



WOKINGHAM BOROUGH COUNCIL

A Meeting of an **INDIVIDUAL EXECUTIVE MEMBER DECISION** will be held in First Floor 14 - Civic Offices on **WEDNESDAY 21 MARCH 2018 AT 9.00 AM**

A handwritten signature in black ink, appearing to read 'Manjeet Gill', is written over a light blue rectangular background.

Manjeet Gill
Interim Chief Executive
Published on 13 March 2018

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WOKINGHAM BOROUGH COUNCIL

Our Vision

A great place to live, an even better place to do business

Our Priorities

Improve educational attainment and focus on every child achieving their potential

Invest in regenerating towns and villages, support social and economic prosperity, whilst encouraging business growth

Ensure strong sustainable communities that are vibrant and supported by well designed development

Tackle traffic congestion in specific areas of the Borough

Improve the customer experience when accessing Council services

The Underpinning Principles

Offer excellent value for your Council Tax

Provide affordable homes

Look after the vulnerable

Improve health, wellbeing and quality of life

Maintain and improve the waste collection, recycling and fuel efficiency

Deliver quality in all that we do

For consideration by

David Lee, Executive Member for Strategic Highways and Planning

Officers Present

Luciane Bowker, Democratic and Electoral Services Specialist

James McCabe, Senior Planning Officer

IMD NO.	WARD	SUBJECT	
IMD 2018 /14	None Specific	WOKINGHAM BOROUGH COUNCIL RESPONSE TO THE BRACKNELL FOREST COUNCIL DRAFT LOCAL PLAN	5 - 12

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Agenda Item IMD14

INDIVIDUAL EXECUTIVE MEMBER DECISION

REFERENCE IMD: IMD 2018 /14

TITLE	Wokingham Borough Council Response to the Bracknell Forest Council Draft Local Plan
DECISION TO BE MADE BY	Executive Member for Strategic Highways and Planning- David Lee
DATE, MEETING ROOM and TIME	21 March 2018 FF14 - 9am
WARD	None Specific;
DIRECTOR	Director of Corporate Services - Graham Ebers, Interim Director of Environment - Josie Wragg

OUTCOME / BENEFITS TO THE COMMUNITY

To ensure that Bracknell Forest Council's Local Plan has minimal negative impacts upon Wokingham Borough and that any positive benefits are maximised.

RECOMMENDATION

The Executive Member for Strategic Planning and Highways agrees that Wokingham Borough Council:

- a) Supports Bracknell Forest's plan to meet its own housing need
- b) Expects Bracknell Forest to meet its share of Reading's unmet housing need should this be necessary
- c) Expects that Bracknell Forest will work closely with WBC to ensure appropriate infrastructure is delivered to mitigate the impact of any development which would have cross boundary implications.

SUMMARY OF REPORT

Bracknell Forest Council has published its Draft Local Plan. The Draft Local Plan details the proposed policies and spatial vision for Bracknell Forest Borough up to 2034. This follows from its Issues and Options consultation which ran in June/July 2016.

This report outlines Wokingham Borough Council's response to the proposed housing target in the draft Plan, including the issue of unmet need in Reading Borough which sits within the same Housing Market area as both Bracknell Forest, Wokingham Borough, and West Berkshire.

The report also considers employment land provision, retail provision, Gypsy and Traveller provision, and infrastructure which are issues considered in the Draft Local Plan.

Four proposed housing site allocations in the Bracknell Forest Draft Local Plan are within close proximity to the Wokingham Borough boundary. Wokingham Borough Council therefore would welcome the opportunity to discuss further any cross-boundary strategic issues such as traffic and transport impacts associated with development at these locations.

Background

Bracknell Forest Council (BFC) has published its Draft Local Plan (the Plan) with a consultation running between 8 February 2018 and 26 March 2018. This is a Regulation 18 consultation under the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). The Plan sets out the long term vision for Bracknell Forest Borough up until 2034 and includes proposed development management policies and proposed site allocations for various uses.

BFC forms part of the West Berkshire Housing Market Area (HMA) with Wokingham Borough Council, West Berkshire Council and Reading Borough Council. BFC also forms part of the Central Berkshire Functional Economic Market Area with Wokingham Borough, Reading Borough and the Royal Borough of Windsor and Maidenhead.

