

TITLE	Wokingham Borough Local Development Framework – Proposed Main Modifications to the Managing Development Delivery Development Plan Document (Local Plan)
FOR CONSIDERATION BY	The Special Council Executive Committee on 25 July 2013
WARD	None specific
STRATEGIC DIRECTOR	Heather Thwaites, Strategic Director Development and Regeneration
LEAD MEMBER	Keith Baker, Executive Member for Strategic Planning and Highways

OUTCOME / BENEFITS TO THE COMMUNITY

Once adopted, the policies in the Managing Development Delivery Development Plan Document, in combination with the Core Strategy will form an up-to-date and robust Development Plan for the Borough and will ensure the delivery of high quality, infrastructure rich development in defined locations to 2026. It will also ensure that the Council has a demonstrable five-year supply of housing sites, as required by the National Planning Policy Framework.

RECOMMENDATION

The Executive recommends to Council the following:

- 1) To note the Interim Conclusions issued to the Council on 24th June 2013 by Planning Inspector Patrick Whitehead upon his consideration of the MDD Plan (see Appendix 1 of this report)
- 2) To agree the Proposed Main Modifications to the MDD Plan, as set out in *WBC45 Schedule of Proposed Main Modifications to the MDD* (see Appendix 2 of this report), which are proposed by the Council following discussions at the public hearings and the receipt and consideration of the Planning Inspector's interim conclusions
- 3) To agree that the Proposed Main Modifications to the MDD Plan be published for a period of eight weeks public consultation.
- 4) Upon receipt of comments made during the public consultation on the proposed main modifications, that the Council send these comments to the Planning Inspector for his consideration when compiling his final report on the examination of the MDD Plan.
- 5) To note that the Planning Inspector has the authority, following a request from the Council under section 20(7) of the Planning and Compulsory Purchase Act (2004) (as amended) to make any modifications as necessary to the MDD Plan to ensure it is legally compliant/sound. These will be set out in the Inspector's final report into the examination of the MDD Plan.

- 6) That the Core Strategy, MDD DPD, the 'saved' policies of the replacement Minerals Local Plan for Berkshire incorporating the alterations and the 'saved' policies of the Waste Local Plan for Berkshire are the Council's strategic planning policies.

SUMMARY OF REPORT

The MDD Plan:

- i. Identifies the sites to be allocated (outside of the Strategic Development Locations identified in the Core Strategy) for residential development to meet the Borough's housing requirement to 2026 and to ensure a rolling 5 year housing land supply;
- ii. Sets a development limit around the towns and villages and within Strategic Development Locations;
- iii. Defines boundaries for other designations, including Local centres;
- iv. Includes strategic planning policies to be applied to development proposals that come forward. These include policies on various issues including internal space standards for housing; parking standards; character and heritage; green infrastructure and landscape; retail; employment, and transport

The draft MDD Plan (referred to as the submitted MDD) was submitted to the Secretary of State in December 2012 and has been subject to public examination by a Planning Inspector throughout 2013. Public hearings on the MDD Plan were conducted by the Planning Inspector between 14th -24th May 2013. Following the hearing sessions, and having considered the Inspector's Interim Conclusions (published 24th June 2013), this report seeks agreement from the Council to make Proposed Main Modifications to the submitted MDD Plan, that are considered necessary to make the Plan sound.

The Proposed Modifications are set out in *WBC45 Schedule of Proposed Main Modifications to the MDD* (July 2013) (appendix 2). A supporting document – *WBC44 Proposed Modifications to the Managing Development Delivery Development Plan Document (Local Plan)* (July 2013) - sets out a consolidated version of the Plan with the full set of changes proposed.

The proposed Main Modifications to the MDD Plan must be subject to public consultation before the Inspector issues his final report. This is to allow third parties, including local residents and developers, the opportunity to comment on the Proposed Main Modifications. The Inspector will take these comments into account when compiling his final report, including any changes to the MDD Plan which he may subsequently recommend.

Once adopted the MDD Plan will form part of the Development Plan for the Borough until 2026 alongside the Core Strategy and will replace the remaining saved policies from the Wokingham District Local Plan.

Background

Planning law requires that applications for planning permission must be determined in accordance with the Development Plan, unless material considerations indicate otherwise. The Core Strategy, adopted on 29 January 2010, forms part of the Development Plan. The MDD Plan, once adopted, will also form part of the Development Plan and must be consistent with the Core Strategy. Both the Core Strategy and the MDD Plan set out the strategic planning policies to guide development in the Borough until 2026, including the housing target.

Following extensive public consultation and evidence-gathering, the MDD Plan was submitted to the Secretary of State in December 2012 and has been subject to public examination by a Planning Inspector throughout 2013. Public hearings on the MDD Plan were conducted by the Planning Inspector between 14th-24th May 2013. During the hearing sessions the Inspector asked the Council to provide further information relating to specific policies in response to issues relating to soundness and consistency with national policy, that were raised by either third parties or by the Inspector himself. In some instances, the Inspector also requested the Council to propose further changes to the policies to address issues raised at the hearings. In response to these requests, the Council submitted proposed changes to the Inspector on 7th and 14th June (documents WBC42 and WBC43), which were considered by Members in advance of submission.

Following the hearings, on Monday 24th June, the Inspector issued his Interim Conclusions on the MDD Plan to the Council (appendix 1). These Interim Conclusions set out where the Inspector, at this stage, considers the parts of the Plan to be sound or unsound, and how, if unsound, the Council could propose additional changes to rectify these concerns.

Analysis of Issues

The following section is a summary of the Inspector's Interim Conclusions on the soundness of the MDD Plan and the Council's response to these, through the Proposed Main Modifications. It is not an exhaustive list of the Inspector's comments on all the MDD Plan policies. A full version of the Inspector's Interim Conclusions is included as Appendix 1 and the Council's proposed main modifications are set out in Appendix 2 and in the supporting documentation to this report.

Legal and Procedural Requirements, including Duty to Cooperate

- The Inspector has found that the preparation of the MDD complies with the statutory, legal and procedural requirements.
- The Inspector has concluded the Council has met its requirement under section 33A of the Planning and Compulsory Purchase Act 2004 (the Duty to Cooperate).
- One unresolved issue remains with South Oxfordshire District Council regarding measures to improve cross-Thames travel. The Inspector has recommended the deletion of the alignment associated with a third bridge crossing. The Council is proposing to accept this recommendation.

Consistency with the National Planning Policy Framework

- The Inspector has indicated that the MDD Plan is currently unsound insofar as it does not include a specific policy in relation to the presumption in favour of sustainable development. Following the hearings, the Council suggested a modified version of the Planning Inspectorate's model policy. The Inspector has indicated that

should this policy be included in the final MDD Plan, this would result in a sound plan in this respect. The Council is proposing to accept this recommendation.

Consistency with the Core Strategy

- The Inspector considers that the MDD Plan is generally consistent with the adopted Core Strategy, including the strategic priorities for the area and the general approach to delivering the majority of new housing development in the four Strategic Development Locations

Housing requirement

- The Inspector has concluded that the housing target included in the Core Strategy, which was based on the South East Plan requirement, provides the most recent assessment of the overall housing requirement for the Borough and therefore remains the appropriate housing target for the Borough in the short term.
- The Inspector concludes that no other credible basis for calculating an alternative level of housing need has been suggested.

Housing land supply

- The Inspector considers that the Council's Strategic Housing Land Availability Assessment (SHLAA) (March 2013) provides a credible evidence base to support the allocation process.
- The Inspector concluded there has been an underperformance in housing delivery over the past 6 years, against the adopted housing target. Therefore, in accordance with the NPPF, a 20% buffer of housing sites should be brought forward into the early stages of the plan period. The Council is proposing to include text relating to on-going monitoring to demonstrate that the appropriate level of supply of housing land is maintained, based on on-going monitoring of delivery rates.
- The Inspector considers that the risk of harm to the overall strategy (set out in the Core Strategy) attached to the allocation of more sites outside the SDLs outweighs the potential benefit of meeting an assessed short term need, which the development industry may not be equipped to meet in present economic circumstances. Therefore the Inspector is not recommending that any further sites are required to be allocated within the MDD.

Matter 2 – Cross-cutting policies

- CC01 Development Limits – the Inspector considers it is the proper role of the MDD Plan to include development limits for the SDLs. The Inspector considers that the policy as drafted is unsound on the basis that the proposed limits for the SDL are over-prescriptive and he recommends that greater flexibility should be granted to the SDLs within the policy. However, the Inspector accepts that the change proposed by the Council (which proposes an additional clause to policy to allow some flexibility for the location of development within the SDLs) will result in a sound policy. As the Plan has been found sound in relation to housing need, there is no requirement to change the development boundaries.
- CC02 Settlement Separation Areas – The Inspector has concluded that the policy is unsound, due to its unnecessary duplication with Core Strategy policy CP11 *Proposals outside Development Limits (including countryside)* and has recommended that the policy be deleted. The Council is proposing to accept this recommendation (as the continued use Core Strategy policy CP11 will provide protection against inappropriate development in the countryside).
- Policy CC04 Sustainable Design and Construction and Policy CC005 Renewable Energy and decentralised energy networks – the Inspector has suggested

alternative wording to allow flexibility in the application of these policies. The Council is proposing to accept these recommendations.

- Policy CC06 Noise – the Inspector considers that the policy as currently drafted is unsound but that the change proposed to this policy by the Council (which proposes using alternative standards for noise impact assessment, as oppose to original standards which were based on revoked guidance), would render the policy sound.
- Policies CC07-CC10 – generally considered sound by the Inspector, subject to the changes proposed by the Council

Matter 3 – Topic-based policies

- Policies TB01-04 and TB06 – the Inspector considers these policies to be sound
- Policy TB05 Housing Mix and Policy TB07 Internal Space Standards – the Inspector considered that the policies as currently drafted are unsound, but has recommended wording to allow flexibility in the application of these policies, in order to make them sound. The Council is proposing to accept these recommendations.
- Policies TB08–TB10 – generally considered sound by the Inspector, subject to the changes proposed by the Council

Matter 4 – Topic-based policies

- Policy TB11 Core Employment Areas and Defined Bad Neighbour Uses – the Inspector considers that the policy as currently drafted does not satisfactorily define what a bad neighbour use might be and what the Council's strategy is with locating such uses and so in this respect is unsound. However, the Inspector is of the view that the Council's proposed change to the policy (the deletion of the Bad Neighbour Use allocation) will render the policy sound
- Policy TB12 Employment Skills Plan - the Inspector considers that the Council's proposed change to the policy (the definition of the development to which the policy applies) renders the policy sound
- Policies TB13-TB26 – the Inspector considers that either these policies are sound as submitted, or sound subject to the changes proposed by the Council

Matter 5 – Site Allocations

- Policies SAL01-SAL03 – The Inspector considers that as currently drafted, these policies are unsound as their intent is not clear. However, the Inspector has recommended an alternative form of wording for these policies which he considers would provide more clarity and result in the policies becoming sound. The Council is proposing to accept this recommendation
- Policy SAL01 Allocated housing sites (identified in the Wokingham District Local Plan) – The Inspector concluded that no convincing evidence was provided to suggest that the sites are not deliverable and therefore no modifications are necessary in this respect.
- Policy SAL02 Allocated housing sites – The Inspector concluded that the risk of undermining the overall strategy of the Core Strategy through the increased allocation of land outside the SDLs outweighs the potential benefit of meeting an assessed short-term need and therefore no case has been made to increase the amount of land allocated through SAL02. The Inspector has indicated that the base year of the plan should remain as 2012 (the Council had proposed updating it to 2013) and therefore sites with planning permission granted since April 2012 should remain as allocations within Policy SAL02. The Council is proposing to accept this recommendation.
- Policy SAL04 Allocated reserve housing sites – The Inspector concluded that the number of reserve sites allocates was adequate, as progress is being made on the

delivery of the SDLs and there are sufficient permissions or allocations outside the SDLs to provide short term flexibility. No further change to the policy, including allocation of additional sites, is required.

