INDIVIDUAL EXECUTIVE MEMBER DECISION
REFERENCE IMD: IMD 2021/04

TITLE	West Berkshire – Local Plan Review Emerging Draft consultation
DECISION TO BE MADE BY	Executive Member for Planning and Enforcement - Wayne Smith
DATE, **MEETING ROOM and TIME**	27 January 2021 Virtually at 10.30am
WARD	None Specific;
DIRECTOR / KEY OFFICER	Director, Place and Growth - Chris Traill

PURPOSE OF REPORT (Inc Strategic Outcomes)

To consider the council's response to West Berkshire Council's 'Local Plan Review – Emerging Draft consultation' running from 11 December 2020 to 5 February 2021 to ensure it has minimal negative impacts upon Wokingham Borough and that any benefits are maximised.

RECOMMENDATION

The Executive Member for Planning and Enforcement agrees that Wokingham Borough Council submits the comments contained in this report as this council's response to the West Berkshire District Council consultation 'Local Plan Review – Emerging Draft consultation' (December 2020):

1) Support for West Berkshire Council's intent to meet housing needs in full within West Berkshire District;
2) Reiterates that any potential unmet housing need from Reading Borough Council should be clarified and addressed within West Berkshire District and/or Bracknell Forest;
3) Requests additional clarity on the approach to proposed allocations which fall within the Detailed Emergency Planning Zone around AWE Burghfield;
4) Requests additional clarity over how Gypsy and Traveller and Travelling Showperson needs are to be met in full over the plan period;
5) Requests additional clarity on how or whether employment needs are to be met in full accounting for the longer plan period compared to the economic evidence base, as well as additional clarity on how and where office floorspace need will specifically be addressed;
6) Requests ongoing engagement as part of the Duty to Cooperate regarding infrastructure necessary to support the proposed growth.

SUMMARY OF REPORT

West Berkshire District Council (WBDC) is progressing a review of its planning policies through work on the emerging 'Local Plan Review' which will cover the period 2020-2037. The emerging draft plan (the Plan), which includes a proposed spatial strategy and development sites, is subject to public consultation to 5 February 2021. This report sets out a recommended response to the consultation.

The Plan proposes major new residential growth on land south of Newbury and north east of Thatcham, alongside a number of smaller sites. Development is also proposed in existing urban centres, by maximising the use of brownfield land, and optimising development densities. Following the extension of emergency planning arrangements around AWE Burghfield, there is no proposed allocation relating to Grazeley garden town which was jointly investigated by WBDC, Reading Borough Council (RBC) and Wokingham Borough Council (WBC), with the support of Homes England and the Ministry of Housing and Local Government.

Using the government's standard method to calculate housing need, the Plan sets out a strategy which is capable of accommodating, and modestly exceeding, the housing needs in full within WBDC. However, there is a need to clarify the issue of unmet need from RBC. WBC is not in a position to assist with any unmet housing need and would expect this to be addressed, if necessary, by WBDC and Bracknell Forest Council (BFC).

As regards Gypsy and Traveller provision, a target has been identified for additional pitches required over the plan period. The Plan sets out proposed allocations to contribute to this need, but it is unclear how needs will be met in full over the plan period.

Additionally, the Plan sets out WBDC's targets for employment floorspace. This broadly accords with the employment evidence, but there are some uncertainties about whether the extra year's need from the extended plan period to 2037 has been factored in and how / whether office need will be met in full.

Infrastructure evidence required to support and mitigate the impacts of the development proposed is still evolving. WBDC will need to engage with WBC as this work progresses in order for any cross-boundary implications to be understood.

This report recommends that WBC support WBDC's position to meet its own housing need in full and that clarification be sought regarding the approaches to Gypsy and Traveller accommodation needs, employment need, and infrastructure provision.

Background

West Berkshire District Council (WBDC) is progressing a review of its adopted planning policies, called the Local Plan Review (LPR). Currently the process is at an early stage.

