

# Sustainability Appraisal (SA) of the Wokingham Local Plan Update (LPU)

Non-technical  
Summary

September 2024

**WOKINGHAM**  
BOROUGH COUNCIL

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# Introduction

AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Wokingham Local Plan Update (LPU).

Once in place, the LPU will set a strategy for growth and change for the period to 2040, allocate sites to deliver the strategy and establish the policies against which planning applications will be determined.

SA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives. Local Plans must be subject to SA.

Central to the SA process is preparation of an SA Report for publication alongside the draft plan that presents an appraisal of “the plan and reasonable alternatives”.

At the current time, the SA report is published alongside the ‘proposed submission’ version of the LPU, under Regulation 19 of the Local Planning Regulations (with ‘interim’ reports previously having been published alongside early drafts of the plan in 2020 and 2021).

This is the Non-technical Summary (NTS) of the SA Report.

## Structure of the SA Report / this NTS

SA reporting essentially involves answering the following questions in turn:

1) What has plan-making / SA involved **up to this point**?

- including in relation to ‘reasonable alternatives’.

2) What are the SA findings **at this stage**?

- i.e. in relation to the draft plan.

3) What happens **next**?

Each of these questions is answered in turn below. Firstly though there is a need to set the scene further by answering the question: *What’s the scope of the SA?*

## What’s the scope of the SA?

The scope of the SA is reflected in a list of topics and objectives. Taken together, this list provides a methodological ‘framework’ for appraisal.

The following topics comprise the core of the SA framework:

- Accessibility (to community infrastructure)
- Air and wider environmental quality
- Biodiversity
- Climate change adaptation
- Climate change mitigation
- Communities
- Economy and employment
- Historic environment
- Homes
- Land, soils and natural resources
- Landscape
- Transport
- Water

## Plan-making / SA up to this point

Two key steps in the required SA process are: A) appraise reasonable alternatives in time to inform development of the draft plan; and then B) publish information on reasonable alternatives as part of the draft plan consultation.

As such, Part 1 of the SA Report explains work undertaken in 2024 to develop and appraise a reasonable range of “growth scenarios”, essentially in the form of alternative key diagrams, i.e. alternative approaches to development where each is ‘reasonable’ in terms of providing for development needs and delivering on wider plan objectives.

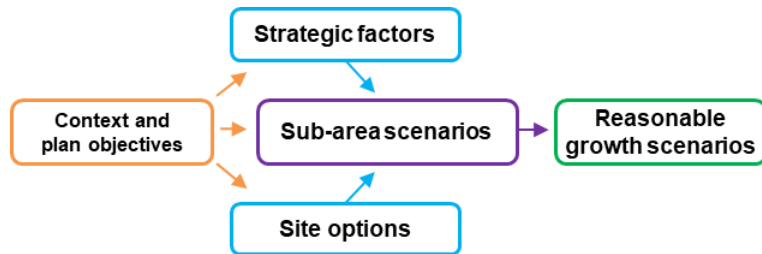
A focus on growth scenarios ensures a focus on the choice at the very heart of the plan. Furthermore, it ensures a focus on alternatives that are meaningfully different in terms of ‘significant effects’ (it being a requirement for SA to focus on significant effects).

In short, the process of exploring growth scenarios involved: **1)** defining growth scenarios; **2)** appraising growth scenarios; and then **3)** feeding-back to inform the draft plan.

## Defining growth scenarios

Section 5 of the main report explains the process of defining reasonable alternative growth scenarios for appraisal and consultation. Figure A provides an overview.

Figure A: Process overview



### Context and plan objectives

Plan-making has been underway since 2016, but a key milestone was reached in 2020 when the Council consulted on a Draft Local Plan, which was then followed by consultation on a Revised Growth Strategy (RGS) in 2021. The RGS stage was triggered by updated evidence on a major constraint to growth in the far southwest of the Borough (Grazeley).

Further context comes from the date of the adopted Local Plan (2010, namely the Core Strategy) and the Government’s current [consultation](#) on Proposed reforms to the National Planning Policy Framework (NPPF) and other changes to the planning system. There is an urgent need to adopt a new Local Plan (the LPU) in order to avoid a situation whereby the adopted Local Plan is deemed out-of-date such that the presumption / tilted balance in favour of sustainable development applies when considering planning applications.

Simply achieving an up-to-date local plan is key, but there are also a range of other objectives in place to guide plan-making and, in turn, work to define growth scenarios. These cover Council priorities including net zero, nature recovery and affordable housing.

### Strategic factors

Section 5.2 of the main report gives consideration to:

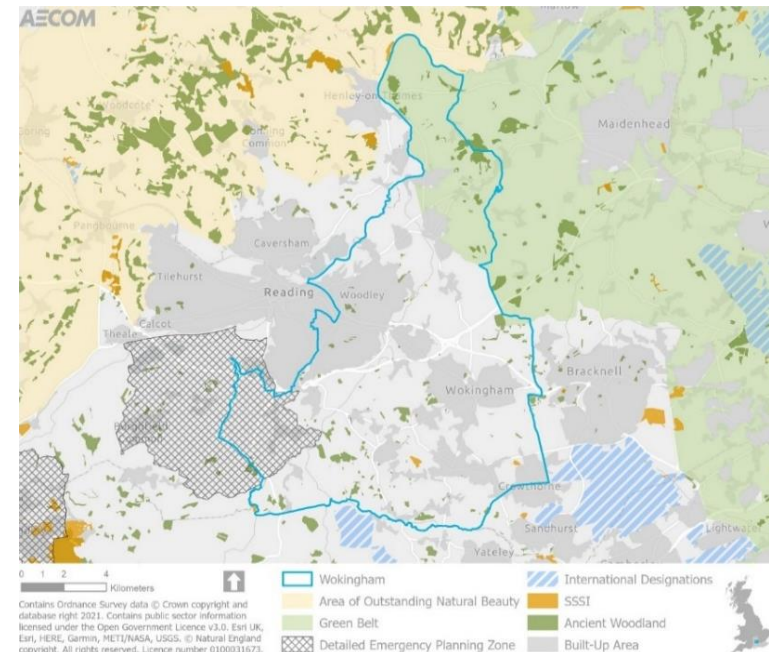
- **Quantum (how much?)** – in the Wokingham context there is a clear case for providing for housing and wider development needs in full, as opposed to generating unmet need that would then need to be provided for elsewhere in a constrained sub-region. There is also a need to remain open to evidenced arguments for modest higher growth, i.e. setting the housing requirement at a figure modestly above local housing need (LHN).