- Policies SAL04 – SAL08 - the Inspector considers that either these policies are sound as submitted, or sound subject to the changes proposed by the Council
- SAL09 Transport Site Allocations - the Inspector considers that in the absence of a proposal for a park and ride facility at Coppid Beech, the policy as currently drafted is unsound. However, the Inspector accepts that the Council's proposed change to the policy (inclusion of reference to Coppid Beech Park & Ride within policy but not an allocation) would render the policy sound

Under legislation the Council also has the authority to make minor changes to the MDD Plan, such as correcting typographical errors and factual changes which do not materially alter the policy thrust of the plan. These changes will be set out in a Schedule of Minor Changes which will be published at the same time as consultation on the Main Modifications, for information only. Further minor changes may also be made to the Plan prior to its adoption.

Consultation

The Proposed Main Modifications to the MDD Plan will, subject to Members' agreement, be subject to 8 weeks of public consultation, starting on Wednesday 31st July until Wednesday 25th September 2013. Publicity of the consultation will align with the notification requirements set out in the 2012 Regulations and in the Council's Statement of Community Involvement.

Next steps

Following consultation on the Proposed Main Modifications, the Council will supply the Planning Inspector with the representations (comments) submitted during the consultation. At this stage the Council does not have the opportunity to comment on the submitted comments. The Inspector will take the comments made by third parties into consideration when finalising his report on the MDD examination. Following a request from the Council under section 20(7) of the Planning and Compulsory Purchase Act (2004) (as amended) the Inspector has the authority to make any modifications as necessary to the MDD Plan to ensure it is legally compliant/sound. On receipt of his report, the Council will then have two options (1) to accept the Inspector's modifications and formally adopt the MDD Plan, or (2) to not accept the Inspector's recommendations and withdraw the Plan.

Revenue and capital budgets over the next 3 years

The main cost associated with the recommendations in this report will be the cost of consultation on the Proposed Main Modifications. The costs of producing the consultation document and the undertaking the consultation were anticipated and will be paid for through the budget allocated for the examination of the MDD Plan, within the Land Use and Transport Team.

Having an up-to-date Development Plan against which to determine planning applications will help in reducing the costs of defending planning appeals, as the Council will have a robust evidence base against which to justify its position.

Risk management

The Inspector's interim conclusions indicate that he will find the plan to be sound, so long as the recommendations set out in his interim report are followed by the Council (as proposed by this report). Notwithstanding this, Members are asked to note that there will likely be objections submitted to the Inspector during the consultation on the Council's Proposed Main Modifications, which the Inspector will be required to give due regard to, prior to making his final determination on the MDD Plan.

Equality

Officers consider that the MDD Plan has been prepared and submitted in accordance with all relevant legislation, including the Equality Act 2010, as well as the Town and Country Planning (Local Development) (England) Regulations 2012; the Environmental Assessment of Plans and Programmes Regulations 2004; the Conservation of Habitats and Species Regulations 2010; the Human Rights Act 1998.

An Equality Impact Assessment of the Submitted MDD Plan was undertaken (CD01.07.12) to demonstrate that the Council had satisfied its duty under section 149 of the Equality Act 2010. Officers understand that this remains an on-going duty, the requirement of which the Council will need to continue to adhere to as the MDD progresses to the adoption stage and beyond.

In respect of the Human Rights Act 1998 and the Equality Act 2010 in particular, Members are asked to note that all individuals who may be affected by the proposed policies with the MDD Plan, have had the opportunity to make representations on them, and will now have the opportunity to make representations on the Inspector's interim findings.

In the view of officers, the Proposed Main Modifications do not materially alter the status of the MDD Plan, as a legally compliant document in all respects.

Sustainability

The MDD Plan supports the delivery of sustainable development across Wokingham Borough. It supports the delivery of both the Core Strategy policy CP1 *Sustainable Development* and the core principle of sustainable development as set out in the National Planning Policy Framework.

Policy proposals contained within the MDD Plan were subject to a Sustainability Appraisal assessment, to ensure that the most appropriate policy option was progressed taking into account impacts on social, environmental and economic objectives. Where the Proposed Main Modifications would have an impact on the Sustainability Appraisal previously done, this has been reassessed against the Sustainability Appraisal framework (document WBC46).

Alternative Options

1. *Do not accept the Inspector's interim conclusions and propose no further changes to the MDD Plan*

If the Council was minded not to accept the Inspector's interim conclusions and propose no further changes to the MDD Plan, it is likely that the Inspector will find elements of the Plan unsound and through his final report recommend changes to the Plan which would not be subject to public consultation and which the Council would have to accept before adoption. Alternatively the Council may not accept the final recommendations of the Planning Inspector and choose to withdraw the MDD Plan from production entirely (and therefore not adopt the Plan).

FINANCIAL IMPLICATIONS OF THE RECOMMENDATION

	How much will it Cost/ (Save)	Is there sufficient funding – if not quantify the Shortfall	Revenue or Capital?
Current Financial Year (Year 1)	Exact costs of the Proposed Main Modifications consultation are not known but are not expected to be significant (less than £5k).	Yes. The costs of the consultation will be covered by the existing budget approved to cover the MDD public examination process.	Revenue
Next Financial Year (Year 2)	It is expected that the MDD will be completed and adopted within the current financial year (2013/14)		
Following Financial Year (Year 3)			

Other financial information relevant to the Recommendation/Decision

The budget is based on what we know at this point of time and based on the indicative programme indicated by the Inspector. Any change to this programme could have financial implications.

Cross-Council Implications

Will allocate sites for development and policies against which all planning applications will be assessed.

List of Background Papers

1. Appendix 1 - ID/11 *Inspector's Interim Conclusions on the MDD Plan*
2. Appendix 2 – *WBC45 Schedule of Proposed Main Modifications to the MDD Plan* (July 2013)

The documents listed below are available to view as hard copies at the Council Offices at Shute End, Wokingham

3. *WBC44 Proposed Modifications to the Managing Development Delivery Development Plan Document (Local Plan) (July 2013)*
4. *WBC46 Final sustainability appraisal (incorporating a strategic environment assessment) of the Submitted Managing Development Delivery Development Plan Document (Local Plan) (MDD DPD) (incorporating proposed modifications) (July 2013)*

5. *WBC47 Schedule of Proposed Minor Changes to the Managing Development Delivery Development Plan Document (July 2013)*

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**THE WOKINGHAM BOROUGH COUNCIL'S MANAGING
DEVELOPMENT DELIVERY LOCAL PLAN
INDEPENDENT EXAMINATION****INSPECTOR'S INTERIM CONCLUSIONS**

This document is intended to give a brief indication of those aspects of the Local Plan which are considered sound, and those where main modifications will be necessary for soundness reasons. These are based on my consideration of the Submission Managing Development Delivery Local Plan (MDD), together with the schedule of minor changes [CD01.C]. I have also taken into consideration the pre-examination Proposed Changes [WBC24], the supporting evidence, the issues raised in the representations, discussions, statements and responses made at the hearing sessions and in writing, including written answers to matters raised during the hearings. The interim conclusions are as follows:

Matter 1**Legal and Procedural Requirements**

The preparation of the MDD has complied with the statutory, legal and procedural requirements, including compliance with the Local Development Scheme, consultation undertaken and Statement of Community Involvement, Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) and the Sustainable Community Strategy. Subject to matters and issues considered below, the MDD is generally consistent with the Council's adopted Core Strategy (CS).

Duty to Co-operate

I have looked carefully at the evidence presented and I have concluded that the Council has met the requirement set out in S33A of the amended Planning and Compulsory Purchase Act 2004. Whilst I have noted criticism that some evidence refers to future intentions, I consider the Council has undertaken sufficient cross-border co-operation to support the proposals within the MDD. Where issues with adjacent authorities and other relevant bodies have not been fully resolved, these have been properly documented as part of the Examination, together with information regarding ongoing negotiations [CD01.07.25; WBC/07: SoCG/01-10; WBC/16-19, 22-23].

Although I have concluded that the Council has met the legal requirement set out in S33A, there remains an unresolved issue with South Oxon DC (SODC) regarding measures to improve cross Thames travel. The MDD includes a reference to such measures in Appendix 3 which "*..may include a bridge..*", reflecting a similar statement in the CS, Policy CP10. In this respect the Plan is unsound. It is SODC's view that there is no study which recommends that a third bridge should be provided in this location, whilst two studies do indicate there would be detrimental impact on the

road network within South Oxfordshire as a result of a third bridge [WBC/15]. Policy CC08 provides for safeguarding alignments of the Strategic Transport Network & Road Infrastructure, and Map 151 confirms a safeguarded alignment for a third Thames bridge. The amendment to the Map, included with WBC/24 shows the safeguarded alignment, terminating at the Borough boundary, mid-river. In view of the advice from SODC, the alignment should be deleted, together with the reference at item i. in Appendix 3.

SHLAA

Although there has been criticism of the SHLAA process, in general terms I consider the SHLAA [documents comprising CD09.01-02.06], together with updating documents [CD01.06.01 & 02 and CD03.03.02] does provide a credible evidence base to support the allocation process. The main criticism – that it does not provide an adequate basis to demonstrate a five year supply of housing land is addressed below.

Consistency with the NPPF

The National Planning Policy Framework (NPPF) was published during the course of preparation of the MDD, replacing previous Government guidance and advice. Significant matters of consistency relate largely to the presumption in favour of sustainable development (paras 11 – 16); boosting the supply of housing (paras 47 – 55); and ensuring viability and deliverability (paras 173 – 177). The latter two will be considered below.

The Plan is unsound in so far as it does not include a specific policy (such as the model policy available on the Planning Portal) to indicate the presumption in favour of sustainable development. The Council considers the MDD, along with the CS, to be compliant with the NPPF [CD01.07.16] with the presumption in favour of sustainable development reflected in para 1.9 of the MDD. This is not a satisfactory response. However, as an alternative, it has proposed a modified form of the model policy, together with supporting text [WBC/42]. This would be a satisfactory response resulting in a sound Plan in this respect.

