

TITLE	Local Plan Update: Draft Plan Consultation
FOR CONSIDERATION BY	The Executive on Wednesday, 15 January 2020
WARD	None Specific;
LEAD OFFICER	Director of Locality and Customer Services - Sarah Hollamby
LEAD MEMBER	Executive Member for Planning and Enforcement - Wayne Smith

PURPOSE OF REPORT (INC STRATEGIC OUTCOMES)

The purpose of this report is to seek Executive's approval to carry out consultation on a Local Plan Update (LPU): Draft Plan, the document that will guide how development will be managed. Once adopted, the LPU will replace the Council's current planning policies that are set out in the Core Strategy and Managing Development Delivery (MDD) local plans. Adoption of the LPU will enable the production of subordinate or supplementary planning guidance such as the Borough Design Guide, which just be based on adopted planning policy.

The Regulations governing the preparation of local plans require that plans are prepared in consultation with the local community and other stakeholders.

RECOMMENDATION

That the Executive:

- 1) agree the Local Plan Update: Draft Plan (as set out in Appendix 2 to the report) and other supporting documents for consultation;
- 2) agree the proposed consultation framework;
- 3) agree that any minor changes to the Draft Plan and material produced to support the consultation be delegated to the Director of Locality and Customer Services, in consultation with the Lead Member for Planning and Enforcement; and
- 4) adopt the Local Development Scheme 2019 (as set out in Appendix 3 to the report)

EXECUTIVE SUMMARY

It is a requirement to regularly review and where necessary update local plans – the documents that contain a council's planning policies and are used as the starting point for determining planning applications. Whilst the Core Strategy and Managing Development Delivery local plans are still working to manage development within Wokingham Borough, they are intended to do this to 2026.

The preparation of a new local plan – the Local Plan Update (LPU), will look further forward and so ensure that our planning policies continue to be effective in managing decisions by the council, and where these are appealed, by Planning Inspectors.

Without effective planning policies, there would be no real control or influence over where and how new housing and other types of development take place.

Local plans must be prepared in consultation with the local community and other stakeholders. The next stage of preparing the LPU is consultation on a Draft Plan which sets out the proposed vision, objectives and strategy for how development is managed. This is proposed to start no later than 3 February and end 20 March

Through consultations held to date, respondents have expressed clear preferences for development needs to be met through large scale developments, where infrastructure can be planned, funded and provided alongside and for infrastructure to be provided early, and where possible, ahead of development.

The draft vision for the LPU is:

- I. A borough that focuses on the needs of our residents
- II. A borough that will be sustainable for years to come.
- III. A borough where people choose to live, learn and work because the places we build and the places we protect are valued and enriching.

The draft vision has had regard to the views expressed to date, and are in line with the priorities of the emerging Council Plan.

Analysis of the housing market clearly shows a number of failings with the way the government has calculated the minimum number of homes a council must plan for. A case will be advanced to demonstrate exceptional circumstances exist to deviate from the normal application of this government planning policy reducing the requirement to 769.2 dwellings per annum. We will review and adjust this figure downwards if the future circumstances permit.

In line with the expressed preference of residents, the draft development strategy seeks to meet the majority of development needs through the continued delivery of our existing strategic development locations as defined and specified in the Core Strategy adopted in 2010, and through the creation of a garden town at Grazeley. This has been endorsed by the cross party Planning and Transport Policy Member Working Group as the most sustainable and suitable option. The Grazeley proposal will provide a significant supply of housing beyond the plan period of 2036, into the 2050s, helping to reduce or eliminate the need for large scale development elsewhere. It also allows opportunity for the SDL developments to fully form and mature.

With the delivery of a highly sustainable garden town at Grazeley, only a handful of the 300+ areas of land promoted by landowners for development are required for allocation. Due to the proximity of Grazeley to the Shinfield/Spencers Wood/Three Mile Cross SDL, the spatial strategy expressly seeks to provide a protective buffer in the form of a limitation to further large scale development in this area.

The Draft Plan also proposes a wide range of planning policies to ensure its quality and to protect the environment. These include policies in response to the challenge of climate change, air quality, and the identification of a brand new (nationally) type of local plan designation to bring protection to valued landscapes and Local Green Spaces. The Draft Plan also seeks to secure a high proportion of affordable housing to assist those who are unable to access suitable housing via the market.