LHN is calculated using the Government’s standard method, and on this basis is set at 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).

- **Broad spatial strategy (where?)** – key considerations include: A) maximising supply from previously developed land (PDL); B) accounting for development viability given desirable policy asks including 40% affordable housing, net zero development and 20% biodiversity net gain; C) balancing supply geographically and broadly in line with the settlement hierarchy; D) balancing strategic sites (able to deliver infrastructure) and smaller sites (important for ‘delivery’); and E) accounting for understanding of infrastructures (community, transport, green/blue and grey) issues and opportunities.

A key element of the proposed broad spatial strategy that is well-established at this stage in the plan-making process is a desire to ensure a strong focus of growth at one or more Strategic Development Locations (SDLs), defined as large strategic sites able to deliver a mix of uses onsite and new/upgraded infrastructure alongside new homes. The Core Strategy (2010) allocated four SDLs (two now near complete; two still coming forward) and there is support for broadly following a not dissimilar approach in the LPU.

Figure B: Select key constraints to growth affecting the sub-region



**Site options**

Section 5.3 of the main report explains how a key ‘bottom up’ starting point for work to define growth scenarios was the Housing and Economic Land Availability Assessment (HELAA), which identifies a long-list of sites that are available, achievable and potentially suitable for allocation. Section 5.3 then explains two SA workstreams that have sought to build upon the HELAA (in terms of appraising site options in isolation). Firstly, and most importantly, detailed work has been undertaken at several stages over the course of the plan-making / SA process to shortlist and appraise strategic site options, including SDL options. Secondly, and as only a minor step in the overall process of defining growth scenarios, all site options were subject to GIS analysis (e.g. distance to a school).

**Sub-area scenarios**

This is a key section within the main report (Section 5.4), which aims to draw together the ‘top down’ and ‘bottom up’ understanding generated from the preceding two sections.

Five sub-areas are defined, and for each the aim is to: A) discuss strategic factors; B) consider site options (in isolation and in combination); and then C) conclude on sub-area scenarios to take forward, i.e. alternative combinations of site allocations.

The outcomes are presented across three maps below, where each of the map shows:

- Committed sites – namely sites with planning permission (including where there is a ‘resolution to grant’) and two small existing allocations that can be rolled forward.
- HELAA suitable sites – there are eight sites with a combined capacity of just 321 homes, such that all can reasonably be progressed as a ‘constant’, i.e. it is reasonable to assume allocation under all sub-area area scenarios.
- HELAA potentially suitable (PS) sites – this is a key category of ‘marginal’ site options for consideration. The analysis in Section 5.4 leads to one of three conclusions: A) Progress to the sub-area scenarios as a ‘constant’; B) progress as a ‘variable’; and C) not progress to the sub-area scenarios, i.e. rule out at this stage (‘omission’).
- Gypsies, Roma and Travellers (GRT) options – there are six options in total, and ultimately the emerging proposed approach is to allocate four (not the one in the north, which is a small site in the Green Belt; and not the southeastern most site, which is a larger site in a sensitive and not very accessible location).

Finally, two of the maps show a proposed area of ‘intensification’ at the northern edge of the existing Arborfield Green SDL. This a site with an existing planning permission (Arborfield Studios) and the new proposal is to support an additional 300 homes.