Consistency with the Core Strategy

The MDD is consistent with the strategic priorities for the area and takes forward the general approach to delivering the majority of new housing development in 4 Strategic Development Locations (SDLs) with the remainder mainly concentrated in towns and villages where facilities and services are available or proposed (Policy CP9). In this respect the MDD is sound. More detailed issues regarding consistency which arise with policies CP4, CP5 and CP17 will be considered below.

Housing requirement

The Council indicated that it is appropriate to use the housing numbers in the CS since this is a recently adopted document. The numbers comprise the requirement from the former South East Plan (SEP), together with a shortfall against the former Berkshire Structure Plan, totalling 13,232, equating to just over 660 dpa for the Plan period.

The Council was criticised for the absence of an up-to-date Strategic Housing Market Assessment (SHMA) on which to base its housing requirement. The existing SHMA for Berkshire dates from 2007 [WBC/28]. However, it did not offer conclusions on the overall requirement for housing within Berkshire, indicating that this would be set by the SEP. As the CS is based on the SEP requirement, and was adopted in 2010, it clearly provides the most recent assessment of the overall requirement.

No other credible basis for calculating an alternative overall level of housing need has been suggested. The 2008 based projections – indicating an annual requirement for 986 dwellings per annum for the period 2011-2021 – suggests a serious under-estimation of the housing requirement. However, the national projections vary from a potential requirement of 242 dpa (2003) to 733 dpa (interim 2011). This suggests that reliance on a single projection would be unwise. In any case, recent performance of around 330dpa completed shows that even if the requirement were to be based on a higher estimate, it is unlikely that this could be achieved in the short term. For these reasons it is better to rely on the CS numbers in the short term.

Housing land supply

Two significant appeal decisions, relating to land at Shinfield and at Kentwood Farm, with inquiries held respectively in October & November 2011, concluded that the Council could not demonstrate a 5-year deliverable housing supply. In the case of the second appeal, a letter dated 17 May 2012 confirmed that, as at 1 April 2012, the Council still did not have a 5-year deliverable housing supply. Representations to the Examination maintain that this is still the case.

Despite the Council's assertions, there can be no doubt that there has been underperformance in housing delivery over the past 6 years: Appendix 3 to WBC/11 shows the average figure is 329 dpa compared to the 662 dpa to meet the overall housing requirement. This is clear evidence that, in accordance with para 47 of the NPPF, there should be a buffer of 20% moved forward from later in the plan period.

Evidence provided [CD03.03.02] suggests the annual requirement for assessing a 5-year supply is around 900 dpa (2013-2018) or just over 1,000 dpa (2014-2019). Against these, the assessment shows sites for around 6,000 in the former case and well over 6,500 in the latter, each equating to around 6-years supply, or providing a 20% buffer. However, in each case a notional flexibility allowance would reduce the buffer to below 20%.

The Council has argued that its performance mirrors that of the sub-region, region and country as a whole, reflecting the current recession and the impact of wider issues such as mortgage availability. It is also clear that the Council's strategy of concentrating on a limited number of Strategic Development Locations (SDLs) carries with it the risk of under-delivery in the short term. The allocation of more sites outside the SDLs to address the short term need risks undermining the overall strategy. This could lead to further shortfall in delivery from the SDLs over time.

On balance, it appears unlikely that the development industry could immediately raise the annual rate of delivery from the 400 achieved in 2012-2013 to the 990 annual rate anticipated over the 5-year period 2013-2018, or the 1,000 annual rate anticipated from 2014 even if further land were to be allocated. The risk of harm to the overall strategy attached to the allocation of more sites outside the SDLs outweighs the potential benefit of meeting an assessed short term need which the development industry may not be equipped to meet in present economic circumstances. Accordingly, I have accepted that the MDD is not unsound in this respect.

The Council has provided information to show the changes which would be necessary in the event that the base date of the MDD document is changed from 01/04/2012 to 01/04/2013. Whilst the Council's monitoring process can be used to update the overall situation by 'rolling forward' for the additional year, there appears no significant benefit to this, and no convincing evidence to suggest the action would be appropriate or necessary. Accordingly the base date of 01/04/2012 should be retained in the MDD.

Matter 2

CC01

The policy defines development limits for each settlement and the policy indicates the requirements for the grant of planning permission for proposals at the edge of settlements. The accompanying text includes justification for seeking careful siting and design at the edge of settlements to avoid hard edges. The policy derives from CS Policy CP9, but the CS policy indicates these will relate to the major, modest and limited development locations – it gives no indication that limits would be defined for SDLs, but indicates that individual development briefs would be prepared for these (now published as SPDs 2-5).

There are 2 concerns: firstly, that development limits for SDLs should not be included within CC01 and secondly, that the defined limits are over-prescriptive, inconsistent or have not been properly defined.

The development briefs, SPDs 2-5, provide location boundaries for each SDL but indicate that the MDD "...will define the development limits within

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the boundaries of the SDLs and provide further clarification regarding where the development within each SDL would occur". The SPDs also indicate that the MDD "...will translate high level policies in the Core Strategy into more detailed development management principles". There is, therefore, no escaping the fact that it is the proper role of the MDD to include development limits for the SDLs.

It is argued that as master planning of the SDLs would follow on from the SPDs, the boundaries in the submission MDD have already been overtaken by events. In this circumstance it could be said that it is too early to define precise limits for SDLs. Solutions offered range from deletion of the Policy and the boundaries, and rely on the CS Key Diagram and the SPDs to providing wider, or more flexible boundaries. It was also suggested that the definition of boundaries should follow the grant of planning permission. None of these would provide a satisfactory alternative.

However, the Policy as drafted does not address the problem in a satisfactory manner and so must be unsound. It is inevitable that any boundary defined for an area where significant growth is planned will be amended through time and the development of proposals. The obvious answer is for Policy CC01 to include a third section addressing the specific requirements for development limits for SDLs. The Council has accepted this to be the case and has suggested a suitable third paragraph to the Policy as a proposed change [WBC/43]. With this paragraph included the Policy is sound.

A number of requests have been made for changes to the development limits. Since the Plan has been found sound in respect of the amount of land and the specific sites allocated, there is no requirement to change development boundaries to ensure that the housing requirement is met. Therefore, where anomalies have been drawn to the Council's attention, it is for the Council to determine whether it wishes to make minor modifications to address them. In particular the Council's intention to amend the development limit in respect of the representation regarding Dr Severn's land [WBC/43] is noted. The amended boundary is logical and may be progressed by means of a Minor Modification.

A further request for a specific change to the development limit relates to delivery of the Full Northern Distributor Road and the Coppid Beech Park and Ride. It is the Council's position that the development of highway infrastructure and a park and ride facility is appropriate development beyond the development limits and so it is not necessary to redefine the limits in order to facilitate delivery. This is a sound approach and no modification is necessary to the MDD in this respect.

CC02

The MDD indicates that settlement separation areas are related to the four SDLs to ensure their separation from other settlements, although the

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Policy does not clearly state this to be the case – that is left to the supporting text. The CS policies, CP18 – 21, advise that for each of the SDLs measures would be necessary to maintain separation from specified settlements but does not clearly identify the mechanism for this. SPDs 2-5 clarify the Council's intention to include the settlement separation in the MDD. Prior to this the rural area is subject to a CS countryside designation (CP11) which seeks to protect the separate identity of settlements and maintain the quality of the environment. Whilst CC02 seeks to protect specific areas from development that would harm the physical and visual separation of settlements, it is difficult see why Policy CP11 would not achieve the same level of protection in that any proposal which would fail the CC02 test would also be likely to fail in terms of CP11.

Examples include properties east of Finchampstead Road near 'The Throat' (Map 11), where long plots are excluded from the development limit for North Finchampstead, but not included in the adjacent settlement separation area; and land to the east of Winston Close, Spencers Wood (Map 20), also outside the development limit but not within the separation area. It appears unlikely that development would be permitted in either of these locations under CS Policy CP11, and the 'additional protection' afforded by CC02 for adjacent open land appears spurious.

The study undertaken by David Lock Associates [CD 10.07.01] acknowledges that the purposes of settlement separation and development limit boundaries share some common objectives – although it fails to identify where there are differences. It also indicates that all other land not within development limits or areas of settlement separation will be covered by countryside policies such as CS CP11. Nowhere within the evidence base is it possible to identify the different consequences of testing development proposals against CC02 as opposed to CS Policy CP11. In these circumstances the Plan must be considered as unsound with Policy CC02 appearing as an unnecessary duplication of CP11. Measures to increase the restrictive nature of CC02 would likely be unacceptable since it would risk blurring the distinction with Green Belt policy and cause confusion.

The Council has referred to the CS Inspector's report which it claims gives support to the Policy. However that Inspector, para 7.4, shared the concerns of some developers that carrying forward the detailed gaps shown on the WDLP would be unduly restrictive and would not work with regard to land within the SDLs. The Council has not proposed any further modifications to the Policy as a result of the hearings. Without specific policy wording indicating a clear distinction between this Policy and CS Policy CP11, in terms of the objectives and intent; the conclusion must be that the Policy should be deleted.

This is not to deny that settlement separation is important and the previous Inspector supported the identification of 'critical gaps' in the SDLs on the CS Key Diagram. He also recommended the issue of

identifying and providing justification for other key gaps should be addressed as part of the MDD. However, a convincing case has not been made for identifying any other key gaps, nor has the issue of identifying satisfactory boundaries been successfully addressed.

CC03

Suggestions that the Policy simply duplicates policies within the CS are not supported by evidence. There has been a suggestion that criterion 2 should be more positively worded and the Council has responded with revised wording [WBC/33] as a consequence of which the Policy is sound. The Council has also agreed to an amendment [SoCG/14] to improve clarity.

CC04

Concerns regarding this Policy centre on the additional costs of meeting the full CfSH Level 4. The Policy indicates that permission will only be granted for new homes that at least meet the requirements of the full Code Level 4. There is no indication of flexibility within the Policy and no exemptions – for example in respect of small schemes or individual dwellings. The Council's Sustainable Design and Construction SPD [CD 13.10] indicates that "*..all residential schemes should seek to be built to Code Level 4 or whatever mandatory Code Level is higher*". It does not require the level to be met in all developments and all circumstances. The Council's own viability study [CD 01.07.33] advises that the requirement comes at a cost, calculated at between £5-8,000 per dwelling. This suggests that in the circumstances of the present housing market, the Policy would be counter-productive to the Council's need to deliver housing. It would also be contrary to the advice in the NNPF, that planning authorities should "*..boost significantly the supply of housing*". For these reasons the Policy is unsound and consideration should be given to amending the text.

