

Wokingham Borough Council

Pre-Publication Consultation Statement

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

September 2024



**WOKINGHAM
BOROUGH COUNCIL**

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1. Introduction

- 1.1 This Pre-Publication Consultation Statement sets out how Wokingham Borough Council has undertaken consultation under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 to inform the preparation of the Local Plan Update 2023-40 Proposed Submission Plan. It describes the key issues raised and how the findings of the consultations have been considered.
- 1.2 The council has undertaken the following formal periods of consultation:
1. Issues and Options –August and September 2016.
 2. Homes for the Future –November 2018 and February 2019.
 3. Draft Plan –February and April 2020.
 4. Revised Growth Strategy –November 2021 and January 2022.
- 1.3 Statements summarising the main issues raised for each consultation have been prepared and are available on the council’s website. This statement is supplementary to these, and primarily focuses on the key issues raised in latter Draft Plan and the Revised Growth Strategy consultations.
- 1.4 Table 1 below describes the consultation the council must undertake at Regulation 18 stage of the plan making process.

Table 1: Regulation 18 requirements.

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| <p>18. (1) A local planning authority must –</p> <ol style="list-style-type: none">a) notify each of the bodies or persons specified in paragraph (2) of the subject of a local plan which the local planning authority propose to prepare, andb) invite each of them to make representations to the local planning authority about what a local plan with that subject ought to contain. <p>(2) The bodies or persons referred to in paragraph (1) are –</p> <ol style="list-style-type: none">c) such of the specific consultation bodies as the local planning authority consider may have an interest in the subject of the proposed local plan;d) such of the general consultation bodies as the local planning authority consider appropriate; ande) such residents or other persons carrying on business in the local planning authority’s area from which the local planning authority consider it appropriate to invite representations. <p>(3) In preparing the local plan, the local planning authority must take into account any representation made to them in response to invitations under paragraph (1).</p> |
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- 1.5 The National Planning Policy Framework (NPPF) 2023 states that plans should be shaped by early, proportionate, and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees.
- 1.6 The purpose of the Regulation 18 stage is to provide opportunity for the council to engage with residents and relevant organisations on how planning policy can be used to help address key planning issues in the borough, and to seek views on the council's preferred options for addressing these. The consultations provide an opportunity for interested parties to comment on key planning issues for the borough and the council's preferred option to address them, and also to suggest any issues or alternative options.
- 1.7 This consultation statement has been prepared to meet the requirements of Regulation 19 of the Town and County Planning (Local Planning) (England) Regulations 2012 which requires a statement setting out:
- Which bodies and persons were invited to make representations under Regulation 18.
 - How those bodies and persons were invited to make such representations.
 - A summary of the main issues raised by those representations.
 - How those main issues have been addressed in the Proposed Submission Plan.

2. Previous consultations

- 2.1 The council has been preparing the Local Plan Update for a number of years. During this time, the council has undertaken a number of formal engagement exercises where residents and stakeholders were able to comment on the direction of and proposed policies. The council has also published a number of 'call for sites' during where people were asked to provide details of land they considered to be available and suitable for potential development.
- 2.2 The council has undertaken four formal consultations as set out below:
- 1. Issues and Options –August and September 2016.**
The purpose of the consultation was to open up discussion on the scope and potential direction of how development might be managed.
 - 2. Homes for the Future –November 2018 and February 2019.**
The consultation invited views on all areas of land that had been promoted as being available and potentially suitable for development by landowners, developers or third parties. Views were also sought on locations that may be

suitable for higher development densities and taller buildings. The consultation attracted responses from 1,463 individuals and organisations.

3. Draft Plan –February and April 2020.

The Draft Plan Consultation set out a preferred strategy for managing development and a suite of development management policies. The consultation attracted 5,500 responses from 721 individuals and organisations.

4. Revised Growth Strategy –November 2021 and January 2022.

The Revised Growth Strategy Consultation set out an alternative preferred strategy to that previously presented in the Draft Plan Consultation. This was necessary following a change in circumstances making the originally preferred strategy unachievable. The consultation was focussed on where new housing might be located and the designation of areas as Local Green Space. The consultation attracted around 2,800 responses from a combination of individuals and organisations.

- 2.3 At each stage, public consultation was undertaken in accordance with the procedures and standards set out in then adopted Statement of Community Involvement¹.
- 2.4 Specific and general consultation bodies are specified in Part 1(2) of The Town and Country Planning (Local Planning) (England) Regulations 2012. The council maintains a database of these bodies together with local organisations, residents, developers, landowners and other individuals who have expressed an interest in being consulted on or being kept informed of the development of planning policy. Specific and general consultation bodies, along with other interested residents and stakeholders were notified of each consultation.
- 2.5 Each consultations was supported by a programme of engagement activities.
- 2.6 Engagement activities undertaken to support the Draft Plan Consultation, included the following main actions:
- Leaflet distributed to around 64,000 households across the borough.
 - Emails and/or letters distributed to all individuals and organisations registered on the council's planning policy consultation database, including specific and general consultation bodies.
 - Drop-in sessions held at local venues across the borough.
 - Press releases and statutory notices placed on the council's website and in libraries across the borough.
 - Consultation details published on the council website and social media pages.

¹ Statement of Community Involvement (March 2024), available at: <https://www.wokingham.gov.uk/planning-policy/emerging-plans-and-guidance/statement-community-involvement>

- Hard copies of the plan and supporting documents were made available at the council offices and at libraries across the borough.

2.7 Further details of the engagement activities is set out in the Report on Initial Consultation Outcomes (January 2021)²

2.8 Engagement activities undertaken to support the Revised Growth Strategy Consultation, included the following main actions:

- Postcards and leaflet distributed to around 64,000 households across the borough.
- Electronic newsletter distributed to all individuals and organisations registered on the council's planning policy consultation database, including specific and general consultation bodies listed in the Regulations.
- Drop-in sessions held at local venues in the borough.
- Virtual information sessions held on Microsoft Teams.
- Press releases and statutory notices placed on the council's website and in the local newspaper.
- Consultation details published on the council website, Engage Wokingham Borough and social media pages.
- Hard copies of the consultation document and supporting documents were made available at the council offices.
- Full consultation display available in council's reception lobby.

2.9 Further details of the engagement activities undertaken during the Revised Growth Strategy consultation can be found in the Report on Initial Consultation Outcomes (September 2022)³.

3. Summary of key issues

3.1 The following table provides a summary of the key issues raised through the consultation exercise. A commentary is also provided by the council to explain how the issue has been taken into account and, where relevant, how this has led to a particular change to a policy or proposal in the Proposed Submission Plan.

² Draft Local Plan Regulation 18 – Report on initial consultation outcomes (January 2021)

³ Local Plan Update: Revised Growth Strategy Consultation 2021 – Report on initial consultation outcomes (September 2022), available at: <https://www.wokingham.gov.uk/planning-policy/emerging-local-plan-update/previous-consultations>

Table 1: Summary of responses to Regulation 18 consultations

Summary of key issues raised	Changes made to the Proposed Submission Plan
Spatial vision	
Key issues raised include: • The need for further emphasis on reducing use of natural resources and responding to climate change. • The need for further reference to the natural environment, including biodiversity net gain.	The spatial vision includes the borough being a sustainable place for generations. This is expanded upon in the supporting text which refers to moving towards being net zero and reducing the unnecessary use of resources. The vision is supplemented by objectives covering climate change and biodiversity. Turning more widely to policies, a new ‘Climate Change and Energy’ chapter is included in the Proposed Submission Plan that comprises a suite of planning policies on energy and water standards and renewable energy generation. The policies have evolved from those proposed in the Draft Plan and with the evolved policies informed by current industry best practice, including those found sound and adopted by other local planning authorities. The policies are supported by a comprehensive evidence base, including the ‘Net Zero Policy – Technical Evidence Base’ and the ‘Local Plan and Community Infrastructure Levy Viability Study. The Proposed Submission Plan continues to propose policies that respond to climate change. Climate change is embedded into a number of policies in the plan covering matters such as prioritising active and sustainable travel, green and blue infrastructure, trees, woodland, hedges and hedgerows, landscape and design. Additional detail regarding biodiversity net gain is provided in Policy NE2 of the Proposed Submission Plan. Site-specific requirements for biodiversity net gain are also included in Policy SS13: Loddon Valley Garden Village and Policy SS12 South Wokingham Strategic Development Location, and Policy SS11: Arborfield Green Strategic Development Location. Other policies continue to be proposed in the Proposed Submission Plan that address

Summary of key issues raised	Changes made to the Proposed Submission Plan
	matters such as the natural environment, particularly those contained in Chapter 11.
Objectives	
Key issues raised include: • Further investment being required in public transport services and infrastructure, e.g. walking and cycling routes to reduce reliance on cars; • Recognition of the borough's historic landscapes and connectivity with townscapes, landscapes and other assets; • Recognition that green and blue infrastructure can contribute to a sense of place; • The need for the timely delivery of infrastructure; • Protection and enhancements of the natural environment, safeguarding irreplaceable habitats and delivering biodiversity net gain. • A need for a more even distribution of housing across the borough. • The need for more affordable housing and smaller dwellings to accommodate needs of older persons. • The erosion of public open spaces due to pressure from development.	Objective 2 seeks to reduce the need to travel and widen travel choice, with reference made to walking, cycling and public transport. Objective 3 seeks the improvement of strategic transport connectivity. These objectives continue to be carried forward into the spatial strategy and policies promoted in the Proposed Submission Plan. Objective 4 seeks to maintain the strengthen the sense of place and includes reference to the historic environment, landscape and townscape character, and biodiversity. These objectives continue to be carried forward into the spatial strategy and policies promoted in the Proposed Submission Plan. Objective 10 seeks the timely provision of new and improved infrastructure. This objective continues to be carried forward into the spatial strategy and policies promoted in the Proposed Submission Plan. The spatial strategy promoted by the Proposed Submission Plan take account of constraints and opportunities for development across the borough. Taking factors into account, development is directed to those locations assessed as most suitable and sustainable. It is recognised that as a proportion, less development is proposed in the northern part of the borough, however this is justified by the presence of constraints such as flood risk, best and most versatile land and Green Belt. It is also notable that less land has been promoted for development on the north of the borough than elsewhere,

Summary of key issues raised	Changes made to the Proposed Submission Plan
Environment Agency recommended an additional objective relating to protection of natural resources and improving water quality.	possibly reflecting the above constraints. Notwithstanding, the Proposed Submission Plan includes allocations across the borough. Objective 9 seeks to meet the need for housing and ensuring that a range of suitable housing options are available, including affordable housing. This objective continues to be carried forward into the spatial strategy and policies promoted in the Proposed Submission Plan. Notably Policy H3 seeks a proportion of affordable housing from qualifying developments, whilst Policy H1 seeks an appropriate housing mix. The housing mix detailed in supporting text has been updated to reflect the Local Housing Needs Assessment 2022 and includes smaller 1-bedroom and 2-bedroom dwellings. It is acknowledged that development will lead to the loss of undeveloped, greenfield land. The Proposed Submission Plan promotes a spatial strategy and policies that promote the use of suitable and available previously developed land and takes into account green infrastructure across the borough. To help guide development decisions, NE6: Valued landscapes identified areas of the borough which have particular valued. Policy HC3: Local Green Space identified over 100 spaces identified by communities as of particular local importance. Public open spaces continue to be protected. Objective 1 seeks the mitigation of, and adaptation to climate change. Taking account of climate change would include matters such as current and future flood risk. The council does not consider a specific objective on natural resources and water quality is necessary. It should be notes that the Proposed Submission Plan continues to recognise and respond to flood risk and water quality, for example through policies contained in Chapter 10: Flooding and drainage, as well as site allocation policies.

Summary of key issues raised	Changes made to the Proposed Submission Plan
Spatial Strategy	
Key issues raised by residents and parish/town councils include: • Growth proposed in the borough is disproportionately low in some areas, e.g. Twyford, Hurst, Sonning. • Maximise opportunities to increase densities and optimise previously developed land over greenfield sites. • Cumulative impact of growth on existing communities, settlements and infrastructure. • Slow delivery of key infrastructure, services and facilities to support existing SDLs. • Access and highway impact on the local and strategic road network. • Identification of a new SDL at Hall Farm / Loddon Valley contrary to the Arborfield and Barkham and Shinfield Neighbourhood Plans. • Extending existing settlements with larger scale development a more sustainable option, e.g. land at Twyford / Ruscombe and Ashridge. Key issues raised by the development industry included: • Larger allocations are often complex, require significant infrastructure and lead-in times which can delay delivery • Identifying small / modest development opportunities that can deliver early in plan period. • Plan period should be extended further to ensure a 15-year plan post adoption. Several proposed an extension to 2040	The spatial strategy promoted by the Proposed Submission Plan take account of constraints and opportunities for development across the borough. Taking factors into account, development is directed to those locations assessed as most suitable and sustainable. It is recognised that as a proportion, less development is proposed in the northern part of the borough, however this is justified by the presence of constraints such as flood risk, best and most versatile land and Green Belt. It is also notable that less land has been promoted for development on the north of the borough than elsewhere, possibly reflecting the above constraints. Notwithstanding, the Proposed Submission Plan includes allocations across the borough. Policy SS2: Spatial strategy specifically sets out support for the efficient use of available and suitable previously developed land within settlements. Notwithstanding this clear support, assessments of land supply demonstrate that available and suitable previously developed land is insufficient to meet development needs, requiring suitable greenfield land to be identified and enable for development. The impact of all land promoted for development has been carefully considered in preparing the Proposed Submission Plan, for example through the Housing and Economic Land Availability Assessment and other technical assessments. It is acknowledged that some places will see greater change as a result of the spatial strategy, then others. The council has considered the impact of development and believes the spatial strategy is the most suitable and sustainable.

Summary of key issues raised	Changes made to the Proposed Submission Plan
• Growth proposed in the borough is disproportionately low in some settlements, given their role and sustainability credentials • Challenges with delivery of infrastructure for the SDLs • Clarity on emergency planning arrangements and implications for development proposals within the DEPZ	Whilst acknowledging that residents would wish to see infrastructure provided earlier, this is not possible in all cases with the population having to establish before schools or shops become viable. The council has successfully delivered other infrastructure earlier than required by impacts, for example the council has used borrowing to support the early delivery of road connections under the adopted development plan. The timely delivery of infrastructure considered throughout the Propose Submission Plan. The Proposed Submission Plan continues to identify the Loddon Garden Village as a key component of the spatial strategy and part of the most suitable and sustainable approach to meeting development needs and managing development. Alternative large developments have been assessed in preparing the Proposed Submission Plan but are not preferred at this time. The promotion of land to the east of Twyford, within Ruscombe Parish is situated within the Green Belt, with large parts comprising best and most versatile agricultural land. The council is satisfied that development needs can be met sustainably through land outside of the Green Belt, and as such no exceptional circumstances exist to necessitate amending Green Belt boundaries. The council considers that its proposed housing supply enabled by the spatial strategy to be robust and that it provides sufficient flexibility. Whilst acknowledging the time required to deliver larges sites, a number of proposed allocations are already subject to live planning applications or active pre-application engagement, providing confidence of delivery. The spatial strategy

Summary of key issues raised	Changes made to the Proposed Submission Plan
Bracknell Forest Council welcomed further engagement on cross boundary transport impacts, e.g. A329(M) through Bracknell.	and supporting allocations purposely include smaller sites which are not reliant on early infrastructure deliver to assist in maintaining a more even land supply. A housing trajectory is provided in Appendix F of the Proposed Submission Plan which shows that the housing requirement plan can achieve. The plan period has been extended from 31 March 2037/38 to 31 March 2040. The Proposed Submission Plan has been tested to ensure development viability is maintained. This has taken account of different site typologies and includes a specific assessment of the Loddon Valley Garden Village The Proposed Submission Plan continues to include a policy to guide decisions on development in proximity to AWE Burghfield (Policy SS7). No allocations are proposed within the Detailed Emergency Planning Zone that surrounds the establishment. The council will continue to work with Bracknell Forest Council and other neighbouring local authorities on cross boundary transport impacts and other strategic matters. The council has produced a Duty to Cooperate Statement setting out how engagement and cooperation has been undertaken and achieved.
Settlement Hierarchy	
Key issues raised by residents and parish/town councils include: Whether the classification of Charvil as a Tier 3 settlement and the identification of two proposed housing allocations is appropriate.	The settlement hierarchy provides a framework for steering development to the most sustainable locations across the borough. Settlements higher up the hierarchy are those that have a broader range of services and facilities.