WBDC has now published its emerging draft plan (the Plan) for consultation. 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 WBDC up to 2037 and includes proposed development management policies and proposed site allocations for various uses. The plan period has been extended to 2037 in order to look ahead a minimum of 15 years from adoption, which is programmed for 2022. The consultation runs until 5 February 2021.

The Plan follows on from two earlier consultations:

- In February / March 2018: Scope and content of the LPR
- In November / December 2018: A proposed Vision for the LPR, and revisions to the emerging evidence base.

This consultation is supported by a number of documents, including an Interim Sustainability Appraisal, Transport Assessment, Density Pattern Book and a Site Selection Background Paper.

Business Case (including Analysis of Issues)

<u>Housing need and supply</u>

Using the government's standard method, housing need within WBDC calculates as 513 dwellings per annum (dpa) at 1 April 2020. This equates to a total of 8,721 additional homes in the period 2020 - 2037.

Policy SP 12 – 'Approach to Housing Delivery' states that:

'*Provision will be made for 8,840 to 9,775 net additional homes in West Berkshire for the period 1 April 2020 to 31 March 2037; 520– 575 dwellings per annum.*'

The minimum provision of homes under Policy SP 12 exceeds the current calculation of housing need (513dpa), being based on the slightly higher outcome of the 2019-based calculation (520dpa). This, and the range up to 575dpa, provides some flexibility to changes in the calculation of housing need.

Notwithstanding, Policy SP 12 notes that 575 is not a ceiling or cap to development. Ultimately, the Plan seeks to meet and exceed the current calculation of housing need in full in accordance with national policy and guidance.

Taking account of existing commitments, allocations and anticipated windfall developments (which together total 8,114 dwellings), a land supply for a further 1,661 dwellings is needed against the requirement of 9,775 homes. This figure reflects the upper end of the range (i.e. 575 dpa) to allow for flexibility over the lower figure for non-delivery, phasing issues, etc. Analysis of the proposed spatial strategy and allocations to meet this is provided below under 'Proposed spatial strategy and housing site allocations'.

The government's December 2020 changes to the standard need formula have no direct impact on WBDC.

On the issue of housing need and supply, it is recommended that Wokingham Borough Council (WBC) acknowledges and supports the WBDC position that need will be met in full within the district over the plan period.

Unmet housing need from Reading Borough Council

Reading Borough Council's (RBC) Local Plan (adopted November 2019) identifies a shortfall of 230 dwellings over the plan period 2013 – 2036 against the housing need identified within the Berkshire Strategic Housing Market Assessment (2016).

WBDC states in the Plan and supporting documents that there has been no request from other local authorities within the Western Berkshire Housing Market Area (HMA) (i.e. Bracknell Forest Council (BFC), RBC and WBC) to accommodate any unmet need and that the potential shortfall from RBC no longer exists.

Recent statements by the Deputy Leader for RBC suggest the view held by RBC is that unmet need still exists.

It is important to note that the government's recent revision of the standard method (published 16 December 2020), now requires a 35% uplift to be applied to RBC's housing need to account for the authority being within the country's top 20 largest cities and urban centres. Whilst statements from government expect the increased need to be met within the largest cities and urban centres themselves, and not passed to neighbouring local authorities, engagement and clarification is required from RBC.