A more acceptable wording would be as follows:

"Planning permission will only be granted for proposals that seek to deliver high quality sustainably designed and constructed developments by:

1. In respect of all new homes:

- a) seeking to achieve the requirements of the full Code for Sustainable Homes Level 4;*
- b) meeting internal potable water...."*

Consequential changes will be necessary to the supporting text at para 2.26.

CC05

The Council has suggested changes to the text of CC05 [WBC/20] to provide clarity. An outstanding objection to the second part of the Policy seeks a commitment to a minimum separation distance of 1.5km between any wind turbine and any residential property for health reasons. The Council has a statement regarding On-Shore Wind Turbine Development, but this does not include a reference to separation distances other than that relating to shadow flicker. The evidence provided in support of the change relates to a study on Wind Turbine Noise, Sleep and Health carried out for the Northumberland and Newcastle Society (2012). However, the study is based largely on an extensive review of other studies and the recommendations were made in relation to a relatively sparsely populated rural authority. It is not convincing evidence that can be readily transposed to the situation in Wokingham.

However, a recent ministerial statement on local planning and onshore wind (6 June 2013) indicates that DCLG will shortly issue new planning practice guidance setting out clear requirements that the cumulative impact on the landscape and local amenity should be taken into account. Accordingly, the text of criterion 3 should be amended with appropriate wording. The following text may be considered appropriate:

"3. Proposals for renewable energy and decentralised energy works, including wind turbines, must demonstrate that:

- a) they are appropriate in scale, location and technology type;*
- b) are compatible with the surrounding area, including the impact of noise and odour;*
- c) do not have a damaging impact on the local topography and landscape;*
- d) there is no significant impact on heritage assets, including views important to their setting;*
- e) in the case of wind turbines, take account of their cumulative effect and properly reflect their increasing impact on the landscape and on local amenity."*

CC06

The Policy included in the submission document is unsound. Whilst such a policy is consistent with national policy in the NPPF (para 123) the text is over-reliant on advice in the now deleted PPG24, and in particular annexes 1-3 of that document. The Council has given consideration to the criticism and worked with representors to remedy the situation. The revised wording at Appendix 1 to WBC/24 results in a sound document. The Council may wish to make specific reference to para 123 of the NPPF in the Policy Background section. The Council proposes to include annexes 1 and 2 as an appendix to the MDD, based on text derived from the Noise Policy Statement for England (2010) and from PPG24. This is

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reasonable. However, the Council may wish to consider minor changes to the text for clarity: firstly, including the full description of 'noise sensitive receptors (NSRs)' in the first, rather than the second paragraph of Annex 1; and secondly Annex 2 contains original references to 'local planning authorities' in general, rather than Wokingham BC in particular. It may be appropriate to replace the references with 'the Council...'. These occur in paras 2, 7, 8 10, 13 and 15 (twice).

CC07

Changes are proposed to Appendix 2 [WBC/24], addressing concerns raised by representors. As a result the policy, together with the supporting text, is sound.

CC08

No issues have been raised regarding the Policy, although matters relating to Appendix 3 will be addressed below. The Policy and its supporting text are sound.

CC09

An amendment to para 2.62 to include uses within SAL09, proposed by the Council ensures the Policy and its supporting text are sound.

CC10

The Council has worked with representors to amend the wording to criterion 2(a) as recorded in WBC/20. Although the parties have achieved a measure of agreement, the Council has not accepted the wording requested by representors, preferring its own text which reflects para 49 of the Wokingham Borough Strategic Flood Risk Assessment [CD10.03.01]. This appears to be a reasonable approach, consistent with advice in the Technical Guidance to the NPPF, and in this respect the Policy is sound.

Matter 3

TB01 – 04

There are no representations or issues which lead to the conclusion that these policies are unsound.

TB05

There is significant concern with the second part of the Policy, requiring all dwellings to be built to Lifetime Homes Standards. The requirement is considered by the development industry to be onerous and inflexible, and likely to have an impact on the viability of proposals. The Council's basis for the requirement is its commitment to higher standards and ensuring

flexible provision for older people [WBC/07-08]. Nevertheless, Lifetime Homes Standards is a voluntary code which does have cost implications for developers assumed to be around £600 per dwelling unit in the 2008 study by Levvel [CD 10.05.01] although the report indicates that the cost may be significantly higher, in the range of £1,000 to £2,000 per unit. In the context of the NPPF, particularly para 173, which indicates that the scale of policy burdens should not threaten viability, the Policy is unsound. In order to be made sound, it is necessary to recast item 2 of the Policy to require a proportion of dwellings to be built to Lifetime Homes Standards. An appropriate form of words would be:

"2. A proportion of all dwellings must be built to Lifetime Homes Standards. The proportion will be determined on a site-by-site basis, normally within the (suggested?) range of 10-20%".

TB06

Although there have been representations suggesting the policy is contrary to national advice in the NPPF, these are not convincing evidence that the Policy is unsound. The exclusion of private residential gardens from the definition of previously-developed land provides a justification for treating their development with caution. The Policy seeks to ensure that, where proposals are acceptable, they make a positive contribution to the locality. This accords with para 60 of the NPPF which indicates it is proper to seek to promote or reinforce local distinctiveness.

TB07

In principle there is nothing to suggest that a policy requirement for minimum internal space standards is unsound. The London Plan, Policy 3.5, requires LDFs to incorporate minimum space standards that generally conform to those set down in Table 3.3 of the Plan. In the case of Wokingham the Council's Design Guide SPG [CD13.03] provides a guide to minimum internal space standards, based on those in the London Housing Guide. It also indicates that the forthcoming MDD will adopt those minimum standards as part of the Plan. The NPPF, whilst indicating that design policies should avoid unnecessary prescription or detail, advises that plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area.

The Council has provided evidence to justify the standards proposed and a comparison shows those proposed to be generally consistent with other sources [WBC/06]. It has not proposed any modifications to the Policy apart from correcting a typographical error. However, the Policy does not provide flexibility to take account of the circumstances relating to individual proposals and so could impose an unnecessary burden on developments. In particular, representors have indicated concern that the Policy would have a profound effect on 2 and 3 bedroom properties which, typically, are those sought by first time buyers with lower purchasing power. Accordingly, to be found sound the Policy should include a degree

of flexibility. This could be achieved by an appropriate form of wording as follows:

"1. Proposals for new residential units, including change of use or conversions, should ensure that the internal layout and size are suitable to serve the amenity requirements of future occupiers. The Council will assess all development proposals against the following minimum standards..."

TB08

Policy TB08 raised concerns about consistency with the CS regarding the amount and type of provision for open space and indoor sports facilities sought in respect of new developments. During discussions following the hearings agreement was reached with representors on the content of Table 1, although there remain differences of opinion over the specified quantities. Table 2 remains in contention since representors state that there are no standards currently contained within the CS and so there should be a zero requirement in the MDD. The differences between the provision in the MDD and the CS for Table 1 (open space, sport and recreational facilities) is relatively small, with the increase in natural greenspace applying to development which doesn't have to make provision for SANG (outside the 7km distance). On balance, it appears the recalculated figures are a reasonable requirement, based on the comments in Table 1.

With regard to the provision of indoor leisure facilities, it is clear that the CS (Policy CP3, criteria g. and h.) did indicate an intention to ensure provision of recreational/sporting facilities and to require contributions towards the provision of a network of community facilities, although it gave no indication of the actual standards or requirements. However, the Policy follows advice in the NPPF (section 8) regarding the promotion of healthy communities. Para 70 seeks to ensure that planning policies should deliver social, recreational and cultural facilities, and plan positively for the provision of community facilities – including sports venues. It is not unreasonable to require that new developments contribute to the pressure for new facilities arising from the increase in population. In a SoCG [SoCG/02] Sport England accepts that its previous concerns regarding the robustness of the evidence base as a basis for setting standards by the Council have been addressed. On this basis it would appear that the requirements set out in Policy TB08 have a reasoned justification and so the Policy is sound.

TB09

There are no soundness issues with the Policy, but the Council has proposed minor changes to the wording for accuracy and clarity.

TB10

The Government's planning policy for traveller sites makes it clear that authorities should plan positively for traveller sites. The Government's policy indicates that criteria-based policies should be included to provide a basis for decisions "...where there is no identified need...". Accordingly, the first criterion of Policy TB10 is unsound. The Council has proposed to remedy the Policy and provide amended text [WBC/42] which would provide a sound Policy.

Matter 4**TB11**

The Policy defines 'bad neighbour use sites', but does not indicate, in policy terms, what the consequences of the definition might be for those sites. Nor does it provide a satisfactory and workable definition of what a bad neighbour use would be. In these respects the Policy is unsound. Following the hearings, the Council has reviewed the Policy, concluding that the existing Bad Neighbour Use Policy (saved Policy WEM9) is rarely used in determining planning applications, and that other policies within the Development Plan could address the issues. As a consequence it proposes deletion of reference to bad neighbour uses in Policy TB11, together with the related supporting text at paras 3.54-55 [WBC/43]. With these modifications the Policy is found sound.

TB12

Policy TB12, in the form shown in the submitted MDD, is unsound in that it appears the intention is to apply the requirement for an Employment and Skills plan to all proposals for development. This, clearly, cannot be the case. It would be an unduly onerous burden applied to small scale developments and contrary to the Government's commitment to ensuring the planning system does not act as an impediment to sustainable growth. The Council has addressed the issue [WBC/42] with a proposed change to both the Policy and supporting text limiting the Policy's application to major development proposals. The change proposed to para 3.57 indicates that additional guidance will be provided on the scale and type of contribution expected from development. This successfully addresses the soundness concern.

TB13

Concern was raised that criterion 2b is too onerous and could not be met since outline planning permission has already been granted for Phase 1 of the 3 phase development of the University's Science and Innovation Park, including land within the Settlement Separation Area. Although the general policy relating to settlement separation, Policy CC02, has been recommended for deletion, the specific issue of visual separation between Earley and Shinfield should be addressed by the proposals. Accordingly

criterion 2b is an appropriate requirement. The final part of the criterion – “..and between *Shinfield Village*” may require minor amendment to address clarity.

TB14

The University considers there are issues with the Policy regarding the place of the University within the region and its local importance together with some concerns expressed regarding the wording of the Policy. Following the hearings the Council has sought to work with the University to agree Policy wording. Although full agreement was not possible, the Council's proposed modifications to the Policy and the supporting text, as contained in WBC43, are not radically different to those suggested by the University. The modifications result in a sound policy.

TB15 - 16

There are no unresolved representations regarding policies TB15 and 16, which are considered sound.

TB17

The classification of School Green, Shinfield as both a District Centre and as a Local Centre on the submitted Policies Map has been raised in relation to Policy TB17. No change is necessary to the Policy which is sound, but the Council has proposed a minor change to the Policies Map [WBC/42].

TB18 – 19

There are no representations or issues which lead to the conclusion that these policies are unsound.