Summary of key issues raised	Changes made to the Proposed Submission Plan
Key issues raised by the development industry include: • Whether Spencers Wood, Shinfield and Three Mile Cross should be defined as a Tier 1 settlement (major development location); • Whether Swallowfield should be defined as a Tier 2 settlement (modest development location); • Whether Sindlesham being defined as a Tier 3 settlement (limited development location)	The settlement hierarchy has been reviewed to ensure it reflects an up-to-date understanding of services and facilities. The council is satisfied that the hierarchy appropriately reflects the nature of settlements. Whist Charvil is a tier 3 minor settlement, the proximity to the tier 1 major settlement of Twyford justifies the spatial strategy put forward in the Revised Growth Strategy. Notwithstanding, the Proposed Submission Plan identifies one allocation, with the other removed as a result of new flood risk analysis.
Existing Strategic Development Locations (SDL)	
<i>Arborfield Green SDL:</i> Key issues raised by residents and parish/town councils include: • Whether the scale of development proposed in the area is appropriate. • The delivery of planned infrastructure. • Pressure on existing infrastructure (e.g. schools, health care). • The adequacy of public transport services. Key issues raised by residents and parish/town councils to the development guidelines include: • The requirement for improvements to cycling and pedestrian routes to access services / facilities, e.g. Bohunt School • The requirement for traffic calming measures • The need to retain existing trees • Climate change mitigation • The requirement for active travel	The Arborfield Garison (now Arborfield Green) Strategic Development Location was originally identified within the adopted Core Strategy local plan for a sustainable, well designed mixed use development of around 3,500 new homes. The designated was tested through that plans examination process. It has since been granted planning permission and is being delivered. The allocation is supported by a package of infrastructure including a secondary school (delivered), primary schools (one of two delivered), and new road connections (delivered). The council remains of the view that the development is sustainable and well planned for. It is acknowledged that the proposed new health facility has not been delivered within the site, with health authorities preferring other solutions to serve the increased population. Policy SS11: Arborfield Green Strategic Development Location provides a framework to assess future development proposals. Requirements of the policy include:

Summary of key issues raised	Changes made to the Proposed Submission Plan
Key issues raised by the development industry include: • Over reliance on SDLs to deliver housing • The need to reduced the requirement to align with the council’s housing land supply evidence. A landowner with an interest in the Arborfield Green SDL suggested that capacity of the area could accommodate a further 500 dwellings. Land at Barkham Square would provide opportunity to expand the SDL.	- Prioritisation of cycle and pedestrian movements through the SDL to maximise connectivity and accessibility to the district centre and planning education provision. - Improvements to the management of general traffic, including consideration of traffic calming measures. - Achieving climate resilient neighbourhoods through adaptation and mitigation methods, including passive design principles and energy demand reduction measures. - Implementation of a sustainable transport and movement strategy providing new/improved cycling and pedestrian connections. Proposed Submission Plan Policy SS11 has recognised the opportunity to optimise development density to provide an additional 300 dwellings. The policy also allocates the adjoining area known as Barkham Square for around 600 dwellings. The suitability and viability of these changes has been tested through the technical evidence base. The council considers that its proposed housing supply enabled by the spatial strategy to be robust and that it provides sufficient flexibility. Whilst the strategy endorses strategic scale development, the spatial strategy and supporting allocations purposely include smaller sites which are not reliant on early infrastructure deliver to assist in maintaining a more even land supply. A housing trajectory is provided in Appendix F of the Proposed Submission Plan which shows that the housing requirement plan can achieve.

Summary of key issues raised	Changes made to the Proposed Submission Plan
<i>South Wokingham SDL:</i> Key issues raised by residents and parish/town councils include: • The loss of green space, agricultural land and open countryside. • Impact on the separation between Wokingham, Bracknell and Crowthorne. • Congestion and highway safety on the network, e.g. London Road, Old Wokingham Road, South Wokingham Distributor Road, Waterloo Road, Nine Mile Ride. • Whether there is adequate accessibility to key settlements/towns (e.g. Wokingham, Bracknell) by public transport. • Impact on character around the south of Wokingham. Key issues raised by residents and parish/town councils to the development guidelines include: • The need to retain existing trees and provide sufficient open space. • The need to maximise opportunities for public transport and active travel, including consideration for all users. • The requirement for junction / highway improvements at Easthampstead Road with Old Wokingham Road. • The need to explore opportunities to re-instate Ludgrove Road, a recognised historic route. Key issues raised by the development industry include:	The South Wokingham Strategic Development Location was originally identified within the adopted Core Strategy local plan for a sustainable, well designed mixed use development of around 2,500 new homes. The designated was tested through that plans examination process. It has since been granted planning permission and is being delivered. The allocation is supported by a package of infrastructure including primary schools (one of two delivered), and new road connections. The council remains of the view that the development is sustainable and well planned for. Policy SS2: Spatial strategy specifically sets out support for the efficient use of available and suitable previously developed land within settlements. Notwithstanding this clear support, assessments of land supply demonstrate that available and suitable previously developed land is insufficient to meet development needs, requiring suitable greenfield land to be identified and enable for development. Transport modelling has been undertaken to inform the likely impact of development on the road network. This shows that impact can be managed to be acceptable. Policy SS12: South Wokingham Strategic Development Location proposes a requirement to ensure development proposals implement a sustainable transport and movement strategy informed by a detailed Transport Assessment, and providing connections for pedestrians and cyclists to key destinations and nearby settlements, such as Wokingham and Bracknell; and highway improvements along the A321 / A329 corridors, including measures for active travel and public transport services.

Summary of key issues raised	Changes made to the Proposed Submission Plan
- Challenges with delivery of infrastructure that have prevented SDL delivery. - The impact of multiple landowners on delivery. - Whether the site is deliverable within the plan period. Landowners associated with the site commented that flexibility on the design and layout of the access road is required and promoted a higher development density of 35dph.	An additional policy is proposed in the Proposed Submission Plan that introduces several sustainable development principles. Policy SS1 ensures that development proposals maintain the separate identity of settlements and places, avoiding physical or perceived coalescence. With regard to the proposed allocation, criterion 4a) of Policy SS12 ensures the siting, layout, form, design and landscaping of the development protects and maintains the physical, visual and perceived separation of the defined settlements of Wokingham, Crowthorne / Pinewood (Crowthorne), Finchampstead North and Bracknell. Policy SS12 is supported by development guidelines, which set out the concept rationale, place-making principles and infrastructure requirements for the South Wokingham SDL. Criterion B3.8b) ensures that development to the south of Wokingham embeds and integrates into the landscape setting, structured around a landscape-led approach, incorporating existing landscape features, such as tree and hedgerow planting. The council is satisfied that the South Wokingham Strategic Development Location is developable with the vast majority expected to be completed within the plan period. Planning permission has now been granted for the majority of the remaining development parcels and the council has secured a loan from Homes England for the delivery of the distributor road which will unlock the site. The related policy SS12, has been amended to increase the scale of additional development to be delivered on land south of Waterloo Road to 1,100 dwellings, an increase from 835 dwellings within the Revised Growth Strategy.

Summary of key issues raised	Changes made to the Proposed Submission Plan
Bracknell Forest Council welcomed confirmation on SANG capacity. Thames Water commented that local upgrades to the existing wastewater network may be required. Local wildlife trust raise that development should achieves a minimum 10% net gain in biodiversity and provides blue and green infrastructure. Policy should also include measures to ensure mitigation of effects on priority habitats; and to improve habitat connectivity.	Policy SS12 requires SANG to be provided as part of the proposed development to ensure impacts on the integrity of the Thames Basin Heaths SPA are mitigated. The development guidelines continue to recognise improvements to the utilities network by securing capacity and connections ahead of occupation. Further, Policy C8 (Utilities) continues to ensure development proposals demonstrate sufficient capacity for wastewater collection infrastructure to service the development, and engagement is sought with utility providers, including relevant water supply / wastewater companies early in the planning process to identify potential infrastructure requirements. Criteria 8(a) of Policy SS12 requires development proposals to implement a comprehensive ecological strategy that achieves measurable biodiversity net gain of at least 10% calculated using the latest statutory metric. Criteria 4(f) of Policy SS12 also requires development proposals to draw on the recreational and ecological opportunities of the Emm Brook, utilising its role and function in biodiversity enhancements. Plan should also be read as a whole. An additional policy is proposed in the Proposed Submission Plan relating to biodiversity net gain. Policy NE2 states: <i>'All development proposals should demonstrate a minimum biodiversity net gain of 10% (unless specific in another site allocation policy) calculated via the most up-to-date national biodiversity accounting metric and provide details of the long-term maintenance and management of the net gain. This should be delivered on site in the first instance, or through biodiversity off-setting where appropriate.'</i>

Summary of key issues raised	Changes made to the Proposed Submission Plan
<i>South of the M4 SDL:</i> Key issues raised by residents and parish/town councils include: • Scale of development and impact on the highway network (e.g. M4, A327 and A33) • Pressure on existing infrastructure, services and facilities, e.g. health care, schools, public, transport • Impact on character of Shinfield and Arborfield villages • Contrary to Shinfield Neighbourhood Plan • Delays to delivery of local centre Key issues raised by the development industry include: • Higher provision of housing and employment to enhance the sustainability of the SDL • Policy should be updated to reflect changes to DEPZ Environment Agency recommended a commitment for development to design in measures to mitigate potential effects on ancient woodland. Local wildlife trust recommended an additional requirement to ensure development achieves a minimum 10% net gain in biodiversity and provides blue and green infrastructure.	The South of the M4 Strategic Development Location was identified within the adopted Core Strategy local plan for a sustainable, well designed mixed use development. The designated was tested through that plans examination process. The development has since been granted planning permission and is now nearing completion. As a result, the Proposed Submission Plan does not propose any site allocation. Settlement areas for the related settlements are defined on the Policies Map.

Summary of key issues raised	Changes made to the Proposed Submission Plan
<i>North Wokingham SDL:</i> Key issues raised by residents and parish/town councils include: • Impact on character of north Wokingham and surrounding area • Separation between Wokingham and Hurst • Congestion and highway safety on the network, e.g. M4, A329(M), Reading Road • Pressure on parking provision at Twyford railway station • Noise and air pollution from M4 and A329(M) • Increase densities to optimise use of available land Key issues raised by residents and parish/town councils to the development guidelines include: • Active travel improvements should consider access for all users • Retain existing trees and open spaces • Maintain separation between Wokingham and Binfield/Bracknell • Noise mitigation • Consideration of commuter traffic to Twyford railway station Local wildlife trust recommended an additional requirement to ensure development achieves a minimum 10% net gain in biodiversity and provides blue and green infrastructure. <i>Across the SDLs</i> Key issues raised by the development industry include: • Challenges with delivery of infrastructure.	The North Wokingham Strategic Development Location was identified within the adopted Core Strategy local plan for a sustainable, well designed mixed use development. The designated was tested through that plans examination process. The development has since been granted planning permission and is now nearing completion. As a result, the Proposed Submission Plan does not propose any site allocation. Settlement areas for the related settlements are defined on the Policies Map. The site capacities expressed in policies relating to Strategic Development Locations provide suitable flexibility by using the term ‘around’. This

Summary of key issues raised	Changes made to the Proposed Submission Plan
• A flexible housing figure similar to the Core Strategy. • A reduced housing figure to align with the latest Five-Year Housing Land Supply Statement. • Reliance of the SDLs and contribution to housing distribution in the borough. Historic England recommended an additional development principle to consider heritage assets. Environment Agency recommended references to watercourses, biodiversity net gain and habitat compensation in the policy/development guidelines.	enables development proposals to come forward with detailed site capacities, following an appropriate design-led solution and taken account relevant local and national policies. The council considers that its proposed housing supply enabled by the spatial strategy to be robust and that it provides sufficient flexibility. Whilst the strategy endorses strategic scale development, the spatial strategy and supporting allocations purposely include smaller sites which are not reliant on early infrastructure deliver to assist in maintaining a more even land supply. A housing trajectory is provided in Appendix F of the Proposed Submission Plan which shows that the housing requirement plan can achieve. Additional principles / requirements are included each policy relating to Strategic Development Location to ensure development proposals incorporate measures to conserve and enhance heritage assets and their settings, through appropriate design and provision of sufficient space. Some policies also include detailed site-specific requirements. Policy SS11: Arborfield Green Strategic Development Location), Policy SS12: South Wokingham Strategic Development Location, and Policy SS13: Loddon Valley Garden Village include place shaping principles and development guidelines that continue to cover matters such as watercourses, biodiversity net gain and habitat compensation. Other specific policies continue to be proposed in the plan that provide a suitable policy framework for these matters (e.g. Policy FD3; Policy NE1 and Policy NE2).
Loddon Valley Garden Village	
Key issues raised by residents and parish/town councils include: • Timing of delivery of key infrastructure, services and facilities. • The adequacy of public transport and active travel routes.	Loddon Valley Garden Village is proposed to be allocated for a holistically planned, beautifully designed, and sustainable new community. As well as being in proximity to key employment destinations, the community will be

Summary of key issues raised	Changes made to the Proposed Submission Plan
• Congestion and highway safety on local / strategic network, including M4, A327, A329, B3349, Mole Road, Church Lane and Hyde End Road. • Coalescence with settlements, e.g. Arborfield and Shinfield. • Impact on character of Hall Farm, Carter's Hill and neighbouring settlements. • Contrary to Arborfield and Barkham and Shinfield Neighbourhood Plans. • Flood risk from River Loddon and Bearwood Lakes Category A Dam Reservoir. • Loss of green space, agricultural land and countryside and harm to natural environment. • Disproportionate distribution of growth across the borough. • Overestimate of local employment opportunities at Thames Valley Science Park, e.g. Shinfield Studios. • Pressure on capacity of existing infrastructure, services and facilities (e.g. health, schools). • The availability of limited information on costings in the viability assessment, e.g. M4 junction • The appropriateness of concentrating affordable housing in one location. • Impact on air quality, noise and vibration. • Impact on nature conservation sites, protected trees and ancient woodland. • Mineral extraction likely to cause delays to site delivery.	delivered with a comprehensive supporting infrastructure including new schools (primary and secondary), shops, services and facilities, open space including a country park and new connections. The related Policy SS13 is supported by additional guidance contained in Appendix C of the Proposed Submission Plan. These set out the concept rationale, key place making principles and infrastructure requirements for the site. The council is required to plan for development needs, with the number of homes informed by a national standard methodology. Policy SS2: Spatial strategy specifically sets out support for the efficient use of available and suitable previously developed land within settlements. Notwithstanding this clear support, assessments of land supply demonstrate that available and suitable previously developed land is insufficient to meet development needs, requiring suitable greenfield land to be identified and enable for development. It is acknowledged that neighbourhood development plans have supported the development limited defined within the existing adopted Core Strategy and Managing Development Delivery local plans. Assessments of land supply clearly demonstrate that it is not possible to meet development needs without identifying additional greenfield land. The Proposed Submission Plan identified those locations assessed as most suitable and sustainable. The spatial strategy promoted by the Proposed Submission Plan take account of constraints and opportunities for development across the borough. Taking factors into account, development is directed to those locations assessed as most suitable and sustainable. It is recognised that as a proportion, less development is proposed in the northern part of the borough, however this is justified by the presence of constraints such as flood risk, best and most versatile land and Green Belt. It is also notable that less land has been promoted for development on the north of the borough than elsewhere, possibly reflecting the above constraints.