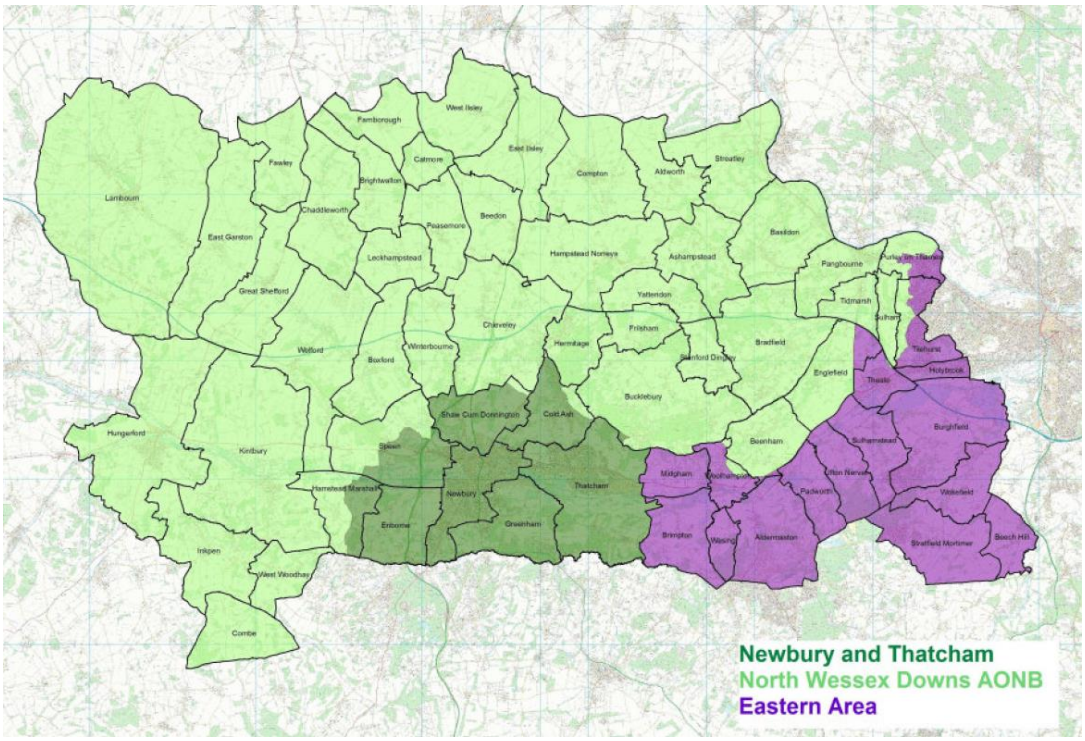
As previously expressed to all local authorities within the Western Berkshire HMA, WBC expects any potential unmet need from RBC to be met by WBDC or BFC, given the existing comparatively higher level of housing need in WBC. In addition, the change in emergency planning arrangements around AWE Burghfield has resulted in substantial objections from the Ministry of Defence towards the Grazeley garden town proposal which was a central plank of WBC's Draft Local Plan. As a result of the changed circumstances, a review of spatial options for the WBC local plan will be undertaken. At the time of writing it is not possible to say how future developments needs will be accommodated within WBC, or indeed whether there will be any issues on which cooperation will be sought from neighbouring local authorities, such as unmet needs. Any housing delivered within the wider HMA is suitable in principle to address any shortfall from the other local authorities regardless of proximity.

It is recommended that clarification is sought regarding the issue of unmet need arising from RBC. It is further recommended that WBC reaffirms that it would expect WBDC and BFC to accommodate any potential unmet from RBC.

Proposed spatial strategy

The Plan takes a place based approach to future growth, by identifying 3 distinct spatial areas: Newbury and Thatcham; North Wessex Downs AONB; and Eastern Area. Development sites and decisions within each spatial area should therefore reflect the different characteristics of the district. Within each of the areas, settlements are defined

and placed within the settlement hierarchy based on their function and sustainability. The areas are shown in the figure below.



The Newbury and Thatcham urban area continues to be the focus of new housing and employment development. An urban extension south of Newbury is proposed to accommodate 1,500 dwellings (carried forward from the existing development plan and expected to deliver 1,000 dwellings within the plan period) as well as regeneration and intensification within the existing centre for a further 250 dwellings. The expansion of Thatcham to the north east is also proposed, comprising 2,500 dwellings, of which a minimum 1,250 are expected within the plan period.

The Eastern area partly adjoins WBC. Here the strategy proposes to maintain the individual identities of the separate settlements and to conserve the high quality landscape and environmental assets. New non-strategic development allocations are proposed at Theale, Woolhampton and Tilehurst in addition to existing commitments at Theale, Calcot and Burghfield Common. AWE Burghfield and AWE Aldermaston are significant constraints, which act to restrict development opportunities.