Whilst separate to the local plan process, we know through the 'Enough is Enough' campaign, that residents have concerns over the scale of house building being required by government. The council will continue to convey to government the strength of public feeling and frustration in this regard and to try to ensure that future changes to the planning system are more sensitive and reflective of places, and recognise that local authorities that deliver new housing are given greater assurances that local decisions will be respected and upheld.

A key part of this is to continue its dialogue with government through the Garden Settlement Programme and the HIF bid with a view to securing freedoms and flexibilities in recognition of our housing delivery.

BACKGROUND

The Council's current planning policies are contained in the Core Strategy (adopted 2010) and Managing Development Delivery (MDD) (adopted 2014) local plans.

Councils are required to regularly review and where necessary update their local plans. Whilst the Core Strategy and MDD are still working to manage development now, they are intended to do this to 2026. While they contain some flexibility to coordinate development for a longer period, the preparation of a new local plan – the Local Plan Update (LPU) - looking further forward will ensure that planning policies continue to be effective in managing decisions by the council, and where these are appealed, by Planning Inspectors.

Without effective planning policies, there would be no real control or influence over where and how new housing and other types of development take place. This could lead to housing and other forms of development being allowed in poor locations, being of lower quality, and in places where infrastructure cannot be improved to help deal with the impacts, e.g. pressures on roads, schools and community facilities. The lack of control and coordination is likely to lead to a higher scale of housebuilding across the borough, as has been experienced in the period before the adoption of the Core Strategy local plan.

CONSULTATION

Local plans must be prepared in consultation with the local community and other stakeholders. The council previously consulted on an Issues and Options in 2016 and the Homes for the Future Consultation in 2018/2019.

Through these consultations, respondents have clear preferences. These include:

- Preference for development needs to be met through large scale developments, where infrastructure can be planned, funded and provided alongside.
- Preference for large developments to be located where there is good accessibility to transport links, they are adjacent to existing settlements and ensures the delivery of new infrastructure.
- Recognition that a range of approaches are required to meet development needs, including size of site and location across the borough.
- Preference for infrastructure to be provided early, and where possible ahead of development, to limit limits.
- Acknowledgement of the need to understand changes in the employment and retail markets, and allowing areas to adapt positively to future requirements.
- The need to protect the identity of places, and the role of the countryside and Green Belt in achieving this,

Further details are provided in the Statement of Consultation (see Appendix 1 - available via the Council's website or on request from Democratic Services).

NEXT STEPS

The next stage of preparing the LPU is consultation on a Draft Plan, setting out the proposed vision, objectives and strategy for how development is managed. The proposed consultation will facilitate further engagement, with comments received helping to confirm or refine the policy approaches and allocations.

The amended Plan will be subject to further consultation and subsequently submission to the government for examination later this year.

DRAFT PLAN OVERVIEW

The strategy and policies presented in the Draft Plan has been guided and endorsed by the cross party Planning and Transport Policy Member Working Group. The full Draft Plan is provided in Appendix 2 (available via the Council's website or on request from Democratic Services).

Vision and objectives

Establishing a vision is the starting point for the LPU, in that it sets out the broad philosophy of what is trying to be achieved. To aid the delivery of the draft vision, a number of strategic objectives have been defined.

The draft vision is:

- I. A borough that focuses on the needs of our residents
- II. A borough that will be sustainable for years to come.
- III. A borough where people choose to live, learn and work because the places we build and the places we protect are valued and enriching.

Whilst the LPU looks towards 2036, the vision takes a much longer term view.

The strategic objectives include:

- Making the fullest contribution possible to the mitigation of, and adaptation to, climate change and the transition to a low-carbon economy.
- Reduce the need to travel and widen travel choice, by providing local opportunities to access learning and employment, services and facilities, through ensuring that options for walking, cycling and public transport are attractive, accessible for all, convenient and safe, and by enabling digital connectivity.
- Maintain and strengthen the sense of place by securing quality designed development through protecting and enhancing the distinctive historic environment, landscape character, townscape character and biodiversity value, assisting vibrancy, and by keeping settlements separate.
- Champion thriving town and local centres to provide the focus of their communities both in social and economic activity, ensuring they can adapt to the challenges they face.
- Enable conditions to allow the economy to creatively grow by being adaptable to structural and technological change, ensuring the economic benefits are felt by all.
- Facilitate timely provision of new and improved infrastructure by working with providers to achieve focused investment and by securing appropriate benefits from new development.

