facilities are not justified on site, either because the new population will be too small for a viable facility, or there is sufficient potential capacity off-site to meet the expected needs of the population. Details of any off-site investment will be considered at the application stage, likely as part of a S106 agreement.

***Policy HC8: Noise***

***Response:*** Object

***Explanation***

- 6.7.12. The University objects to this policy as from technical review by RPS (**Appendix 17**), two errors have been identified in the labelling and layout of Table 11 of the LPU, as a result of which strict compliance would not be possible as drafted. A proposed modification is set out below.
- 6.7.13. The final sentence of paragraph 13.45 of the supporting text states *"Where noise is of a continuous and/or tonal nature, this should be 5dB below background noise levels"*. Is also of concern for the following reasons:
- (i) It is not specific enough: it does not clarify where the noise is to be assessed (though it is considered safe to assume that it is at the receptor) nor, more importantly, whether it refers to the absolute level of noise or the rating level of the noise.
  - (ii) It is anachronistic, as it appears to relate to *new* noise sources as opposed to the *existing* sources discussed in the previous sentence. Noise of a tonal nature would also normally be expected to be quieter than noise of a continuous nature, since it is generally considered more noticeable. Noise of an impulsive nature would also be expected to be quieter, for the same reason, but is not mentioned.
- 6.7.14. Aside from these issues, allowances for tonality and impulsivity (as well as other sonic characteristics) are already covered by BS4142's acoustic feature corrections. Existing planning legislation and guidance (including the NPPF and the NPSE) also make reference to acceptable rating levels with respect to LOELs



and SOAELs, so the statement in paragraph 13.45 is unnecessary in any case.

### Proposed Change

Table 11: Internal and external noise standards

Room	Time	Noise Level ( <del>dB LA max</del> <del>L<sub>Aeq</sub></del> )
Bedrooms	Night (23.00-07.00)	30 <del>dB L<sub>Aeq,8hr</sub></del> Individual noise events should not normally exceed 45 dB L <sub>Amax</sub> during the night time
Living Rooms	Daytime (07.00-23.00)	35 <del>dB L<sub>Aeq,16hr</sub></del>
Outside amenity space	Daytime (07.00-23.00)	50 - 55 <del>dB L<sub>Aeq,16hr</sub></del> Balconies will need to meet the same standard unless it is clear they are not intended to be an outdoor living area

## 6.8. Chapter 14: Monitoring and implementation

- 6.8.1. The University notes and has no objection to the provisions set out in LPU Chapter 14 regarding Monitoring and Implementation, and the associated framework set out in Appendix M to the LPU.
- 6.8.2. However, the University's objections under policy SS13 relating to self-build and custom housing, and for gypsy and traveller pitches do require amendments to be made to the Monitoring Framework table provided at Appendix M of the LPU (page 228).

## 7. Conclusion

### 7.1. Summary of representations

- 7.1.1. These representations confirm the **support** of the University for the allocation of Loddon Garden Village, and all principal components of the Local Plan Update. Insofar as objections are put forward, primarily these are intended to ensure the effectiveness of the Policy SS13 to assist with securing the delivery of the LGV.
- 7.1.2. The University's ambition is for the Loddon Garden Village to be a fully integrated and sustainable new community. Given the extent of the University's landownership, the University will have a crucial role to play in the delivery of the Loddon Garden Village, and accordingly the University's support adds certainty to its delivery.
- 7.1.3. As described throughout these representations, supported by the accompanying Vision Document and Technical Reports, the University (working closely with the other principal landowners) has produced a substantial body of technical evidence which demonstrates the appropriateness, sustainability and deliverability of Loddon Garden Village.

### 7.2. Next steps

- 7.2.1. Moving forward the University will continue to work positively with WBC, the other landowners, other stakeholders and local communities on the development of the Vision and Masterplan and Strategic Design Code required by Policy SS13, and then the planning application process. This will ensure timely progress towards delivery of the site, consistent with the development trajectory within the LPU.
- 7.2.2. We therefore commend the LPU to the Inspector and request that, subject to focused modifications, the plan is able to proceed promptly towards adoption.

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