The largest area, the North Wessex Downs Area of Outstanding Natural Beauty (AONB), will accommodate appropriate and sustainable growth that conserves and enhances its special landscape qualities. Only modest (between 15 – 55 dwellings) new development allocation sites are proposed.

The spatial strategy proposes to direct development to areas of lower environmental value, optimising the use of previously developed land (PDL), and optimising development densities. Higher development densities (at least 70 dwellings per hectare (dph)) are expected in town centres as part of flatted development, and a district wide minimum of 30 dph applies unless this would harm prevailing character. It is recommended that WBC support WBDC's intention to promote higher density housing at more sustainable settlements.

Overall, the spatial strategy approach does not seek to allocate significant levels of development in proximity to WBC, with growth focussed on Newbury and Thatcham as the largest and most sustainable settlements.

Grazeley Garden Town

Over a number of years, WBC has worked jointly with WBDC and RBC to investigate the potential for a garden town in the area around Grazeley. This work, which was undertaken with the support of Homes England and the Ministry of Housing, Communities and Local Government considered the potential to deliver 10,000 dwellings within WBC and 5,000 dwellings in WBDC over an extended period. The three local authorities prepared a joint bid to the government's Housing Infrastructure Fund (HIF) for £252m in order to achieve the upfront delivery of key infrastructure. This bid was ultimately unsuccessful.

The Plan acknowledges that whilst Grazeley has been identified as a possible location for a new garden settlement, there are uncertainties regarding the proximity to AWE Burghfield, funding for infrastructure and delivery timescales. As a result, the Plan does not identify Grazeley as a development allocation.

Policy SP 4 provides a framework for assessing applications in proximity to the AWE facilities at Aldermaston and Burghfield. It states that planning permission is likely to be refused within the Detailed Emergency Planning Zones (DEPZ), especially when the Office for Nuclear Regulation advise against it.

Housing allocations

A number of sites identified in the Housing Site Allocations Development Plan Document (2006 – 2026) (HSA) have been carried forward to the current consultation draft as they have not yet been completed.

The Plan sets out housing / mixed use allocations at Policies SP13 to SP15. These policies outline all allocations, including those newly proposed in the Plan, those carried forward from the HSA, and those expected to come forward through neighbourhood plans. As outlined earlier, there is a need to identify additional land to accommodate the shortfall of 1,661 dwellings. The new sites identified within policies SP13 to SP15 would exceed this figure.

It is recommended that WBC supports the identification of sufficient land to accommodate housing needs in full.

There are no significant new allocations bordering WBC that are considered likely to have significant impacts for its residents or the delivery of WBC services. However, it is recommended that clarification is sought on the following residential sites carried forward from the HSA:

- Land adjoining Pondhouse Farm, Clayhill Road, Burghfield Common – proposed for around 100 dwellings and, as stated in the Site Selection Background Paper, benefits from planning permission. However, construction has not begun and the applicant has provided no deliverability update. It is located within the DEPZ surrounding AWE Burghfield which was updated in May 2020. WBC understands additional development within the DEPZ will not be compatible with

the AWE Off-Site Emergency Plan. In the event that the extant permission lapses, WBC requests clarity from WBDC, as the emergency planning authority for the area, on whether this site is a deliverable including the advice of the emergency planning officer with regard to the AWE Off-Site Emergency Plan.

- Land to the rear of The Hollies Nursing Home and land opposite 44 Lamden Way, Burghfield Common – proposed for around 60 dwellings, of which 28 dwellings have planning permission and construction has begun. As above, this site is located within the DEPZ surrounding AWE Burghfield; accordingly WBC would welcome clarity as to whether the remainder of the site without planning permission is deliverable, with reference to the AWE Off-Site Emergency Plan.

WBC wish to remain fully engaged with WBDC's transport modelling and Infrastructure Delivery Plan work moving forward to ensure that there are no significant adverse impacts of cumulative planned development on Wokingham Borough.