TB20

Criteria 1c and 1d of the Policy have been criticised for lacking clarity. This is because they do not identify whether positive impact would conflict with the Policy. In this respect the Policy is unsound. The Council has agreed to amend the wording [WBC/42], introducing “adverse” to both criteria, together with “commercial” to the preamble. These are appropriate changes which successfully address the matter of soundness. However, there also appears to be an unintentional change to the wording of criterion 1b which should be addressed in the final text.

TB21

Policy TB21 has been criticised as relying on an out-of-date Landscape Character Assessment, and because it allows for the grant of planning permission only where the specific requirements are addressed by development proposals. For these reasons the Policy is considered

unsound. Whilst the Council has not felt able to accept the proposed rewording of the Policy suggested by representors, it has provided an amended text both for the Policy and for the supporting text [WBC/42]. These successfully address the issue of soundness.

TB22 - 23

There are no representations or issues which lead to the conclusion that these policies are unsound.

TB24

The Council's proposed minor change to the Policy introduces the phrase "*..conserve and enhance..*". It has been pointed out that there is an apparent conflict with the legislation which refers to "*..conserve or enhance..*". The Council agreed to look at the Policy again and has proposed further changes [WBC/43] on which it has agreement with English Heritage. The amended Policy provides clarity and precision in terms of the Council's approach to designated Heritage Assets, and its requirements for their conservation and enhancement. The amended Policy is sound.

TB25

There are no representations or issues which lead to the conclusion that this policy is unsound.

TB26

The issue in contention is the use of the phrase "strong justification" in item 3 of the Policy necessary for proposals that involve the demolition of a Building of Traditional Local Character. It is argued this is a more onerous requirement than the "balanced judgement" referred to in the NPPF. However the NPPF, para 135, indicates that the balanced judgement will be required "*..having regard to the scale of any harm or loss and the significance of the heritage asset*". There does not appear to be conflict inherent in the approach in that the judgement should be based on strong justification. The Council has not proposed any change to the Policy or the accompanying text. English Heritage supports the Council's view [WBC/42] leading to the conclusion that the Policy is sound.

Matter 5**SAL01/SAL02/SAL03**

The Policies have been criticised for a lack of clarity and for not being consistent with the NPPF so far as being positively prepared. The concern is that the Policies include a presumption against development for uses

other than residential. The Policies are unsound in that their intent is not clear. The Council has considered the representations and provided an alternative form of wording [WBC/42]. However, the text remains obscure and would provide more clarity in the following form, appropriate to all three policies:

"The sites listed below (and defined on the Policies Map) are allocated for residential development and should be used only for this purpose, and in accordance with the requirements of the Development Plan. Additional guidance on appropriate uses and specific requirements for each site are included in Appendix 12".

SAL01

Questions were raised concerning the deliverability of the 3 sites listed under SAL01, particularly as a consequence of their being allocations identified through the Wokingham District Local Plan (2004). However, no convincing evidence was provided to suggest that the sites are not deliverable. The sites are intended to contribute towards the overall housing requirement and maintain a rolling 5 year supply of housing land. Some doubt was expressed regarding the latter point, but evidence from the Council suggests that there is a good chance that development on two of the sites will commence in the near future. No modification to the Policy is necessary for soundness reasons.

SAL02

A number of issues were raised concerning SAL02. In particular there was concern expressed that the Policy does not take account of the need to significantly boost housing supply, that there are insufficient sites to provide flexibility in terms of delivery, particularly if there are delays in the delivery of the SDLs. As indicated above, under housing land supply, the risk of undermining the overall strategy of the CS through the increased allocation of land outside the SDLs outweighs the potential benefit of meeting an assessed short-term need. For this reason a convincing case has not been made to increase the amount of land allocated through SAL02.

Doubt was also raised concerning the deliverability of individual allocations. However, on the whole, the Council's evidence - including that provided by the detailed appraisal of sites dated December 2012 [CD01.07.28] - indicates that the Policy is sound in terms of the allocations included.

The Council has suggested updating the data base through the monitoring process and deleting those sites for which planning permission has been granted and reducing significantly the overall number of dwellings. This is not a convincing argument and was resisted by representors at the hearings. As indicated elsewhere in this report, the base year should not

be amended and sites with planning permission should remain as allocations within Policy SAL02.

SAL03

The CS (para 4.82) recognised that unforeseen circumstances may result in delays in the delivery of housing sites and indicated that the MDD would be expected to identify sites for at least 500 dwellings in reserve allocations for development post 2026 which could be released earlier if there was a need to maintain supply against broad annual targets. However, Policy SAL03 identifies sites for only around 135 dwellings in total. The argument for reducing the reserve allocations is that the total of deliverable permissions since 2008 together with allocations in SAL02 and SAL03 amount to 1,621 dwellings, exceeding the sum of 1,000 dwellings and 500 dwelling as a reserve required by the CS.

The Council's evidence suggests that there is a robust supply of sites with planning permission to meet short term needs, whilst acknowledging that the SDLs have long lead-in times. Even so, the Council reported that permission has been granted for almost 2,500 dwellings within the SDLs, and there have been completions in the order of 197 so far. It is argued that the Council's figures represent a best-case scenario. Nevertheless, it appears that progress is being made on the SDLs and there are sufficient permissions and allocations outside the SDLs to provide short term flexibility. In these circumstances the reserve allocations may be seen as adequate leading to the conclusion that the Policy is sound.

SAL04

The Policy seeks to ensure provision of open space by the grant of planning permission for open space associated with certain new developments. Of these, 3 relate to allocated sites carried forward from the WDLP and have previously defined boundaries, whilst a further 3 are associated with specified SAL02 allocations. Although the Policy cannot be said to reflect advice in the NPPF relating to the designation of Local Green Space, as suggested by the Council [WBC/12], it is well grounded in local planning policy (WDLP policies and CS, CP3) and the need for consistency with Bracknell Forest BC. It also reflects the NPPF concern with promoting healthy communities (para 74) and addresses specific issues relating to individual sites.

The Council has responded to criticism by proposing modifications [WBC/43] to the text and adding a second criterion to the final part of the Policy. The supporting text has also been amended at para 4.36. The modified Policy is considered sound. The Council has also suggested that, if the plan base date is revised to 01/04/2013, the fourth item – land east of University of Reading's Bulmershe campus, Woodley Avenue, Woodley, should be deleted since the associated residential scheme now has planning permission. The amendment to the base date has not been

accepted as necessary or beneficial so the site should be retained as part of SAL04.

SAL05

The requirement for the delivery of avoidance measures for the Thames Basin Heaths SPA is based in CS Policy CP8 and the retained SEP Policy NRM6. It allocates sites as SANG (Suitable Alternative Natural Greenspace) as part of the avoidance measures required for residential planning applications within certain distances of the SPA. There was discussion at the hearings regarding the degree of prescription included in the Policy but it appears the final part provides for alternative, or bespoke solutions.

There was also some concern regarding potential over-provision built into the Policy. The Council has addressed the issue in its post-hearing responses [WBC/43] and indicated the need for flexibility to accommodate potential revisions to the SPA boundary. It has proposed additional text to para 4.37 to provide additional clarity. As a consequence the Policy is found sound.

SAL06

There are no substantive outstanding representations regarding Policy SAL06 which allocates 2 sites as Country Parks. The Policy can be regarded as sound.

SAL07

There are no representations of substance indicating that Policy SAL07 is not sound.

The University of Reading's long term Vision for the Science and Innovation Park envisages that it would be fully built-out in around 25 years from a start on the site. This will be beyond the Plan period for the MDD which indicates completion of some 55,000 sq m (gross) of floor space completed by 2026. Accordingly the Policy is sound in that it identifies the development that is expected to occur within the Plan period. It is, however, appropriate for the supporting text to indicate that development will continue beyond the Plan period. The Council has proposed amending the text in para 4.52 to this effect and, whilst this is not a matter of soundness, it is an appropriate minor modification.

The Council has indicated that there is evidence of demand for high quality employment accommodation within the borough, especially where it can support skills and knowledge retention alongside the approved Science Park. One such allocation is that west of Kybes Lane at Green Park. It can be argued that the absence of sufficient land to meet the specific identified demand amounts to an unsound policy. Accordingly it is

appropriate to include the land identified in WBC/9 under Policy SAL07, together with appropriate adjustments to the Policy Map.

SAL08

The soundness of Policy SAL08 has been challenged only in respect of the inclusion or exclusion of specific sites within the Policy. The Council has proposed a minor change in respect of the site at Carnival Pool, Wokingham to include C3 (residential) as a potential element of regeneration. This does provide some additional clarity but is not a matter of soundness.

SAL09

There are no representations requiring modification to SAL09 other than site specific concerns. However, the absence of the proposal for a park and ride facility at the Coppid Beech location has been questioned. Since this is a commitment on the part of the Council the Policy is unsound in the absence of a reference. The Council has indicated that a detailed location for the facility has not been established although the general location has been set through the North Wokingham SDL SPD. It is not therefore appropriate or possible to define a location in Policy SAL09. However, the Council has proposed clarification by a specific reference within the Policy and supporting text at para 4.73 [WBC/24]. This is an appropriate response creating a sound policy.

Omission Sites

I have concluded that the MDD is generally sound in respect of the amount of land allocated for housing purposes, and the individual sites included in policies SAL01 – SAL03. It follows that there is no need or reason to recommend further allocations. It is also the case that none of the omission sites proposed by representors offer clear benefits over those included in the MDD, either in terms of location, sustainability or deliverability.

Two omission sites have been proposed for employment purposes under Policy SAL07. These are land off Sandhurst Road, Finchampstead North (1FI108) and land at Lambs Lane Business Park, Swallowfield (1SW114). Both lie in open countryside outside development limits. Evidence to support the sites' inclusion on the basis that additional land is required or that they are preferable in location, sustainability or deliverability is not convincing.

I will report further on individual sites in my report to the Council in due course.

Matter 6**Monitoring**

A number of issues have been raised concerning the Monitoring Framework. However, none are of significant consequence affecting the soundness of the document as a whole. The Council has proposed some minor modifications to address concerns. As a consequence of the recommendation regarding Policy CC02, the indicator and target relating to this Policy should be deleted.

Appendices

Issues relating to appendices have been considered in the context of the appropriate policy.

NOTE:

Those parts of the MDD not referred to above may be taken as being found sound, although the Council may wish to pursue Minor Modifications to address matters of accuracy and clarity.

THE NEXT STEPS

The Council is invited to consider these preliminary conclusions and put forward the necessary amendments to the policies and accompanying text in a schedule of Proposed Main Modifications necessary to ensure the soundness of the MDD. These Proposed Main Modifications can then be published and be subject to a 6 week formal period of public consultation. If any further Sustainability Appraisal is needed, it should be undertaken before public consultation and published at the same time.

Before reaching my final conclusions and preparing my report to the Council, I will consider any representations and responses on the Schedule of Proposed Modifications, along with those made during earlier stages of the examination process.