**Figure C: All HELAA sites categorised by sub-area**

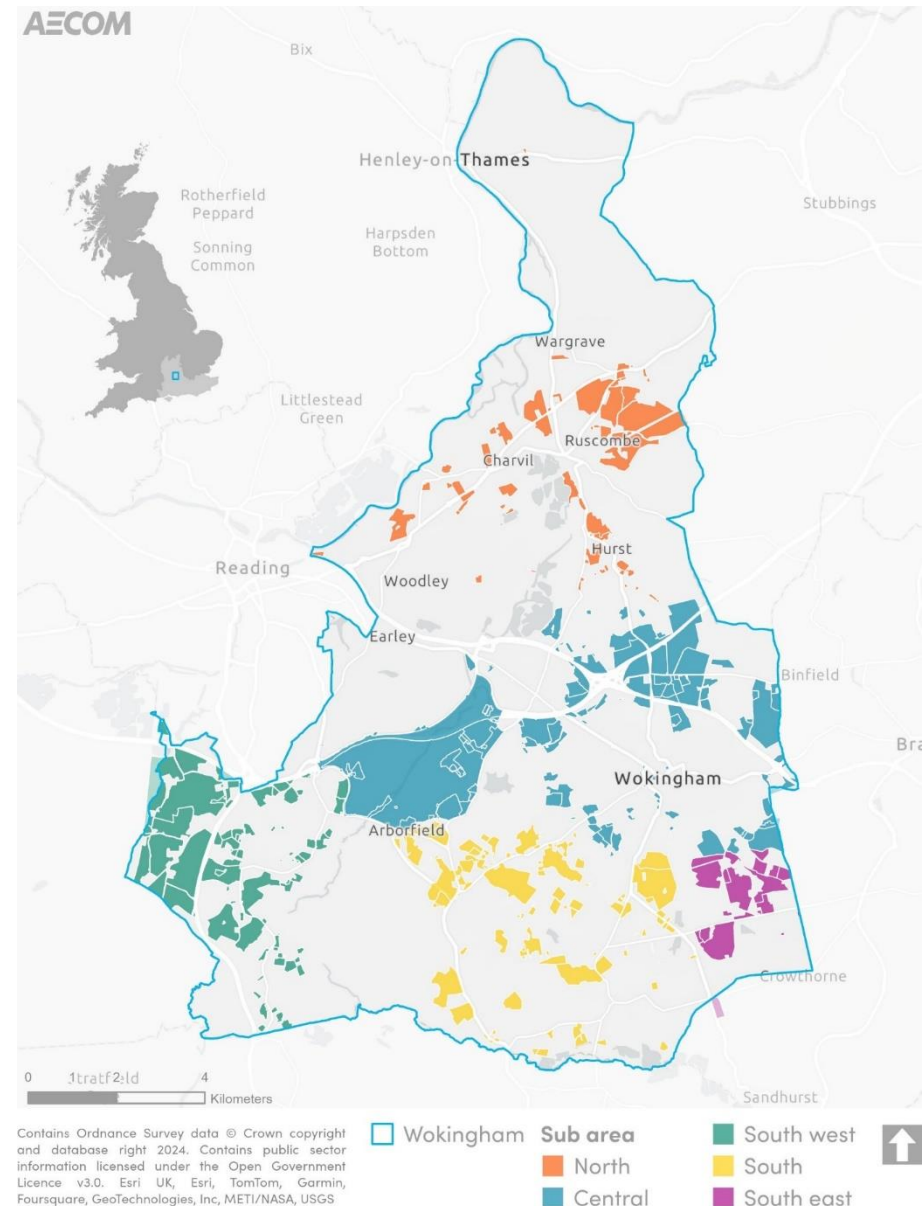


Figure D: Site options categorised by status in the north sub-area

