

# **Statement of Common Ground**

between

**Wokingham Borough Council**

and

**Bracknell Forest Council**

in relation to the

Wokingham Borough Local Plan Update 2023-2040

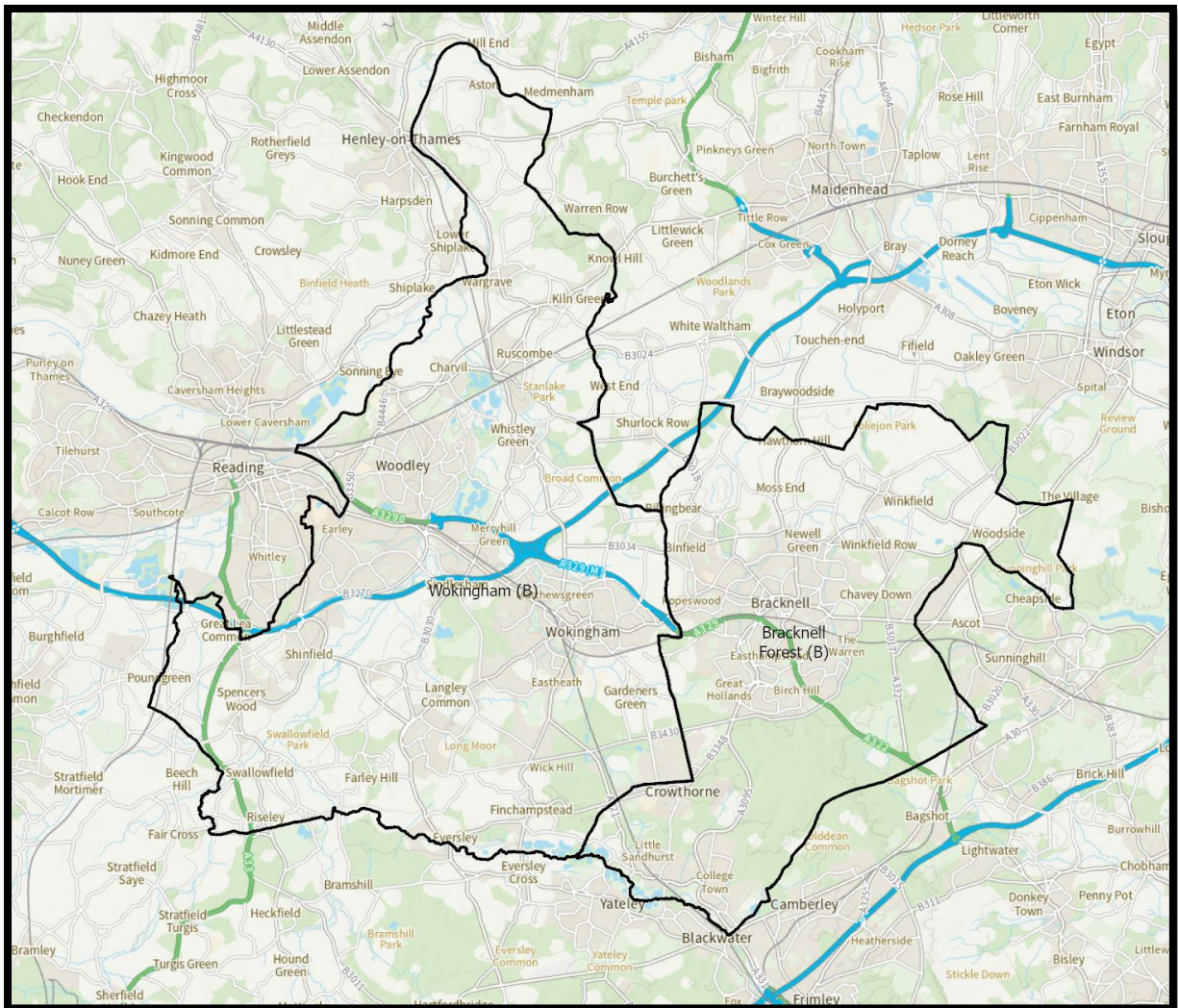
March 2025

## 1. Introduction

- 1.1 This Statement of Common Ground has been prepared by Wokingham Borough Council (WBC) and Bracknell Forest Council (BFC), collectively referred to as “the parties”. It sets out matters of agreement and areas of disagreement between the parties in relation to proposals in the preparation of the Wokingham Borough Local Plan Update 2023 – 2040: Proposed Submission Plan.

## 2. Strategic Geography

**Figure 1: Map of the local authorities.**



- 2.1 Wokingham Borough is located approximately 50km west of London, in the heart of the Thames Valley and within the Royal County of Berkshire. The borough covers an area of 17,892 hectares and is characterised by a variety of settlements with the largest being Earley, Winnersh and Woodley, which are in proximity to Reading Borough, and Wokingham.
- 2.2 Bracknell Forest Borough is located to the east of Wokingham Borough, also within the Royal County of Berkshire. The largest settlements in proximity to Wokingham Borough are Bracknell, Binfield and Crowthorne.

- 2.3 The parties are neighbouring local authorities sharing a boundary from Crowthorne in the south east (which straddles the administrative boundary, including land in both local authorities). Moving northwards, the boundary lies west of Bracknell and Binfield, east of Wokingham town.
- 2.4 The parties are linked by various roads, notably the A329(M), London Road, Forest Road, Nine Mile Ride and Old Wokingham Road. The Reading to London Waterloo, and Reading to Gatwick airport railway lines also connect the settlements within each borough.

### **3. Local Plan Positions**

#### ***Wokingham Borough Council***

- 3.1 WBC commenced evidence gathering to inform the Local Plan Update in 2016. The plan-making process has been informed by opinions expressed through various consultations, including Issues and Options Consultation (2016), Homes for the Future Consultation (2018), Draft Plan Consultation (2020) and Revised Growth Strategy Consultation (2021). A wide range of technical reports have also been completed, including reports relating to sustainability, landscape character, transport, flood risk, air quality, housing, economic and retail needs, and land supply.
- 3.2 WBC invited representations on the Local Plan Update Proposed Submission Plan between 30<sup>th</sup> September and 13<sup>th</sup> November 2024.
- 3.3 The plan has been submitted for examination under the transitional arrangements set out in the 2024 version of the National Planning Policy Framework (NPPF), meaning it will be examined against the requirements of the December 2023 NPPF.

#### ***Bracknell Forest Council***

- 3.4 BFC's adopted local plans are the Bracknell Forest Local Plan (2024) and saved policies in the Site Allocations Local Plan (2013). A new Local Development Scheme was agreed by BFC's Cabinet on 18<sup>th</sup> March 2025.

#### ***Minerals and Waste Local Plan***

- 3.5 WBC and BFC worked jointly on the preparation of the Central and Eastern Berkshire Joint Minerals and Waste Plan with Reading Borough Council, the Royal Borough of Windsor and Maidenhead. The plan was adopted in January 2023. There is no published timetable for its review.

