



WOKINGHAM BOROUGH COUNCIL

A Meeting of an **INDIVIDUAL EXECUTIVE MEMBER DECISION** will be held in First Floor 13 - Civic Offices, Shute End, Wokingham RG40 1BN on **MONDAY 23 DECEMBER 2019 AT 10.00 AM**

A handwritten signature in black ink, appearing to read 'Susan Parsonage', written in a cursive style.

Susan Parsonage
Chief Executive
Published on 13 December 2019

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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

Wayne Smith, Executive Member for Planning and Enforcement

Officers Present

Ian Bellinger, Category Manager for Growth and Delivery (Strategy and Commissioning: Place)

James McCabe, Specialist Strategy & Commissioning Place

Callum Wernham, Democratic & Electoral Services Specialist

IMD NO.	WARD	SUBJECT
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IMD 2019/30	None Specific	WOKINGHAM BOROUGH COUNCIL RESPONSE TO THE BRACKNELL FOREST COUNCIL DRAFT LOCAL PLAN REVISED GROWTH STRATEGY CONSULTATION	5 - 12
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CONTACT OFFICER

Callum Wernham

Tel

Email

Postal Address

Democratic & Electoral Services Specialist

0118 974 6059

callum.wernham@wokingham.gov.uk

Civic Offices, Shute End, Wokingham, RG40 1BN

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Agenda Item IMD30

INDIVIDUAL EXECUTIVE MEMBER DECISION

REFERENCE IMD: IMD 2019/30

TITLE	Wokingham Borough Council response to the Bracknell Forest Council Draft Local Plan Revised Growth Strategy Consultation
DECISION TO BE MADE BY	Executive Member for Planning and Enforcement - Wayne Smith
DATE, MEETING ROOM and TIME	23 December 2019 FF13 at 10.00am
WARD	None Specific;
DIRECTOR / KEY OFFICER	Deputy Chief Executive - Graham Ebers, Director of Locality and Customer Services - Sarah Hollamby

PURPOSE OF REPORT (Inc Strategic Outcomes)

To ensure that Bracknell Forest Council's review of its planning policies leads to a strategy which has minimal negative impacts upon Wokingham Borough and that any positive benefits are maximised.

RECOMMENDATION

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

- 1) Seeks further clarification around whether the proposed housing allocations are sufficiently flexible to meet housing needs in full;
- 2) Seeks further clarification around how the identified accommodation needs for the Gypsy and Traveller community will be addressed in full within Bracknell Forest Borough;
- 3) Expects that Bracknell Forest will work closely with Wokingham Borough Council 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 (BFC) are progressing a review of its planning policies, with consultation on a Revised Growth Strategy being held between 25 October and 6 December 2019. This report sets out a recommended response to the consultation.

BFC are planning to meet their housing needs in full, however, the Revised Growth Strategy there is uncertainty whether the plan provides sufficient flexibility to ensure delivery. One site is reliant on allocation within a Neighbourhood Plan.

Whilst the proposed allocation at Jealotts Hill would provide greater capacity, Wokingham Borough Council (WBC) would encourage BFC to consider identifying further supply to ensure the growth strategy contains sufficient flexibility to deal with changes in future housing requirements or unknown issues in deliverability.

Four of the proposed housing allocations are in proximity to the Wokingham Borough boundary. WBC would welcome the opportunity to discuss cross-boundary strategic issues such as traffic and transport impacts associated with development at these locations to ensure these are suitably mitigated.

With regards to Gypsy and Traveller accommodation needs, it is not clear how BFC proposes to meet its need. WBC expects that identified needs are met in full within Bracknell Forest borough.

Background

Bracknell Forest Council (BFC) are progressing a review of their adopted planning policies.

Two consultations have been undertaken to date:

- In February / March 2018 BFC consulted upon a Draft Local Plan. The draft plan set out the long-term vision for the development of Bracknell Forest Borough up to 2034, included proposed development management policies, and identified proposed site allocations for various uses.
- In September 2018, a further, focussed, consultation was undertaken seeking views on two newly promoted sites which BFC considered as having potential for allocation.

BFC is now consulting on a Revised Growth Strategy. The consultation period is 25 October 2019 to 6 December 2019. This, as with the previous consultations referred to above, is a Regulation 18 consultation under the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

The consultation plan documents are split into two parts:

- Part 1 Strategic Revised Growth Strategy presents a new approach to managing development. The presented approach includes some significant changes to the strategy previously set out in the earlier consultation held in 2018 (further details are provided below under 'Analysis of Issues').
- Part 2 presents development management policies.

The draft plan period has been extended to cover the period to 2036.