These are interim conclusions, without prejudice, on the soundness of the MDD. The full reasoning for the final conclusions will be included in the report to the Council. It should be remembered that it is not the role of the Inspector to 'improve' the MDD and the recommendations will only address issues of soundness identified through the whole Examination, including the hearing stage. The recommendations will not, therefore, address all matters which have raised concerns amongst representors. Whilst requesting the

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Council to consider Main Modifications needed to make the MDD sound, this note is made available to others for information only.

Patrick T Whitehead

Inspector (24/06/2013)

Proposed Main Modifications to the Managing Development Delivery DPD

The modifications below are expressed either in the conventional form of strikethrough for deletions and underlining for additions of text, or by specifying the modification in words in *italics*.

The page numbers and paragraph numbering below refer to the Submission Managing Development Delivery Development Plan Document (December 2012) and do not take account of the deletion or addition of text.

Ref	Page	Policy/ Paragraph	Main Modification
MM01	6	New Policy CC00 and supporting text paragraph 2.2A	<p><u>Policy CC00 – Presumption in Favour of Sustainable Development</u></p> <ol style="list-style-type: none"> 1. <u>Planning applications that accord with the policies in the Development Plan for Wokingham Borough will be approved without delay, unless material considerations indicate otherwise.</u> 2. <u>Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:</u> <ol style="list-style-type: none"> a. <u>Any adverse impacts of planning permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole; or</u> b. <u>Specific policies in that Framework indicate that development should be restricted.</u> <p><u>2.2A When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.</u></p>
MM02	7	Policy CC01, clause 3	<u>Development proposals within the areas allocated as SDL in the adopted Core Strategy (policies CP18-21) will be granted that are within the identified development limits unless an acceptable alternative has</u>

Ref	Page	Policy/ Paragraph	Main Modification
			<p><u>been agreed through the granting of planning permission accompanied by a deliverable SDL-wide:</u></p> <ul style="list-style-type: none"> a. <u>Comprehensive masterplan; and</u> b. <u>Infrastructure Delivery Plan which:</u> <ul style="list-style-type: none"> i. <u>Ensures that the applicant funds and delivers an appropriate share of the SDL infrastructure; and</u> ii. <u>Does not prejudice the comprehensive delivery and implementation of the wider SDL</u>
MM03	9	Policy CC02	<i>Delete entire policy, supporting text and policy background box.</i>
MM04	11	Policy CC03, criterion 4(a)	The establishment of a Loddon/ Blackwater riverside footpath and bridleway, as defined on the Policies Map, to accommodate dual use along the River Loddon
MM05	14	Policy CC04	<p>Planning permission will only be granted for proposals that demonstrate the following: <u>seek to deliver high quality sustainably designed and constructed developments by:</u></p> <ol style="list-style-type: none"> 1. <u>In respect of all new homes shall at least:</u> Seeking to achieve the requirements of the full Code for Sustainable Homes Level 4; ^{PC129} Meet requirements of the full Code for Sustainable Homes Level 4 or any future national equivalent.
MM06	14	Paragraph 2.26	Future proofing development does not harm the viability of schemes since the affordable housing viability study (2008) assumed that all homes were built to Code Level 4.
MM07	17	Policy CC05, criterion 3	<p>Any proposals for renewable energy and decentralised energy works, including wind turbines, must demonstrate that:</p> <ol style="list-style-type: none"> a) <u>It is They are appropriate in scale, location and technology type;</u> b) <u>It is Are compatible with the surrounding area, including the impact of noise and odour;</u> c) <u>There is no negative cumulative visual impact Do not have a damaging impact on the local topography and landscape;</u> d) <u>There is no significant impact upon heritage assets, including views important to their setting;</u> e) <u>In the case of wind turbines, take account of their cumulative effect and properly reflect their increasing impact on the landscape and on local amenity</u>
MM08	20	Policy CC06	<i>Replace policy CC06 paragraphs 2.48-2.50 with the text included as appendix 1 of WBC24.</i>
MM09	29	Policy CC10, clause 2(a)	<p>2. All development proposals must:</p> <p>a) Reproduce Greenfield run-off characteristics and return run-off rates and volumes back to the original greenfield levels, <u>where practicable for Greenfield sites and for Brownfield sites both run-off rates and volumes be reduced to as near greenfield as practicably possible.</u></p>
MM10	36	Policy TB05, page 26, criterion 2	All dwellings must be built to Lifetime Homes Standards. A proportion of all dwellings must be built to Lifetime Homes Standards. The proportion will be determined on a site-by-site basis, normally within the range of 10-20%
MM11	40	Policy TB07, criterion 1	<u>Planning permission shall be granted where new residential units, including change of use or conversions can meet the following Proposals for new residential units, including change of use or conversions, should ensure that the internal layout and size are suitable</u>

Ref	Page	Policy/Paragraph	Main Modification
			to serve the amenity requirements of future occupiers. The Council will assess all development proposals against the following minimum standards to ensure that the internal layout and size are suitable to serve the amenity requirements of future occupiers.
MM12	46	Policy TB10, criterion a	There is an identified need
MM13	48	Policy TB11	<p>Policy TB11: Core Employment Areas and Defined Bad Neighbour Uses</p> <ol style="list-style-type: none"> 1. Core Employment Areas listed in policy CP15 – Employment Development of the Core Strategy together with bad neighbour use sites are defined on the Policies Map. 2. Bad neighbour uses are uses within Use Class B2 or those that have no use class definition (Sui Generis).
MM14	48	Paragraphs 3.53-3.55	<p>3.53 Bad neighbour uses by their very nature, may have adverse environmental implications due to excessive outside storage, noise, smell and dust. They include activities such as motor vehicle repair and salvage operations; paint spraying; haulage depots, and the production of unsightly or noxious waste materials.</p> <p>3.54 Existing “bad neighbour” uses are defined in the following locations:</p> <ul style="list-style-type: none"> i. Hogwood Lane (parts) ii. Rushwood Works, Ruscombe (parts of) iii. Parts of Molly Millars Land Industrial Estate (north side), Wokingham iv. Toutley Works (parts) / Depot, Site is within North Wokingham SLD v. Kentwood Farm (northern part only), Wokingham <p>3.55 There are also some existing bad neighbour uses outside these identified areas.</p>
MM15	49	Policy TB12	Proposals for major development should be accompanied by an Employment Skills Plan to show how the proposal accords opportunities for training, apprenticeship or other vocational initiatives to develop local employability skills required by developers, contractors or end users of the proposal.
MM16	49	Paragraph 3.56	In line with the Council's Economic Development Strategy (2010) to encourage the use of local labour and to ensure that local people have the skills and abilities to compete for local jobs, the Council will promote the use of an Employment and Skills Plan <u>within major development proposals</u> .
MM17	50	Paragraph 3.57	The Council will produce additional guidance which sets further detail on the scale and type of contribution expected from development, including the stages of development (construction, and where appropriate end user). The plan may cover apprenticeships; training initiatives such as pre-employment training; work experience, and work skills training. It should cover all stages in the development process including construction and end user phases to maximise training, skills and employment outcomes. The Council may use S106 agreements or planning conditions to incorporate the Employment Skills Plan.

Ref	Page	Policy/ Paragraph	Main Modification
MM18	51	Policy TB14	<p>Policy TB14: Whiteknights Campus</p> <p>The University of Reading's is a national and international educational establishment of strategic importance which will continue to adapt and expand over the plan period. The Whiteknights Campus is defined on the Policies Map will continue to be a focus for development associated with the University of Reading. Such development may include additional student, staff, teaching, research and enterprise accommodation, infrastructure and services, and sports and leisure facilities among other uses. There will also be improvements to access, including rationalisation of vehicle entrances and exits.</p> <p><u>Development proposals will accord with the following criteria:</u> on the Whiteknights Campus site shall demonstrate that:</p> <p>They are for the purposes of research and development related to the work of the University. Such development may include additional student, teaching, research and enterprise accommodation, infrastructure and services, and sports and leisure facilities among other uses</p> <p>b) They respect the historic landscape, open areas and listed buildings and their settings and the character of the area</p> <p>The quality of Local Wildlife Sites, Areas of wildlife significance (including Local Wildlife Sites) and current or potential green infrastructure networks will be are retained and enhanced</p> <p>They maintain or enhance the safety of those using the campus users, (including highway safety issues and designing out crime) will be maintained and enhanced;</p> <p>There are no significant detrimental impacts on neighbouring residential properties from the development, including from noise or parking; and</p> <p>The loss of undeveloped areas on the site will be weighed against the benefits of development to the wider community.</p>
MM19	51 and 52	Paragraphs 3.61 and 3.62	<p>3.61</p> <p>The University of Reading is a national and international educational establishment of strategic importance which will continue to adapt over the plan period. The University operates from a number of sites within Wokingham Borough, including Whiteknights Campus (circa 119 hectares) of which approximately one third lies within Reading Borough. Therefore, a consistent approach to planning policy in Reading Borough Council's Sites and Detailed Policies Development Plan Document and the MDD DPD has been taken. Development proposals will be jointly considered by Reading Borough Council and Wokingham Borough Council. <u>The policy aims to ensure that the Whiteknights Campus continues to develop as the focus for the University of Reading and contribute the</u></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>area as a whole and the wider national interest. This policy helps to achieve objective xiii of paragraph 2.68 of the Core Strategy in that it maintains and enhances the Borough's knowledge and skills base.</p> <p>3.62 The Whiteknights Campus will continue to be the main campus and the focus for development associated with the University of Reading. Such development may include additional student, staff, teaching, research and enterprise accommodation, infrastructure and services and sports and leisure facilities. has a number of issues which distinguish it from other parts of the Borough, and therefore necessitate a distinct approach. The University has around 17,500 students¹, which is roughly equivalent in size to a town such as Thatcham or Marlow, and Whiteknights is the hub of university activity. Students, staff and visitors need to be supported by services, facilities and infrastructure. A separate policy is therefore required for the part of the Whiteknights campus that lies within the Borough.</p> <p>3.62A There are a number of constraints and complexities affecting the site. Parts of the site have significant wildlife importance, and the area is a prominent part of the local landscape, adjoining part of the East Reading wooded ridgeline Major Landscape Feature, with large tracts of open space. A number of listed buildings are on site, and university uses have a potential effect on surrounding residential areas. In addition, approximately a third of the Campus is within Reading Borough, meaning that a consistent approach is required. Development proposals will be jointly considered by Reading Borough Council and Wokingham Borough Council.</p> <p>3.62B In 2008, the University drew up a Whiteknights Campus Development Plan, which set out the University's principles for future development of the site, including providing 1,297 additional bedspaces, waste and catering facilities and changes to the accesses and internal circulation. The Whiteknights Campus Development Plan does not form part of either Reading or Wokingham Borough's Development Plan, but it outlines the changes that are proposed to occur on the site in the coming years, and has informed this policy. Much of the physical development proposed has already received planning permission, and it is therefore important that the policy looks beyond the current Whiteknights Campus Development Plan and is flexible to take account</p>

¹ www.reading.ac.uk.