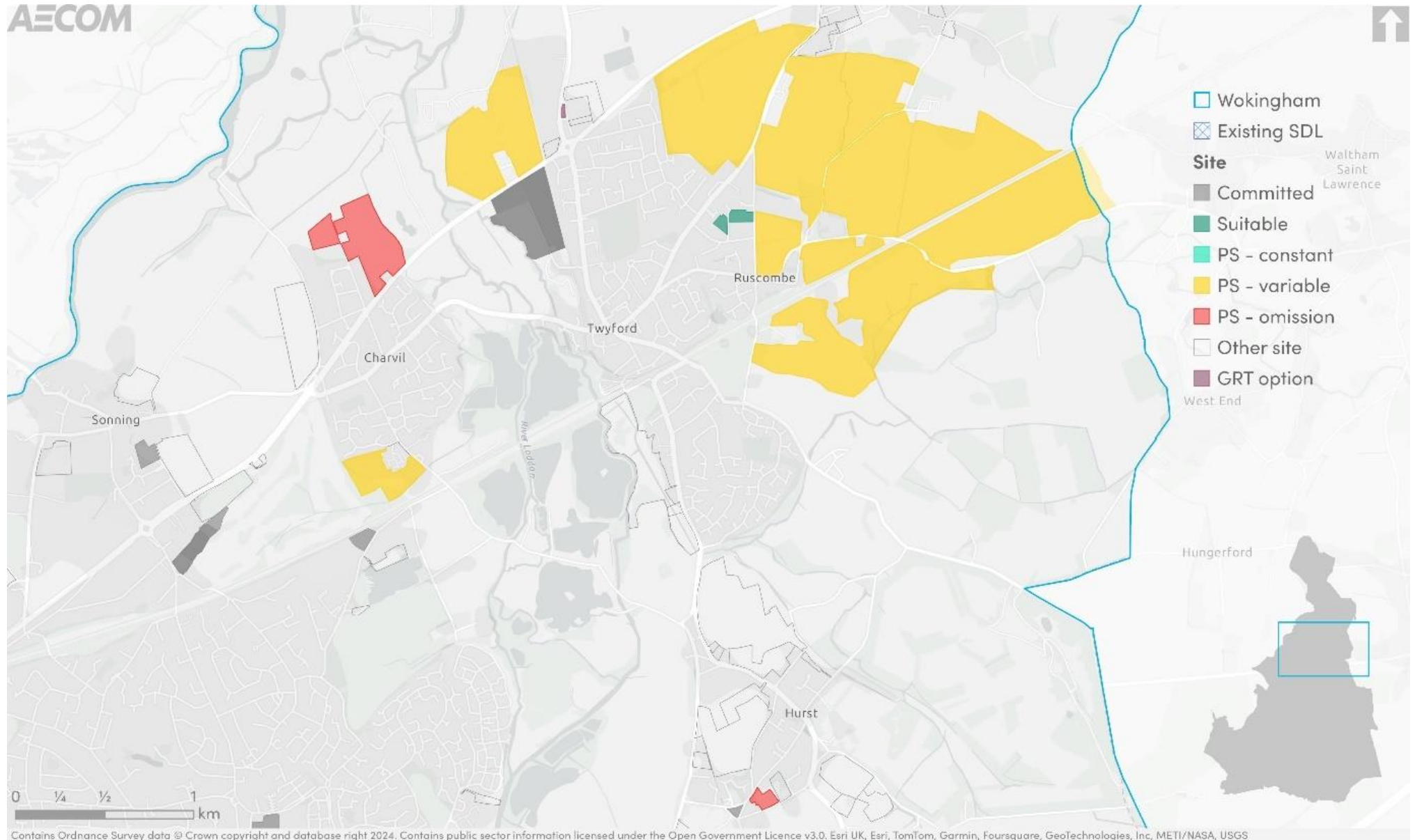


Figure E: Site options categorised by status in the central sub-area

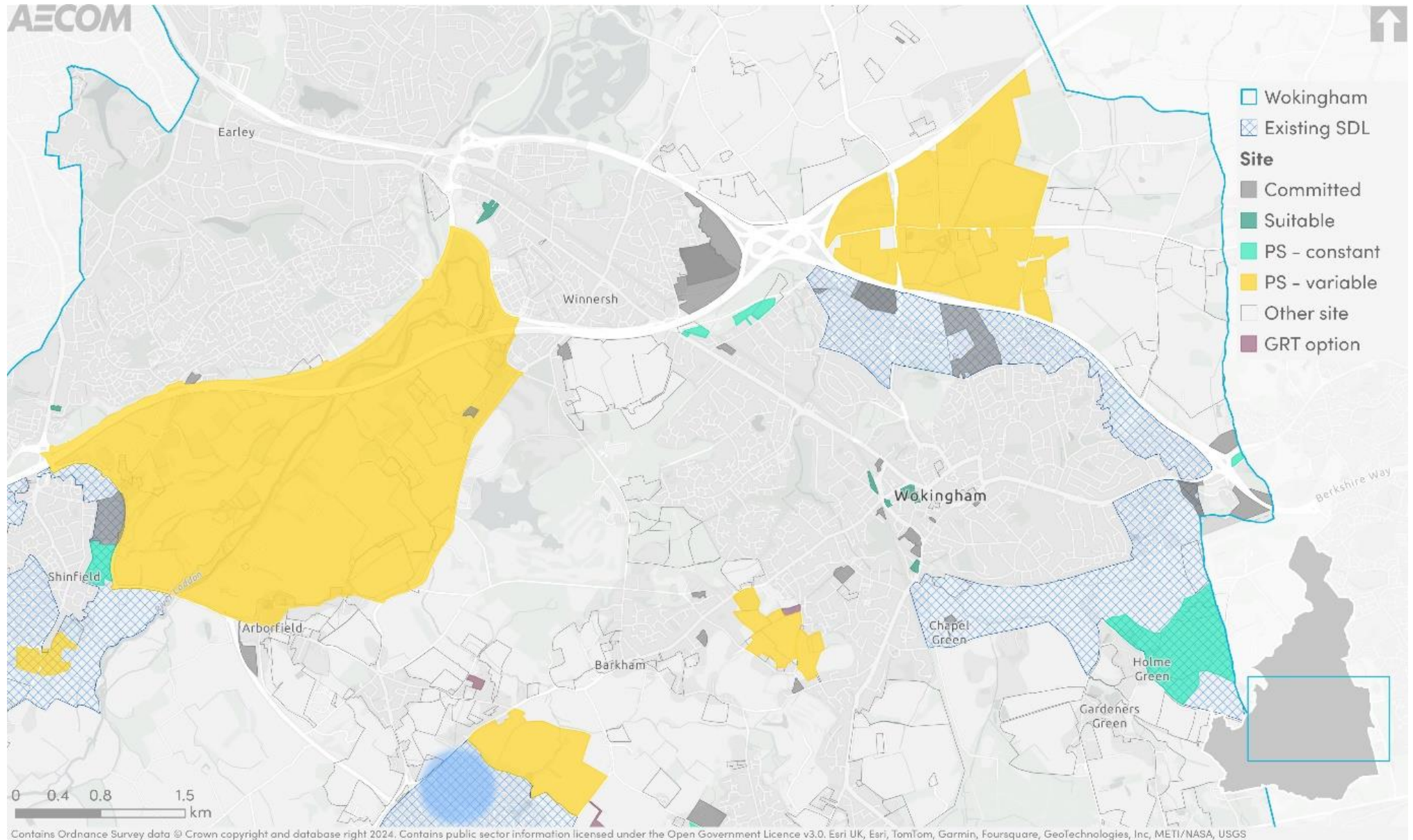
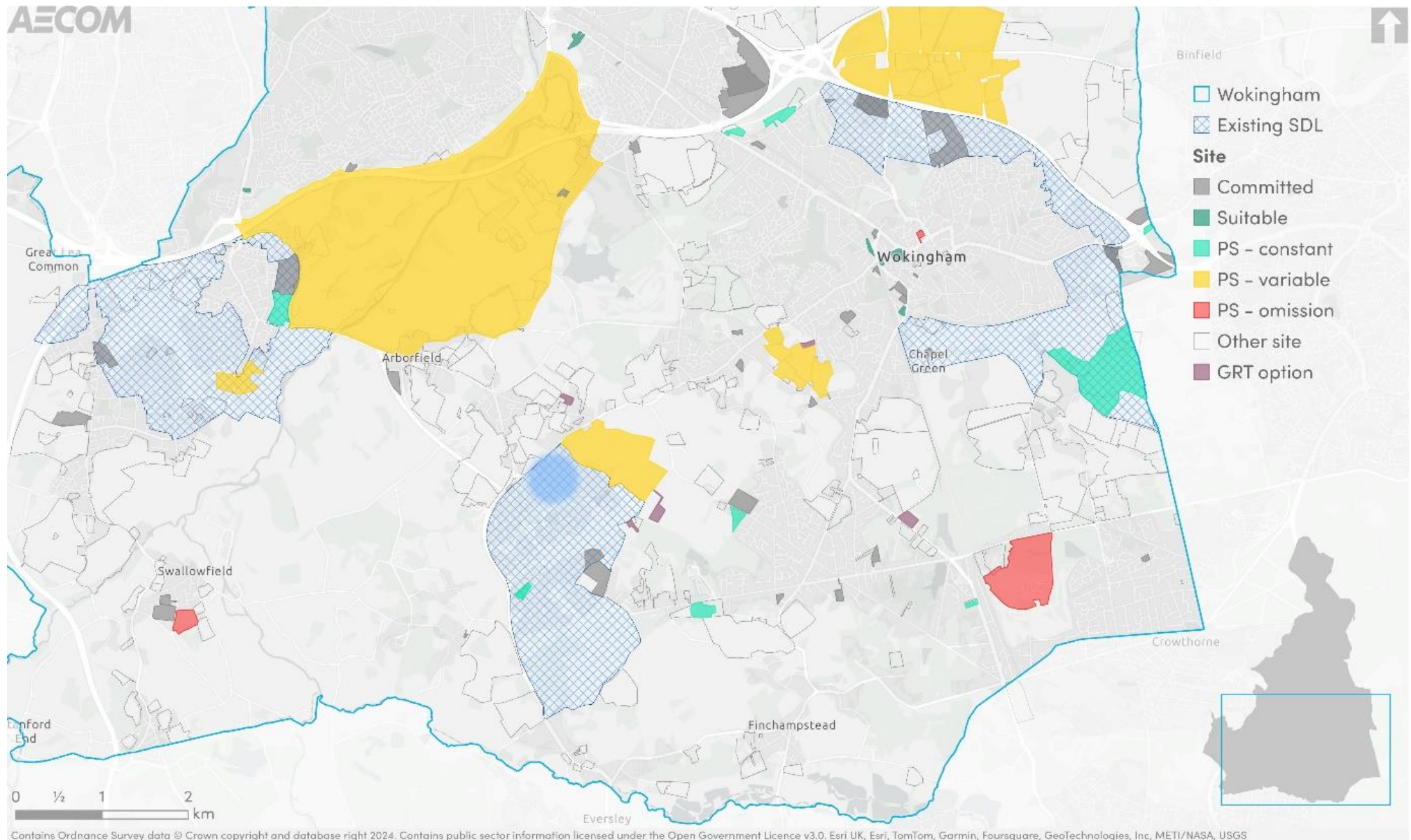