#### 4. **Key Strategic Matters**

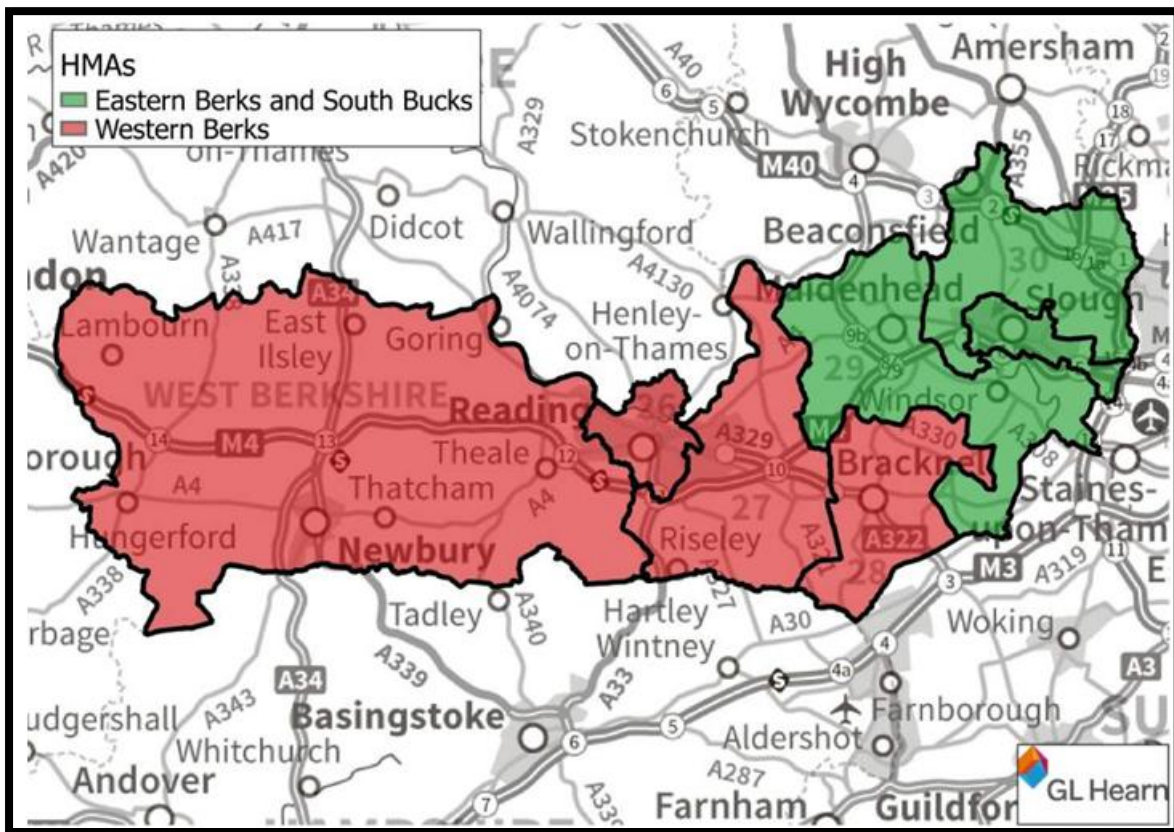
##### ***Engagement on strategic cross boundary matters***

- 4.1 The parties have engaged to discuss relevant strategic cross boundary matters throughout the preparation of their respective plans. This has included engagement on specific evidence base documents which underpin particular proposed policies.
- 4.2 The duty to cooperate activities between the parties are recorded in the Wokingham Borough Council's Duty to Cooperate Statement of Compliance (February 2025).
- 4.3 The relevant strategic cross boundary matters between the parties were defined as follows:
- a) Housing need and supply (including the provision of sites for Gypsies and Travellers).
  - b) Employment need and supply.
  - c) Retail need and supply.
  - d) Green Belt and landscape character.
  - e) Historic environment.
  - f) Infrastructure, including transport, health, education, utilities.
  - g) Recreational pressure on the Thames Basin Heaths Special Protection Area.
  - h) Green infrastructure, habitats and biodiversity.
  - i) Flood risk and climate change.
- 4.4 BFC responded to the Proposed Submission Plan (Regulation 19) publication. The representation did not raise any issues regarding legal compliance or failure to discharge the duty to cooperate. A number of concerns were raised on grounds of soundness to specific policies. In addition, comments not related to soundness were made. Please see Appendix A for further information.

##### ***a) Housing need and supply (including the provision of sites for Gypsies and Travellers)***

- 4.5 The Berkshire (Including South Bucks) Strategic Housing Market Assessment (SHMA) 2016 identified Wokingham Borough and Bracknell Forest Borough being part of a Western Berkshire Housing Market Area (HMA) centred on Reading and comprising the local authorities of Reading Borough Council, Bracknell Forest Council, West Berkshire District Council and Wokingham Borough Council. Whilst HMAs are no longer specifically referenced in the NPPF, the accompanying Planning Practice Guidance: plan-making, references them in the context of cooperation. The parties agree that for Wokingham Borough, the Western Berkshire HMA is the core area for cooperation on the planning of housing.

**Figure 2: Housing Market Areas.**



- 4.6 The local housing need figure as defined by the standard method set out in national guidance associated with the 2023 NPPF for Wokingham Borough is 748 dwellings per year at 1 April 2024. The figure was 795 dwellings at 1 April 2023. Policy SS10 applies both these figures, calculating the housing need and requirement to be 12,763 dwellings over the plan period 2023-2040. There is no unmet need arising from other local authorities within the Western Berkshire Housing Market Area.
- 4.7 The Proposed Submission Plan enables a land supply capable of providing as a minimum 13,955 dwellings within the plan period, meeting local housing need plus a reasonable allowance for potential non-delivery. The parties agree this is sufficient to meet the housing need and requirement as set out in Policy SS10.
- 4.8 The spatial strategy set out in Policy SS2 proposes to meet a large proportion of the housing requirement through the evolution of the existing planned developments at the Arborfield Green, and South Wokingham Strategic Development Locations, and the delivery of a new sustainable garden village on land between Shinfield, Sindlesham and Arborfield, called Loddon Valley Garden Village. A number of allocations for a lesser scale of development are also proposed across Wokingham Borough. Further information on proposed allocations is provided below.
- 4.9 The need for Gypsy and Traveller pitches is proposed to be primarily met through a combination of specific site allocations and delivery as part of strategic scale development.

The modest remaining need is expected to be met through windfall developments, for which a positive framework is set by Policies H9 and H10.

- 4.10 In summary on housing need, the parties agree that housing need, including the provision of Gypsy and Traveller pitches, can be delivered in full over the plan period within Wokingham Borough.