Summary of key issues raised	Changes made to the Proposed Submission Plan
• Protection of heritage assets e.g. Bearwood College, St Bartholomew's Church and Locally Valued Historic Assets in the neighbourhood plan. • Unclear why other suitable alternatives such as Ashridge and Twyford / Ruscombe have not been considered. • No need to plan beyond the plan period. Key issues raised by residents and parish/town councils include: • Timescales and lead-in times for housing and infrastructure delivery. • Uncertainty in delivery and funding of strategic infrastructure. • The absence of a viability assessment. • Limited access to public transport services and infrastructure, e.g. railway station . • Pressure on capacity of infrastructure and services. • Plan should allocate additional sites of varied sizes / locations to boost housing supply in the short term.	Notwithstanding, the Proposed Submission Plan includes allocations across the borough. The Loddon Valley Garden Village is the preferred strategic allocation contained within the Proposed Submission Plan. Other potential areas were considered through technical work and through the sustainability appraisal. The council has reviewed the matters raised in representations and remains of the opinion that the Loddon Valley Garden Village is the most suitable and sustainable option. The provision of housing in proximity to key employment destinations is a positive factor is the selection of the Loddon Valley Garden Village proposal. The council recognises that there is no guarantee that residents of the garden village will work locally, however aligning the location of homes and jobs provides for such an opportunity. The allocation is situated adjacent to existing bus routes which can be improved and are likely to financially sustainable. Additional routes are also being considered with the site promoters and in consultation with Reading Borough Council. Transport modelling has been undertaken to inform the likely impact of development on the road network. This shows that impact can be managed to be acceptable. Viability of the development, including the delivery of necessary infrastructure, has been tested through the 'Local Plan and Community Infrastructure Levy Viability Study'. This supersedes the high level viability assessment undertaken as part of the previous masterplanning exercises. Policy SS13 continues to include a requirement in the place shaping principles to ensure the siting, layout and form of development protects

Summary of key issues raised	Changes made to the Proposed Submission Plan
	and retains the permanent physical and visual sense of separation of Arborfield and the defined settlements of Arborfield Cross and Shinfield. An additional requirement is proposed in the place shaping principles to ensure the development incorporates measures to protect the separate identity of Carter's Hill. Constraints such as the historic environment, noise and biodiversity have been fully considered and do not inhibit the principle of development or quality of place. The council is confident that the new community will not be at risk of flooding or lead to an increase of flood risk elsewhere. Indeed a betterment might be achieved. Policy SS13 includes a place shaping principle which requires development to locate new buildings outside of areas of flood risk. The concept plan illustrates how this can be achieved. In addition, a delivery principle requires the implementation of a comprehensive drainage and flood alleviation strategy that considers and takes opportunities to improve the management of flood risk and reduce risk of flooding to areas beyond the garden village. Additional guidance is included in Appendix C related to flood risk and drainage matters. 40% of housing delivered on the garden village is expected to be affordable, affordable housing. This is an increase on the requirement of 35% to be affordable housing on existing strategic development sites. Whilst the garden village will make the largest contribution to meeting need, affordable housing will come forward across the borough through smaller scale developments. The garden village is expected to devise and implement a comprehensive energy and sustainability strategy, aligned to deliver zero carbon development. This accords with the council's climate emergency declaration and Climate Emergency Action Plan. The Proposed Submission Plan includes a dedicated chapter on energy and climate change which

Summary of key issues raised	Changes made to the Proposed Submission Plan
Key issues raised by Reading Borough Council include: • The limited detail on infrastructure package to incentivise sustainable behaviours and travel choices, including public transport and active travel connections. • The opportunity to explore opportunities for a dedicated public transport link across the M4 to Reading. • Request for clarity on trigger for new junction on the M4.	includes policies relating to energy standards for residential and non-residential developments. Whilst the plan period is to 2040, the council considers that meeting the majority of development needs through strategic scale development is the most sustainable and suitable approach within the context of the borough. Meeting the majority of needs through strategic scale development was the most supported approach to development in early consultations on the local plan. As recognised in national planning policy and guidance, large scale developments can extend beyond a single plan period. Planning for the full vision is necessary to ensure the appropriate provision of infrastructure. The council considers that its proposed housing supply enabled by the spatial strategy to be robust and that it provides sufficient flexibility. Whilst the strategy endorses strategic scale development, the spatial strategy and supporting allocations purposely include smaller sites which are not reliant on early infrastructure deliver to assist in maintaining a more even land supply. A housing trajectory is provided in Appendix F of the Proposed Submission Plan which shows that the housing requirement plan can achieve. Policy SS13 requires the development to devise and implement a comprehensive transport strategy covering aspects both within and beyond the allocation. The potential to deliver an acceptable strategy has been demonstrated through masterplanning and initial engagement between the land promoters and the councils. The allocation is situated adjacent to existing bus routes which can be improved and are likely to be financially sustainable. The council has engaged with Reading Borough Council on transport matters, including potential

Summary of key issues raised	Changes made to the Proposed Submission Plan
Key issues raised by the Environment Agency include: • Assessments to determine impact on Arborfield Sewage Treatment Works, wastewater and water supply and watercourses. • Further evidence and modelling required on exception test, climate change, historic events and flood alleviation. • Minimum 10m buffer maintained from the watercourse. • Long-term management of the river corridor. • Explore opportunities for environmental and flood risk improvements. Historic England recommended a requirement to assess significance of heritage assets and their settings. Natural England sought collaborative approach to protect the River Loddon SSSI and habitats. Local wildlife trust sought a higher percentage in biodiversity net gain and measures to protect / enhance ancient woodland.	improvements to public transport and active travel connections. The Infrastructure Delivery Plan and viability assessment include allowances and schemes which may be delivered, with the details to be progressed as the proposal moves towards the planning application. The garden village does not propose a junction onto the M4. Previous policy referred to safeguarding land to allow for the future opportunity, however in response to the more detailed vision for the site and engagement with National Highways, this requirement has been removed in the Proposed Submission Plan. The council has published a new Strategic Flood Risk Assessment (SFRA), Water Cycle Study and Sequential & Exception Tests which have been produced with input from the Environment Agency. Ongoing engagement has led to the signing of a Memorandum of Understanding where it is agreed that there are no flood risk barriers that would prevent the delivery of the garden village. New chapter 'Flooding and drainage' added to the plan and development guidelines included in the plan for this development, which address these issues. Policy SS13 requires the conservation and enhancement of heritage assets. The requirement in Policy SS13 has been amended for development proposals to implement a comprehensive ecological strategy. The strategy should achieve a measurable biodiversity net gain of at least 20% as calculated using the latest statutory metric.

Summary of key issues raised	Changes made to the Proposed Submission Plan
Sport England sought further information on sport / recreation uses and recommended preparation of a built facilities / playing pitch strategy.	Additional requirements have been included within the ‘Delivery Principles’. Proposals should implement a comprehensive strategic landscape and green and blue infrastructure strategy that ‘retains, and incorporates appropriate buffers for, ancient woodland, ancient or veteran trees, watercourses, hedgerows and other trees’. Additional guidance on site specific matters are set out in the Development Guidelines (Appendix C). A Playing Pitch Strategy and Built Indoor Leisure Facilities Strategy have been prepared and inform the standards set out in Policy HC4 of the Proposed Submission Plan. Additional guidance on sport / recreation uses within Loddon Valley Garden Village is set out in Appendix C.
Climate change and energy standards	
Key issues raised by the development industry include: • Whether the policy and standards would impact on development viability. • Clarification required over definition of ‘carbon neutral’.	The energy standards included in the Proposed Submission Plan have evolved from the Draft Plan stage, informed by latest industry best practice and policies adopted by other local planning authorities. The achievability and viability of the proposed approach has been specifically tested for Wokingham Brough through the ‘Net Zero Policy – Technical Evidence Base’ and ‘Local Plan and Community Infrastructure Levy Viability Study’. In summary, the evidence base confirms that the proposed standards can be viably delivered in the majority of cases. The Proposed Submission Plan now defined and utilises the term ‘net zero’ as opposed to ‘carbon neutral’ as the latter can be achieved wholly through offsetting emissions, whereas ‘net zero’ is better achieved through a focus in the first instance on reducing emissions, with offsetting used as a last resort. Net zero’ is defined as: “a scenario in which the quantity of anthropogenic greenhouse gas emissions arising from the development’s operational

Summary of key issues raised	Changes made to the Proposed Submission Plan
Utility providers suggested the policy could achieve a lower water efficiency standard. Key issues raised include Renewable energy policy should consider impacts on ecology and landscape. Environment Agency indicated support for the policy but suggested consideration of natural flood management. The policy should also align with evidence contained in the Strategic Flood Risk Assessment (SFRA) regarding potential effects of climate change.	energy use on an annual basis is zero or negative, and where whole-life emissions are reduced through sustainable design measures.” The Proposed Submission Plan utilises the optional technical standard water consumption target of 110 litres per person per day for housing (includes a fixed factor of water for outdoor use of 5 litres per person per day). This is beyond the mandatory building regulations standard of 125 litres per person per day, and reflects the borough being within a water stressed area. Developments are encouraged to go even further beyond the 110 litre standard. Policy continues to support other measures to minimise impact on the water environment, such as greywater recycling and rainwater harvesting and other water saving and recycling measures. The water efficiency standards are therefore considered reflective of best practice. The council has worked collaboratively with the Environment Agency, Thames Water and South East Water to produce a Water Cycle Study to support the plan process. Policy CE7 (Low carbon and renewable energy generation) continues to ensure that proposals do not give rise to unacceptable impacts, including landscape and biodiversity (criteria 1a). 1c) of CE7 also explicitly makes clear the need for 10% biodiversity net gain to be achieved for low carbon and renewable energy generation schemes. New chapter ‘Flooding and drainage’ added to the Proposed Submission Plan which addresses these issues.

Summary of key issues raised	Changes made to the Proposed Submission Plan
Infrastructure Key issues raised by residents and parish/town councils include: • The capacity of existing infrastructure and services, notably health care, education, utilities and digital infrastructure and communications technology.	The council has engaged infrastructure providers regarding the capacity of infrastructure and improvements that would be required to support population growth. This engagement is reflected in the Infrastructure Delivery Plan. Contributions towards the improvement of infrastructure will be secured in accordance with Policy SS15: Securing infrastructure.
Active and sustainable transport Key issues raised by the development industry include: • Whether the policy is onerous and unnecessary as it fails to consider the scale of development, inconsistent with the NPPF. • Whether the policy conflicts with standards in current best practice/national guidance and the council's Living Streets Guidance regarding accessible walking distances. • Reference should be made to the council's adopted parking standards. • Whether the requirement to submit an Electric Vehicle Charging Strategy is onerous and requested further clarity on its content, scope and timing in the planning process.	The council considers that the policy is consistent with national policy and guidance. Criteria 2(c) of Policy C2 (Mitigation of transport impacts and highways safety and design) of the Proposed Submission Plan requires the submission of transport assessments/statements in accordance with the council's Local Validation requirements. The council's latest Local Validation List provides clarity that transport assessment/statements should be submitted where development proposals have significant transport implications. Proposed Submission Plan Policy C2 requires developments to comply with relevant best practice documents, including Healthy Streets and the Living Streets (or successor document). The spatial strategy set out in the Proposed Submission Plan places the majority of development in locations which have better accessibility to services and facilities and employment opportunities. Opportunities for active travel public travel have been taken into account, and where appropriate transport improvements have been identified within the IDP. The Proposed Submission Plan policies C1 and C3 supports cycle routes being segregated in accordance with national guidance set out in LTN1/20.

Summary of key issues raised	Changes made to the Proposed Submission Plan
Bracknell Forest Council suggested an amendment to the policy to consider other non-motorised uses in the user access hierarchy and refer to ‘active travel’.	Updated Policy C5 requires regard to be had to council’s most up to date parking standards. Noted. Additional wording has been included in the supporting text to Policy C5 (Parking and electric vehicle charging) to provide clarity that relevant proposals should have regard to the council’s most up to date standards. The title of Policy C3 in the Proposed Submission Plan has been renamed to ‘Active travel’, and recognises that development proposals must promote sustainable transport by prioritising active travel, including walking, wheeling and cycling.
Safeguarded routes / improvements to transport routes	
Key issues raised by residents and parish/town councils include: • The appropriateness of safeguarding of land for a high-quality express bus service or dedicated transport route along the A4 and A329 corridors, including a dedicated public transport link between the A3290 and Napier Road. • The need for improvements to public transport services and infrastructure and car parking provision. Reading Borough Council suggested an amendment to the policy to refer to the East Reading Fast Track Public Transport Corridor rather than Cross-town Link.	The proposal to safeguard land for a high-quality express bus service or dedicated public transport route along the A4 and A329 corridors has been deleted and not included in Policy SS16 (Safeguarded routes) of the Proposed Submission Plan. The area of land is proposed for designation as a Local Green Space in the Proposed Submission Plan. An assessment of the area of green space, known as ‘Land to the south of the River Thames’, is set out in the Local Green Spaces Assessment. Whilst the area of land safeguarded for this aspiration has been deleted and is not included within the Proposed Submission Plan, Policy SS17 continues to recognise the council’s commitment to working with appropriate partners and stakeholders to deliver (amongst other ambitions) <i>‘(j) improvements to the quality and frequency of bus services along any part of the network, having regard to relevant strategies.’</i>