Business Case (including Analysis of Issues)

Housing need and supply

BFC are planning to meet their housing need, however how this is defined has changed since the consultations held in 2018.

In 2018, the housing need for Bracknell Borough was calculated as 670 dwellings per annum (pa). As of April 2019, the housing need calculates as 615 dwellings pa. This equates to a total of 10,455 additional homes in the period 2019 – 2036.

The Revised Growth Strategy Policy LP3 – 'Provision of housing' states that:

'Provision will be made for at least an additional 10,455 homes in Bracknell Forest Borough for the period 2019/20 to 2035/36.'

Taking account of existing commitments, allocations and anticipated windfall developments, a land supply for a further 1,702 dwellings is required. Applying a flexibility buffer this rises to 1,877 dwellings.

Analysis of proposed allocations to meet this is provided below under 'Proposed site allocations'.

Unmet housing need from Reading Borough

Reading Borough Council's (RBC) recently adopted Local Plan (November 2019) identifies a shortfall of 230 dwellings over the plan period 2013 – 2036. This is a reduction from 644 dwellings identified in RBC's proposed submission plan.

BFC's previous draft plan made reference to the shortfall from Reading and the need for the Berkshire authorities to work together to accommodate this need. WBC's response to Bracknell's draft plan set out that, given Wokingham Borough has a significantly higher housing need than its neighbouring Berkshire authorities, it was expected that BFC and West Berkshire would accommodate the unmet need from Reading in full. However, since that time, it is our understanding that the modest shortfall in Reading's local plan has effectively been removed when more recent assessments of housing need are considered.

Proposed site allocations

The Revised Growth Strategy housing/mixed use allocations are set out in Policy LP4. This sets out that 2,028 dwellings will be delivered through allocations, of which approximately 1,250 dwellings will be delivered on mixed use sites within Bracknell Town Centre (an increase from 1,051 dwellings suggested in the previous consultation plans). 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, including connectivity to towns outside of Bracknell Forest such as Wokingham and Reading.

Included within the overall allocation figures is a site in Warfield for 235 dwellings which is identified in the submission version of the Warfield Neighbourhood Plan, which has been submitted for examination. It is understood that examination proceedings have paused due to the lack of an Appropriate Assessment. Therefore, uncertainties remain around the deliverability of this site which, if removed from supply, would mean BFC would not be able to meet its identified allocations need including 10% flexibility buffer.

As highlighted in WBC's previous response to BFC's draft plan consultation in March 2018, the following proposed residential allocations either border or are close to Wokingham Borough and are therefore likely to have impacts on this borough:

1. LP4 – Land at the Hideout and Beaufort Park, Nine Mile Ride (226 dwellings)
2. LP3 – Land east of Wokingham Road and south of Dukes Ride (Derby Field) (217 dwellings)
3. LP3 – A cluster of separate sites around Binfield: BIN1, BIN5, BIN10, BIN12, BIN16, BIN20 (together amounting to 222 dwellings)

The Land at Hideout and Beaufort Park is one of a handful of sites identified in LP4 which has its own specific policy (LP5 in this case) due to it having 'specific requirements' or because it is in multiple ownership. LP5 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. It is noted that the site capacity has been significantly reduced from 570 proposed in the BFC draft plan to 226 dwellings. Notwithstanding, the site would generate significant extra trips onto this road which would impact upon WBC's wider road network.

Additionally, it is noted that the site 'Land east of Wokingham Road and south of Dukes Ride (Derby Field)' partly extends into Wokingham Borough (and has been promoted through WBC's call for sites process as site 5FI046¹). The plan proposes a developable area for the site that is wholly within Bracknell Forest Borough, with the portion of the site within Wokingham Borough left over as open space. WBC notes that the site is sustainably located next to Crowthorne train station where potential residents of the site would be able to walk to access trains towards Reading and Gatwick. Notwithstanding, it should be noted that there are capacity issues with the train station car park, which has led to on street parking impacts on local roads within Wokingham Borough. WBC encourages BFC to progress options to improve Crowthorne station parking capacity as part of the infrastructure package to support the plan. The Infrastructure Delivery Plan (overview provided in subsequent section) already includes measures to improve capacity of Crowthorne High Street; improve cycle/walk connections to the train station; improve public transport links to Bracknell; among others. Given the site is part located within Wokingham Borough, WBC would expect development to contribute to necessary local road improvements within Wokingham Borough, particularly Wellingtonia Roundabout and Dukes Ride.

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.

Going forward there is a need for both BFC and WBC 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.

Proposed Green Belt release (Syngenta)

The Revised Growth Strategy promotes a new allocation of a 240 hectare site at Jealotts Hill for a comprehensive mixed use development based on 'Garden Settlement' principles and which is also intended to be zero net carbon development. The site is currently occupied by Syngenta, which is a multi-national agricultural technology company.