Figure F: Site options categorised by status in the central sub-area



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**Defining reasonable growth scenarios for the Borough as a whole**

In theory, the final task (Section 5.5 of the main report) is to combine sub-area scenarios to form growth scenarios for the Borough as a whole – see Table A. However, in practice, this is a challenging task because there are numerous scenarios for two of the sub-areas (because it is difficult to rule out combinations of variable sites as unreasonable).

**Table A: Summary sub-area scenarios**

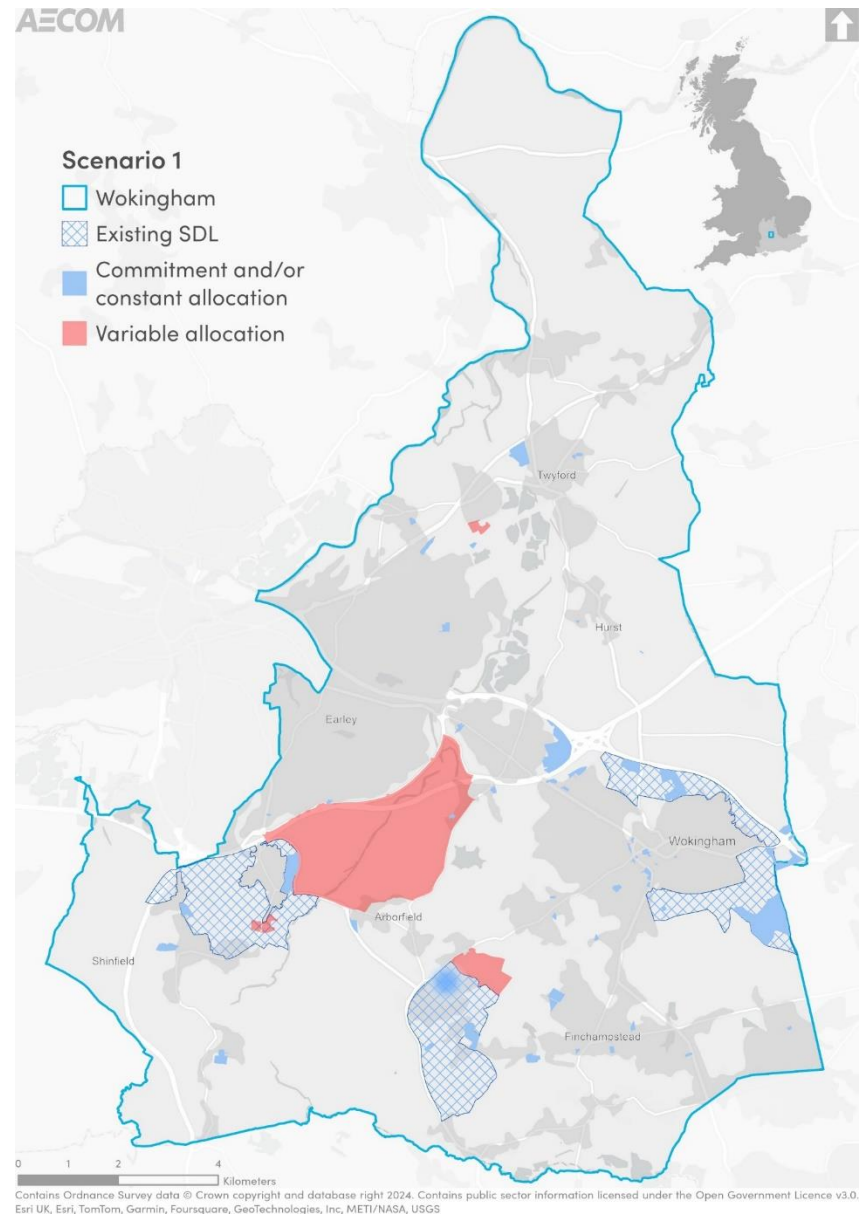
Sub-area	Variable sites	Scenarios
North	3	8
Central	3	8
Southwest	1	2
South	1	2
Southeast	0	1

As such, it is also important to categorise options in another way, namely according to the settlement hierarchy (see Table 5.2 in the main report). Having done so, it became possible to define seven reasonable growth scenarios:

- 1) Constants + Loddon Valley **SDL**, Barkham Sq & small sites
- 2) Constants + Loddon Valley **SDL**, Blagrove Ln, Riverways Fm & small sites
- 3) Constants + Loddon Valley **SDL**, Barkham Sq, Blagrove Ln and Riverways Fm
- 4) Constants + Loddon Valley **SDL**, Barkham Sq, Blagrove Ln, Riverways Fm & small sites
- 5) Constants + Ashridge **SDL**, Barkham Sq, Blagrove Ln, Riverways Fm & small sites
- 6) Constants + Loddon Valley **SDL**, East of Twyford/Ruscombe **SDL** & small sites
- 7) Constants + Loddon Valley **SDL**, Ashridge **SDL** & small sites

