

EXAMINATION OF

THE WOKINGHAM BOROUGH LOCAL PLAN UPDATE 2023-2040

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By email via the Programme Officer

Dear Mr Bellinger,

MATTERS, ISSUES AND QUESTIONS FOR PART 1 HEARING SESSIONS

1. Following a review of the Council's response to our Initial Questions letter dated April 2025, we have determined that staged hearing sessions are required to enable an early exploration of certain aspects of the Wokingham Borough Local Plan Update 2023-2040 ('Plan'). The hearing sessions relating to this are scheduled to begin on 18 November 2025.
2. This letter sets out the Matters, Issues and Questions ('MIQs') for the part 1 hearing sessions. The MIQs are not intended to cover all facets of the matters identified, but to assist in our consideration of key aspects of the Plan. As such, as we continue our review of the examination documents, we may ask further questions before or during the hearing sessions.
3. Prior to the hearing sessions, written statements from the Council and representors are invited on the MIQs. Where reference is made to evidence produced by the Council, this should be clearly cross-referenced by providing the examination reference and document title, page and paragraph number.

4. It is noted that the Council has submitted a Schedule of Proposed Modifications to the Plan [CD22] and changes to the Policies Map [CD23]. Modifications are also proposed in Statements of Common Ground 'SoCGs'. For clarity, we are examining the Plan as consulted on at publication¹ stage [CD1]. While we will have regard to the proposed modifications, these may only be included in the Plan if we consider they are necessary for legal compliance or soundness reasons and recommend them as main modifications.
5. The Plan is being examined under the National Planning Policy Framework ('the Framework') published on 19 December 2023. Any references below to the Framework relate to this version.
6. Should further changes to the Plan be proposed as a result of the MIQs, then these should be added to the Schedule of Proposed Modifications. This should be kept up-to-date, and the latest version published prior to the hearing sessions.
7. Further information about the examination, hearing sessions and the format for written statements is provided in the accompanying Guidance Note, and the Planning Inspectorate's Procedure Guide for Local Plan Examinations, which should be read alongside the MIQs.

Matter 1: Legal Compliance and the Duty to Co-operate

Issue 1 - Duty to Co-operate

- 1) Has the Council engaged constructively, actively and on an ongoing basis with all of the relevant authorities and prescribed bodies on the strategic matters applicable to the Plan and have they been resolved? How has this engagement shaped the Plan?
- 2) Does the evidence contained in the Statement of Compliance [CD8a] and the associated SoCGs [CD8b-m; WBC1-4, WBC7 and WBC21-24] adequately demonstrate that the Council has met the Duty to co-operate?
- 3) Are there any strategic matters on which the Duty to Co-operate has not been met? If so, what is the evidence to support this?

Issue 2 - Sustainability Appraisal ('SA')

- 4) Is the methodology used for the most recent SA dated September 2024 [CD3a] robust?

¹ Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012

- 5) On what basis were the SA growth scenarios selected and why were some sites identified as 'constants' across all of those scenarios?
- 6) Have reasonable alternatives been appropriately considered and have adequate reasons been given as to why these have not been selected? In particular:
 - a. Are the reasonable alternatives sufficiently distinct to highlight different sustainability implications?
 - b. Have reasonable alternatives to each of the Plan's strategic and non-strategic policies been considered?
- 7) Overall, is it clear how SA has informed judgements about the growth promoted in the Plan, the choice of spatial strategy, and the strategic and non-strategic policies it contains?

Issue 3 - Habitats Regulations Assessment ('HRA')

- 8) Does the HRA [CD6] comply with the Conservation of Habitats and Species Regulations 2017 and is it otherwise robust?
- 9) Are the Plan's approaches to and the availability of Suitable Alternative Natural Green Space, including a proposed extension to Rooks Nest Wood, capable of appropriately mitigating the impacts of development on the integrity of 'habitats sites' as defined in Annex 2 of the Framework to an appropriate timescale?