#### South Wokingham Strategic Development Location

- 4.11 The South Wokingham Strategic Development Location is located south of Wokingham town. The allocation extends to the administrative borough boundary of BFC, however the planned housing would be wholly situated within Wokingham Borough. The land was originally allocated for around 2,500 homes in the adopted Wokingham Borough Core Strategy local plan (2010). The section to the north of the railway line has been completed. The section to the south of the railway line was granted planning permission in 2024 and includes the completion of a new distributor road (the South Wokingham Distributor Road), a primary school, a neighbourhood centre, open space and vehicular and active travel connections.
- 4.12 Policy SS12: South Wokingham Strategic Development Location proposes to evolve the original allocation to provide an additional 1,100 dwellings on land south of Waterloo Road, of which at least 980 dwellings are anticipated to be delivered by 31<sup>st</sup> March 2040. Most of this land is within the extent of the original allocation but was not proposed to be built on at that time. The additional dwellings would be supported by an additional primary school over that already planned, further open space including SANG, and new highways infrastructure.
- 4.13 A high level concept plan which sought to illustrate how the additional land might be developed was included within the Revised Growth Strategy Consultation (2021). This included an illustrative layout of housing, open spaces and key highway concepts including a new junction onto Old Wokingham Road. This high level concept plan was updated and included as Figure 7 of the Proposed Submission Plan.
- 4.14 In their representation in response to the Proposed Submission Plan, BFC raised a number of concerns and comments regarding the cross boundary impacts of the extension to the South Wokingham Strategic Development Location upon Bracknell Forest, covering:
- Impact on the landscape character and setting of land to the east of the proposed allocation within Bracknell Forest that is classified as Landscape Character Area G1 - Easthampstead Wooded Estates in the Bracknell Forest Borough Landscape Character Assessment and forms an integral part of Policy LP36 of the adopted Bracknell Forest Local Plan.
  - The adequacy of the green buffer along Old Wokingham Road.
  - The suitability of the junction on to Old Wokingham Road.
  - The connection of the proposed development to the planned South Wokingham Distributor Road and impacts on BFC's transport networks resulting from this.
  - The impact on the highway network in Bracknell Forest.

- The adequacy of proposed sustainable travel connections.
- Appropriate safeguards to cover areas at risk of surface water flooding adjoining the eastern boundary of the site in Bracknell Forest

4.15 Through further engagement the issues of concern have been clarified. This includes WBC proposing modifications to the high level concept plan. In summary:

- WBC have proposed modifications to the high-level concept plan to:
  - Provide a slightly wider green buffer along Old Wokingham Road
  - Move the proposed roundabout on Old Wokingham Road westward into the site, allowing for additional planting on the route of the existing road.
  - Show further sustainable and active travel connections from the site into adjoining land, including Bracknell Forest.
  - Clarify the intention for the primary highways route through the site to directly join the South Wokingham Distributor Road.
- It is now agreed that the issue of flood risk is not a matter of soundness (see paragraphs 4.50 to 4.52 below).
- Whilst BFC accepts that some changes have been made to the illustrative concept plan, it does not consider that the changes provide sufficient safeguards. BFC considers that:
  - Main modifications are needed to Policy SS12 to include a specific reference to the illustrative concept plan in order to make the policy effective.
  - A new policy criterion is added to Policy SS12 to refer to the incorporation of measures to respect the landscape character and setting of Old Wokingham Road, and land to the east within Bracknell Forest.
  - Further transport modelling is required to assess the cumulative residual impacts on Bracknell Forest's transport networks and the extent of mitigation measures required together with an outline of how these would be funded and delivered within the plan period.
- WBC do not consider that these modifications to the Plan are necessary.
- The parties agree the site is developable in principle, subject to suitable mitigation measures being agreed.

#### Other allocations

4.16 The Proposed Submission Plan included two other allocations in proximity to the administrative boundary between the parties:

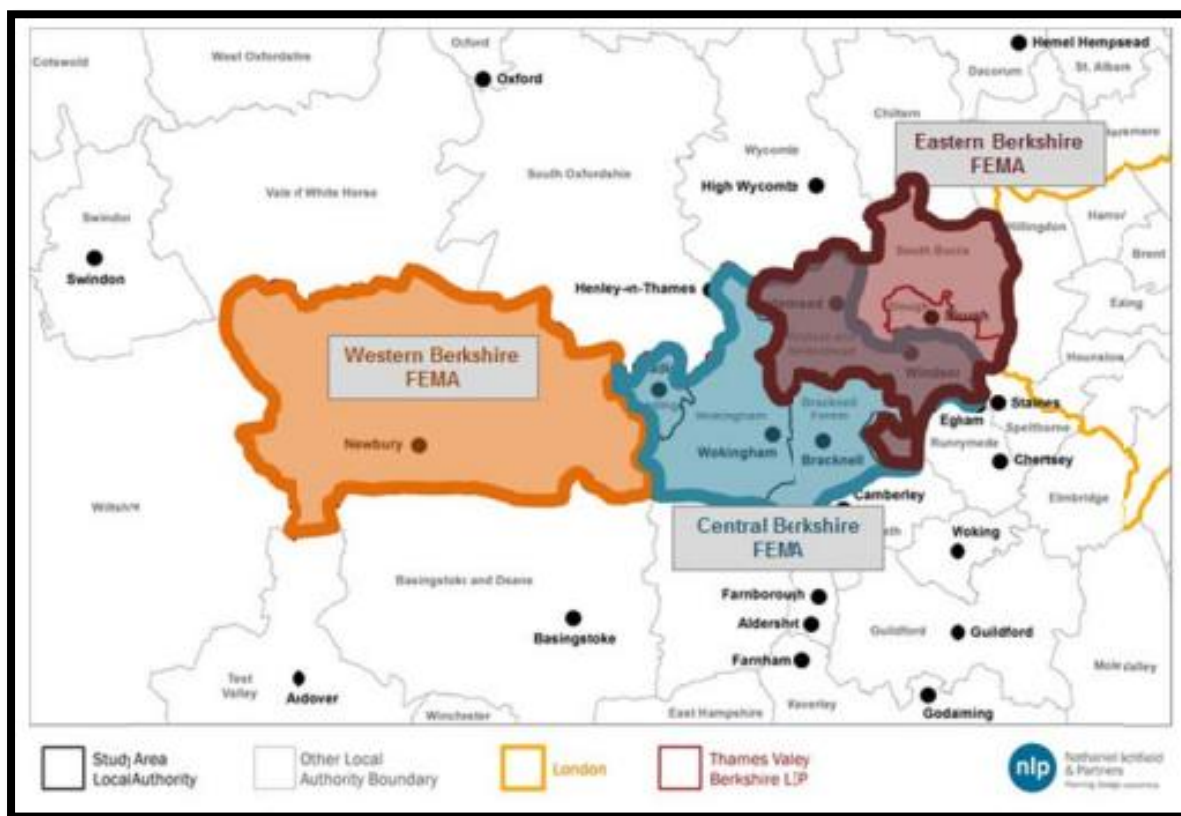
1. 'Land adjacent to Amen Corner, north of London Road, Bracknell' (45 dwellings); and
2. 'Land south of London Road, Wokingham' (12 dwellings).

4.17 Whilst Bracknell Forest originally objected to the inclusion of site 1: Land adjacent to Amen Corner north, it is accepted that this site now has a resolution to grant planning permission and the S106 is under negotiation. BFC did not object to the allocation of site 2: Land south of London Road.

**b) Employment need and supply**

4.18 The Berkshire Functional Economic Market Area (FEMA) study 2016 identified Wokingham Borough and Bracknell Forest Borough being part of a Central Berkshire FEMA, centred on Reading and comprising the authorities of Reading Borough Council, Bracknell Forest Council and the Royal Borough of Windsor and Maidenhead. The Royal Borough of Windsor and Maidenhead is also part of the Eastern Berkshire FEMA, alongside Slough Borough Council. The parties agree this strategic geography as the core areas for cooperation on the planning for employment.

**Figure 3: Functional Economic Market Areas.**



4.19 The need for employment land within Wokingham Borough has been identified through an Employment Land Needs Assessment (2024). Employment needs over the plan period is set out in Table 3 of the Proposed Submission Plan and reproduced below.