Ref	Page	Policy/ Paragraph	Main Modification
			<p><u>of other proposals as they come forward.</u></p> <p><u>3.62C Proposals within the Whiteknights Campus Development Plan include rationalising the substantial number of vehicle access points around the campus. Given that growth is likely to occur on the campus, it is vital that access points are appropriately located. The Council is therefore supportive of this principle in the Whiteknights Campus Development Plan.</u></p>
MM20	62	Policy TB20, criterion 1	<ol style="list-style-type: none"> 1. Planning permission will only be granted for <u>commercial</u> development proposals throughout the Borough that demonstrate: <ol style="list-style-type: none"> a. There is no harmful impact on the amenity of adjoining land uses in terms of noise, fumes and disturbance b. There is no significant impact on highway safety c. There is no significant <u>adverse</u> visual impact d. There is no significant <u>adverse</u> environmental impact
MM21	64	Policy TB21, section1	<u>Proposals must Planning permission will only be granted where it can be demonstrated how they have that the proposal addresseds the specific requirements of the Council's Landscape Character Assessment, including the landscape quality; landscape strategy; landscape sensitivity and key issues.</u>
MM22	64	Paragraph 3.97	The supporting text (paragraph 4.19) to policy CP3 – General Principles of the Core Strategy states that proposals should take account of the Council's <u>current</u> Landscape Character Assessment (2004).
MM23	64	Paragraph 3.98	The Landscape Character Assessment provides guidance on the intrinsic characteristics of landscape character areas. It details how landscapes should be conserved and managed and the degree, i.e. sensitivity, to which landscape areas can accommodate development. Applicants shall use the Landscape Character Assessment to identify important landscape features that should be protected or enhanced through development proposals. <u>This should be incorporated as part of a landscape and visual impact study as detailed in paragraph 2.20 of this Plan.</u>
MM24	71	Policy TB24	<p><i>Amend title of policy as follows:</i></p> <p><u>"Designated Heritage Assets (Listed Buildings, Historic Parks and Gardens, Scheduled Monuments and Conservation Areas"</u></p>
MM25	71	Policy TB24	<ol style="list-style-type: none"> 1. Historic Parks and Gardens, Scheduled Monuments and Conservation Areas are shown on the Policies Map. 2. <u>The Borough Council will conserve and seek the enhancement of designated heritage assets in the Borough and their settings by:</u> <ol style="list-style-type: none"> a. <u>Requiring Development works</u> to or affecting heritage assets <u>or their setting</u> will need to demonstrate that <u>the proposals would at least conserve and, where possible enhance there is no detrimental impact on the important character and special architectural or historic interest of the building, Conservation Area, monument or park and garden including its setting and views. Proposals should seek to conserve and enhance the heritage assets.</u> b. Supporting development proposals or other initiatives

Ref	Page	Policy/ Paragraph	Main Modification
			<p>that will conserve and, where possible, enhance the local character, setting, management and historic significance of designated heritage assets, with particular support for initiatives that would improve any assets that are recognised as being in poor condition or at risk.</p> <p>3. Proposals for building works shall retain or incorporate existing features or details of <u>historic or architectural significance</u> or design quality into the scheme.</p>
MM26	72	Paragraph 3.123	"...This will be accessed on a site by site basis. <u>and</u> and the level of preservation will be appropriate to whether the remains add to national or local knowledge <u>the significance of the remains</u> ."
MM27	73	Paragraph 3.127	"Special regard should be given to the historical context, <u>outbuildings</u> , scale, form, and massing..."
MM28	75	Paragraph 4.8A	The NPPF (paragraph 47) indicates that authorities should ensure that either a 5% or 20% buffer within their deliverable 5 year supply should be maintained. The size of buffer depends upon whether the authority has a record of persistent under delivery or not. The Council through its annual monitoring of housing delivery will update the information within appendix 14 of the MDD to detail the current assessments of housing land supply from the various sources and whether a rolling deliverable 5 year supply is still available for the remainder of the Plan period (see table A14.3 in appendix 14).
MM29	75	Footnote	The information in table A14.3 indicates that the authority can maintain at least a 5% buffer when the 5 year land supply is shown to exceed 5.25 years (since $5 \times 1.05 = 5.25$). Likewise, if table A14.3 indicates that at least a 6 year supply is available, this means that the authority exceeds the 20% buffer (as $5 \times 1.2 = 6$).
MM30	78	Policy SAL01	The sites listed below (and defined on the Policies Map) are allocated for residential development <u>and should be used only for this purpose, and in accordance with</u> . There is a presumption against the development of these sites for uses other than specified unless the applicant can demonstrate that the requirements of the Development Plan <u>A</u> (including the additional guidance <u>on appropriate uses and specific requirements for each site are included in Error! Reference source not found.</u>) for the site can be achieved.
MM31	80	Policy SAL02	The sites listed below (and defined on the Policies Map) are allocated for residential development <u>and should be used only for this purpose, and in accordance with</u> . There is a presumption against the development of these sites for uses other than specified unless the applicant can demonstrate that the requirements of the Development Plan <u>A</u> (including the additional guidance <u>on appropriate uses and specific requirements for each site are included in Error! Reference source not found.</u>) for the site can be achieved.
MM32	82	Policy SAL03	The reserve sites listed below (and defined on the Policies Map) are allocated for residential development and should be used only for this purpose, and in accordance with. There is a presumption against the development of these sites for uses other than specified unless the applicant can demonstrate that the requirements of the Development Plan <u>A</u> (including the additional guidance on appropriate uses and

Ref	Page	Policy/ Paragraph	Main Modification														
			<p><u>specific requirements for each site are included in Error! Reference source not found.) for the site can be achieved. There shall be</u> The sites listed below (and defined on the Policies Map) are allocated for residential development with no dwelling completions until after 1 April 2026 <u>on any reserve site, unless one of the following applies:</u></p>														
MM33	86	Policy SAL04	<p>Policy SAL04: New public open space associated with residential development within and adjoining the Borough Planning permission will be granted for public open space on the following sites, as defined on the Policies Map, where it contributes towards the overall open space requirements associated with the development of the relevant related residential site</p> <table border="1"> <thead> <tr> <th>Open space sites</th><th>Related Development Plan policy & site for residential development</th></tr> </thead> <tbody> <tr> <td>1. Land at Hatch Farm Dairies, Winnersh</td><td>Wokingham District Local Plan (WDLP) Policies WH3 and WR4, MDD DPD policy SAL01 (site WI122)</td></tr> <tr> <td>2. Land at Sandford Farm, Woodley</td><td>WDLP Policies WH4, WH5 and WR4, MDD DPD policy SAL01 (site WD116)</td></tr> <tr> <td>3. Land east of Berkshire Way, Wokingham (Amen Corner)</td><td>Bracknell Forest Borough's Core Strategy Policy CS4 and Proposed Submission Site Allocations DPD Policy SA8</td></tr> <tr> <td>4. Land east of University of Reading's Bulmershe campus, Woodlands Avenue, Woodley</td><td>MDD DPD policy SAL02 (site WD115)</td></tr> <tr> <td>5. Land south and west of Folly Court, Blagrove Lane, Wokingham</td><td>MDD DPD policy SAL02 (site WK160)</td></tr> <tr> <td>6. Land north-west of Arbor Lane, Winnersh</td><td>MDD DPD policy SAL02 (site WI114)</td></tr> </tbody> </table> <p>Proposals for other uses <u>on these allocated sites compatible with the Development Plan</u> will be permitted where <u>it is</u> they demonstrated that:</p> <p class="list-item-l1">a) adequate open space to meet both the overall and specific requirements of <u>Core Strategy</u> policy CP3 - General Principles for development (criteria g), as amplified by Error! Reference source not found. or Bracknell Forest's Core Strategy policies CS4 Land at Amen Corner (Parish of Binfield) and CS6 Limiting the Impact of Development and Site Allocations DPD Policy SA8 Land at Amen Corner</p>	Open space sites	Related Development Plan policy & site for residential development	1. Land at Hatch Farm Dairies, Winnersh	Wokingham District Local Plan (WDLP) Policies WH3 and WR4, MDD DPD policy SAL01 (site WI122)	2. Land at Sandford Farm, Woodley	WDLP Policies WH4, WH5 and WR4, MDD DPD policy SAL01 (site WD116)	3. Land east of Berkshire Way, Wokingham (Amen Corner)	Bracknell Forest Borough's Core Strategy Policy CS4 and Proposed Submission Site Allocations DPD Policy SA8	4. Land east of University of Reading's Bulmershe campus, Woodlands Avenue, Woodley	MDD DPD policy SAL02 (site WD115)	5. Land south and west of Folly Court, Blagrove Lane, Wokingham	MDD DPD policy SAL02 (site WK160)	6. Land north-west of Arbor Lane, Winnersh	MDD DPD policy SAL02 (site WI114)
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Ref	Page	Policy/ Paragraph	Main Modification
			(South), Binfield is available for the related site; <u>or</u> b) <u>it ensures high quality development is achieved on the related site (including the advice in appendix 12) in line with Core Strategy policies CP1 and CP3.</u>
MM34	88	Policy SAL05	<p>Policy SAL05: Delivery of avoidance measures for Thames Basin Heaths Special Protection Area</p> <p>The following sites are allocated (and defined on the Policies Map) as Suitable Alternative Natural Greenspace (SANG) as part of the avoidance measures required for the Development Plan:</p> <ol style="list-style-type: none"> 1. Rooks Nest Woods, Barkham Ride, Barkham (18.3ha) 2. Land south-west of junction of Old Wokingham Road and Nine Mile Ride, Crowthorne (5.12ha) 3. Land surrounding West Court, The Devil's Highway, Arborfield Garrison (70.71ha) 4. Land west of May's Farm, Hyde End Road, Three Mile Cross (8.171 7.81ha) 5. Land east of May's Farm, Hyde End Road, Three Mile Cross (14.4 11.94ha) 6. Land north-west of Nullis Farm, Ryeish Lane, Spencers Wood (9.501 8.96ha) 7. Land south and east of Tanner's Copse, Hyde End Lane, Shinfield (18.18 19.31ha) 8. Land north of Bell Farm, Bell Foundry Lane, Wokingham (21.58ha) 9. Land at Keephatch Woods, Binfield Road, Wokingham (8.75ha) 10. Land west of St. Anne's Manor Hotel, London Road, Wokingham (11.16ha) 11. Land north of Waterloo Road (near Lock's Farm), Wokingham (15.04ha) 12. Land south of Waterloo Road (near Lock's Farm), Wokingham (8.21ha) 13. Land opposite Holme Green, Heathlands Road, Wokingham (2.13 ha) 14. Land east of Lucas Hospital, Chapel Green, Wokingham (6.21 ha) and 15. Land west of Lucas Hospital, Chapel Green, Wokingham (5.39ha). <p>There is a presumption against their development <u>of these sites</u> for uses other than SANG <u>on these sites</u> unless the applicant can demonstrate that sufficient alternative avoidance measures for all <u>relevant submitted and/or approved plans and projects within the Borough taking account of Natural England's advice on SANGs.</u></p>
MM35	89	Paragraph 4.37	The sites are allocated in accordance with policy CP8 - Thames Basin Heaths Special Protection Area (SPA) of the <u>Core Strategy</u> . The <u>allocation of SANG takes account of potential needs for additional avoidance measures associated with the continuing review of SPA (as referenced in paragraph 4.47 of the Core Strategy) and any implications for plans or projects in the Borough under The Conservation of Species and Habitats Regulations 2010.</u>
MM36	89	Paragraph 4.38	Natural England has advised the Council, along with the other ten local authorities surrounding the Thames Basin Heaths Special Protection Area, that the provision of appropriate avoidance measures, [new/enhanced areas of informal open space – Suitable Alternative Natural Greenspace (SANG)] together with contributions towards Strategic (pan-SPA) Access Management and Monitoring (SAMM) would address the recreational disturbance issue to the Thames Basin Heaths SPA. Such measures will be required for residential planning applications on sites within 5km (linear) of the SPA and may be