The draft vision and strategic objectives has had regard to the views expressed to date, and are in line with the priorities of the emerging Council Plan.

Development needs

The National Planning Policy Framework (NPPF) sets out the government's planning policies for England and how these should be applied. It is a requirement that local plans are consistent with the NPPF.

Paragraph 11 of the NPPF states that local plans should positively seek opportunities to meet the development needs of the area, and that the strategic policies within them should, as a minimum, provide for objectively assessed needs for housing, as well as needs that cannot be within neighbouring areas.

Paragraph 60 states the minimum number of homes needed, should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.

Demonstrating exceptional circumstances requires the presentation of a set of factors that come together to justify diverting from the normal application of national planning policy and guidance. There is no formal definition or standard set of assessment criteria.

Analysis of the housing market clearly shows a number of failings with the standard method as it applies in the context of Wokingham Borough. These include the impact of new house building increasing the median house prices (contrary to the premise of the standard method), and the failure to recognise the geographical and functional relationship between Wokingham Borough and Reading and the associated impact on median workplace earnings.

When these factors are addressed in the standard method calculation, local housing need calculates as 769.2 dwellings per year from April 2019. Applying the standard method unaltered results in a local housing need of 804 dwellings per year. The concerns expressed by residents earlier this year (see the section 'Safeguards of the Plan-Led System' below) were in response to a housing requirement of 800-900 dwellings per year. The 769.2 dwelling figure is substantially lower. We will review and adjust this figure downwards if the future circumstances permit.

Spatial strategy and sites proposed for allocations

The strategy established by our existing local plans – the Core Strategy and MDD focus the majority of development in the four Strategic Development Locations (SDL) (North and South Wokingham, Arborfield Garrison and Shinfield/Spencers Wood/Three Mile Cross), with a lesser level of development supported within towns and villages subject to consideration of accessibility and impacts. This approach has enabled significant new infrastructure to be delivered alongside new homes so helping to mitigate impacts and allowing us opportunity to retain the character of our towns and villages through actions such as the retention of gardens.

The four SDLs will continue to make a significant contribution to meeting housing needs in the LPU. Further land is required to help meet the longer term needs and to address a new government requirement that a proportion of new housing is delivered on small sites under one hectare.

In line with the expressed preference of residents, an assessment of strategic scale development opportunities has been undertaken. This shows that the creation of a garden town at Grazeley is the most sustainable and suitable option to meet the majority of additional housing needs in the plan period to 2036 and beyond into the 2050s. It offers the opportunity to create new community, well supported by infrastructure so limiting the need to travel by car for everyday journeys, and with rail link to both Reading and Basingstoke, and dedicated public transport routes into Reading, providing a viable alternative to the car.

The proposal to create a Grazeley garden town was unanimously supported by the cross party Planning and Transport Policy Member Working Group.

The creation of the garden town has been investigated jointly with West Berkshire District Council and Reading Borough Council. It has the potential to deliver 10,000 dwellings within Wokingham Borough and 5,000 dwellings in West Berkshire District over an extended period.

To achieve the upfront delivery of key infrastructure, again a key priority of residents, a joint bid to the government's Housing Infrastructure Fund (HIF) has been made for £252m. A successful outcome will enable the upfront delivery of a wide package of infrastructure including measures designed to mitigate traffic effects.

The delivery of a garden town at Grazeley supplements the existing SDLs and similarly reduces or eliminates the need for large scale development on the edge of other towns and villages. It also allows opportunity for the SDL developments to fully form and mature.

Due to the proximity of Grazeley to the Shinfield/Spencers Wood/Three Mile Cross SDL, the spatial strategy expressly seeks to protect this area with a buffer to limit further large scale development in this area. This provides some assurance regarding further unplanned change in the area, and seeks to overcome issues of displacement, where housing markets compete to the detriment of delivery.