Summary of key issues raised	Changes made to the Proposed Submission Plan
South Oxfordshire District Council and Oxfordshire County Council questioned the need to safeguard land safeguarded for a Third Thames Crossing as it predetermined ongoing site option appraisal work and insufficient engagement. Natural England commented that the policy should seek to maximise opportunities for sustainable transport.	Policy SS17 of the Proposed Submission Plan continue to support the improvements to the transport network and supporting the provision of sustainable transport measures, including active travel and public transport services and infrastructure improvements. Policy C5 ensures development proposals provide and retain appropriate levels of parking. The council continues to support the principle of a third Thames crossing and considers the safeguarding of land connecting Thames Valley Park Drive / A3290 into South Oxfordshire as appropriate and does not predetermine the acceptability of any proposal. Safeguarding reflects the project being identified by Transport for South East. Additional detail is provided in the supporting text to Policy SS16 (Safeguarded routes) to clarify that the delivery of the project would involve land outside of the borough (in South Oxfordshire District) and that there is currently no deliverable outcome, with further business case and an assessment of impacts required before any future proposal can be considered. The council will continue to work with South Oxfordshire District Council, Oxfordshire County Council, Reading Borough Council, Transport for South East and other key stakeholders as necessary. For the avoidance of doubt, the spatial strategy promoted by the Proposed Submission Plan is not reliant on the delivery of the third Thames crossing. Policy SS17 has been re-structured into three sub-categories, covering active travel, public transport and road network improvements. Criteria a) to d) identify the council's ambitions for active travel improvements. Criteria e) to m) identify the council's ambitions for improvements to public transport

Summary of key issues raised	Changes made to the Proposed Submission Plan
	services and infrastructure. Policy C1 and C3 of the Proposed Submission Plan also promote opportunities to encourage more sustainable modes travel in development proposals.
Countryside and Green Belt	
Key issues raised by residents and parish/town councils include: • The need to retain landscape features, e.g. trees and hedgerows. • The need for stronger protection of countryside and green spaces. • The need for stronger protection for the Green Belt. Key issues raised by the development industry include: • The need to identify the types of development as exceptions. • The need for flexibility to allow small-scale development on land adjacent to or well-related to the built-up area.	Policy SS5 of the Proposed Submission Plan continues to identify types of development that will be supported in the countryside, as shown through criteria 2a) to 2l). Two additional policies are included in the Proposed Submission Plan. Policy SS3 supports in principle, development proposals within major and modest settlements, subject to meeting detailed criteria. Policy SS4 supports, in principle, development proposals within minor settlements for up to 9 dwellings. Further, criteria 3a) to 3d) of the policy supports limited residential development proposals as an exception, provided criteria are met. The introduction of these policies allows for some flexibility in facilitating smaller-scale development on land adjacent to or well-related to the built-up area, consistent with national policy. Policy SS6 continues to propose a suitable policy framework for managing development proposals within the Green Belt, or outside the Green Belt where they would impact on its amenity and openness. The council does not consider that exceptional circumstances exist to release land from the Green Belt for the purposes of residential development, and therefore no land within the Green Belt is proposed for allocation in the Proposed Submission Plan. Policy SS5 continues to propose a suitable policy framework for managing development in the countryside. In addition, criteria 3 of the policy has been

Summary of key issues raised	Changes made to the Proposed Submission Plan
	amended to ensure proposals take a landscape led approach to development, and take account matters such as coalescence of settlements, contribution and enhancement of the local, natural and historic environment, and scale, nature and location. A suitable policy framework for managing proposals that impact on landscape features, such as trees, woodland, hedges and hedgerows continues to be proposed in the Proposed Submission Plan. Policy NE4 ensure development proposals protect and incorporate such features, and ensure they are well integrated within the public realm, and in a suitably landscaped setting. Criteria 3a) to 3f) set out a number of requirements that should be taken into account in the design and layout of new development.
Employment	
Key issues raised by residents and parish/town councils include: • The appropriateness of the planned expansion of Thames Valley Science and Innovation Park. • The impact of permitted development in CEAs, notably Molly Millars Estate. Key issues raised by the development industry include • Whether there is an overemphasis places on CEAs and town centres is at the expense of supporting employment activity in rural locations. • The responsive to changing circumstances and flexibility to ensure sufficient land is available.	The council considers that the Proposed Submission Plan provides a suitable framework for supporting the economy, including the continues support for key employment locations, as well as supporting suitable opportunities for employment related development in the countryside. Policy ER1 (Core Employment Areas) provides flexibility by supporting the delivery of complementary non employment uses in Core Employment Areas to support their rejuvenation and regeneration, providing this does not undermine the continued economic function of the area. Policy ER2 (Employment uses outside Core Employment Areas) sets out how proposals for employment development proposals of differing scales and locations will be assessed. This provides proportionate flexibility that smaller

Summary of key issues raised	Changes made to the Proposed Submission Plan
• The need to encourage mixed-use development to introduce new areas of employment land alongside housing and other uses. • The need to support alternative and complementary uses. • Whether the support for the rural economy is overly restrictive and inconsistent with the NPPF. Reading Borough Council suggested amendments to the policy to provide clarity that there is no identified need for employment floorspace.	scale employment proposals may be acceptable outside Core Employment Areas, but within defined settlements. Policy ER3 (Supporting the rural economy) has been amended to provide support for development proposals that contribute towards supporting a prosperous rural economy, providing the criteria are met. This helps to ensure the rural economy is suitably supported, in the context of the wider economic strategy which focuses new major economic development towards Core Employment Areas. The expansion of Thames Valley Science and Innovation Park will be integrated into the wider concept regarding the Loddon Valley Garden Village. A proportion of the planned floorspace has now been delivered or has planning permission. The Proposed Submission Plan is supported by an Employment Land Needs Review. The supporting text to Policy SS8 (Meeting employment needs) of the Proposed Submission Plan clarifies that the Employment Land Needs Review has identified no quantitative requirement for additional office land/floorspace over the plan period. The study did find a larger need for new industrial floorspace, with a minimum of 18ha of additional land over the plan period. Completions, commitments and new site allocations for employment uses are capable of providing additional floorspace that is sufficient to meet the identified needs over the plan period.
Retail	
Key issues raised by residents and parish/town councils include: • Whether the classification of centres is appropriate. • Whether independent retailers should be protected.	Policy ER5 sets out a hierarchy of centres, categorised into major town centres, small town and district centres and local centres. The council considers the hierarchy to appropriately to guide future development proposals.

Summary of key issues raised	Changes made to the Proposed Submission Plan
	Policy ER7 (Strengthening the role of town centres) continues to ensure that relevant development proposals submit a retail impact assessment, demonstrating that they would not have an adverse impact on vitality and viability of existing and future identified centres. Policy ER6 protects the loss of retail in Primary Shopping Areas and loss of shopping facilities in local centres. However planning policy is not able to direct whether retail units are occupied by independent or multinational retailers.
University of Reading	
Key issues raised include: • Whether the Whiteknights Campus policy was aligned to the University of Reading's priorities and ambitions. • The need to acknowledge the conservation of the locally listed historic park and garden. Reading Borough Council suggested the Whiteknights Campus policy should align with the adopted local plan policy, as agreed through a Statement of Common Ground.	Policy SS9 and accompanying text of the Proposed Submission Plan have been updated to reflect the University of Reading's Estate Strategy 2022-2032. The criteria have been amended (4a) to refer to conserving and enhancing 'historic parkland landscape', in addition to heritage assets and their settings. In addition, Policy DH5 of the Proposed Submission Plan continues to propose a suitable policy framework for managing development proposals affecting non-designated heritage assets, including Local Historic Parks and Gardens, such as Whiteknights Park. The Whiteknights Campus policy has been updated to more closely align with the related policy in Reading Borough's adopted Local Plan.
Biodiversity and geodiversity	
Key issues raised include: • A requirement to achieve 10% net gain in biodiversity is subject to the Environmental Bill gaining Royal Assent. • Reference to irreplaceable habitats is inconsistent with national policy.	An additional policy is included in the Proposed Submission Plan relating to biodiversity net gain. Policy NE2 states: <i>'All development proposals should demonstrate a minimum biodiversity net gain of 10% (unless specific in another site allocation policy) calculated via the most up-to-date national biodiversity accounting metric and provide details of the long-term maintenance and</i>

Summary of key issues raised	Changes made to the Proposed Submission Plan
Environment Agency sought an additional requirement to compensate for loss/degradation of habitats of principal importance.	<i>management of the net gain. This should be delivered on site in the first instance, or through biodiversity off-setting where appropriate.'</i> Irreplaceable habitats are referenced and defined within the NPPF. Policy NE1 is considered consistent with the national definition and policy. Policy NE1 of the Proposed Submission Plan has been re-structured and updated to provide guidance for specific identified sites. For instance, criteria 7a) to 7d) of the policy ensure development proposals that are likely to have an adverse effect on a site of local importance (including priority species or priority habitats) follow a sequential approach, with a last resort being the need to secure compensation measures, including long-term management and maintenance.
Green and blue infrastructure	
Key issues raised by the development industry include: • Whether it is appropriate to require mitigation measures to only be implemented within their land ownership. • Comment that contributions towards site-specific infrastructure should be made through the site-specific policies or through funding mechanisms (e.g. CIL). Environment Agency suggested the policy should cross refer to Policy NE10 (River corridors) regarding application of buffers zones.	The site-specific projects listed under criteria 6a) to 6d) of the Draft Plan policy have been removed in the Proposed Submission Plan. However, Criteria 4 in Policy C4: Green and blue infrastructure and public rights of way of the Proposed Submission Plan recognises that development proposals in the vicinity of the Emm Brook and River Loddon contribute to the achievement of a multi-use riverside footpath, cycleway and bridleway, thereby providing a degree of flexibility. References to site-specific infrastructure projects are identified in the relevant site allocation policies (e.g. Policy SS13: Loddon Valley Garden Village; Policy SS12: South Wokingham Strategic Development Location). The supporting text to Policy C4 has been amended to ensure the policy is read and implemented alongside Policy FD3 (River corridors), where proposals include or are adjacent to a watercourse or river corridor.

Summary of key issues raised	Changes made to the Proposed Submission Plan
Thames Basin Heaths Special Protection Area	
Key issues raised include: • Alignment with the Joint Strategic Partnership Board Delivery Framework. • Clarity on the definition of ‘development’.	Policy NE3 (Thames Basin Heaths Special Protect Area) continued to reflect the Joint Strategic Partnership Board Delivery Framework and has been updated to reflect best practice. The supporting text in the Proposed Submission Plan provides further clarity on the instances where Policy NE3 will apply for residential development proposals. Proposals falling within Use Classes C1 (Hotels) and C2 (Institutions) will be assessed on a case-by-case basis, in consultation with Natural England.
Landscape and trees	
Key issues raised by residents include: • Concerned that protection of trees, woodlands and hedgerows is insufficient. • New development proposals should provide and maintain such features. Key issues raised by the development industry include: • A balanced approach to assessing development proposals in line with paragraph 171 of the NPPF. • Too restrictive in preserving and enhancing local landscape character.	Policy NE4 of the Proposed Submission Plan continues to recognise the valuable contribution that trees, woodland, hedges and hedgerows make to the borough’s natural environment, biodiversity, amenity and visual character. The policy has been amended to ensure development proposals protect and incorporate features, and ensure they are well integrated within the public realm, in a suitably landscaped setting. Criteria 3a) to 3f) provides detailed set of criteria that development proposals should take account in the design and layout of their schemes, including enhanced and additional tree and hedgerow planting, buffer zones around woodlands and other features and sufficient space to enable trees to thrive. Policy NE5 of the Proposed Submission Plan continues to set an appropriate framework for guiding development proposals with regard to landscape and reflects national planning policy which expects development to contribute to and enhance the natural and local environment.

Summary of key issues raised	Changes made to the Proposed Submission Plan
Environment Agency sought amendments to tree, woodland and hedgerow policy to encourage development to improve biodiversity and ecology across landscapes.	A local plan should be read as a whole, and therefore Policy NE2 (Biodiversity net gain) and other relevant policies in the development plan will apply when considering development proposals.
Valued landscapes	
Kery issues raised by the development industry include: • Policy approach too onerous and disproportionate for locally designated landscapes. • Inspector found that certain areas within the borough were not considered ‘valued landscape’ following planning appeals. • Boundaries should follow permanent and physical features on the ground. • Evidence used to justify the proposed valued landscapes.	The council is satisfied that the approach and methodology for identifying the valued landscapes in the Proposed Submission Plan is consistent with national policy and guidance and current practice. The approach to identifying valued landscapes was based on an aggregation of demonstrable physical attributes of the landscape and has been refined following consultation and engagement with specialist officers. The methodology set out in the Valued Landscapes Assessment is consistent with the Inspector’s conclusions in the Aylesbury Road, Wendover appeal decision, by recognising that although valued landscapes may include some areas that do not necessarily exhibit any of the demonstrable physical attributes, they nonetheless form an integral part of a wider valued landscape, and therefore deserve protection under the NPPF. Requiring an individual site or land parcel to demonstrate those attributes in order to qualify as a valued landscape would be a formulaic, literal approach and as recognised in the Wendover decision, could lead to anomalies. The boundaries of the valued landscapes have been amended, wherever possible, to follow identifiable features on the ground such as field boundaries or roads. Boundaries of some valued landscapes have been reviewed, reassessed and refined in response to earlier consultations made by individuals, landowners and other stakeholders on the local plan. A summary of the issue and response can be found in Appendix 4 of the Valued Landscapes Assessment.

Summary of key issues raised	Changes made to the Proposed Submission Plan
Sites of Urban Landscape Value	
Key issues raised by residents include: • Areas proposed as SULV should also be considered as Local Green Space.	Areas considered and proposed for designation as a Site of Urban Landscape Value (SULV) in the Proposed Submission Plan have also been assessed for their suitability as Local Green Space. The assessment of all nominated areas is set out in the Local Green Spaces Assessment. Policy HC3 of the Proposed Submission Plan continues to propose the designation of Land south of Reading Road, Bulmershe (Woodley/Earley), South Lake (Woodley), Maiden Erlegh Lake (Earley), Joel Park (Wokingham), Woosehill Meadows (Wokingham) and Cantley Park (Wokingham) as Local Green Space.
Flood risk and drainage	
Key issues raised by residents include: • The need to have regard to historic flooding events in settlements, notably Charvil, Swallowfield, Shinfield, Winnersh and Wokingham. • Concern with the application of SuDS in mitigating flood risk. • Concern that housing allocations in flood zones would increase the risk of flooding. • Concern regarding the impact development could have on existing watercourses. Key issues raised by the development industry include: • Concerns that the requirement to return run-off volumes to greenfield rates too onerous. • The minimum requirement for 10m undeveloped buffer from watercourses was inconsistent with legislation and guidance published by the Environment Agency.	Proposed Submission Plan Policy FD1: Development and flood risk (from all sources) continues to require that development proposals take account of all sources of flooding, including historic flooding. Evidence of historic flooding is contained in the Strategic Flood Risk Assessment (SFRA) (2023), which development proposals will need to have regard to. A policy is proposed in the Proposed Submission Plan covering sustainable drainage (Policy FD2). The policy ensures that development proposals reproduce greenfield runoff characteristics and return run-off rates and volumes back to original greenfield levels, or for brownfield sites, reduce run-off rates and volumes to near greenfield rates or provide a betterment. The council has taken into account the risk of flooding in selecting site allocations. With the exception of previously developed land, the Proposed Submission Plan does not promote development within areas at flood risk.