**Table 1: Employment needs 2022-2040.**

	Industrial	Office
Identified need 2022-2040	73,756 m <sup>2</sup> (18 Ha)	30,761 m <sup>2</sup> (GIA)
Completions 2022-2023	41,284 m <sup>2</sup>	4,979 m <sup>2</sup>
Commitments at 31 March 2023	7,731 m <sup>2</sup>	41,313 m <sup>2</sup>



Net need (2023-2040)	24,741 m <sup>2</sup>	15,531 m <sup>2</sup> over supply
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- 4.20 Future office needs are anticipated to be met, because there is an oversupply of over 15,000 m<sup>2</sup> floorspace when compared to identified needs.
- 4.21 Future industrial need can be met through a combination of completions, commitments and the appropriate expansion of Core Employment Areas as set out in Policy SS8.
- 4.22 Employment needs can be delivered in full within Wokingham Borough over the plan period.

### ***c) Retail need and supply***

- 4.23 The need for retail land has been identified through a Retail and Commercial Leisure Study (2023). Retail need over the plan period is set out in paragraph 4.24 of the Proposed Submission Plan. In summary there is no capacity to support additional comparison goods, but there is a need for between 14,700 m<sup>2</sup> and 17,200 m<sup>2</sup> of convenience goods by 2040.
- 4.24 Convenience floorspace is currently being delivered as part of the near complete South of the M4 Strategic Development Location and the Arborfield Green Strategic Development Location. The Proposed Submission Plan expects further convenience goods floorspace to come forward as part of the South Wokingham Strategic Development Location (Policy SS12) and the Loddon Valley Garden Village (Policy SS13). Windfall sites would also be supported within town centres.
- 4.25 Retail needs can be delivered over the plan period within Wokingham Borough.
- 4.26 The parties agree that no material impact will arise to defined centres within BFC, including proposals for regeneration, from the retail proposals within the South Wokingham Strategic Development Location or the Loddon Valley Garden Village.
- 4.27 Turning to potential for unplanned retail proposals, BFC wishes to ensure that such proposals do not impact planned public and private investment in centres within Bracknell Forest.
- 4.28 Following engagement, the parties note the requirements of NPPF paragraph 94 which requires an impact assessment for retail and leisure development located outside of centres, including the impact on existing, committed and planned public and private investment in a centre or centres in the catchment area. WBC believe Policy ER7 provides a suitable framework for the assessment of unplanned retail proposals and therefore it is not necessary to repeat national policy. BFC would prefer to see reference to the impact on existing, committed and planned public and private investment specifically included within the policy text. The parties agree this matter is not one of soundness.

### ***d) Green Belt and landscape character***

- 4.29 The Proposed Submission Plan has been informed by a Green Belt Review (2016) (undertaken jointly with BFC) and a Landscape Character Assessment (2004, 2019). Regard has also been had to BFC's Landscape Character Assessment (LUC, 2015).
- 4.30 The spatial strategy set out in Policy SS2 proposes to meet development needs on land outside the designated Green Belt. The impact of the extension to the South Wokingham Strategic Development Location on the landscape character of Bracknell Forest is discussed under paragraphs 4.14 and 4.15 above.

***e) Historic environment***

- 4.31 The Proposed Submission Plan has been informed by a Historic Environment Topic Paper (2024) which provides background evidence and justification for WBC's approach to the conservation and enhancement of the historic environment.
- 4.32 The parties do not expect the growth identified in the Proposed Submission Plan to impact the significance of heritage assets within Bracknell Forest.

***f) Infrastructure, including transport, health, education, utilities***

- 4.33 WBC has prepared an Infrastructure Delivery Plan (2024) (IDP) to identify infrastructure needs arising from planned growth. This important document reflects all aspects of infrastructure need.
- 4.34 Transport modelling and assessment has been undertaken throughout the plan-making process to identify and address issues on the local, major and strategic highway network. Modelling outputs have been shared with BFC. The strategy set out in the Proposed Submission Plan has been informed by the Transport Assessment Report (2024).
- 4.35 WBC does not expect the growth identified in the Proposed Submission Plan to generate significant additional traffic within Bracknell Forest that might lead to severe impact. Transport mitigations are proposed which will help to mitigate impacts, including those in Bracknell Forest.
- 4.36 BFC does not agree, as it has not been demonstrated that the highways and transport impacts from the extension of the South Wokingham SDL would not result in severe residual cumulative impact on BFC's transport network. The Transport Assessment Report (2024) identifies locations with significant increases in delay on BFC's highway network but does not set out how these would be mitigated. Further modelling and any required mitigation of the impact of the proposed allocation is needed in respect of BFC's transport network.
- 4.37 WBC's opinion is that the transport assessment shows impacts on the network are acceptable.
- 4.38 WBC has engaged with utility companies in the preparation of the Proposed Submission Plan and associated IDP. Phase 1 and Phase 2 Water Cycle Studies (2019, 2024) have been prepared to consider the impact on potable and waste water infrastructure.
- 4.39 The parties do not expect the growth identified in the Proposed Submission Plan to generate additional needs for community infrastructure such as school places and healthcare facilities within Bracknell Forest.

***g) Recreational pressure on the Thames Basin Heaths Special Protection Area***

- 4.40 The Thames Basin Heaths Special Protection Area (SPA) is designated because the heathland habitat supports the important species of ground nesting birds: Dartford warbler, nightjar

and woodlark. Natural England has advised that residential development around the SPA boundary is likely to have a significant effect (alone or in combination with other plans or projects) on the integrity of the SPA through associated recreation activity on the heaths and air pollution.

- 4.41 Natural England advise that all residential developments within 5km and larger residential developments proposing 50 dwellings or more within 7km may impact on the integrity of the SPA. The zone of influence therefore extends into the southern half of Wokingham Borough.
- 4.42 The available evidence indicates that beyond the immediate area around the SPA, effective mitigation can be achieved by a combination of providing additional Suitable Alternative Natural Greenspaces (SANGs) together with financial contributions towards Strategic Access Management and Monitoring measures (SAMM).
- 4.43 The Proposed Submission Plan has been informed by the Thames Basin Heaths Special Protection Area Avoidance and Mitigation Strategy, which sets out an agreed method of avoiding and mitigating impacts on the SPA.
- 4.44 No land is allocated for development within 400m of the SPA, where the avoidance of mitigation of impacts is considered unachievable.
- 4.45 Beyond 400m, larger development proposals of 50 or more dwellings are expected to provide their own SANG as part of the development. All Strategic Development Locations and the Loddon Valley Garden Village are required to provide SANG as a key aspect of their masterplan. Smaller development proposals of 49 dwellings or less are expected to mitigate their impact via securing capacity in off-site SANG. WBC is supporting planned and anticipated developments from small sites by providing additional strategic SANG capacity.
- 4.46 The full need for SANG can be delivered within Wokingham Borough over the plan period, and WBC is not seeking mitigation in neighbouring local authorities.