With the continued delivery of existing SDL as originally defined in the Core Strategy local plan adopted in 2010 (with minor amendments) and the proposed allocation of Grazeley garden town, only a handful of the 300+ areas of land promoted by landowners for development are proposed for allocation for further housing development (18 sites, providing a minimum of 940 dwellings) and all these have been discussed with and are preferred by the relevant town and parish council. These are spread across the borough, and include the continued support for the regeneration of Wokingham town centre.

Other key policy areas

Many of the draft policies in the Draft Plan provide a continuation of the current policy approach. However, in line with the above-mentioned vision and objectives, the Draft Local Plan includes some changes. These include the following policy areas.

a) Climate change (new policy area)

Climate change is challenging the way we do things and, by declaring a climate emergency, the Council has committed itself to leading by example.

By locating the majority of development in places that reduce car dependency will help achieve this. In addition, the Draft Plan proposes a range of policies that seek to make the fullest contribution towards transitioning to a low carbon society. These will include requiring all new major developments to be carbon neutral and a permissive approach towards renewable energy generation provided the impacts are acceptable.

b) Valued landscapes (new protective policy)

In line with the objective of strengthening the sense of place, objective analysis has been undertaken to create a framework of valued landscapes. These are landscapes where a combination of attributes show them to be particularly important. In total, the Draft Plan proposes the designation of 10 valued landscapes.

c) Local Green Space (new protective policy)

The NPPF introduced a new optional designation of Local Green Space (LGS). This allows communities to identify and protect green areas of particular importance to them. The Draft Plan proposed the designation of 12 LGS, helping to ensure that the value of these areas are reflected in the consideration of any development proposals.

d) Affordable housing

Access to affordable, high quality housing is a challenge for people living and working in the borough, and in particular the young given that they are more likely to be on lower incomes. In recent years, the supply of affordable housing in the borough has increased significantly, largely due to delivery across the four existing SDL, with delivery being one of the highest in England. Despite this, the net need for affordable housing remains high.

The government advises through the NPPF that the provision of affordable housing should not be sought from developments of 9 or less dwellings, other than in designated rural areas.

The strategy established by our existing local plans – the Core Strategy and MDD require proportionate provision from developments of 5 or more dwellings. Given the ongoing need for affordable housing, the Draft Plan proposes to continue seeking a proportion of affordable housing from schemes below the government's advice.

e) Air quality

Air quality will be a key consideration when looking at proposed developments, with applicants required to provide information and ensure air quality is maintained.

f) Rural exceptions

Rural exception sites are scale developments for affordable housing on land that would not normally be acceptable for housing. They are used to meet specific local housing need. We will actively promote this type of development to local communities.

Sustainability Appraisal

All local plans are required to be appraisal through a Sustainability Appraisal (SA) and subject to a Habitat Regulations Assessment (HRA).

The SA considered ways that the plan can contribute to improvements in environmental, social and economic conditions; as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have. In doing so, it helps make sure that proposals in the plan are appropriate given reasonable alternatives.

Alternatives to a garden settlement at Grazeley explored through the SA include building more homes in or adjacent to the Shinfield/Spencers Wood/Three Mile Cross SDL, Arborfield Garrison SDL, and along the A4 corridor including the release of land from the Green Belt at Twyford / Ruscombe.

The HRA considers potential impact of the plan on sites of international importance to nature consideration, including Special Protection Areas and Special Areas of Conservation. In doing so the HRA ensures the proposals in the plan maintain the integrity of these important sites.

PROPOSED CONSULTATION FRAMEWORK

The council is required under the Regulations governing the preparation of local plans to consult with key stakeholders. The arrangements adopted by the council are expressed in the Statement of Consultation (SCI).

Taking the Regulatory and SCI requirements into account, the following actions are proposed:

Consultation will start no later than 3 February and end 20 March 2020.

The consultation will involve the following:

- Notification of all those on the existing Planning Policy consultation database;
- Notification to all those people and organisations registered on the major development sites, vulnerable groups information databases;
- Making the documents available on:
 - The Council's website;
 - At the Shute End offices;
- Distributing a summary leaflet to households across the borough via Royal Mail;
- Using social and traditional media to promote the consultation;
- Staffing four drop-in sessions across the borough in keeping with the proposed development strategy.