Summary of key issues raised	Changes made to the Proposed Submission Plan
Environment Agency suggested amendments to the flood risk policy to improve clarity regarding the application of the sequential test and taking account effects of climate change.	Where the site areas extends into an area at risk, no development is supported in this area. The council considers that Policy FD3 of the Proposed Submission Plan provides effective protection for watercourses. Site-specific requirements are included in the development guidelines for relevant site allocations and the Strategic Development Locations, for example to ensure built development maintains the setting of the watercourses and retention of a suitable buffer. The council does not consider the requirement to return run-off rates/volumes to greenfield rates too onerous. A Viability Study supports the Local Plan Update and concludes that the requirements of the policy will have minimal impact on development viability, with the implementation of sustainable drainage reflected in base construction costs. Policy FD3 (River corridors and watercourses) in the Proposed Submission Plan has been amended to provide clarity that a buffer of 8m should be provided for rivers. The policy provides sufficient flexibility by clarifying that the extent of the buffer should reflect the type, size and nature of the watercourse. Policy FD1 has been amended and now includes clearer sub-headings relating to requirements for a sequential test and exception test for development proposals. The policy ensures that development is guided to areas of lowest flood risk, in the first instance, taking an sequential approach and account of the effects of climate change. The Proposed Submission Plan is supported by a Strategic Flood Risk Assessment (SFRA) and an Sequential and Exception Test.

Summary of key issues raised	Changes made to the Proposed Submission Plan
Housing requirement and supply	
Key issues raised by residents and parish/town councils include: - Disagreement with the number of homes required by government, expressing the need to protect the countryside / green spaces. Key issues raised by the development industry include: - The absence of a detailed housing trajectory. - The need to review of existing development limits (settlement boundaries). - The need to Identify reserved housing sites. - The need to identify a higher housing requirement above that required by the government. - Housing completions prior to current year should be discounted,	The method of assessing housing need is set out in national planning policy. Other method can only be used in exceptional circumstances. The Proposed Submission Plan continues to use the national standard method as the basis for calculating housing need and has set the housing requirement accordingly. The council considers that its proposed housing supply enabled by the spatial strategy to be robust and that it provides sufficient flexibility without the need for reserve sites. A housing trajectory is provided in Appendix F of the Proposed Submission Plan which shows that the housing requirement plan can achieve. Settlement areas have been reviewed to reflect the spatial strategy. The Proposed Submission Plan take account of completions from the base date, 1 April 2023. This reflects the most recent year for which data was available during preparation. Housing completions prior to the base year do not form part of the housing supply.
Sites allocated for residential / mixed use	
Land north of The Shires (5BA024)	
Revised Growth Strategy proposal: 4 dwellings	
No specific comments were received.	-
Rooks Nest Farm and 24 Barkham Ride, Finchampstead (5BA032; 5BA033)	
Revised Growth Strategy proposal: 270 dwellings	

Summary of key issues raised	Changes made to the Proposed Submission Plan
Key issues raised by residents and parish/town councils include: • Congestion and highway/pedestrian safety on the network, e.g. Barkham Ride. • Capacity of infrastructure, e.g. health care, utilities. • Impact on Longmoor Bog SSSI, California Country Park and Rooks Nest Wood SANG. • Accessibility to services and facilities. • Coalescence between Finchampstead and Barkham. • Conflict with the Arborfield and Barkham Neighbourhood Plan. • Improvement to Barkham Ride would facilitate future development at Barkham Square. • Disproportionate level of development. • Opportunities to provide a bridleway linking the greenway and footpath. A petition was signed by 1,112 people raised the following additional key issues: • Loss of agricultural land. Thames Water commented that scale of development is likely to require upgrades to water supply and wastewater network.	The landowner of land at Rooks Nest Farm is no longer promoting the site for residential use. This part of the site has been removed from the local plan process. The landowner of 24 Barkham Ride continues to promote the site. The council has conducted a detailed and robust site selection process informed by a suite of comprehensive technical evidence. Through this process the site has been assessed as suitable and developable. The Proposed Submission Plan allocates land at 24 Barkham Ride for approximately 30 dwellings. The proposed allocation is supported by site specific requirements, set out in Appendix E (Development Guidelines). The council is satisfied that development is sustainable and will not result in unacceptable impacts. The site is predominantly poor-quality agricultural land (Grade 4) with a smaller section in the western part of the site falling within agricultural land of good to moderate quality (Grade 3). The development guidelines continue to propose requirements such as exploring opportunities to provide pedestrian / cycle connectivity to areas of open space, including Rooks Nest Wood Country Park and California Country Park; providing a landscape buffer to ensure appropriate transition from residential to countryside; achieving vehicular access from Barkham Ride. Policy C8 (Utilities) ensures development proposals demonstrate sufficient capacity for wastewater collection infrastructure to service the development, and engagement is sought with utility providers, including relevant water supply / wastewater companies early in the planning process to identify potential infrastructure requirements.

Summary of key issues raised	Changes made to the Proposed Submission Plan
Landowner of 24 Barkham Ride confirmed their availability and deliverability of the site and highlighted the potential for improved pedestrian connections and existing access arrangements.	
Land east of Park View Drive North, Charvil (5CV001) Revised Growth Strategy proposal: 78 dwellings	
Key issues raised by residents and parish/town councils include: • Flood risk on site and surrounding area. • Impact on air quality, including the Twyford Crossroads AQMA. • Limited services and facilities in Charvil village (e.g. public transport, health, education). • Congestion and highway safety on the A4. • Access and connectivity to the village. • Proposed developments are disproportionate to current size and scale of settlement. • Impact on character, biodiversity. Landowner confirmed availability of site and promoted an increase in site capacity to at least 88 dwellings. Areas were also promoted further north and west to accommodate additional development. Environment Agency highlighted the following: • Clay ground conditions will require areas for attenuation. • Development more sensitive to infiltration discharges and surface activities (e.g. road drainage). Thames Water commented that the scale of development is likely to require upgrades to water supply and wastewater infrastructure.	The site is no longer proposed for allocation in the Proposed Submission Plan. An assessment of the site is contained in the Housing and Economic Land Availability Assessment (HELAA).

Summary of key issues raised	Changes made to the Proposed Submission Plan
Land west of Park Lane, Charvil (5CV002) Revised Growth Strategy proposal: 61 dwellings	
Key issues raised by residents and parish/town councils include: • Flood risk on site and surrounding area. • Impact on air quality, including the Twyford Crossroads AQMA. • Limited services and facilities in Charvil village (e.g. public transport, health, education). • Congestion and highway safety on the A4 and Park Lane. • Proposed developments are disproportionate to current size and scale of settlement. • Impact on character, biodiversity (parish council sought an east to west green corridor). • Affordable housing and smaller, modest sized dwellings. Landowner confirmed availability of site and promoted a capacity of at least 75 dwellings.	The council has conducted a detailed and robust site selection process informed by a suite of comprehensive technical evidence. Through this process the site has been assessed as suitable and developable. The site is included within Policy SS14 of the Proposed Submission Plan (ref: SS14.4). The council is satisfied that development is sustainable and will not result in unacceptable impacts. The site has been demonstrated to pass the flood risk Sequential Test. Details regarding the site selection process and site assessment can be found in the Site Selection Topic Paper and Housing and Economic Land Availability Assessment (HELAA). The proposed site allocation is supported by site-specific requirements set out in the development guidelines (Appendix E). The development guidelines continue to include preference for low density housing in keeping with the surrounding area.

Summary of key issues raised	Changes made to the Proposed Submission Plan
Thames Water commented that the scale of development is likely to require upgrades to water supply infrastructure.	Policy C8 (Utilities) ensures development proposals demonstrate sufficient capacity for wastewater collection infrastructure to service the development, and engagement is sought with utility providers, including relevant water supply / wastewater companies early in the planning process to identify potential infrastructure requirements.
31-33 Barkham Ride, Finchampstead (5FI003) Revised Growth Strategy proposal: 66 dwellings	
Key issues raised by residents and parish/town councils include: • Congestion and highway/pedestrian safety on the network, e.g. Barkham Ride. • Access arrangements on Barkham Ride. • Capacity of infrastructure, e.g. health care, utilities. • Limited services and infrastructure for public transport and active travel. • A chalet park has completed on 31 Barkham Ride which is likely to inhibit cohesive design. • Impact on protected trees. • Cumulative impact with allocation at Rooks Nest Farm. Environment Agency expected a buffer to be incorporated for the watercourse that runs through / adjoining the site, and to provide opportunities for habitat enhancements. Thames Water commented that scale of development is likely to require upgrades to water supply and wastewater network.	The land received the granting of planning permission (refs: 223528 and 230791) subject to completion of legal agreements at the meetings of the council's Planning Committee on 13 March 2024 and 12 June 2024. The site is included within Policy SS14 of the Proposed Submission Plan (ref: SS14.6), reflecting the grant of permission and the site not being under construction. Criteria 2(d) of Policy FD3 (River corridors and watercourses) ensures proposals in the vicinity of a river or watercourse provide or retain a minimum 8m undeveloped buffer zone, and development guidelines for the site acknowledge the need to provide a buffer around the watercourse. Other policies are proposed in the Proposed Submission Plan to support and maximise opportunities for habitat enhancements/improvements. Policy C8 (Utilities) ensures development proposals demonstrate sufficient capacity for wastewater collection infrastructure to service the development,

Summary of key issues raised	Changes made to the Proposed Submission Plan
	and engagement is sought with utility providers, including relevant water supply / wastewater companies early in the planning process to identify potential infrastructure requirements.
Greenacres Farm, Nine Mile Ride, Finchampstead (5FI004) Revised Growth Strategy proposal: 100 dwellings	
Key issues raised by residents and parish/town councils include: • The location being outside of development limits. • Impact on green route and proposed Forest and Rides valued landscape. • Congestion along Nine Mile Ride. • Impact on the semi-rural character of the area. • Limited infrastructure. • Development guidelines should: support development of previously developed land and protect open green areas and Public Rights of Way within the site and; maintain and enhance connectivity of the woodland corridor. Key issues raised by the development industry include:	The council has conducted a detailed and robust site selection process informed by a suite of comprehensive technical evidence. Through this process the site has been assessed as suitable and developable. The site is included within Policy SS14 of the Proposed Submission Plan (ref: SS14.7). The council is satisfied that development is sustainable and will not result in unacceptable impacts. The proposed site allocation is supported by site-specific requirements set out in the development guidelines (Appendix E). The development guidelines continue to include matters such as providing vehicle access from Nine Mile and the retention of onsite mature and protected trees. An additional requirement is included in the development guidelines, which encourages the redevelopment of land currently used for commercial / industrial uses. The development guidelines also continue to ensure any new access points are sensitive of mature and protected trees along the Nine Mile Ride green route. The western part of the proposed allocation, which comprises predominantly greenfield land is included in the Forest and Rides valued landscape. Policy NE6

Summary of key issues raised	Changes made to the Proposed Submission Plan
• Allocation is not wholly previously developed land as described in the plan • Habitats and protected trees are constraints that can impact on site capacity Thames Water recommended early engagement on upgrades to wastewater network.	of the Proposed Submission Plan supports proposals within or affecting a valued landscape, provided they have particular regard to the attributes listed in the policy, in addition to protecting, integrating and/or enhancing the special features, characteristics and qualities of the landscape. Policy C8 (Utilities) ensures development proposals demonstrate sufficient capacity for wastewater collection infrastructure to service the development, and engagement is sought with utility providers, including relevant water supply / wastewater companies early in the planning process to identify potential infrastructure requirements.
Jovike, Wokingham Road, Finchampstead (5FI024) Revised Growth Strategy proposal: 15 dwellings	
Key issues raised by residents and parish/town councils include: • Site's capacity. • Impact on wildlife. • Congestion. • Pressure on services and facilities.	The council has conducted a detailed and robust site selection process informed by a suite of comprehensive technical evidence. Through this process the site has been assessed as suitable and developable. The site is included within Policy SS14 of the Proposed Submission Plan (ref: SS14.8). The council is satisfied that development is sustainable and will not result in unacceptable impacts. The proposed site allocation is supported by site-specific requirements set out in the development guidelines (Appendix E). The development guidelines continue to ensure proposals consider matters such as vehicle access from Lower Wokingham Road.

Summary of key issues raised	Changes made to the Proposed Submission Plan
Westwood Yard, Sheerlands Road, Finchampstead (5FI028) Revised Growth Strategy proposal: 10 dwellings	
Key issues raised by residents and parish/town councils include: • Impact on wildlife. • Impact on living conditions. • Infilling of the existing SDL departs from the original vision. • Retention of green space. • Opportunity to increase capacity to optimise use of available land. Environment Agency commented that water attenuation features will need to be designed into the site layout.	The council has conducted a detailed and robust site selection process informed by a suite of comprehensive technical evidence. Through this process the site has been assessed as suitable and developable. The site is included within Policy SS11 of the Proposed Submission Plan. The council is satisfied that development is sustainable and will not result in unacceptable impacts. The policy incorporates the land at Westwood Yard into the boundary of the Arborfield Strategic Development Location. The policy and additional guidelines ensure the development proposal addresses site-specific matters such as biodiversity net gain, ecological habitats and green / blue infrastructure. A policy (DH2) continues to be proposed in the Proposed Submission Plan to ensure development proposals do not cause undue harm to the amenity of neighbouring and/or nearby properties. The application of sustainable drainage systems (SuDS) is addressed in criteria 7a) of Policy SS11. Further guidance is set out in the development guidelines (Appendix C). A policy (FD3) on sustainable drainage continues to be proposed in the plan. Proposals must demonstrate through a site-specific Flood Risk Assessment or Surface Water Drainage Strategy that surface water arising from development is managed in a sustainable manner. Policy FD3 includes specific requirements for SuDS provision, including through scheme design and layout.

Summary of key issues raised	Changes made to the Proposed Submission Plan
Landowner confirmed availability and deliverability of the site. Amendment was suggested to include Westwood Cottage within the allocation boundary. Site should also be renamed to Westwood Yard.	The site has been incorporated into the Arborfield Green SDL. The site has been re-named to 'Westwood Yard' in the Proposed Submission Plan.
Land adjacent to Whistley Green Cottage, Whistley Green, Hurst (5HU002) Revised Growth Strategy proposal: 3 dwellings	
Key issues raised by residents and parish/town councils include: • Unsustainable location for additional growth. • Impact on green route and landscape character. • Limited infrastructure, services and facilities. • Access arrangements. • Impact on Area of Special Character and historic settlement pattern. • Separation between Hurst and Whistley Green. Landowner confirmed available and deliverability of the site.	The site is no longer proposed for allocation in the Proposed Submission Plan. An assessment of the site is contained in the Housing and Economic Land Availability Assessment (HELAA).
Land north-west of Hogmoor Lane, Hurst (5HU030) Revised Growth Strategy proposal: 12 dwellings	
Key issues raised by residents and parish/town councils include: • Unsustainable location for additional growth. • Impact on green route, landscape character and protected trees. • Limited infrastructure, services and facilities. • Access arrangements.	The site is no longer proposed for allocation in the Proposed Submission Plan. An assessment of the site is contained in the Housing and Economic Land Availability Assessment (HELAA).

Summary of key issues raised	Changes made to the Proposed Submission Plan
• Impact on Area of Special Character and historic settlement pattern. • Separation between Hurst and Whistley Green. • Congestion on highway network, e.g. Broadwater Lane.	
Land north of London Road and east of A329(M) (5HU051) Revised Growth Strategy proposal: 45 dwellings	
Key issues raised by residents and parish/town councils include: • Accessibility to services and facilities in Wokingham and surrounding settlements. • Noise pollution from A329. • Separation between Wokingham and Bracknell. • Congestion and highway safety on the network, e.g. London Road. Landowner/development confirmed availability and deliverability of site. Scope for improved pedestrian access, including Coppid Beech roundabout, SANG. Bracknell Forest Council expressed concerns that development would compromise a strategic gap in the Bracknell Forest Local Plan. Thames Water commented that scale of development is likely to require upgrades to wastewater network.	The land received a resolution to grant planning (ref: 232026) subject to completion of legal agreements at the meetings of the council's Planning Committee on 13 March 2024 and 12 June 2024. The site is included within Policy SS14 of the Proposed Submission Plan (ref: SS14.28), reflecting the grant of permission and the site not being under construction.