#### ***h) Green infrastructure, habitats and biodiversity***

- 4.47 The spatial strategy set out in Policy SS2 proposes to meet development needs away from the administrative boundary between the parties. The parties do not expect the growth identified in the Proposed Submission Plan to impact designated habitats within Bracknell Forest. For the avoidance of doubt, any localised impacts (if any) will be considered as part of the normal processes during the consideration and assessment of applications. Furthermore, partnership working is actively being explored between the parties with regards to mandatory Biodiversity Net Gain.
- 4.48 Any new green infrastructure delivered as part of the plan where relevant and necessary will be planned for and connect to existing green infrastructure assets within Bracknell Forest including Public Rights of Way.

### ***i) Flood risk and climate change***

- 4.49 The Proposed Submission Plan has been informed by Level 1 and Level 2 Strategic Flood Risk Assessment (2024).
- 4.50 The parties do not expect the growth identified in the Proposed Submission Plan to have implications for land elsewhere in the river catchment.
- 4.51 Notwithstanding and in relation to the Policy SS12 which relates to the South Wokingham Strategic Development Location, BFC would prefer the policy to include the need for a site specific Flood Risk Assessment. WBC is content that the framework provided by Proposed Submission Plan is appropriate requiring a comprehensive drainage and flood alleviation strategy (Policy SS12(7)) and a specific Flood Risk Assessment (Policy FD1(5)). The parties agree this matter is not one of soundness.

### **5. Areas of Agreement**

- 5.1 The parties have engaged effectively and on an on-going basis during the plan making process and WBC has fully fulfilled its duty to cooperate with BFC.
- 5.2 The parties agree the following statements of common ground:
- a) The parties agree that the Proposed Submission Plan makes provision to fully meet development needs.
  - b) The parties agree that the evidence supporting the Proposed Submission Plan is robust and proportionate to the plan-making stage of planning, with the exception of transport modelling and mitigation within Bracknell Forest.
  - c) The parties agree that the extension to the South Wokingham Strategic Development Location is developable in principle, although BFC considers this to be subject to transport modelling and the satisfactory mitigation of any impacts on BFC's highway network being resolved. BFC also considers that Policy SS12 needs to refer to the illustrative concept plan and measures to safeguard the landscape character of Bracknell Forest (land to the east of the site and Old Wokingham Road) to make the policy effective.
  - d) The parties will continue to engage through the pre-application and planning application processes on development proposals in the vicinity of the administrative boundary, or further afield where there is potential for cross boundary impacts.

### **6. Areas of Disagreement**

- 6.1 Within the context of agreeing the extension to the South Wokingham Strategic Development Location is developable in principle, the parties disagree on the following detailed aspects:

- Whether or not it has not been demonstrated that the highways and transport impacts from the extension to the South Wokingham SDL would result in severe residual cumulative impact on BFC’s transport network. BFC considers that the Submission Local Plan has not clearly set out what highway improvements would be required within BFC nor how they would be funded and delivered within the Plan Period.
- The specific location of the roundabout to access the site from Old Wokingham Road, with BFC preferring an alternative location further south on the Old Wokingham Road, in the area identified on the concept plan as SANG/Open Space, and whether associated highway safety impacts at the Easthampstead Road junction have been mitigated.
- The adequacy of the landscape buffer along Old Wokingham Road, and the safeguarding of the landscape character within Bracknell Forest.
- Whether the policy should specifically refer to the need for a Flood Risk Assessment.

6.2 The parties also disagree regarding the need to refer to the impact on existing, committed and planned public and private investment in retail centres specifically within Policy ER7.

## **7. Governance Arrangements Including Future Review**

7.1 The parties agree to:

- Continue to cooperate and work collaboratively regarding the location and timing of infrastructure delivery relating to the South Wokingham Strategic Development Location.
- Continue to cooperate and work collaboratively to agree the location and timing of highways infrastructure to mitigate the cumulative impact of development and to connect walking and cycling networks.
- Keep a dialogue open on matters arising which are likely to have significant impacts and implications for the delivery of local plan policies.
- Maintain positive principles of cooperation.

## **8. Signatories**

8.1 We confirm that the information in this Statement of Common Ground reflects the joint working and engagement undertaken to date to address identified strategic matters. The parties will continue to work together to address cross boundary issues.

***Signed for Wokingham Borough Council***

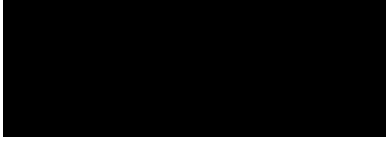


Name: Trevor Saunders

Position: Assistant Director, Planning

Date: 27/03/2025

*Signed for Bracknell Forest Council*



Name: Jo Male

Position: Assistant Director, Planning

Date: 25.03.2025

## **Appendix A**

### **Summary of BFC comments on the Proposed Submission Plan**



Summary of BFC comments	WBC response
<b>SS2 Spatial Strategy and Settlement Hierarchy</b>	
<p>The Ashridge site, north of the A329M is not a proposed allocation; however, if an alternative scenario was to be taken forward that included the Ashridge site as a development location, this would have additional impacts on various junctions and links. Additional mitigation within the wider network, (including Bracknell Forest), would be required as well as connectivity for sustainable modes of travel. BFC maintains its previously stated view that any development at the Ashridge site cannot be supported without an all-movements junction at Warren House Road.</p>	<p>Comment noted. The site is not a proposed allocation, but has been considered at various stages, including as a growth scenario in the Sustainability Appraisal.</p>
<p>Table 1: ‘Housing need’ refers to using the requirement resulting from the national standard method at 1 April 2023 for the first year of the plan period (795 dpa) and the requirement resulting from the calculation at 1 April 2024 (748 dpa) for the remainder of the plan period.</p> <p>BFC question whether using a combination of figures is in accordance with national policy, and whether it is the housing need figure calculated at the beginning of the plan period (1 April 2023) that should be applied.</p> <p>The hybrid figure used in Policy SS10 does not appear to have been assessed within the Sustainability Appraisal (SA). Para. 5.2.8 of the SA refers to a figure of 748 dpa.</p>	<p>WBC is satisfied the housing requirement appropriately reflects the PPG and that housing needs can be met.</p> <p>Incorrect. The SA acknowledges the higher figure in the first year of the plan period. Paragraph 5.2.8 states “The standard method derived LHN for the Borough is currently 748 dwellings per annum (dpa), or 12,763 homes in total over the plan period (once slightly higher LHN for the first year of the plan period is factored in).” WBC is satisfied that the sustainability assessment is</p>

Summary of BFC comments	WBC response
<p>Table 6 'Housing Supply' identifies sites which would provide some flexibility over and above the requirements referred to in Policy SS10. If the 1 April 2023 standard method figure of 795 dpa is used for whole 17 year plan period, a smaller degree of flexibility would result.</p> <p>On the basis of the current calculations, a sufficient supply of land for housing appears to have been identified (even if the 1 April 2023 figure is used), and there is no unmet housing need arising.</p> <p>BFC has some concerns, particularly in relation to the cross boundary impacts of certain proposed allocations, and discrepancies with the figures relating to the proposed allocations.</p>	<p>robust. It is noted that housing completions have occurred which meet the initial plan period.</p> <p>Comment noted.</p> <p>Comment noted.</p> <p>Comment noted. WBC response is provided against allocation policies.</p>
<p>BFC's main concerns are cross boundary impacts of the South Wokingham SDL extension. Concerns were raised when responding to the Revised Growth Strategy consultation, particularly regarding landscape character/gap issues.</p> <p>The now adopted BFC Local Plan does not include a specific 'separation of settlement/gap' designation, but it does include policy LP36 on landscape character which requires proposals to have regard to the setting of a settlement and their distinctive character, and also how they protect/enhance and restore the defined characteristics and valued features of surrounding landscape character. Landscape features in this character</p>	<p>WBC recognises the location of the development is likely to have some impact on Bracknell Forest and has sought to mitigate the impacts as far as possible with regard to the policy framework.</p> <p>WBC have engaged with BFC throughout the preparation of the plan and has specifically discussed the South Wokingham Strategic Development Location proposal as evidenced within the Duty to Cooperate Compliance Statement.</p> <p>Engagement has noted that the site and surrounding area is not a national landscape and is not identified as a</p>