Analysis of Issues

Provision of Housing

The Berkshire (including South Bucks) Strategic Housing Market Assessment 2016 (SHMA) identified the Objectively Assessed Need (OAN) for the Western Berkshire HMA to be 2,855 dwellings per annum in the period 2013-2036, with Bracknell Forest's contribution equating to 635 dwellings per annum. Since the publication of the SHMA, the government has consulted upon a standardised methodology for calculating housing need. Based on this methodology there would be a need in Bracknell Forest for 670 dwellings per annum – 35 dwellings per annum higher than the SHMA figures – which would equate to 12,060 dwellings over the plan period (2016/17 – 2033/34).

BFC is proposing to use the higher figure derived from the standardised methodology as its OAN for the purpose of the Plan. Accordingly, Policy LP2 – Provision of housing states that:

'Provision will be made for at least an additional 12,060 homes in Bracknell Forest Borough for the period 2016/17 to 2033/34.'

On the basis of the information available WBC accepts that using the OAN as derived from the standardised methodology is a reasonable approach at the time of writing. However, WBC notes that this methodology has not been confirmed and therefore encourages BFC to have due regard to any developments with the proposed methodology moving forward, as well as the revised NPPF, which could mean that a revised housing target is necessary as the plan progresses.

Based on planning permissions; completions; already allocated sites within the Site Allocations Local Plan 2013 (which supported the existing Core Strategy); and expected windfalls, the Plan sets out a remaining requirement of a minimum 2,924 dwellings (or 3,216 applying a 10% buffer) which will be met by new allocations in this Draft Plan. See the relevant section below for a consideration of proposed allocations.

Unmet need from Reading Borough

Reading Borough Council's (RBC) Proposed Submission Plan identified a shortfall of 644 dwellings (or 28 dwellings per annum). RBC committed in its plan to work with the neighbouring authorities within the Western Berkshire HMA to accommodate its unmet need.

BFC's plan makes reference to the shortfall identified by RBC, albeit with reference to a higher shortfall as presented at an earlier stage in RBC's plan making process. Paragraph 6.7 of the Plan states:

'Whilst the Draft Reading Borough Local Plan (April 2016) suggests that there may be a need to deal with a shortfall of 943 dwellings over the plan period, the Government's indicative assessment of housing need suggests a lower OAN than previously used. Furthermore, Reading Borough Council is keen that its unmet need is accommodated within the Greater Reading Urban Area. The four authorities within the Western Berkshire HMA have agreed to work collaboratively to consider how to meet needs within the HMA, as set out in the West of Berkshire Spatial Planning Framework.'

In October 2017, a Memorandum of Understanding (MoU) between the four local authorities in the Western Berkshire HMA was signed noting the modest shortfall (of 644 dwellings) from Reading and agreeing that the authorities will work together to address this. Any housing delivered within the wider HMA is suitable in principle to address any shortfall from Reading. Therefore, while WBC notes that the BFC Draft Plan acknowledges RBC's shortfall, WBC reiterates that it expects BFC to accommodate a portion of this shortfall as a Western Berkshire HMA authority. The shortfall should not purely be met in the immediate 'Greater Reading urban area' but it is for the whole HMA to agree how this should be accommodated across the HMA.

No agreement has yet been reached as to where the shortfall should be addressed and ongoing dialogue is required between Reading, WBC, Bracknell Forest Council and West Berkshire Council. WBC already has the highest assessed housing need within the Western Berkshire HMA (assessed as 856 dwellings per annum and increased to 894 dwellings per annum through planning appeals). By comparison, the identified need for the other Western Berkshire HMA authorities is significantly lower, as follows (the figure in brackets is the proposed draft standard methodology figure):

- West Berkshire – 665 dwellings per annum (545)
- Reading – 699 dwellings per annum (611)
- Bracknell Forest – 635 dwellings per annum (670)

As WBC's requirement is considerably higher this will need to be reflected within the ongoing discussions; WBC expects that the modest shortfall can be met within Bracknell and West Berkshire.

Site allocations

The Plan's housing/mixed use allocations are set out in Policy LP3. This sets out that the proposed housing allocations will deliver an estimated capacity of 3,651 dwellings (which,

it is noted, is greater than the identified allocation requirement). The Plan proposes the allocation of 24 sites (some of which have been clustered together) of over 1ha in size as well as 7 small sites of less than 1ha. Approximately 1,051 dwellings are proposed to be delivered on mixed use sites within Bracknell Town Centre. WBC is supportive of BFC's intention to promote higher density housing within the Town Centre which has excellent access to public transport and employment.