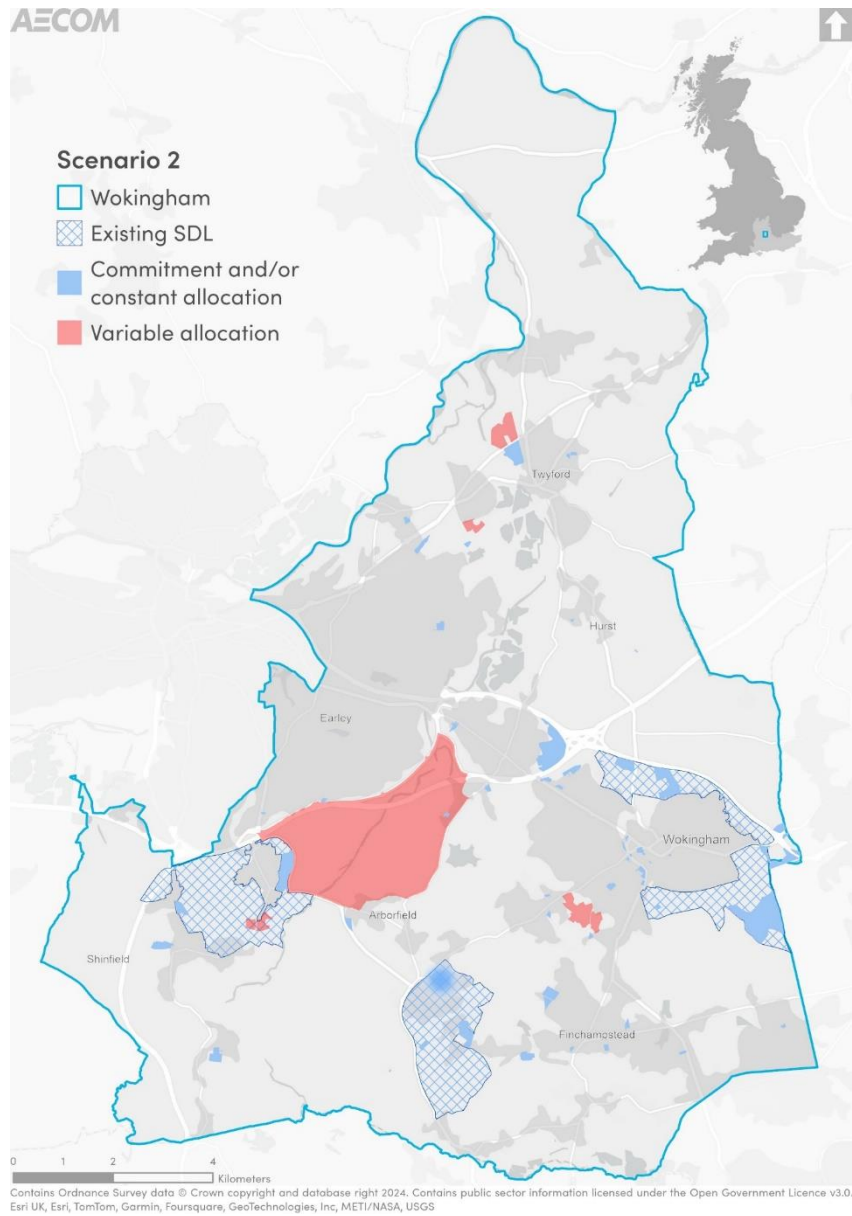
These seven growth scenarios are explained in Table 5.3 in the main report, and across a series of maps. With regards to growth quantum, total supply varies from LHN +10% (Scenarios 1, 2 & 5) to LHN plus 22% (Scenario 7). With regards to employment land, this is held constant across the scenarios, although Thames Valley Science Park might not be able to reach its full potential without support for Loddon Valley SDL (i.e. under Scenario 5). Finally, with regards to providing for Gypsy & Traveller / GRT accommodation needs, the approach is to allocate four sites as a constant across all seven scenarios.