Summary of BFC comments	WBC response
<p>are associated with its 'tranquil and undeveloped character.' Figure 7 shows residential development along the eastern boundary adjacent to Old Wokingham Rd and the borough boundary, so there is concern this will impact the undeveloped landscape character of the area, rural character of Old Wokingham Road, and separation between Bracknell and Wokingham.</p> <p>It is not clear how the DLA Strategic Site Report (2021) has informed the allocation or the concept plan. The concept plan has not been updated despite more development now being proposed. SS12(4) regarding maintaining settlement separation would be difficult to achieve. The limited green buffer on the concept plan is not sufficient to mitigate the impact on Bracknell Forest.</p> <p>There are two cross boundary applications currently being considered, for 95 dwellings, and for up to 850 dwellings.</p>	<p>valued landscape. BFC have also been asked to identify specific sensitivities to WBC.</p> <p>The policy framework for the South Wokingham Strategic Development Location specifically referenced the need for development proposals to:</p> <ul style="list-style-type: none"> <li>• Protect and maintain the physical, visual and perceived separation of the defined settlements of Wokingham, Crowthorne / Pinewood (Crowthorne), Finchampstead North and Bracknell.</li> <li>• To embed and integrate the development into the landscape setting, and to structure the scheme around a landscape-led approach by incorporating existing landscape features, such as watercourses and tree and hedgerow planting; and notable existing buildings in order to achieve an attractive place which is well related to its setting. Planting along the Old Wokingham Road should be reinforced to help maintain the experience of moving between settlements.</li> </ul> <p>To further ensure the issues raised by BFC are met, WBC is proposing modifications to the high level concept plan aimed at further illustrating the above (see Appendix B). This includes moving the Old Wokingham Road roundabout west further into the site and adding more extensive planting along the length of Old Wokingham Road. These modifications, which have been discussed with the landowners, further confirm the opportunity to provide mitigation to reduce visual impact of the proposal when viewed from within Bracknell Forest.</p>

Summary of BFC comments	WBC response
<p><u>Impact on Bracknell transport network</u></p>	<p>The level of detail provided in the high level concept plan is proportional to the stage of plan making, with it appropriate that more detailed discussions occur as part of the planning application process.</p>
<p>The SA has not tested a scenario that omits the South Wokingham site, so the impacts of other alternatives cannot be understood.</p>	<p>The SA has considered multiple reasonable alternatives to meeting development needs throughout the plan-making process. The broad sustainability of the South Wokingham Strategic Development Location has been consistently recognised throughout. WBC is satisfied that the SA process is robust.</p>
<p>BFC testing shows the development would draw more traffic through junctions including Waterloo Rd, Peacock Lane, Vigar Way and A329, so there are concerns about the amount of housing close to the borough boundary. The concept plan shows development being served directly by a new junction onto Old Wokingham Road that has not been discussed prior to publication of this version of the plan. The impact should not be to the detriment of the operation of BFC's road network.</p>	<p>WBC has shared and published strategic transport modelling at various stages of plan-making which considered the impact on road traffic from potential developments including the South Wokingham Strategic Development Location.</p>
<p>The Transport Assessment Report identifies junctions in Bracknell with delays of over 30 seconds, which would have a severe residual cumulative impact on the road network, contrary to NPPF 108a, 114d and 115. Evidence does not show the route via A329/A329M via Old Wokingham Road (within Bracknell Forest) would be less attractive than via the SDL spine road and London Road</p>	<p>The principle of a junction onto Old Wokingham Road was shown in the Strategic Sites Report (2021), the Revised Growth Strategy Consultation (2021), and within information from the promoting landowners by WBC (2021). The principle of a junction was also included in all associated transport assessments. Engagement between the parties in the period prior to the Proposed Submission Plan included figures showing the junction.</p>
	<p>BFC's representation in response to the Revised Growth Strategy Consultation (2021), which showed the</p>

Summary of BFC comments	WBC response
<p>(within Wokingham Borough). Traffic would have a disproportionate impact on BFC's road network.</p> <p>BFC's transport modelling assumed growth would be spread across Wokingham Borough. Development proposed by WBC locates significant development in proximity to Bracknell Forest and their highway network, and emerging policies do not appear to include suitable/deliverable mitigation measures.</p> <p>Provision does not appear to have been made for safe and suitable sustainable travel from the SDL to Bracknell Forest. Bus connections to Crowthorne Station and wider</p>	<p>proposed location of the roundabout access on Old Wokingham Road on the concept plan and within the transport assessment, did not object to the principle of the junction.</p> <p>WBC do not consider the impact on the Bracknell Forest transport network of the development proposed will be severe. A Junction delay of 30 seconds is representative of a junction operating around 70% of capacity. In BFC Local Plan evidence, Table 4-1 defines this as within Level of Service D, and only reports delays over 50-80 seconds as 'over capacity'.</p> <p>It is accepted that there is no definition of 'severe' in the NPPF. The policy test focuses on the 'cumulative residual' effect. WBC evidence explains in Section 1.5 how it expects to consider the 'severe' threshold, seeking to identify further mitigation through planning applications where necessary.</p> <p>The IDP sets out a series of mitigations schemes, some of which extend into Bracknell Forest Borough. WBC is committed to working with BFC to agree the scope and timing of these off site works as part of the planning application process. In this regard, WBC has agreed to undertake further transport modelling using BFC's transport model to sensitivity test traffic impacts and confirm/refine necessary mitigations.</p> <p>As a result of engagement between the parties, WBC have proposed modifications to the high-level concept plan to better illustrate a possible response to the potential issues raised by BFC. The proposed</p>

Summary of BFC comments	WBC response
<p>Bracknell are needed, plus walking/cycling networks, which are not adequately addressed in supporting text.</p> <p>Concerns about surface water flooding in the eastern part of the site which is proposed for development, which could increase flood risk on Old Wokingham Rd and Bracknell Forest. Hydraulic modelling will be required and consultation with BFC.</p> <p>The policy does not refer to safeguarding against cross boundary flooding, and there is no reference to a site specific FRA, which is referred to in the 'Sequential and Exception Test' evidence.</p>	<p>modifications include pulling the roundabout into Old Wokingham Road westwards into the site, allowing further landscaping to reduce visual impact when viewed from the east. The modifications also clarify the intention for the primary route through the site to join the South Wokingham Distributor Road and the restriction of traffic on Easthampstead Road.</p> <p>Part 9(a) sets out how development proposals should provide new and improved active travel routes to other centres, including Bracknell. The updated concept plan identifies routes identified in recent discussions. Public transport will also be supported, including links to surrounding communities, as set out in development guideline B3.8(g).</p> <p>Engagement between the parties has clarified that this matter is not one of soundness. Policy SS12 requires a comprehensive drainage and flood alleviation strategy for the site. A site specific Flood Risk Assessment is required by Policy FD1. WBC is satisfied the site can be delivered without resulting in cross boundary flooding from all sources. BFC preference is for Policy SS12 to specifically refer to the need for a Flood Risk Assessment.</p>