The following residential sites either border or are close to Wokingham Borough and are therefore likely to have impacts for WBC:

1. LP4 – Land at the Hideout and Beaufort Park, Nine Mile Ride (570 dwellings)
2. LP3 – Land east of Wokingham Road and south of Dukes Ride (217 dwellings)
3. LP3 – A cluster of separate sites around Binfield: BIN1, BIN5, BIN6, BIN7, BIN10, BIN11, BIN12 (together amounting to 250 dwellings)

The Land at Hideout and Beaufort Park is one of a handful of sites identified in LP3 which has its own specific policy (LP4 in this case) due to it having 'specific requirements' or because it is in multiple ownership. LP4 sets out, amongst other considerations, that measures will need to be implemented to maintain the separation between Wokingham, Bracknell and Crowthorne, and also that comprehensive on and off site transport measures will be required to mitigate impacts on the road network. This site has a proposed access onto Nine Mile Ride (B3430) which extends westwards into Wokingham Borough and is known to be a congested road with few opportunities for upgrades. The site would generate significant extra trips onto this road which would impact upon Wokingham's wider road network.

WBC would wish to remain fully engaged with BFC's transport modelling and Infrastructure Delivery Plan work moving forward to ensure that there are no significant detrimental impacts of planned development on Wokingham Borough, particularly with regard to the sites identified above. WBC notes that the potential CIL funding that these allocations may generate will need to be appropriately shared between BFC and WBC to contribute towards any necessary infrastructure improvements beyond Bracknell Borough.

WBC notes that BFC and WBC need to be conscious of the general issue of future coalescence between the built up areas of Bracknell Forest and Wokingham borough. WBC would be generally resistant to future planned developments which compromise the separation of the built up areas.

Provision of Employment

The Central Berkshire Economic Development Needs Assessment (EDNA) uses 3 different scenarios for calculating future office and industrial floorspace requirements for each authority within the Central Berkshire Functional Economic Area (Bracknell Forest, Wokingham, Windsor & Maidenhead, Reading). For Bracknell Forest the potential floorspace (sqm) requirements for the period 2013-2036 are as follows, set out by scenario:

	Scenario 1	Scenario 2	Scenario 3
Offices	106,215	-215,165	85,410
Industrial	324,395	6,785	263,110
Total	430,610	-208,380	348,520

In its 'Economic Development' section, the Plan acknowledges the large variation in floorspace requirements depending on the scenario. However, it is noted that at paragraph 5.7 (in the Key Pieces of Evidence section) a summary of the findings of the EDNA is given which specifically mentions only the Labour Supply figures (Scenario 3). This would seem to indicate this is the scenario that BFC considers to be most robust.

The Plan references Employment Commitments data which has shown reductions in office and industrial floorspace over recent years. The Plan suggests that market signals are showing no immediate appetite for additional economic floorspace but nevertheless acknowledges the importance of planning which encourages business investment.

In this context, Policy LP8 sets out the sites which are proposed for allocation for employment uses. For the purposes of the plan, BFC has defined employment uses as being uses falling within use classes B1, B2 and B8 together with any sui generis uses that share a significant number of characteristics with those uses. Approximately 34,100sqm of employment floorspace is proposed spread over 6 sites focussed around Bracknell Town Centre – all of these sites are proposed for mixed use which includes housing (approximately 1,051 dwellings, see section above). WBC supports the principle of additional employment use within Bracknell Town Centre. The plan also continues to protect employment uses within designated Employment Areas while also encouraging intensification of these areas. WBC notes however, that the proposed allocations would yield significantly less floorspace than the combined net additional 348,520sqm required by the Labour Supply scenario. WBC would seek clarification as to how the intended plan approach would plug this gap.

Provision of Retail

The Western Berkshire Retail and Commercial Leisure Assessment demonstrated that there is a need in Bracknell Forest for comparison goods floorspace of 27,900sqm and convenience goods floorspace of 5,000sqm by 2036.

The high figure for comparison goods is based on the study's assumption that the opening of the new 'Lexicon' shopping centre in Bracknell Town Centre will increase the centre's attractiveness as a destination for further retail space. Given that the Lexicon has only recently opened and its impacts on future demand are currently uncertain, the Plan proposes that the most appropriate vehicle for dealing with the potential demand will be through future Local Plans rather than the current. This approach is intended to allow the new Town Centre to become properly established and the proposed policies included in

the Plan are aimed at enhancing the vitality and viability of the existing centre by supporting appropriate development.

While BFC is not intending to meet the identified need set out in the evidence study in full, its approach is considered to be pragmatic given the recent nature of the town centre redevelopment. It is recommended that WBC and BFC continue to collaborate on the issue of retail provision moving forward.