Ref	Page	Policy/ Paragraph	Main Modification
			necessary for proposals of 50+ dwellings on sites within 7km (linear). This is the standard approach to delivering avoidance measures (as detailed in paragraph 4.49 of the Core Strategy (supporting text of policy CP8 - Thames Basin Heaths SPA of the Core Strategy)). In the case of bespoke alternatives these will need to satisfy both the Council and Natural England that it will be as effective in addressing the likely significant effects for an indefinite period. Any application including a bespoke solution will need to include sufficient information to enable the assessment of the proposal under Regulation 61 of The Conservation of Habitats and Species Regulations 2010.
MM37	89	Paragraph 4.39	The allocation of these SANG is one element of the overall necessary avoidance measures for addressing the likely significant effects of implementing the Development Plan upon the SPA alongside contributions towards SAMM.
MM38	89	Paragraph 4.41	Where a change of use to all or part of an allocated SANG is proposed, the applicant will need to demonstrate how it does not prevent the delivery of any other relevant approved or submitted plan or project within the Borough taking account of Natural England's advice on SANG. Any approved or submitted plan or project include those proposing where residential development on a site within 5km (or 50+ dwellings within 7km) of the SPA and where it also has: <ol style="list-style-type: none"> Any extant planning consent for residential development; Is allocated within a Any approved or draft Local Development Plan Document (a draft Local Development Document is one to which has reached either the Public Participation stage for a Draft Supplementary Planning Document (under Regulation 12 of The Town & Country Planning (Local Planning)(England) Regulations 2012 or consultation on the Proposed Submission Local Plan (under Regulation 19 of these Regulations); and Is allocated within a Any approved or draft Neighbourhood Development Plan (A draft Neighbourhood Development Plan is one which has reached Publicising under Regulation 16 of The Neighbourhood Planning (General) Regulations 2012).
MM39	89	Paragraph 4.42	Where a reduction in SANG area is proposed, the applicant will need to demonstrate how the remaining area still accords with Natural England's quality and quantity standards (including catchment of SANG) and complies with the above requirements. Details of those relevant approved or submitted plans for each of the allocated SANG relevant at 1 April 2012 2013 are summarised in Appendix 10. The Council as part of its monitoring will update this information.
MM40	90	Paragraph 4.43	The supporting text (paragraph 4.49) to policy CP8 - Thames Basin Heaths SPA of the Core Strategy details the standard avoidance solution. In the case of bespoke alternatives these will need to satisfy both the Council and Natural England that it will be as effective in addressing the likely significant effects for an indefinite period. Any application including a bespoke solution will need to include sufficient information to enable the assessment of the proposal under Regulation 61 of The Conservation of Habitats and Species Regulations 2010.
MM41	92	Policy SAL07, criterion 8 and	<i>Amendments to the development limits at Green Park to enable a revision of the Core Employment Area together with the allocation of an additional site in policy SAL07 for commercial/employment use for around 20,000m²</i>

Ref	Page	Policy/ Paragraph	Main Modification					
		supporting text	<p><u>Land south and west of Kirtons Farm Road, Pingewood (Green Park) for the delivery of around 20,000 sq m for B Class Uses.</u></p> <p><u>Land south and west of Kirtons Farm Road, Pingewood (Green Park)</u></p> <p><u>4.53A The site of Kirtons Farm Road is within the expanded Green Park Core Employment Area and the provision of additional employment floorspace will help support the Borough's economy.</u></p>					
MM42	94	Policy SAL08, section 4	<p>4. Land at Carnival Pool, Wokingham, for the delivery of D1 (community uses), D2 (leisure uses) with flexibility for A3 (restaurants & cafes), and A4 (drinking establishments) and C3 (residential) uses</p>					
MM43	98	Policy SAL09, section 1, clause ii	<p>ii. Land at Thames Valley Business Park (Broken Brow), Earley – the delivery of the uses defined in policy SAL07 or a Park & Ride facility and associated development following any development in relation to Crossrail and/or Great Town link</p>					
MM44	98	Policy SAL09, section 2	<p>The Council is also committed to the delivery of a Park & Ride facility adjacent to the Coppid Beech roundabout (A329 London Road).</p>					
MM45	99	Paragraph 4.73	<p><u>Land at Coppid Beech, Wokingham</u></p> <p><u>The Council is committed to the delivery of a Park & Ride facility adjacent to the Coppid Beech roundabout to ensure that the necessary transport infrastructure is in place to support planned growth in this area. The Council will work with site owners to develop the appropriate location of the facility and the appropriate mechanisms for its delivery.</u></p>					
MM46	103	Monitoring Framework, Policy CC00	<u>CC00: Presumption in Favour of Sustainable Development</u>	<u>CP1</u>	<u>Percentage of applications determined within timeframe.</u>	<u>Determine major, 'minor' and 'other' applications in line with Government targets.</u>	<u>Monitoring published annually</u>	<u>to be taking account of quarterly submissions to Government.</u>
MM47	121- 134	Appendix 1, Noise	<p><u>Replace policy appendix 1 and annexes 1-3 with the text included as appendix 2 of WBC24.</u></p>					
MM48	135	Appendix 2 Car Parking Standards	<p><u>Add in the following text as introductory paragraph:</u></p> <p>APPLYING PARKING STANDARDS</p> <p><u>The parking standards are based on the use class of a development. It is likely that some developments may not fit within these categories.</u></p> <p><u>It will be the responsibility of the developer to prove that parking provision has been adequately catered for on a proposed site. The developer must prove that parking will not have a detrimental effect on traffic safety or on the character of an area due to an increase in parking on the public highway. This should be set out in the Transport Statement or Transport Assessment as part of the planning application.</u></p> <p><u>The parking standards should be regarded only as a starting point in any discussions with the Borough Council as it should be recognised that each development site will need to be assessed on its own merits, within the wider context of the area in which the development</u></p>					

Ref	Page	Policy/ Paragraph	Main Modification
			<p>sits. This is likely to be more important under the coalition Government's "Localism" agenda for planning.</p> <p>For Residential parking the developer will need to show that spaces identified to serve each dwelling are within an acceptable distance from that dwelling (normally 25m for allocated parking). On larger schemes a plan showing plot numbers and parking layout allocation / unallocated and visitor spaces will be required.</p> <p><i>NB the inclusion of the following change has not been agreed in SOCG14 WBC & the Consortia Board. See covering note in introduction to SOCG14.</i></p> <p><i>Add in to Appendix 2 Figure 3 from CD10.08.03 Parking Standards Study Report –</i></p> <p><i>Consequential change to paragraph 1.12.1 (page 141) to read:</i></p> <p><i>"....A map showing the classification of each ward is shown as Figure 1 in this appendix....The allocations are based..."</i></p> <p><i>This supersedes Minor Change 67 as set out in CD01C Schedule of Minor Changes.</i></p> <p><i>Paragraph 1.13.6 of Appendix 2 of the MDD: After text '...can be found in paragraphs 3.2.13 to 3.2.17' add text 'of the Parking Standards Study Report 2011'.</i></p>
MM49	148	Appendix 3, section i	Measures to improve cross Thames travel which may include a bridge (policy CP10 (1))
MM50	N/A	Maps 106 and 144	<p><i>The Council's proposed change accords with Option 1 in Dr Severn's statement for Matter 2. The proposed changes incorporates the full extent of the residential curtilage to the property at Pinewood, Tintagel Road, Finchampstead and also the residential curtilages to adjacent properties at Heatherlea and Springwood, Tintagel Road, Finchampstead.</i></p> <p><i>See proposed boundary changes to maps 106 (Finchampstead North Modest Development Location) and 144 (South Wokingham SDL Settlement Separation Area).</i></p>
MM51	N/A	Map 114 no.	<p><i>Shinfield Development Limits</i></p> <p><i>Amend development limit for Shinfield to include area approved for development in appeal at Shinfield West (ref APP/X0360/A/11/2151409)</i></p>
MM52	N/A	New map no. 160	<i>Create new map showing alignment of Shinfield Eastern Relief Road (as approved in appeal ref APP/X0360/A/11/2151413)</i>
MM53	N/A	Map 108 no.	<i>Amend Green Park Development Location defined in policies CP9 and CC01</i>
MM54	N/A	Map 221 no.	<i>Amend Green Park Employment Area defined in policies CP15 and TB11</i>

Ref	Page	Policy/ Paragraph	Main Modification
MM55	N/A	Map no. 311	<i>Amendment to site of Urban Landscape Value at Bulmershe, Woodley defined in policy TB22</i>
MM56	N/A	Map no. 624	<i>Amendment to boundary of SANG at West of May's Farm</i>
MM57	N/A	Map no. 625	<i>Amendment to boundary of SANG at East of May's Farm</i>
MM58	N/A	Map no. 626	<i>Amendment to boundary of SANG at North-west of Nullis Farm</i>
MM59	N/A	Map no. 627	<i>Amendment to boundary of SANG at South and East of Tanner's Copse</i>
MM60	N/A	Map no. 709	<i>Potential allocation of land west of Kirtons Farm Road for commercial/employment development</i>

**Wokingham Borough Local Development Framework – Proposed Main Modifications
to the Management Development Delivery Development Plan Document (Local Plan)
For the consideration by the Executive and Special Council Executive Committee on
25 July 2013**

Addendum to Appendix 2 - Additional Main Modification

Ref	Page	Policy/paragraph	Main Modification
MM80	30	Policy TB01, clause 3	3. The alteration and/or extension of a dwelling and the construction, alteration or extension of buildings ancillary to a dwelling in the Green Belt. Any such construction, alteration or extension over and above the size of the original building(s) shall be limited in scale.