For clarity, this proposed allocation would be in addition to the identified housing supply set out above. BFC is not relying on delivery of this site to contribute towards its identified needs. The proposed allocation includes:

1. 4,000 new homes (of which 1,200 are expected to be delivered within the plan period to 2036);

¹ See map of promoted sites here:

<https://wokingham.maps.arcgis.com/apps/webappviewer/index.html?id=4108644c82ca42a99eb395687ac134ca>

2. 132,800 sq metres of employment floorspace, including a Science and Innovation Park;
3. 60,600 sq metres employment floorspace for the existing occupiers;
4. Three primary schools and one secondary school;

The site is located wholly within the Metropolitan Green Belt and therefore exceptional circumstances will need to be demonstrated to release land for development.

Conclusion on site allocations

WBC notes that the identified land supply in the Revised Growth Strategy is only marginally greater than the identified need – being 10,777 (based on the information from table 1 and allocations in policy LP4) compared to a need for 10,455. It is noted that the housing requirement set out in LP3 does not include any buffer on top of the identified 10,455 dwellings. WBC therefore has concerns that the identified supply does not have the appropriate flexibility to cope in the event sites are not delivered as envisaged.

Additionally, the adequacy of the land supply is reliant on a large site which is proposed for allocation in the Warfield Neighbourhood Plan around which there are uncertainties of delivery.

Whilst the proposed allocation at Jealotts Hill would provide greater flexibilities, WBC would encourage BFC to consider identifying further supply to ensure the growth strategy contains sufficient flexibility to deal with changes in future housing requirements or unknown issues in deliverability.

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 does not specifically identify sites to meet the PPTS need or wider cultural need, though it is stated that other sites are being considered at the time of writing, presumably through the planning application process, that would 'meet the outstanding need'. The previous draft consultation included a criteria based policy (LP26) against which applications for new pitches were to be assessed. WBC commented at that time that the policy was not positively worded given it required an identified need to be demonstrated in order for development proposals to be supported, which was contrary to national policy. This wording has been removed in the latest draft criteria based policy (titled Gypsies, travellers and travelling showpeople). However, the previous draft plan policy did include the provision that '*The Council will make provision for five additional Gypsy and Traveller pitches to meet the accommodation needs of Gypsies and Travellers in the Borough*'. The updated policy no longer includes a commitment to provide a defined number of pitches and it is therefore unclear in the current consultation plan exactly how, and if, identified needs will be met.

WBC expects BFC to meet its Gypsy and Traveller need in full. WBC further encourages BFC to explore options for meeting the identified wider cultural need through the plan making process in line with the requirements set out in the National Planning Policy Framework.

Infrastructure

The Revised Growth Strategy contains a high level chapter relating to Infrastructure which sets out the ways in which funding for necessary infrastructure may be secured. It is noted however that there is no key diagram indicating what the required key pieces of infrastructure are considered to be.

It 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 updated IDP has been produced alongside the plan consultation. This lists required infrastructure for each of the sites proposed for allocation. It is noted that numerous junction and road capacity improvements are proposed alongside sustainable transport measures. Specific junctions are identified along with associated costings, but the exact details will be determined following the submission of a Transport Assessment at the planning application stage.

WBC is committed to keeping the borough moving. The level of growth proposed in the BFC plan 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.

Conclusion

It is recommended that WBC seek further clarification from BFC on the issues of the identified housing land supply and the Gypsy and Traveller accommodation supply.

FINANCIAL IMPLICATIONS OF THE RECOMMENDATION

The Council continues to face severe financial challenges over the coming years as a result of reductions to public sector funding and growing pressures in our statutory services. It is estimated that Wokingham Borough Council will be required to make budget reductions of approximately £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?
Current Financial Year (Year 1)	Nil	Yes	n/a
Next Financial Year (Year 2)	Nil	Yes	n/a
Following Financial Year (Year 3)	Nil	Yes	n/a

Other financial information relevant to the Recommendation/Decision
None anticipated

Cross-Council Implications
None anticipated

Public Sector Equality Duty
Due regard has been had to the Public Sector Equality Duty in reviewing and responding to this consultation.

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

Reasons for considering the report in Part 2
N/A

List of Background Papers
Information published by Bracknell Forest Council relating to the Draft Local Plan– see: https://consult.bracknell-forest.gov.uk/portal/planning/bracknell_forest_council_local_plan_-_revised_growth_strategy_october_2019

Contact James McCabe	Service Place Commissioning
Telephone No Tel: 0118 908 8333	Email james.mccabe@wokingham.gov.uk