Issue 4 – Other Legal and Procedural Requirements

Consultation

- 10) Has the Plan been prepared in accordance with the Council's Statement of Community Involvement [CD12] and statutory consultation requirements? Has all relevant and available evidence been made available for consultation, at the various stages of Plan preparation?
- 11) What evidence is there that representations submitted in response to the Plan have been taken into account as required by Regulation 18(3)?

Equalities

- 12) The Equality Impact Assessment [CD11] provides a structured discussion of the broad implications for the Plan for each of the protected characteristics identified by Section 4 of the Equality Act 2010. In what way do specific policies in the Plan affect those with protected characteristics and have any mitigation measures been identified as a result of Section 149 of that Act?

Local Development Scheme

- 13) To what extent has the production of the Plan followed the Local Development Scheme [CD7] and is it in compliance with it?

Climate Change

- 14) Does the Plan, taken as a whole, include policies designed to ensure that the development and use of land in Wokingham contributes to the mitigation of, and adaptation to, climate change in accordance with Section 19(A) of the Planning and Compulsory Purchase Act 2004?

Matter 2: Strategic Transport

Issue 1 – Strategic Transport

- 1) Does the Transport Assessment Report ('TA') and its associated appendices, attachments and addendums [TR1a-o], including the 2032 Interim Year Assessment ('Interim TA'), contain sufficiently accurate assumptions? In particular:
- a. Do the assumptions accurately reflect the development anticipated by the Plan?
 - b. Is the infrastructure identified in the IDP to support the development anticipated by the Plan reflected accurately for each scenario in the TA and Interim TA, particularly in respect of timings for delivery?
- 2) Is the modelling in the TA and the Interim TA sufficiently robust? In particular:
- a. Both assessments were prepared on the basis that School Road, which is shown as part of Route 8 in Figure 22 of the TA, is open to traffic. However, it has purportedly been closed since 2021. What implications, if any, does this have for the reliability of the modelling?
 - b. Do the TA and Interim TA undertake detailed analysis and modelling over appropriately wide geographical areas? In particular, would there be highway impacts beyond the areas mapped in their appendices?
- 3) How significant are the transport effects reported in the TA and Interim TA and would that amount to unacceptable impacts on highway safety or severe residual cumulative impacts on the road network at any point during the plan period?

Matter 3: The Proposed Strategic Development Locations ('SDLs')

Issue 1 – Loddon Valley Garden Village SDL

- 1) Is the site suitable for allocation as an SDL and have the constraints to development been adequately assessed and considered? In particular:
 - a. Has the impact of the development on the highway network been adequately assessed? Are the internalisation assumptions in the TA and Interim TA reliable having regard to when facilities such as schools and local centres would be delivered? Would there be unacceptable impacts on highway safety or severe residual cumulative impacts on the highway network as a result of the development?
 - b. Could adequate public transport connections be provided to the site?
 - c. Is it clear that sufficient sewerage capacity would be available to facilitate the proposed development?
 - d. Has flood risk at this site been appropriately considered?
 - e. Have all other constraints to development been adequately assessed and considered?
- 2) Is the site capable of delivering the necessary infrastructure whilst remaining viable? In particular:
 - a. Is there sufficient certainty that the infrastructure required to support the development could be delivered viably and at the point which it is needed?
 - b. Does the Loddon Valley Garden Village – Financial Viability Assessment [WBC29] demonstrate that the site would be viable and capable of delivering all of the required infrastructure? Does this consider all of the likely infrastructural costs?
 - c. Paragraph 47 of the Council's response to our Initial Questions states that the site promoters agree on how the infrastructure costs would be apportioned. Is this agreement set out in any public document?
- 3) Are the delivery assumptions regarding this site robust? In particular:
 - a. How has the assumed number of dwellings been determined?
 - b. What effect would any delays in the delivery of key pieces of infrastructure, including new road bridges and schools, have on the phasing and delivery of housing at the site? How many dwellings could be completed prior to the delivery of these pieces of infrastructure?