Summary of key issues raised	Changes made to the Proposed Submission Plan
Land between 39-53 New Road, Ruscombe (5RU008) Revised Growth Strategy proposal: 20 dwellings	
Key issues raised by residents and parish/town councils include: • Narrow access to the site. • Pressure on Twyford Crossroads AQMA. • Consideration of safe walking/cycling routes (e.g. through Twyford). • Respect character of the area, do not support increased capacity. Twyford Parish Council did not support the increased capacity. Environment Agency highlighted the following: • Clay ground conditions will require areas for attenuation	The council has conducted a detailed and robust site selection process informed by a suite of comprehensive technical evidence. Through this process the site has been assessed as suitable and developable. The site is included within Policy SS14 of the Proposed Submission Plan (ref: SS14.9). The council is satisfied that development is sustainable and will not result in unacceptable impacts. The proposed site allocation is supported by site-specific requirements set out in the development guidelines (Appendix E). The development guidelines continue to ensure proposals consider/take account matters, such as a preference for a new access point from New Road. The proposal will need to conform with relevant policies of the development plan, and therefore the Local Plan Update should be read as a whole. Policy DH1 (Place making and quality design) continues to be proposed in the Proposed Submission Plan, and ensures development is of a high-quality design and achieves design principles. The Level 2 Strategic Flood Risk Assessment (SFRA) has assessed flood risk affecting the site. The site has been demonstrated to pass the flood risk Sequential Test. A policy (FD3) on sustainable drainage continues to be

Summary of key issues raised	Changes made to the Proposed Submission Plan
Development more sensitive to infiltration discharges and surface activities (e.g. road drainage) Thames Water commented that the scale of development is likely to require upgrades to wastewater network.	proposed in the plan. Policy FD3 includes specific requirements for SuDS provision, including through scheme design and layout. Policy C8 (Utilities) ensures development proposals demonstrate sufficient capacity for wastewater collection infrastructure to service the development, and engagement is sought with utility providers, including relevant water supply / wastewater companies early in the planning process to identify potential infrastructure requirements.
Land north of Arborfield Road, Shinfield (5SH025) Revised Growth Strategy proposal: 191 dwellings	
Key issues raised by residents and parish/town councils include: - Pressure on services and facilities (e.g. schools, health care). - Pressure on utilities (e.g. wastewater). - Coalescence of Shinfield and Arborfield. - Congestion on the network. - Flood risk. - Harm to character of Shinfield village.	The council has conducted a detailed and robust site selection process informed by a suite of comprehensive technical evidence. Through this process the site has been assessed as suitable and developable. The site is included within Policy SS14 of the Proposed Submission Plan (ref: SS14.12). The council is satisfied that development is sustainable and will not result in unacceptable impacts. The proposed site allocation is supported by site-specific requirements set out in the development guidelines (Appendix E). The development guidelines continue to ensure proposals consider/take account of matters, such as a preference for a new access point from Arborfield Road, development steered towards flood zone 1 and surface water corridors within the site left free from development.

Summary of key issues raised	Changes made to the Proposed Submission Plan
Environment Agency highlighted the following: • Request further flooding evidence, sequential and exception test. • Development should be located in lowest areas of flood risk and set back from edge of floodplain. • Expect biodiversity net gain as part of development. Thames Water commented that local upgrades to wastewater network and water supply network may be required.	Policy SS2 (Spatial strategy and settlement hierarchy) ensures that growth should not undermine the separate identity of places and settlements. The site has been demonstrated to pass the flood risk Sequential Test and Exception Test. Development guidelines for the site require development to be steered away from areas of flood risk. Policy FD1 also requires the submission of a detailed site-specific Flood Risk Assessment. Additional detail on biodiversity net gain is provided in Policy NE2 of the Proposed Submission Plan. Policy C8 (Utilities) ensures development proposals demonstrate sufficient capacity for wastewater collection infrastructure to service the development, and engagement is sought with utility providers, including relevant water supply / wastewater companies early in the planning process to identify potential infrastructure requirements.
Land east and west of Hyde End Road, Shinfield (5SH023, 5SH027) Revised Growth Strategy proposal: 175 dwellings	
Key issues raised by residents and parish/town councils include: • Pressure on services and facilities (e.g. schools, health care). • Pressure on utilities (e.g. wastewater). • Coalescence of settlements; e.g. Shinfield and Arborfield; Shinfield and Spencers Wood. • Access and congestion on the network; e.g. Hyde End Road, M4, A327, Basingstoke Road. • Flood risk.	The council has conducted a detailed and robust site selection process informed by a suite of comprehensive technical evidence. Through this process the site has been assessed as suitable and developable. The site is included within Policy SS14 of the Proposed Submission Plan (ref: SS14.12).

Summary of key issues raised	Changes made to the Proposed Submission Plan
• Impact on wildlife, ancient woodland. • Loss of amenity space. • Harm to character of Shinfield and Arborfield village. Environment Agency highlighted the following: • Request further flooding evidence, sequential and exception test • Development should be located in lowest areas of flood risk and set back from edge of floodplain • Expect biodiversity net gain as part of development and no detrimental impact to ancient woodland Thames Water commented that local upgrades to wastewater network and water supply network may be required.	The council is satisfied that development is sustainable and will not result in unacceptable impacts. The proposed site allocation is supported by site-specific requirements set out in the development guidelines (Appendix E). The development guidelines continue to ensure proposals consider/take account of matters, such as sensitivity of new development to the areas of ancient woodland and development contained within flood zone 1. The council has published a new Strategic Flood Risk Assessment (SFRA), Water Cycle Study and Sequential & Exception Tests which have been produced with input from the Environment Agency (EA). The site has been demonstrated to pass the flood risk Sequential Test and Exception Test. The development guidelines continue to ensure development will be provided within flood zone 1. Policy FD1 also requires the submission of a detailed site-specific Flood Risk Assessment. Additional detail on biodiversity net gain is provided in Policy NE2 of the Proposed Submission Plan. Policy C8 (Utilities) ensures development proposals demonstrate sufficient capacity for wastewater collection infrastructure to service the development, and engagement is sought with utility providers, including relevant water supply / wastewater companies early in the planning process to identify potential infrastructure requirements.

Summary of key issues raised	Changes made to the Proposed Submission Plan
Rustlings, The Spring and Land to the rear of Cushendall, Shinfield Road, Shinfield (North) (SSH031) Revised Growth Strategy proposal: 10 dwellings	
Key issues raised by residents and parish/town councils include: Concerns that the proposal would not reflect the character of the area.	The council has conducted a detailed and robust site selection process informed by a suite of comprehensive technical evidence. Through this process the site has been assessed as suitable and developable. The site is included within Policy SS14 of the Proposed Submission Plan (ref: SS14.13). The council is satisfied that development is sustainable and will not result in unacceptable impacts. Policy NE5 (Landscape and design) of the Proposed Submission Plan continues to ensure development proposals adopt a landscape led approach that protects and enhances the character and distinctiveness of the borough's landscape, using up-to-date studies, including the borough-wide Landscape Character Assessment and Design Guide. Other policies are included in the Proposed Submission Plan that appropriately address matters such as landscape and character.

Summary of key issues raised	Changes made to the Proposed Submission Plan
Land at Sonning Farm, Sonning (5SO001) Revised Growth Strategy proposal: 25 dwellings	
Key issues raised by residents and parish/town councils include: • Congestion on the highway network, e.g. Sonning Bridge • Limited infrastructure, services and facilities, e.g. GPs, shops. • Provision of public parking for the village • Cumulative impact of the proposal across Sonning, Twyford, Charvil and Ruscombe, e.g. local roads, services	The council has conducted a detailed and robust site selection process informed by a suite of comprehensive technical evidence. Through this process the site has been assessed as suitable and developable. The site is included within Policy SS14 of the Proposed Submission Plan (ref: SS14.17). The council is satisfied that development is sustainable and will not result in unacceptable impacts. Policy C2 requires the submission of a transport assessment/transport statement with any development proposal to assess any transport impacts and identify measures to minimise any adverse effects. Policy C5 continues to provide adequate guidance for parking, including having regard to the council's up-to-date standards.
Land east of Pound Lane, Sonning (Sonning Golf Club) (5SO008) Revised Growth Strategy proposal: 24 dwellings	
Key issues raised by residents and parish/town councils include: • Congestion and highway safety on the network, e.g. A4, Duffield Road, Pound Lane • Separation of Sonning and Charvil • Pedestrian and cycle improvements	The land was granted permission on 30 November 2023 (ref: 223458). The site is included within Policy SS14 of the Proposed Submission Plan (ref: SS14.16), reflecting the grant of permission and the site not being under construction.

Summary of key issues raised	Changes made to the Proposed Submission Plan
Disproportionate level of development with no infrastructure improvement Landowner confirmed availability and deliverability of the site, and promoted a capacity greater than 24 units, potentially through older persons accommodation. Additional land to east was confirmed as available and deliverable for a further 25 dwellings. Adjacent landowner (5SO010) confirmed discussions with Sonning Golf Club regarding through access. Potential access to 5SO008 from 5SO010.	
Land west of Trowes Lane, Swallowfield (5SW019) Revised Growth Strategy proposal: 70 dwellings	
Key issues raised by residents and parish/town councils include: - Impact on character and countryside - Disproportionate scale of development for the settlement - Risk of groundwater flooding - Limited public transport services and active travel routes - Incompatible with council's climate emergency - Access arrangements, no reference to Charlton Lane - Congestion and highway safety - Improvements to pedestrian connectivity to the north not achievable as land has Reserved Matters Landowner confirmed availability and deliverability of the site. Request that area of woodland to south be incorporated into allocation boundary to assist with biodiversity net gain and green infrastructure.	The land was granted full planning permission at a planning appeal in July 2024 (ref: 230422). The site is included within Policy SS14 of the Proposed Submission Plan (ref: SS14.18), reflecting the grant of permission and the site not being under construction.

Summary of key issues raised	Changes made to the Proposed Submission Plan
Thames Water commented that scale of development is likely to require upgrades to water supply and wastewater network.	
Land at Bridge Farm, Twyford (5TW010) Revised Growth Strategy proposal: 180 dwellings	
Key issues raised by residents and parish/town councils include: • Risk of flooding from the River Loddon • Congestion and highway safety on the network, e.g. A4, Twyford Crossroads, Sonning Bridge • Improvements to public transport and active travel routes • Respect character of the area • Separation between Twyford and Charvil • Smaller, modest sized dwellings Landowner confirmed availability of the site. Outline planning application submitted for up to 200 dwellings. Environment Agency highlighted the following: • Clay ground conditions will require areas for attenuation • Development more sensitive to infiltration discharges and surface activities (e.g. road drainage) Thames Water commented that scale of development is likely to require upgrades to water supply and wastewater infrastructure. A Phase 2 contaminated land risk assessment required to accompany a planning application as site located in a Source Protection Zone.	The land was granted outline planning permission on 5 July 2023 (ref: 212720). The site allocation is supported by development guidelines (Appendix E) that include detailed requirements to address site-specific matters. The site is included within Policy SS14 of the Proposed Submission Plan (ref: SS14.19), reflecting the grant of permission and the site not being under construction.

Summary of key issues raised	Changes made to the Proposed Submission Plan
Winnersh Plant Hire, Reading Road, Winnersh (5WI008) Revised Growth Strategy proposal: 85 dwellings	
Key issues raised by residents and parish/town councils include: • Congestion and highway safety on the network, e.g. Reading Road • Disagree with increased capacity • Site lies in flood zones 2 and 3 • Parking arrangements Landowner suggested that the capacity of the site could accommodate 90 units, supported by a design statement.	The council has conducted a detailed and robust site selection process informed by a suite of comprehensive technical evidence. Through this process the site has been assessed as suitable and developable. The site is included within Policy SS14 of the Proposed Submission Plan (ref: SS14.23). The council is satisfied that development is sustainable and will not result in unacceptable impacts. The capacity of the site has been reduced from 85 dwellings to 60 dwellings to reflect latest flooding evidence and masterplanning. The proposed site allocation is supported by site-specific requirements set out in the development guidelines (Appendix E). The development guidelines continue to ensure the proposal provides vehicular access from Reading Road. Guidelines on flood risk and drainage matters provide additional detail, including no development to be located within Flood Zone 3a, incorporating blue roofs and rainwater re-harvesting, and undertaking detailed modelling, taking account climate change impacts. Policy FD1 requires the submission of a detailed site-specific Flood Risk Assessment. Policy C5 continues to provide adequate guidance for parking, including having regard to the council's up-to-date standards.

Summary of key issues raised	Changes made to the Proposed Submission Plan
Thames Water commented that the scale of development is likely to require upgrades of the water supply and wastewater infrastructure.	Policy C8 (Utilities) ensures development proposals demonstrate sufficient capacity for wastewater collection infrastructure to service the development, and engagement is sought with utility providers, including relevant water supply / wastewater companies early in the planning process to identify potential infrastructure requirements.
Winnersh Farms, Winnersh (5WI004) Revised Growth Strategy proposal: 287 dwellings	
Key issues raised by residents and parish/town councils include • Congestion and highway safety on the network, e.g. Woodward Close and Reading Road • Noise and air pollution from M4 and A329(M) • Site lies in flood zones 2 and 3 • Disproportionate level of housing for the settlement • Accessibility to public transport, services and facilities Landowner/developer for part of the site (Land off Maidensfield) confirmed availability and deliverability. Landowner for unallocated area immediately north objected to its omission from proposed allocation. Thames Water commented that the scale of development is likely to require upgrades of the water supply and wastewater infrastructure.	The land was granted outline planning permission at a planning appeal in March 2024 (ref: 230208). The site is included within Policy SS14 of the Proposed Submission Plan (ref: SS14.21), reflecting the grant of permission and the site not being under construction. The area of land south of Wheatfield Primary School and to the north of the A329(M) is no longer available for development. The area has therefore been removed from the Proposed Submission Plan. The omission site is located on the opposite side of the brook, between it and the motorway junction. Assess would be required through an areas of flood plain. The omission site is not considered suitable for development as a result of contains and placemaking considerations. Policy C8 (Utilities) ensures development proposals demonstrate sufficient capacity for wastewater collection infrastructure to service the development, and engagement is sought with utility providers, including relevant water

Summary of key issues raised	Changes made to the Proposed Submission Plan
	supply / wastewater companies early in the planning process to identify potential infrastructure requirements.
Land on the north-west side of Old Forest Road, Winnersh (5WI009) Revised Growth Strategy proposal: 36 dwellings Key issues raised by residents and parish/town councils include: • Noise pollution from M4 • Access arrangements • Accessibility of public transport Thames Water commented that scale of development is likely to require upgrades to the wastewater network.	The council has conducted a detailed and robust site selection process informed by a suite of comprehensive technical evidence. Through this process the site has been assessed as suitable and developable. The site is included within Policy SS14 of the Proposed Submission Plan, and is combined with the adjacent allocation, known as Land to the rear of Toutley Hall, north west of Old Forest Road, to facilitate a single, comprehensive approach to the masterplanning of the site. The council is satisfied that development is sustainable and will not result in unacceptable impacts. The development guidelines set out in the Proposed Submission Plan (Appendix E) continue to recognise that access is preferred from Old Forest Road.
Land off Wheatsheaf Close, Sindlesham (5WI011) Revised Growth Strategy proposal: 24 dwellings	
Key issues raised by residents and parish/town councils include: • Concern raised on access arrangements from Wheatsheaf Close.	The council has conducted a detailed and robust site selection process informed by a suite of comprehensive technical evidence. Through this process the site has been assessed as suitable and developable.