Summary of BFC comments	WBC response
<p>Policy SS15 (Securing infrastructure) clause 2 (final sentence) would benefit from reference to mechanisms such as conservation covenants. It may not be possible to secure Biodiversity Net Gain provision by the s106 route, if Council owns the land involved.</p>	<p>Comment noted. The policy wording specifically refers to 'legal obligations' rather than 'planning obligations' to provide flexibility for other legal regimes that might not fall specifically under planning. WBC is satisfied that the wording as proposed is sufficient.</p>
<p>The wording of Policy C1: 'Active and sustainable transport and accessibility' and Policy C3: 'Active Travel' and their supporting paragraphs should make it clear that links to walking and cycling networks need to continue beyond borough boundaries; this is also true of the public rights of way networks in Policy C4; and Policy DH1 in the placemaking section under the 'Movement' heading.</p>	<p>Policy C1 refers to accessibility and connectivity within the proposed development site and with the surrounding area. This would include links to locations outside Wokingham Borough. Whilst implied, WBC have proposed a modification to Policy C1 to enhance clarity and context for subsequent policies.</p> <p>Modifications to Policies C3, C4, and DH1 are considered unnecessary.</p>
<p>There is also inconsistency within the evidence base to the Plan, such as between the scenarios tested in the Transport Assessment Report and the Sustainability Appraisal. The level of assessment of cross-boundary transport impacts and links does not appear to accord with Policy C2 (Mitigation of transport impacts and highways safety and design) within the Plan which states "Development proposals must fully assess the transport impacts of the development and provide for appropriate mitigation to minimise the adverse effects".</p> <p>It is also noted that Policy C2 clause 1b) should make clear that provision of, or contributions to, transport infrastructure necessary to address the needs arising</p>	<p>It is not uncommon for there to be minor differences between the SA and the plan. WBC is satisfied the assessment undertaken in the SA is robust.</p> <p>Appropriate to the stage in planning, the WBC evidence has considered transport impacts on capacity and safety. The Development proposals frame partial mitigation of adverse effects which will be examined further through the planning application.</p> <p>As a matter of principal, highway and other interventions may be located outside Wokingham Borough and in such circumstances, WBC would seek to work with the relevant local authority.</p>

Summary of BFC comments	WBC response
<p>from the proposal may need to be provided, or financial payment made for, infrastructure beyond Wokingham Borough Council's administrative area, where impacts are felt within neighbouring boroughs such as BFC.</p>	<p>Proposed modifications to gateway Policy C1 clarifies that accessibility and connectivity will consider matters within the proposed development site and beyond, including locations outside the borough.</p>
<p>Noted that Policy H9 sets out a need for 86 traveller pitches and allocations are identified to accommodate 74 of these. Regarding the remaining need, an application for 4 pitches is pending leaving 8 pitches to be met through windfall development. Policy H10 is supportive of new pitches and resists the loss of pitches.</p> <p>BFC is not in a position to assist with any unmet needs.</p> <p>Paragraph 9.97 strongly resists larger sites being split to circumvent provision stipulated in Policy H9. If this is a local issue of particular concern, it may be beneficial to include it within the policy wording.</p>	<p>Comments noted.</p> <p>WBC is satisfied that the wording is appropriately placed in supporting text, consistent with the similar provision in relation to affordable housing policy (H3).</p>
<p>Para 4.20 states that there is an oversupply of 15,000 sqm office floorspace above the identified need and that there is a need for 24,741sqm of industrial floorspace (which includes Egiii, B2 and B8). The approach to meeting need via the extension of specific Core Employment Areas, and the protection / redevelopment / rejuvenation of Core Employment Areas is considered pragmatic.</p> <p>The NPPF para. 91 states that main town centre uses (which include offices) are subject to the sequential test. Policy ER5, clause 5 and Policy ER7 support main town</p>	<p>The Proposed Submission Plan identifies Core Employment Areas (CEA) as key locations for continued economic growth. The CEA include various employment uses, including office, warehousing and industrial uses.</p> <p>The plan states that a sequential test is not required for office development proposed in CEA, to recognise the key role of CEA in the economy of the borough (and the wider region), and reflect that this type of use is acceptable in principle. Office development in these locations is likely to be large scale, often in the form of national/international businesses headquarters, which</p>



Summary of BFC comments	WBC response
<p>centre uses (and therefore offices) within the centres defined in the retail hierarchy. At the same time, 'employment uses' are defined in para 8.6 as being Business (which it is assumed includes offices), Industrial, Distribution and Storage (BIDS) uses. Policy ER1 supports such uses in the Core Employment Areas. Whilst para. 8.41 of the supporting text states that no sequential test will apply to offices in Core Employment Areas, this is not reflected in the wording of the policies. However, Policy ER2 (Employment uses outside Core Employment Areas) Clause 2 a) refers to the need for employment development proposals of 1,000 sqm or more needing to comply with the sequential approach to location that demonstrates there are no suitable and available opportunities within Core Employment Areas. Furthermore, there is no reference to centres. The approach to the location of office development appear to be confusing and inconsistent with national policy.</p>	<p>are less likely to be suitable in centres, which are often subject to constraints such as heritage considerations.</p> <p>The 1,000m<sup>2</sup> threshold in Policy ER2 applies to all employment development. It is not appropriate to refer to centres, as for example, warehousing and logistics uses are not 'main town centre' uses and may not be appropriate uses within defined centres. ER2(1) recognises that smaller scale employment developments are acceptable subject to defined criteria.</p> <p>Policy ER7 and paragraph 8.41 clarify that apart from office uses, proposals for all main town centre uses of 500m<sup>2</sup> or more should apply the sequential test.</p> <p>NPPF para 91 states that the sequential test should be applied for proposals for main town centre uses which are neither in an existing centre, nor in accordance with an up to date plan. WBC is satisfied the approach to office development and CEAs reflects national policy and ensures appropriate development in CEA can be delivered without the need to prepare a sequential test in relation to existing centres.</p>
<p>In accordance with Policy ER5, criteria 2c (i), Crowthorne Station, Dukes Ride should be shown on the Policies Map.</p>	<p>The Crowthorne Station, Dukes Ride local centre is included on the Policies Map. With only a very small part of the carpark being within Wokingham Borough, it is easier to see on the interactive Policies Map compared to the static map. The BFC Local Plan and the Proposed Submission Plan are fully in conformity.</p>