Gypsy and Traveller Provision

BFC published a 'Gypsy and Traveller and Travelling Showperson Accommodation Assessment 2017' (GTAA) in October 2017. The study identifies a cultural need for 14 pitches in the period 2013/14 – 2035/36 (taking account of delivered pitches in the period 2013/14 to 2016/17). 3 of these pitches are for households that meet the definition of Gypsies and Travellers within the government policy document Planning Policy for Traveller Sites (PPTS).

The Plan sets out the conclusions of the GTAA and it is noted that only the PPTS need is referenced. BFC are still considering options for meeting the identified need but potential options include:

- safeguarding authorised sites
- extending existing sites
- engaging with adjoining Authorities regarding the need for transit accommodation.

WBC would encourage BFC to explore options for meeting the identified wider cultural need through the plan making process – which is modest at 14 pitches in total – rather than purely the PPTS need. By way of observation, there is an ongoing legal challenge to the lawfulness of the PPTS definition of Gypsies and Travellers. The outcome of this could make it doubly important to have flexibility of planned supply in order to discharge the authority's wider duty as a housing authority.

Policy LP26 is a criteria based policy against which applications for new pitches will be assessed. The PPTS sets out that local plans should include criteria-based policies to provide the basis for decisions in the event that applications for pitches come forward and is clear that such policies should be included in plans whether there is an identified need or not – indeed paragraph 11 states: '*Where there is no identified need, criteria-based policies should be included to provide a basis for decisions in case applications nevertheless come forward*' [emphasis added]. Criterion 1 of LP26 specifies that there must be an identified need in order for applications to be considered acceptable and WBC considers that this is contrary to national policy.

Infrastructure

The Plan contains a section entitled Infrastructure. This is a very high level chapter which sets out the ways in which funding for necessary infrastructure may be secured but it is

noted that there is no key diagram showing what the required key pieces of infrastructure are considered to be at this stage. The Plan states that more detail on strategic and local infrastructure requirements will be set out in an Infrastructure Delivery Plan (IDP), relevant supplementary planning documents, development briefs and masterplans associated with new major development proposals and allocated sites. WBC considers that it is vital BFC engage fully with ourselves in the production of these documents as a number of the site allocations, discussed above, will have significant infrastructure impacts for Wokingham Borough. WBC would like to understand at the earliest opportunity what the potential impacts of development would be and what infrastructure is proposed to mitigate this – particularly transport infrastructure – which should be established through Duty to Cooperate discussions.

An initial IDP has been produced alongside the Plan consultation. This lists required infrastructure for each of the sites proposed for allocation but states that this will be further refined as the plan process progresses. It is noted that numerous junction and road capacity improvements are proposed alongside sustainable transport measures. The exact detail is not provided, but it will be vital that WBC is kept updated with any proposals. Further, the IDP sets out that the potential sites for allocation in the plan have been tested in the Bracknell Multi-Modal Transport Model (BMMTM) in order to assess their impacts on infrastructure. It states that further testing and refinement will be required for the next stages of the BFLP including more detail on necessary network improvements. The level of growth will generate substantial additional traffic which will necessitate improvements to the local highway network in Bracknell Forest and also in Wokingham borough. This will remain a key ongoing duty to co-operate issue.

The IDP also states that a new secondary school is required in the north east of the borough as well as three new primary schools on proposed site allocations in the east of the Borough.

WBC reiterates that it is essential BFC involves WBC in the refinement of infrastructure delivery options moving forward as many of the impacts of the developments proposed in the plan will require investment beyond the Bracknell Forest boundary in Wokingham Borough.

FINANCIAL IMPLICATIONS OF THE RECOMMENDATION

The Council faces severe financial challenges over the coming years as a result of the austerity measures implemented by the Government and subsequent reductions to public sector funding. It is estimated that Wokingham Borough Council will be required to make budget reductions in excess of £20m over the next three years and all Executive decisions should be made in this context.

	How much will it Cost/ (Save)	Is there sufficient funding – if not quantify the Shortfall	Revenue or Capital?
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Current Financial Year (Year 1)	n/a	n/a	n/a
Next Financial Year (Year 2)	n/a	n/a	n/a
Following Financial Year (Year 3)	n/a	n/a	n/a

Other financial information relevant to the Recommendation/Decision
N/A

Cross-Council Implications
N/A

SUMMARY OF CONSULTATION RESPONSES	
Director – Corporate Services	No comments received
Monitoring Officer	No comments
Leader of the Council	No comments received

List of Background Papers
Information published by Bracknell Forest Council relating to the Draft Local Plan– see https://www.bracknell-forest.gov.uk/planning-and-building-control/planning/planning-policy/draft-bracknell-forest-local-plan/consultations

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