Summary of key issues raised	Changes made to the Proposed Submission Plan
	The site is included within Policy SS14 of the Proposed Submission Plan (ref: SS14.15). The council is satisfied that development is sustainable and will not result in unacceptable impacts. A site-specific requirement continues to be proposed in the development guidelines (Appendix E) for the proposed allocation to ensure the development proposal investigates access arrangements, including improved access from Wheatsheaf Close.
Land to the rear of Bulldog Garage, Reading Road, Wokingham (5WI012) Revised Growth Strategy proposal: 25 dwellings	
Key issues raised by residents and parish/town councils include: • Preference for high density and storey heights to support affordable homes • Congestion and highway safety on the network, e.g. Reading Road • Access arrangements as site is landlocked • Noise and pollution from motorway, railway and main road • Loss of green space • Poor cycle facilities along Reading Road	The council has conducted a detailed and robust site selection process informed by a suite of comprehensive technical evidence. Through this process the site has been assessed as suitable and developable. The site is included within Policy SS14 of the Proposed Submission Plan (ref: SS14.22). The proposed allocation includes an additional area of land promoted at the BP garage (5WI021), which is immediately adjacent to the site and would help to facilitate access from Reading Road. The development guidelines for the proposed allocation continue to ensure that any access improvements from Reading Road are sensitive to the mature trees along the green route.

Summary of key issues raised	Changes made to the Proposed Submission Plan
Thames Water commented that scale of development is likely to require upgrades to wastewater network.	The council is satisfied that development is sustainable and will not result in unacceptable impacts. Policy H1 continues to be proposed in the Proposed Submission Plan which ensures development proposals provide appropriate housing mix and densities, responding to identified housing needs and demands in the council's most up to date evidence. Criteria 3 of the policy requires development proposals to optimise density and make efficient use of land that responds to size, location, opportunities and constraints of the site. Proposals in urban locations and with good standard of public transport accessibility will be expected to achieve higher densities. Policy C8 (Utilities) ensures development proposals demonstrate sufficient capacity for wastewater collection infrastructure to service the development, and engagement is sought with utility providers, including relevant water supply / wastewater companies early in the planning process to identify potential infrastructure requirements.
69 King Street Lane, Winnersh (SWI014) Revised Growth Strategy proposal: 25 dwellings	
Key issues raised by residents and parish/town councils include: • Access arrangements to King Street Lane • Congestion and highway safety on network, e.g. King Street Lane • Limited public transport • Impact on adjacent Conservation Area	The land received the granting of planning permission (ref: 231094) subject to completion of a legal agreement at a meeting of the council's Planning Committee on 10 December 2023. The site is included within Policy SS14 of the Proposed Submission Plan (ref: SS14.14), reflecting the grant of permission and the site not being under construction.

Summary of key issues raised	Changes made to the Proposed Submission Plan
Landowner confirmed availability and deliverability of the site. Opportunity to increase capacity up to 30 dwellings. Environment Agency expect a buffer to be incorporated to the adjoining watercourse on the eastern boundary and to provide habitat enhancements.	
Land to the rear of Toutley Hall, north west of Old Forest Road, Winnersh (5WI019) Revised Growth Strategy proposal: 15 dwellings	
Key issues raised by residents and parish/town councils include: - Concerns with access arrangements. - Combining the site with the adjacent proposed allocation (5WI009). Landowner confirmed the availability and deliverability of the site. Opportunity to increase capacity up to 30-50 dwellings. Suggestion that site could integrate with adjacent allocation. Thames Water commented that scale of development is likely to require upgrades to wastewater network.	The council has conducted a detailed and robust site selection process informed by a suite of comprehensive technical evidence. Through this process the site has been assessed as suitable and developable. The site is included within Policy SS14 of the Proposed Submission Plan (ref: SS14.20), and is combined with the adjacent allocation, known as Land on north-east side of Old Forest Road, to facilitate a single, comprehensive approach to the masterplanning of the site. The council is satisfied that development is sustainable and will not result in unacceptable impacts. The development guidelines set out in the Proposed Submission Plan (Appendix E) continue to recognise that access is preferred from Old Forest Road. Policy C8 (Utilities) ensures development proposals demonstrate sufficient capacity for wastewater collection infrastructure to service the development, and engagement is sought with utility providers, including relevant water

Summary of key issues raised	Changes made to the Proposed Submission Plan
	supply / wastewater companies early in the planning process to identify potential infrastructure requirements.
Ashridge Farm, Wokingham (5WK002) Revised Growth Strategy proposal: 153 dwellings Key issues raised by residents and parish/town councils include: • Proximity to sewage treatment works • Separation from Wokingham and Hurst • Listed and historic buildings • Flood risk • Pressure on infrastructure, services and facilities • Agricultural land and protected trees Environment Agency suggested an additional requirement in the development guidelines regarding a buffer to the ordinary watercourse. Thames Water commented that local upgrades to wastewater network may be required.	The land was granted full planning permission for up to 153 dwellings in June 2021 (ref: 201515). The site is therefore no longer proposed for allocation in the Proposed Submission Plan, reflecting it being under construction or complete.
Station Industrial Estate, Oxford Road, Wokingham (5WK029) Revised Growth Strategy proposal: 40 dwellings Key issues raised by residents and parish/town councils include: • Noise levels from railway station • Loss of employment/jobs • Opportunities for flats and affordable housing due to town centre location	The council has conducted a detailed and robust site selection process informed by a suite of comprehensive technical evidence. Through this process the site has been assessed as suitable and developable. The site is included within Policy SS14 of the Proposed Submission Plan (ref: SS14.29).

Summary of key issues raised	Changes made to the Proposed Submission Plan
Thames Water commented that scale of development is likely to require upgrades to the wastewater network.	The council is satisfied that development is sustainable and will not result in unacceptable impacts. The proposed site allocation is supported by site-specific requirements set out in the development guidelines (Appendix E). The development guidelines continue to include consideration of achieving higher density development across the site. A requirement is also retained in the development guidelines to investigate potential noise impacts from the railway line, and to provide mitigation measures, such as a suitable buffer. Policy C8 (Utilities) ensures development proposals demonstrate sufficient capacity for wastewater collection infrastructure to service the development, and engagement is sought with utility providers, including relevant water supply / wastewater companies early in the planning process to identify potential infrastructure requirements.
54-58 Reading Road, Wokingham (5WK012) Revised Growth Strategy proposal: 31 dwellings Key issues raised by residents and parish/town councils include: • Congestion at Station Approach / Reading Road • Air quality • Pursue higher densities in town centres Thames Water commented that scale of development likely to require upgrades to wastewater network.	The land received planning permission for 34 retirement living apartments in November 2021 (ref: 202065) and is nearing completion, therefore the site is no longer proposed for allocation in the Proposed Submission Plan.

Summary of key issues raised	Changes made to the Proposed Submission Plan
Former M&S, 26-36 Peach Street, Wokingham (5WK050) Revised Growth Strategy proposal: 15 dwellings	
Key issues raised by residents and parish/town councils include: Concerns over loss of ground level car parking in the town centre required for disabled and elderly visitors. Thames Water commented that scale of development is likely to require upgrades to wastewater network.	The landowner has amended the site's promotion solely for town centre uses. The previously proposed allocation for housing is therefore removed from the Proposed Submission Plan as it is no longer available. A suitable policy framework (Policy ER8) is proposed for managing development proposals in Wokingham Town Centre.
Land to the corner of Wellington Road and Station Road (5WK046) Revised Growth Strategy proposal: 21 dwellings	
Key issues raised by residents and parish/town councils include: - Vehicular access arrangements - Noise and air pollution - Loss of car parking - Loss of trees - Flats must be accessible to disabled and elderly residents	The council has conducted a detailed and robust site selection process informed by a suite of comprehensive technical evidence. Through this process the site has been assessed as suitable and developable. The site is included within Policy SS14 of the Proposed Submission Plan (ref: SS14.31). The council is satisfied that development is sustainable and will not result in unacceptable impacts. The site allocation is supported by site-specific requirements set out in the development guidelines (Appendix E). The development guidelines continue to include consideration of access arrangements (including investigating access from Park Road) and retention of on-site mature and protected trees. Policy H1 of the Proposed Submission Plan continues to introduce accessibility standards for new build dwellings. The policy requires all residential proposals

Summary of key issues raised	Changes made to the Proposed Submission Plan
Thames Water commented that scale of development is likely to require upgrades to wastewater network.	to be accessible and adaptable; and for proposals of 20 or more dwellings at least 5% should be provided to wheelchair accessible and adaptable standards. Policy C8 (Utilities) ensures development proposals demonstrate sufficient capacity for wastewater collection infrastructure to service the development, and engagement is sought with utility providers, including relevant water supply / wastewater companies early in the planning process to identify potential infrastructure requirements.
Wokingham Library, Denmark Street, Wokingham (5WK047) Revised Growth Strategy proposal: 15 dwellings	
Key issues raised by residents and parish/town councils include: • Retain facility as a community asset or for alternative uses (e.g. heritage centre, arts centre, supported living) • Loss of ground level car parking in the town centre • Congestion in and around the town centre, e.g. Langborough Road / Denmark Street • Impact of higher density on character of the area • Refusal of planning permission for 77 dwellings on adjacent land on grounds of scale, size, and impact on neighbouring development and character, including listed buildings and Conservation Area Thames Water commented that scale of development is likely to require upgrades to the wastewater network.	The landowner has withdrawn the availability of the site for development. The proposed allocation has therefore been removed from the Proposed Submission Plan.

Summary of key issues raised	Changes made to the Proposed Submission Plan
Suffolk Lodge, Rectory Road (5WK048) Revised Growth Strategy proposal: 20 dwellings Key issues raised by residents and parish/town councils include: • The loss of a care home facility for older residents in a central location. Thames Water commented that scale of development is likely to require upgrades to wastewater network.	The site is no longer proposed for allocation in the Proposed Submission Plan. An assessment of the site is provided in the Housing and Economic Land Availability Assessment (HELAA). Policy H7 of the Proposed Submission Plan continues protect the loss of specialist accommodation by requiring development proposals to demonstrate that they have met defined criteria.
Millars Business Park, Molly Millars Lane, Wokingham (5WK030) Revised Growth Strategy proposal: 90 dwellings Key issues raised by residents and parish/town councils include: • Lack of access to green space • Site is being redeveloped and unclear where the residential development would be located Key issues raised by the development industry include: The deliverability of the site having been granted planning permission for non-residential use. Environment Agency sought the following: • Request further flooding evidence on exception and sequential tests • Explore opportunities to open up the existing culvert for habitat enhancements	The majority of the land has planning permission for 2 industrial buildings (B2 and B8 use) comprising of 4 industrial units (ref: 201345 and 210705), and therefore the site is considered to be no longer available for residential development and is not proposed for allocation in the Proposed Submission Plan.

Summary of key issues raised	Changes made to the Proposed Submission Plan
Thames Water commented that scale of development is likely to require upgrades to the wastewater network.	
Bridge Retail Park, Finchampstead Road, Wokingham (5WK045) Revised Growth Strategy proposal: 59 dwellings	
Key issues raised by residents and parish/town councils include: • Congestion and highway safety on network, e.g. Finchampstead Road • Density out of keeping with existing character • Air pollution • Retain existing trees to provide buffer to railway and Finchampstead Road • Sensitivity to the setting of the listed building	The council has conducted a detailed and robust site selection process informed by a suite of comprehensive technical evidence. Through this process the site has been assessed as suitable and developable. The site is included within Policy SS14 of the Proposed Submission Plan (ref: SS14.26). The council is satisfied that development is sustainable and will not result in unacceptable impacts. The proposed site allocation is supported by site-specific requirements set out in the development guidelines (Appendix E). The development guidelines continue to include consideration of access arrangements (including preferred access from Finchampstead Road), retention of on-site mature and protected trees and sensitivity of listed buildings and their setting. Policies (H2; DH1) continued to be proposed in the local plan to ensure development proposals achieve appropriate densities that respond to size and location, site constraints and opportunities, and whilst being appropriate to character and amenity of the area.

Summary of key issues raised	Changes made to the Proposed Submission Plan
Environment Agency sought the following: • Further flooding evidence on exception and sequential tests • Requirement in the development guidelines to provide a minimum 5m buffer zone between development and Emm Brook, and to provide environmental enhancements Thames Water commented that scale of development is likely to require upgrades to wastewater network. Landowner confirmed the availability and deliverability of the site. Opportunity to increase site capacity to around 40-90 dwellings, including provision for older persons accommodation.	Policy HC6 clarifies that an air quality assessment is likely to be required, where development has the potential to impact on air quality within an AQMA. The site has been demonstrated to pass the flood risk Sequential Test and Exception Test. The requirement in the development guidelines is retained to ensure built development retains a suitable buffer from the Emm Brook. Criteria 2(d) of Policy FD3 (River corridors and watercourses) also ensures proposals in the vicinity of a river provide or retain a minimum 8m undeveloped buffer zone. Development guidelines also include a requirement for development to be steered towards Flood Zone 1 and avoid areas potentially susceptible to reservoir and surface water flooding, and that rainwater harvesting techniques are incorporated into design. Policy C8 (Utilities) ensures development proposals demonstrate sufficient capacity for wastewater collection infrastructure to service the development, engagement is sought with utility providers, including relevant water supply / wastewater companies early in the planning process to identify potential infrastructure requirements.

Summary of key issues raised	Changes made to the Proposed Submission Plan
Land east of Toutley Depot, Wokingham (5WK051) Revised Growth Strategy proposal: 130 dwellings plus a care home Key issues raised by residents and parish/town councils include: • Unsafe vehicular access from the A321 • Flood risk as site is within Flood Zone 2 and 3 • Encourage public transport, e.g. to Twyford Environment Agency requested additional flood risk evidence and recommended a requirement in the development guidelines to provide a buffer from the ordinary watercourse. Thames Water commented that local upgrades to wastewater and sewage treatment infrastructure may be required.	The land received outline planning permission for up to 130 dwellings and a 70-bed care home in December 2022 (ref: 211777). The site is no longer proposed for allocation in the Proposed Submission Plan, with the site being within the settlement area.
Land south of Gipsy Lane, Wokingham (5WK006) Revised Growth Strategy proposal: 17 dwellings Key issues raised by residents and parish/town councils include: • Site is a soakaway, development would result in flooding in other locations • Protected trees • Identify land as green space for the SDL Environment Agency suggested reference to known waterbodies and achieving biodiversity net gain and habitat compensation.	Following further investigation, it is unclear whether the land is still available for development and therefore the site's deliverability is unknown. The site is therefore no longer proposed for allocation in the Proposed Submission Plan. An assessment of the site is contained in the Housing and Economic Land Availability Assessment (HELAA).