Gypsy and Traveller provision

The West Berkshire District Gypsy and Traveller Accommodation Assessment 2019 (GTAA) identifies the need for additional pitches over the period 2018/19 to 2035/36. Though the GTAA has not yet been published, its findings are set out in the Plan. The GTAA identifies the need for 'cultural' Gypsy and Travellers and a separate need for Gypsy and Travellers who meet the definition set out in the Planning Policy for Traveller Sites (PPTS)[1]. It also identifies a separate need for Travelling Showpeople. These needs are as set out below and broken down into the following periods:

	2018/19 – 2022/23	2023/24 – 2027/28	2027/28 – 2032/33	2033/34 – 2035/36	Total
Gypsy and Traveller permanent pitch need (cultural)	20	9	14	8	51
Gypsy and Traveller permanent pitch need (PPTS)	18	9	13	8	48
Travelling Showpeople plots	20	4			24

The overall need over the plan period is for 51 pitches for 'cultural' and 48 pitches for PPTS Gypsies and Travellers (i.e. 99 pitches in total) and 24 plots for Travelling Showpeople.

Paragraph 11.30 states that the GTAA recommends that turnover at a private Gypsy and Traveller site in Paices Hill should be factored into supply with the effect that this reduces pitch need significantly to 22 and 19 pitches for 'cultural' and PPTS Gypsies and Travellers respectively. It is noted that WBC's own GTAA, produced by the same consultants, outlined how need might be reduced if turnover on public sites was factored in i.e. those sites over which WBC has control over occupancy. However, its final recommendation was that needs should be planned for in full without an allowance for turnover included. WBC wishes to understand the evidence behind the recommendation in WBDC's GTAA and considers that very clear evidence would be

[1] Planning Policy for traveller sites (2015)

required to justify such a reduction in need, particularly as it would relate to a private site where occupancy is not managed by the council.

Policy RSA 32 proposes to allocate an additional 8 permanent pitches at the existing private site at Paices Hill within an area of land currently comprising transit pitches. This allocation is carried forward from the existing HSA. This site appears to be located within the DEPZ of AWE Aldermaston as recently updated. The Site Selection Background Paper identifies that the pitches are in place but do not benefit from planning permission. It is unclear whether this additional accommodation would be compatible with the Off-Site Emergency Plan and whether planning permission would be forthcoming. The deliverability of this site would need to be clarified by WBDC's Emergency Planning team. Informal advice to WBC is that emergency planners would advise against permitting caravans within the DEPZ. WBC would also request clarification on how the use of this land for permanent pitches rather than transit pitches would impact on the need for transit pitches within WBDC and wider.

The Plan also states that an existing council run site (Four Houses Corner), which the GTAA identifies as containing 7 occupied pitches, is planned for refurbishment / redevelopment. It is not clear whether this would comprise redevelopment to an alternate use or whether it might allow for additional pitches to be delivered.

Policy RSA 33 proposes to allocate a site at Long Copse Farm, Enborne for a Travelling Showpersons yard comprising 24 plots. This site would meet the identified need in full to 2036. Again, this proposed allocation is carried forward from the existing HSA.

However, it is noted that the plan period covers an additional year (to 2037) compared to the GTAA. It is therefore unclear how or whether this additional year's need is taken into account.

It is understood that the remaining need for pitches will be met through the planning application process, with proposals assessed against the criteria set out in Policy DC 19. This would require a significant amount of need to be met through windfalls.

It is recommended that WBC seeks clarification regarding the evidence used to justify the turnover allowance and associated reduction in need. It is further recommended that WBC seek clarification over the deliverability of the proposed site allocation for additional pitches at Paices Hill, the impact of this proposed allocation on transit pitch need, and over the potential additional capacity (if any) that could be accommodated at the Four Houses Corner council run site. WBC expects WBDC to meet its Gypsy and Traveller need in full for the whole plan period to 2037, which may require additional sites to be identified and allocated.