- c. Part 4 of Policy SS13 requires that a single agreed vision and masterplan for the whole site is agreed and consulted upon. The policy also requires that other strategies are prepared. Is the preparation of these documents reflected in the assumed delivery timescales?
- d. Part 14 of Policy SS13 and the most recent SA refer to potential on-site mineral resources, and it is suggested that the site intersects with a 'Minerals Safeguarding Area'. Would extraction of minerals be required prior to any development taking place? If so, what impact would this have on housing delivery timescales?
- e. Is there clear evidence that completions would begin within 5 years and that the development can otherwise be considered deliverable as defined by Annex 2 of the Framework?
- f. Would the site deliver the number of units per annum that are envisaged?

Issue 2 – South Wokingham SDL

- 4) Is the site suitable for allocation as an SDL and have the constraints to development been adequately assessed and considered? In particular:
 - a. Has the impact of the development on the highway network been adequately assessed? Are the internalisation assumptions in the TA and Interim TA reliable having regard to when facilities such as schools and local centres would be delivered? Would there be unacceptable impacts on highway safety or severe residual cumulative impacts on the highway network as a result of the development?
 - b. Has flood risk at this site been appropriately considered?
 - c. Have all other constraints to development been adequately assessed and considered?
- 5) Is there sufficient certainty that the infrastructure required to support the development could be delivered viably and at the point which it is needed?
- 6) Are the delivery assumptions regarding this site robust? In particular:
 - a. How has the assumed number of dwellings been determined?
 - b. Is there clear evidence that completions would begin within 5 years and that the development can otherwise be considered deliverable as defined by Annex 2 of the Framework?
 - c. Would the site deliver the number of units per annum that are envisaged?

Issue 3 - Arborfield Green SDL

- 7) Is the site suitable for allocation as an SDL and have the constraints to development been adequately assessed and considered? In particular:
 - a. Has the impact of the development on the highway network been adequately assessed? Would there be unacceptable impacts on highway safety or severe residual cumulative impacts on the highway network as a result of the development?
 - b. Is a secondary access capable of being taken through the adjoining development to the southwest, as indicated in Figure 6 of the Plan? Is a secondary access necessary for this site to be delivered?
 - c. Is it clear that sufficient sewerage capacity would be available to facilitate the proposed development?
 - d. Have all other constraints to development been adequately assessed and considered?
- 8) Is there sufficient certainty that the infrastructure required to support the development could be delivered viably and at the point which it is needed?
- 9) Are the delivery assumptions regarding this site robust? In particular:
 - a. How has the assumed number of dwellings been determined?
 - b. Part 6 of Policy SS11 requires that a site masterplan and other strategies are prepared. Is the preparation of these documents reflected in the assumed delivery timescales?
 - c. Would the site deliver the number of units per annum that are envisaged?

Matter 4: Housing Requirement and Supply

Issue 1 – Housing Requirement and Plan Period

- 1) Is the housing requirement set out in Policy SS10 of at least 12,763 dwellings over the plan period justified, positively prepared and consistent with national policy?
- 2) Is the proposed housing requirement less than 80% of local housing need calculated using the standard method in Planning Practice Guidance published on 12 December 2024?
- 3) Is the plan period of 2023 to 2040 consistent with national policy? If not, is this approach justified?

Issue 2 – Housing Supply

- 4) What would the implications be for the 5 year supply position (on adoption of the Plan) if we were to consider that no contribution should be assumed from either Loddon Valley Garden Village SDL or the South Wokingham SDL Extension?
- 5) What flexibility does the Plan provide if one or more of the SDLs did not come forward to the Council's estimated timescales?
- 6) Is there compelling evidence that the proposed windfall allowance will provide a reliable source of supply?
- 7) Is it justified to include Gypsy and Traveller pitches in the assumed supply of housing?

THE END