**Scenario 1: Loddon Valley SDL, Barkham Sq, small sites**

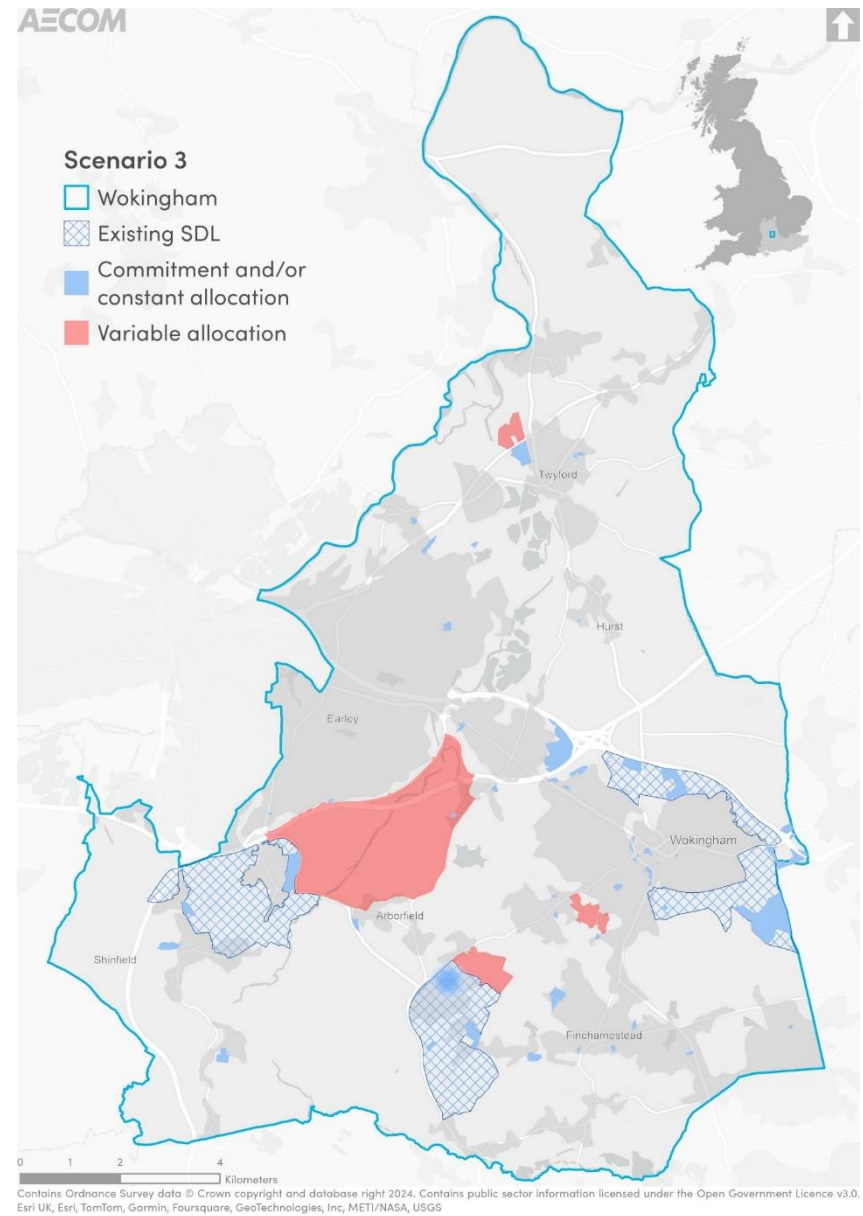




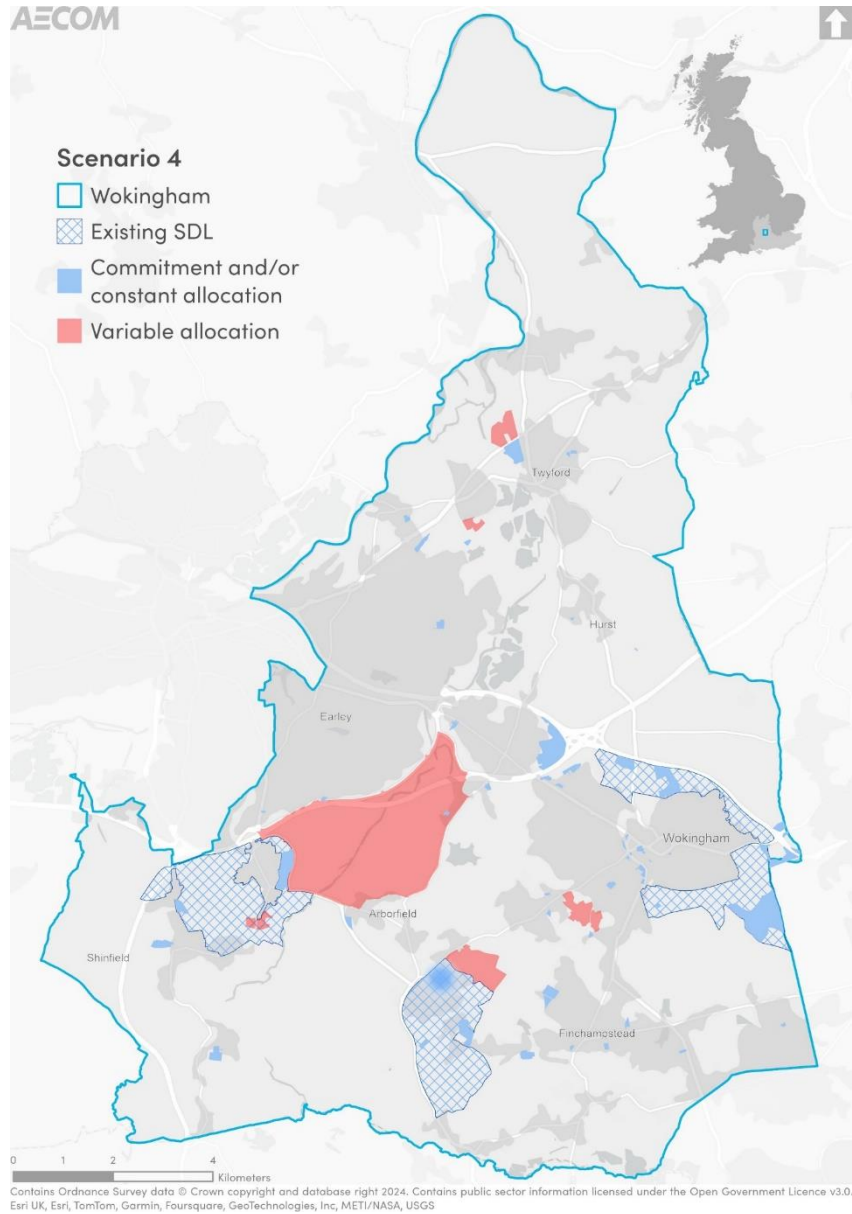
**Scenario 2:** Loddon Valley SDL, Blagrove Ln, Riverways Fm, small sites