Summary of key issues raised	Changes made to the Proposed Submission Plan
Land to the west of St Anne's Drive and south of London Road, Wokingham (5WK043) Revised Growth Strategy proposal: 54 dwellings	
Key issues raised by residents and parish/town councils include: • Loss of trees and wildlife • Separation between Wokingham and Bracknell • Access and congestion on the highway network, e.g. London Road • Planning application (ref: 203544) refused at Planning Committee Thames Water commented that local upgrades to wastewater network may be required. Environment Agency recommended an additional requirement in development guidelines to provide a buffer from development and the watercourse.	The land received full planning permission for 54 dwellings at a planning appeal in December 2022 (ref: 203544). The site is no longer proposed for allocation in the Proposed Submission Plan.
Land to the rear of Sandford Pumping Station, Mohawk Way, Woodley (5WO004) Revised Growth Strategy proposal: 15 dwellings	
Key issues raised by residents and parish/town councils include: • Poor access arrangements • Limited services and facilities, e.g. schools • Disproportionate level of development in the area Environment Agency sought the following: • Further flooding evidence on exception and sequential tests	The site is no longer proposed for allocation in the Proposed Submission Plan. An assessment of the site is contained in the Housing and Economic Land Availability Assessment (HELAA).

Summary of key issues raised	Changes made to the Proposed Submission Plan
Requirement in the development guidelines to provide a buffer zone between development and the River Loddon, and to provide environmental enhancements	
Woodlands Farm, Wood Lane, Barkham (5BA013) Revised Growth Strategy proposal: 15 GRT pitches	
Key issues raised by residents and parish/town councils include: - Vehicle movements and access arrangements on School Road for caravans/mobile homes - Consideration for non-motorised users, e.g. walking, cycling and horse riding - Separation between Arborfield Cross and Barkham - Proximity to The Coombes Local Wildlife Site The landowner/development confirmed the availability of the site. Wider area promoted to accommodate 30 pitches.	The council has conducted a detailed and robust site selection process informed by a suite of comprehensive technical evidence. Through this process the site has been assessed as suitable and developable. The site is included within Policy SS14 of the Proposed Submission Plan (ref: SS14.3). The council is satisfied that development is sustainable and will not result in unacceptable impacts. The proposed site allocation is supported by site-specific requirements set out in the development guidelines (Appendix E). The development guidelines continue to include consideration of access arrangements, including appropriate access for vehicles towing a caravan or a mobile home. A guideline is also retained in the Proposed Submission Plan to ensure the proposal comes forward in accordance with Policy H10 (Traveller sites). Policy H10 also includes consideration of other matters such as landscaping and landscape character. Other matters such as biodiversity/ecology and active travel are covered in the relevant policies of the local plan.

Summary of key issues raised	Changes made to the Proposed Submission Plan
Tintagel Farm, Sandhurst Road, Finchampstead (5FI001) Revised Growth Strategy proposal: 5 GRT pitches	
Key issues raised by residents and parish/town councils include: • Site capacity. • Impact on wildlife. • Congestion. • Pressure on services and facilities.	The landowner has withdrawn the availability of the site for Gypsy and Traveller development, promoting it instead for market housing. The proposed allocation has therefore been removed from the Proposed Submission Plan. An assessment of the site is contained in the Housing and Economic Land Availability Assessment (HELAA). This concluded the site was unsuitable for market housing.
Land to the rear of 166 Nine Mile Ride, Finchampstead (5FI015) Revised Growth Strategy proposal: 4 GRT pitches	
Key issues raised by residents and parish/town councils include: • Site capacity • Impact on wildlife. • Congestion. • Pressure on services and facilities. It is noted the site has planning permission for four GRT pitches. Thames Water commented that scale of development is likely to require upgrades to the wastewater network.	Land was granted full planning permission (ref: 201143) for the proposed addition of 4 pitches for gypsy and traveller use in January 2021. The site is no longer proposed for allocation in the Proposed Submission Plan.
The identification of Gray's Farm for both outdoor and indoor sports and community uses (5WW006)	
Key issues raised by residents and parish/town councils include: • Relocation of existing facilities, e.g. Pinewood Football Club due to regeneration of Pinewood	The boundary of the South Wokingham Strategic Development Location has been extended to incorporate the area at Gray's Farm to provide a sports hub for sports and community uses. Incorporating this area into the SDL would

Summary of key issues raised	Changes made to the Proposed Submission Plan
• Impact on natural environment • Access and congestion on highway network, e.g. Heathlands Road • Separation of settlements, e.g. Wokingham and Wokingham Without • Limited accessibility by public transport • Connectivity to development and SANG planned at South Wokingham SDL Environment Agency recommended in the development guidelines a requirement to provide buffer between development and the watercourse. Sport England sought clarity on the types of uses that would be provided.	facilitate its integration with planned and permitted development. Additional guidance for the South Wokingham SDL is set out in the Development Guidelines (Appendix C), which address matters such as accessibility and connectivity to community services and facilities within the SDL. Policy SS12 of the Proposed Submission Plan continues to recognise that development proposals should protect and maintain the physical, visual and perceived separation of the defined settlements of Wokingham, Crowthorne / Pinewood (Crowthorne). The development guidelines set out a number of key placemaking principles, including to provide <i>‘an ecological buffer along the watercourse’</i>. A specific policy continues to be proposed in the Proposed Submission Plan addressing river corridors and watercourses (Policy FD3). Criteria 3c) of Policy SS12 clarifies the types of uses likely to be provided at the proposed sports hub at Gray’s Farm, including open space, sports and leisure facilities and other community uses. Further detail on open space, sport and leisure provision is set out in Policy HC3.
Housing mix	
Key issues raised by residents and parish/town councils include: • A preference for an appropriate mix of housing to support key workers, single occupancy or people wishing to downsize. • Support for more affordable housing (including rented social housing). • Concern regarding HMO proposals.	Policy H1 of the Proposed Submission Plan continues to ensure an appropriate housing mix, density and standards of both sizes and types, thereby including smaller, more affordable dwellings. The policy direction is supported by Local Housing Needs Assessment which considered various housing needs. Policy H3 of the Proposed Submission Plan continues to ensure residential development proposals of at least 5 units of accommodation (or at least

Summary of key issues raised	Changes made to the Proposed Submission Plan
- Concern regarding development of private residential gardens. Key issues raised by the development industry include: - Threshold for triggering affordable housing being inconsistent with national policy. - The absence of an up-to-date viability assessment. - Insufficient evidence to support the application of optional technical standards Developer suggested that the policy related to development of private residential gardens was too restrictive. Policy does not recognise role that garden land can play in delivering smaller sites. Environment Age ncy suggested a requirement in the ‘development of private residential gardens’ policy to ensure proposals provide a minimum 10% net gain in biodiversity.	0.16ha) provide affordable housing. The policy includes a table which sets out the minimum percentage of affordable housing by location and typology. The supporting text to the policy qualifies the proportion of affordable housing that will be provided as social rent (70%). The council is content that evidence exists to justify lower thresholds than set out in national planning policy. The policy has been tested through the Local Plan and CIL Viability Study and confirms that the proposed policy requirement can be viably delivered in the majority of cases. Both Policy H8 (Conversion and sub-division of buildings) and Policy H12 (Residential development of existing private gardens) ensures that development proposal address matters such as character and parking arrangements. A suitable policy framework is proposed in the Proposed Submission Plan for delivering biodiversity net gain and managing the loss of green spaces. Policy H12 (Residential development of existing private gardens) continues to set an appropriate framework from which to assess the suitability of individual applications. The Local Plan should be read as a whole, and therefore Policy NE2 (Biodiversity net gain) and other relevant polices in the development plan will apply when considering this type of development proposal.
Rural housing	
Key issues raised by the development industry include:	A policy continues to be proposed in the Proposed Submission Plan covering ‘Exception sites’ (Policy H4). The policy has been updated to address types of

Summary of key issues raised	Changes made to the Proposed Submission Plan
That the policy should consider ‘entry level’ exception sites, as per national policy.	exceptions, including rural exception sites, First Home exception sites and community-led development.
Specialist accommodation	
<i>Older persons and vulnerable communities:</i> Key issues raised by the development industry include: - Acknowledging role of the private sector - Accessibility standards are optional requirements which need to be supported by evidence and impact on development viability - Disagreement that needs should mainly be met on strategic sites Berkshire West Clinical Commissioning Group (CCG) sought clarity regarding the term ‘local commissioning priorities’. <i>Gypsies and travellers and travelling showpeople:</i> Key issues raised by the development industry include:	Criteria 1 of Policy H7 (Specialist accommodation) in the Proposed Submission Plan has been amended to acknowledge the role that the private sector plays in supporting households requiring additional support or form of specialist accommodation. The council has produced evidence to support Policy H1 (Housing mix, density and standards) which is presented within the Local Housing Needs Assessment (November 2023). The Viability Study concludes standards will have minimal impact on development viability. Policy H7 of the Proposed Submission Plan continues to propose a criteria-based approach to support development proposals related to specialist accommodation, outside of the strategic allocations. Additional information has been provided within the supporting text to Policy H7. The geographic distribution of site allocations is informed by the availability of suitable sites across the borough. A specific targeted call for Gypsy and Traveller sites was undertaken in January – February 2023. Allocations must accord with

Summary of key issues raised	Changes made to the Proposed Submission Plan
Provision should be distributed across the borough, rather than focused on settlements. Neighbouring councils sought clarity on needs and pitch targets as required by the Planning Policy for Traveller Sites (PPTS). Key issues raised by the development industry include: • The policy not allocating sufficient sites to meet identified need.	national policy, which requires that sites are not located away from settlements in open countryside. Updated Policy H9 clearly sets out the minimum number of pitches required across the plan period. Policy SS14 of the Proposed Submission Plan identifies four site allocations for Gypsy and Traveller pitches or Travelling Showpeople plots, totally around 43 pitches / plots. In addition, Policy SS11 (Arborfield Green Strategic Development Location) identifies the provision of 5 Gypsy and Traveller pitches; Policy SS12 (South Wokingham Strategic Development Location) identifies the provision of 6 Gypsy and Traveller Pitches on land south of Waterloo Road and Policy SS13 (Loddon Valley Garden Village) identifies the provision of 20 Gypsy and Traveller pitches. This provision is summarised in Policy H9. These allocations are capable of meeting the majority of the identified need. Further, Policy H10 (Traveller Sites) of the Proposed Submission Plan continues to propose a criteria-based approach to support new Gypsy and Traveller pitches and Travelling Showpeople plots in order that the modest remaining need can be met through windfall development.
Design	
Key issues raised by residents and parish/town councils include: • The policy should be updated to reflect recommendations in the Building Better, Building Beautiful report (January 2020). • Advertisements policy should also refer to light pollution.	Policy DH1 has been amended to refer to latest relevant national guidance. Policy DH4 (Advertisements and signage) ensures proposals respect the character of the area through appropriate design, taking account illumination and luminance (a form of light pollution).

Summary of key issues raised	Changes made to the Proposed Submission Plan
Heritage Key issues raised include: • The need to reference to degree of harm in line with national policy • The proportionate approach in level of detail requirement for assessing heritage assets Historic England sought additional development principle to ensure non-strategic allocations consider heritage assets and amendments regarding assessing significance of scheduled monuments and non-designated heritage assets.	The council considers the policy is consistent with national policy. An additional criterion is included in Policy DH5 of the Proposed Submission Plan to explain the circumstances where a development proposal would cause less than substantial harm to the significance of a designated heritage asset. Additional wording is included in criteria 3 of Policy DH5 of the Proposed Submission Plan to clarify that a heritage assessment should be prepared in a level of detail proportionate to the asset's importance. The Proposed Submission Plan continues to include development guidelines to support the proposed allocations, taking account matters such as highways, heritage and flood risk. Additional detail is included in the development guidelines to reflect comments from Historic England on specific site allocations. The development guidelines are contained in Appendix E of the Proposed Submission Plan. Criteria 1 of Policy DH6 in the Proposed Submission Plan has been amended to clarify that a detailed archaeological assessment should accompany development proposals that have the potential to affect a scheduled monument or non-designated heritage asset of archaeological interest. Criteria 2 of the policy ensures that the assessment explains the significance of any archaeological remains.
Community services and facilities	
Key issues raised by residents and parish/town councils include: • Potential for a new Scout Headquarters at Emmbrook and a primary school at Wargrave.	A suitable policy framework continues to be proposed in the Proposed Submission Plan through Policy HC2 to support these types of community services / facilities coming forward.

Summary of key issues raised	Changes made to the Proposed Submission Plan
Key issues raised by the development industry include: • Whether evidence exists to justify the standards for open space, sports, recreation and play facilities. • Insufficient flexibility to reflect local / specific circumstances.	The council's existing approach set out in the Core Strategy and MDD local plans has secured and delivered open space, sport, recreation and play provision in new developments across the borough. Updated evidence in the form of an Indoor Built Facilities Strategy and Playing Pitch Strategy provides further justification to standards for indoor facilities and playing pitches in policy.
Health	
Key issues raised by the development industry include: • HIAs in major developments overly onerous.	The council considers that the Policy HC1 is consistent with national policy and guidance. Supporting text qualifies that the scope of a Health Impact Assessment will vary depending on the size and location of the development, thereby providing a degree of flexibility. A plan-wide Viability Study concludes the requirement will have minimal impact on development viability.
Local Green Space	
Key issues raised by residents and parish/town councils include: Requirement for further clarity on how development is to be restricted and/or managed. The uneven distribution of sites across the borough. Comments were received from landowners objecting to the inclusion of their land as Local Green Space.	Policy HC3 ensures that areas identified as Local Green Space on the Policies Map or through neighbourhood plans are protected from inappropriate development, unless very special circumstances are demonstrated, which is consistent with paragraph 107 of the NPPF. The policy is also amended to clarify how development proposals will be assessed where they would result in the loss or erosion of a Local Green Space or would affect its use and function. The council has considered the suitability of all nominations from land to be designated as Local Green Space, with assessments contained in the Local Green Spaces Assessment. Suitability of areas reflects individual nominated sites. It would be inappropriate to place a quota on sites to achieve even distribution.

Summary of key issues raised	Changes made to the Proposed Submission Plan
	Representations from landowners have been taken into account during the assessment process.
Environmental protection	
Environment Agency suggested amendments relating to surface and groundwater quality in the contaminated land and environmental protection policies. Bracknell Forest Council suggested if the requirement for an air quality assessment should also apply to proposals within proximity to an AQMA. Natural England highlighted consideration of air quality through HRA at a strategic level. Natural England and Environment Agency sought consideration of natural environment and wildlife corridors in the light pollution policy.	Criteria 1(d) of Policy HC9 qualifies this further by referring to ‘Water bodies, including both surface water and groundwater bodies’. Criteria 1(d) of Policy HC5 (Environmental Protection) also considers air and water quality ‘including surface water and groundwater’. An additional requirement is included in the policy to provide clarity that an assessment is likely to be required where development has the potential to impact on air quality within an AQMA. This would apply to a proposal outside / in proximity to an AQMA. Air quality modelling has been undertaken and fed into the Habitat Refutation Assessment supporting the Proposed Submission Plan. Noted. The policy has been re-drafted to reflect consultation comments. Criteria 3 of Policy HC7 (Light pollution) ensures consideration of sensitive receptors, such as wildlife corridors, Local Wildlife Sites and protected species.