Whilst the drop-in events will focus on the Draft Local Plan, the events will also be attended by the council's transport planning team who will be seeking views on transport issues across the borough. The views gathered will assist with the preparation of the Local Transport Plan. This will look at issues including roads, congestion, public transport, cycling and walking across the borough.

SAFEGUARDS OF THE PLAN-LED SYSTEM

Separate to the local plan process, through the 'Enough is Enough' campaign lead by elected Members, we know that residents have strong concerns over the scale of house building being required by government (800-900 dwellings per year). The council will continue to lobby the government showing the strength of public feeling and frustration in this regard and to try to ensure that future changes to the planning system are more sensitive and reflective of places, and recognise that local authorities that deliver new housing are given greater assurances that local decisions will be respected and upheld.

A key part of this is to continue its dialogue with government through the Garden Settlement Programme and the HIF bid with a view to securing freedoms and flexibilities in recognition of our housing delivery.

LOCAL DEVELOPMENT SCHEME

A Local Development Scheme (LDS) is a public statement of the programme for the production of local plans required by Regulations governing the planning system.

Since the publication of the last LDS in 2018, there has been a change in circumstances, resulting in the need to revise the programme. This includes the decision to undertake a further consultation on the joint minerals and waste local plan being prepared with Bracknell Forest Council, Reading Borough Council, and the Royal Borough of Windsor and Maidenhead; and to reflect the timing of the Draft Plan consultation.

Amending the LDS will ensure that residents and others are able to understand when future stages in plan preparation are anticipated. An amended LDS is provided in Appendix 3 (available via the Council's website or on request from Democratic Services).

BUSINESS CASE

The council is required under legislation and national planning policy / guidance to maintain an up-to-date local plan. The next stage of preparing the LPU is consultation on a Draft Plan. The proposed consultation will facilitate further engagement. The Draft Plan provides sustainable strategy that will allow for a new local plan to be progressed on a sound basis

Clearly as part of a consultation and engagement process, the comments received will help to confirm or refine the policy approaches and allocations, prior to the plan being submitted to the government for examination. Changes in national policy and guidance will also need to be considered and may lead to amendments.

To achieve the upfront delivery of key infrastructure, again a key priority of residents, a joint bid to the government's Housing Infrastructure Fund (HIF) has been made for £252m. The proposed plan is based on a successful bid. In the event that the bid is unsuccessful, consideration will need to be given to the delivery profile of housing to ensure adequate supply is maintained. This may require amendments to the proposed strategy.

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)	Circa 315k	Yes	Revenue
Next Financial Year (Year 2)	Circa 350k	Yes	Revenue
Following Financial Year (Year 3)	Circa 150k	Yes	Revenue

Other Financial Information

The table above sets out the project costs associated with producing the Local Plan Update.

This is a multi-year project and therefore the costs will be spread across a number of financial years, the exact timing of which will be subject to external influences such as the Planning Inspectorate's availability for the examination. The profile of the budget may vary according to external other factors, and unless exceptional costs arise, is expected to be covered by agreed budgets.

Not progressing the Local Plan Update will result in increased costs through the planning application and appeal process.

Stakeholder Considerations and Consultation

The Draft Plan has had regard to the outcome of earlier consultations alongside technical studies and assessments. The proposed consultation on the Draft Plan will facilitate further engagement, with comments received helping to confirm or refine the policy approaches and allocations.

The proposed consultation framework is based on the council's adopted Statement of Community Involvement.

Public Sector Equality Duty

An Initial Impact Assessment is attached.

List of Background Papers

- [National Planning Policy Framework](#)
- [Planning Practice Guide: Housing and Economic Needs Assessments](#)
- [LPU Issues and Options \(Aug 2016\)](#)
- [Issues and Options Summary of Responses](#)
- [Homes for the Future \(Nov 2018 - Feb 2019\)](#)
- [Wokingham Strategic Growth Locations Report June 2018](#)
- Housing Infrastructure Fund bid

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