Summary of BFC comments	WBC response
<p>Para. 4.24 establishes that whilst there is no further need for comparison retail floorspace, there is a need for between 14,700 and 17,200 sqm of additional convenience floorspace by 2040. The plan states that this is likely to be met via a combination of new local centres within the SDLs and changes of use in existing centres. There should therefore be no unmet retail need during the plan period.</p> <p>Policy ER7 clauses 3 and 6 introduce a local threshold for both the sequential test and impact assessment. Whilst the NPPF para 94 refers to setting a floorspace threshold for requiring an impact assessment, it is silent on the ability to do that for the sequential test.</p> <p>BFC consider the sequential text should be applied for main town centre uses outside designated centres regardless of size and is concerned about the possible impact of new centres, particularly that proposed within the extension to the South Wokingham SDL given that para. 8.43 states they will not be subject to sequential or impact tests. There appears to be a lack of information on the proposed size of the new local centres and the wider impacts that it might have including those in Bracknell Forest such as Crowthorne, Great Hollands and the new centre under construction in Bucklers Park (former TRL site).</p> <p>Policy ER7 clause 7 (retail impact assessment) might benefit from the addition of some wording relating to planned public and private investment and wider retail catchment areas as per NPPF para. 94. Depending on the</p>	<p>A 500m<sup>2</sup> threshold is currently in place in the adopted development plan – no new evidence suggests it would be appropriate to alter this threshold and therefore it is proposed to continue in the Proposed Submission Plan.</p> <p>Policy SS12 South Wokingham Strategic Development Location includes the development principle of appropriate retail centres to meet day to day needs retail needs, which is reinforced in the associated development guidelines. The terminology is consistent with that used on the adopted development plan.</p> <p>WBC is satisfied the policy context ensures that small scale retail will be provided to serve the local community. This scale of development will not materially impact centres in Bracknell Forest.</p> <p>Engagement between the parties has clarified that this matter is not one of soundness. The parties note the requirements of NPPF at paragraph 94 which requires impact assessment be undertaken for retail and leisure development outside of centres and that this should include the impact on existing, committed and planned</p>

Summary of BFC comments	WBC response
<p>scale and location of any development requiring an impact assessment, planned public and private investment may need to be considered in respect of Bracknell Town Centre and some local centres in Bracknell Forest, due to ongoing regeneration. The expansion of clause 7 would help ensure consistency with the NPPF and therefore soundness.</p>	<p>public and private investment in a centre or centres in the catchment area. WBC believe Policy ER7 provides a suitable framework for assessment unplanned retail proposal and there is no necessity to repeat national policy. BFC would prefer to see reference to the impact on existing, committed and planned public and private investment specifically included within the policy text.</p>
<p>It is noted that Policy NE3, clause 8 concerns the loss of SANG. BFC note the loss of SANG will only be accepted where the applicant can demonstrate that sufficient alternative avoidance measures for all relevant submitted and/or approved plans and projects within the borough taking account of Natural England’s advice on SANG.</p> <p>BFC suggest the second sentence should make it clear that any SANG capacity lost needs to be replaced on an equivalent basis and in in the vicinity of the existing SANG since some development may have already been allocated to that particular SANG and replacement capacity should be within the same catchment area.</p> <p>BFC also consider that further text should be added to Policy NE3 relating to the need for an air quality assessment where the site is within proximity to a source of air pollution which could present a risk to habitat sites (as defined in the NPPF). This is in addition to the reference in Policy HC6 (e).</p>	<p>Policy NE3(8) already requires that sufficient alternative avoidance measures must be available taking account of Natural England’s advice on SANGs. This will require matters such as the vicinity of the alternative to be acceptable. WBC is satisfied that this approach is provides a suitable basis to assess planning applications.</p> <p>Policy NE3(2) already states “Development proposals for larger residential development may need to undertake an air quality assessment of the likely significant effects on the SPA and other habitats sites.” WBC is satisfied that this approach is provides a suitable basis to assess planning applications.</p>
<p>There are a few instances where direct reference is made to other plans and strategies in the plan policies. As it is</p>	<p>Comment noted. WBC is satisfied that appropriate referencing has been used throughout the plan.</p>

Summary of BFC comments	WBC response
<p>assumed that these are not being examined, such references may be better located in the supporting text.</p>	
<p>It is noted that the Duty to Cooperate: Interim Statement of Compliance refers to a meeting between the two Authorities on 28th August 2024 stating there was agreement between officers that whilst transport modelling work shows some traffic issues at key junctions on/near the shared boundary, this is within the scope of existing work programmes / engagement and are capable of resolution. Additionally, it was agreed that each Authority's emerging Local Transport Plan, seeks a shift to more sustainable travel, thus having a positive impact on traffic. Actions included a further detailed discussion between the two to map out potential improvements.</p> <p>BFC wishes to highlight that this was a high-level meeting and did not involve discussion about the detailed impact of the extension to the South Wokingham SDL and particularly the Old Wokingham Road.</p>	<p>Comment noted.</p> <p>Several meetings have been held between WBC and BFC officers on a variety of matters, including highways and transport. Transport modelling information has also been shared and discussed.</p> <p>Both parties recognise the need for engagement proportional to the stage of planning.</p>
<p>There appear to be discrepancies in the capacity of the sites allocated within the plan and those tested within the SA. It is not clear if the higher figures in the Plan have been appropriately considered within the SA, particularly in relation to cross boundary implications:</p> <p>Policy SS12 relates to the South Wokingham SDL. This includes a proposed extension of the SDL involving 1,100 homes on land south of Waterloo Road. However, the SA has only tested 980 homes (para 5.4.32/Table 5.2). It is apparent from the Plan (Policy SS12 3.a.ii) that 'at least'</p>	<p>It is not uncommon for there to be minor differences between the SA and the plan. WBC is satisfied the assessment undertaken in the SA is robust.</p> <p>The policies refer to 'at least' to recognise the number of homes proposed is not a limit, and that additional development could be delivered if other important factors are considered to be acceptable.</p> <p>Land at Amen Corner, north of London Road has a resolution to grant Outline planning permission. BFC</p>

Summary of BFC comments	WBC response
<p>980 are to be delivered within the plan period, therefore more than 980 could be achieved. The SA should be clearer in relation to the assessment of the impacts of the totality of the 1,100 dwellings, as all of this could be delivered in the plan period.</p> <p>Policy SS14.28 relates to land adjacent to Amen Corner, north of London Road which is proposed for 45 dwellings. This site does not appear to be referred to within the SA. Whilst the site has resolution to grant planning permission (as noted under Policy SS14), it is not yet a hard commitment and there is no certainty that it will proceed in this form. BFC has concerns about the impact of this development on Bracknell Forest but understands that the presumption in favour of sustainable development applied to the determination of a submitted planning application whereby permission is granted unless the adverse impacts of doing so, significantly and demonstrably outweigh the benefits.</p> <p>As referred to in specific sections of this response, there appear to be several instances of inconsistencies within the SA and the Plan, for example, in terms of what the housing requirement is, housing numbers on proposed allocations, scenario testing and alternatives.</p>	<p>were consulted and responded to the planning application and will be consulted on subsequent Reserved Matters applications.</p>
<p>BFC has no specific comments to make on the HRA but wish to ensure that Natural England has been involved in its production, including work on air quality matters.</p>	<p>Comment noted. Natural England have been engaged on air quality work and the HRA. A Statement of Common Ground has been agreed between WBC and Natural England.</p>

**Appendix B:**

**Modifications to Figure 7: South Wokingham Strategic Development Location: Land south of Waterloo Road concept plan.**