<u>Provision for employment</u>

WBDC's employment evidence[2] identifies a need for 65,000sqm of office floorspace and 62,000sqm industrial, storage and distribution floorspace in the period 2020 – 2036. Policy SP 20 details the strategic approach to economic development and sets out that these figures will be met in full over the plan period. This will be met through a combination of protecting these uses at existing Designated Employment Areas (DEAs);

[2] West Berkshire District Council Employment Land Review (August 2020)

expanding existing and creating new DEAs; and redevelopment (for office floorspace) in Newbury town centre and other town and district centres within the hierarchy.

It is noted that the plan period covers an additional year (to 2037) compared to the economic evidence. It is therefore unclear how or whether this additional year's need is taken into account in this strategic approach.

The Plan contains site specific policies for each proposed allocation which provide further quantitative detail for how the strategic employment needs stated in SP 20 will be met. Policies EMP1-5 propose extensions to existing DEAs to provide a total of 75,700sqm of industrial storage and distribution floorspace. Therefore, even accounting for an additional year's worth of need, the Plan appears to overprovide against this aspect of need.

As regards specific policies for office floorspace development, EMP6 provides for 20,000sqm 'employment floorspace' at Arlington Business Park and Policy SP 20 further supports new office development with a primary focus on Newbury Town Centre. However, there is no specific evidence provided that sites in Newbury are deliverable or any indication given of the quantity of floorspace that could be accommodated. Therefore, it is unclear at this stage exactly how identified needs for office space will be met.

It is recommended that WBC requests clarification on how the additional years' worth of employment need is to be addressed. As regards office floorspace, WBC would welcome additional clarity on how this need will be met as the plan making process progresses.

<u>Infrastructure</u>

Policy SP 23 relates to Infrastructure requirements and delivery. It states:

"*The key infrastructure schemes required to facilitate new development and secure the delivery of development within this plan include, but are not limited to, those schemes set out within the Infrastructure Delivery Plan. A schedule of the infrastructure which has been assessed as critical to the delivery of the Local Plan Review will be included within an appendix."*

WBDC's background evidence webpages note that an updated Infrastructure Delivery Plan (IDP) has been produced and will be published shortly. Similarly, Appendix 5 – Critical Infrastructure Schedule of the Infrastructure Delivery Plan is left blank to be updated at a later stage in the plan making process and there is no Key Diagram within the plan. At the time of writing, it has not been possible to consider the infrastructure interventions deemed necessary to deliver and support the growth proposed in the Plan.

Notwithstanding, a Transport Assessment Report has been produced. All existing commitments and the development proposed within the Plan has been modelled to 2037. An initial list of junctions that would be impacted by development has been identified. Transport modelling is an iterative process so further model runs will be necessary as the strategy evolves. Future work will include identifying and scoping the necessary mitigation that will be required to address areas of concern highlighted by the transport modelling outputs.

It is recommended that WBC requests to be fully engaged in the production of the IDP, future transport modelling, and any other infrastructure evidence in order to understand at the earliest opportunity what the potential impacts of development would be and what infrastructure is proposed to mitigate this. This will be a key Duty to Cooperate issue moving forwards.

Conclusion

In summary, it is recommended that WBC welcomes WBDC's commitment in the Plan to meet its housing need in full within the District. However, there is a need to clarify the issue of unmet need from RBC. WBC is not in a position to assist with any unmet housing need and would expect this to be addressed, if necessary, by WBDC and BFC.

Clarification is also required regarding the issues of Gypsy and Traveller pitch provision and office floorspace provision. Future engagement is required regarding infrastructure delivery work in order to fully understand any cross border implications.

FINANCIAL IMPLICATIONS OF THE RECOMMENDATION
The Council faces severe funding pressures, particularly in the face of the COVID-19 crisis. It is therefore imperative that Council resources are focused on the vulnerable and on its highest priorities.

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

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 comments received
Leader of the Council	No comments received

Reasons for considering the report in Part 2
N/A

List of Background Papers
Local Plan Review 2020-2037: Emerging Draft

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