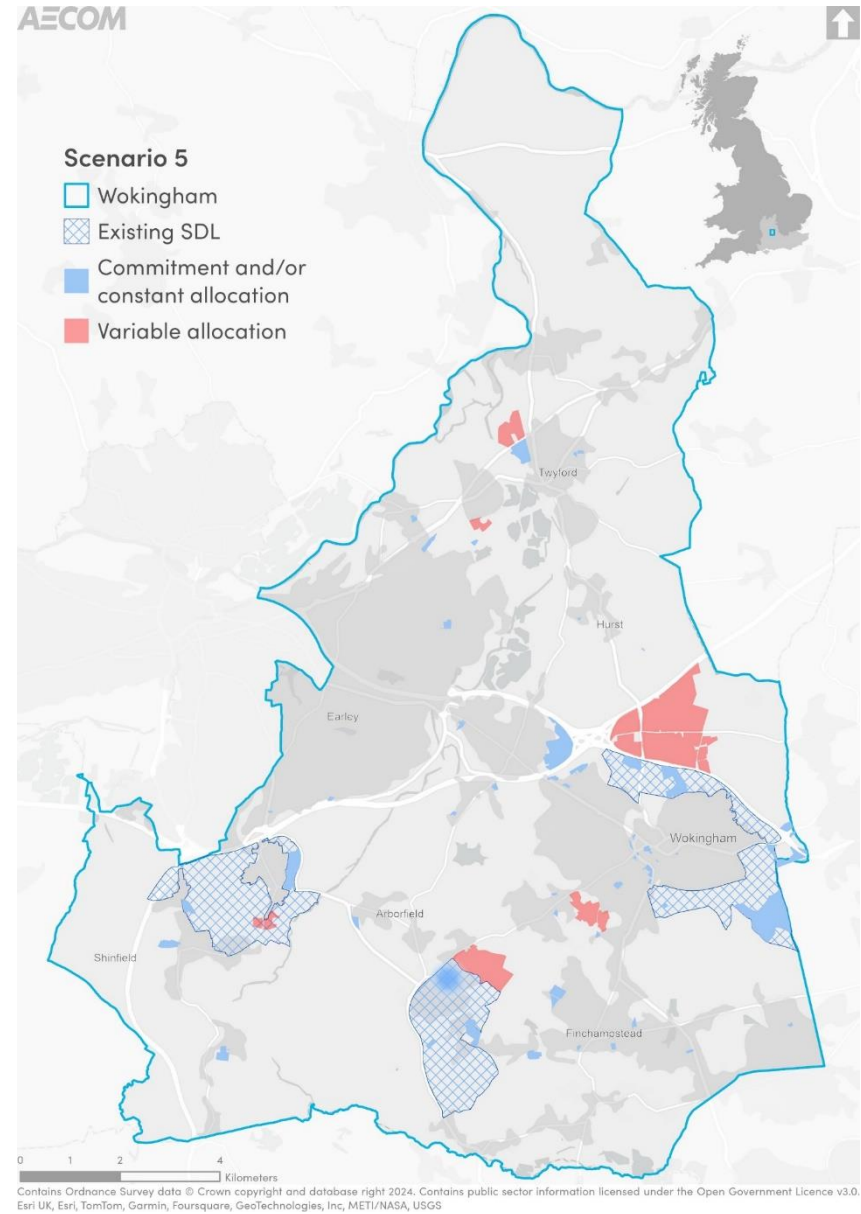
**Scenario 3:** Loddon Valley SDL, Barkham Sq, Blagrove Ln, Riverways Fm



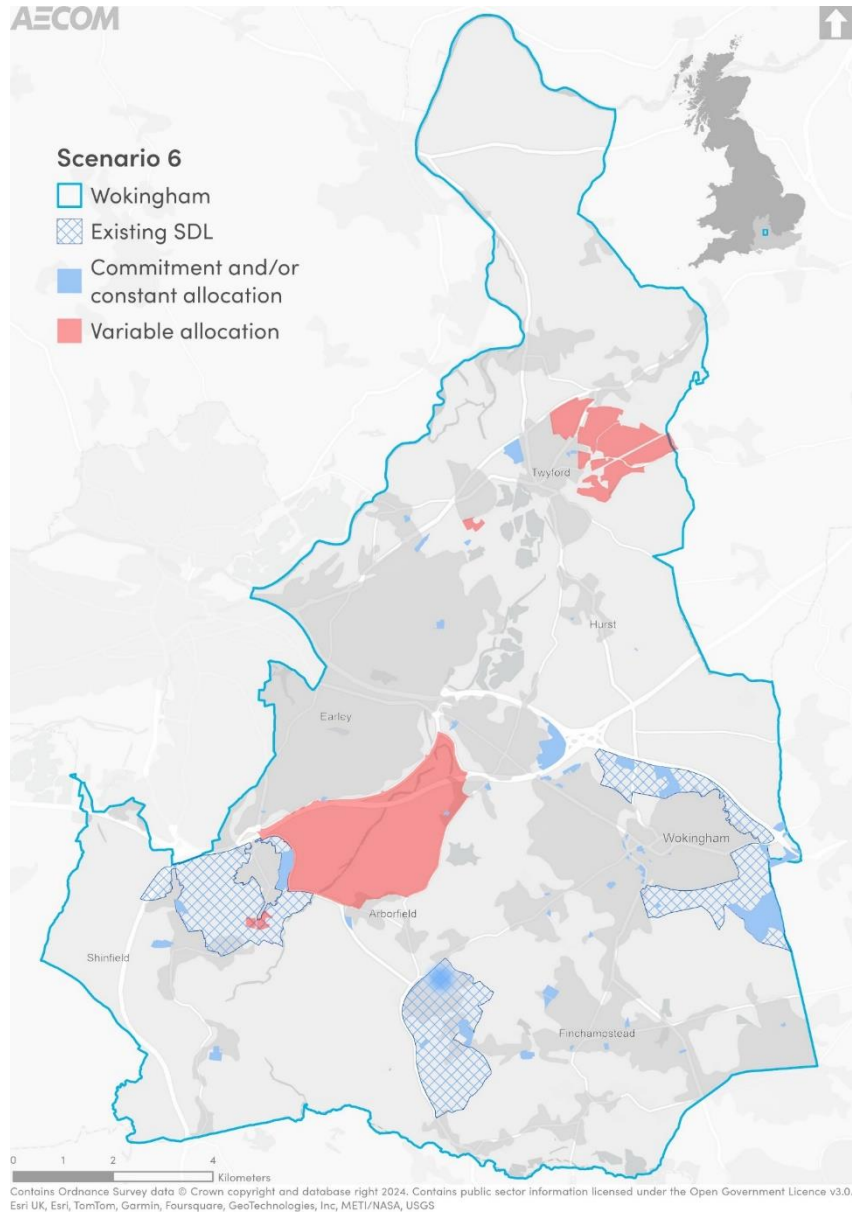
**Scenario 4:** Loddon Valley SDL, Barkham Sq, Blagrove Ln, Riverways Fm, small sites



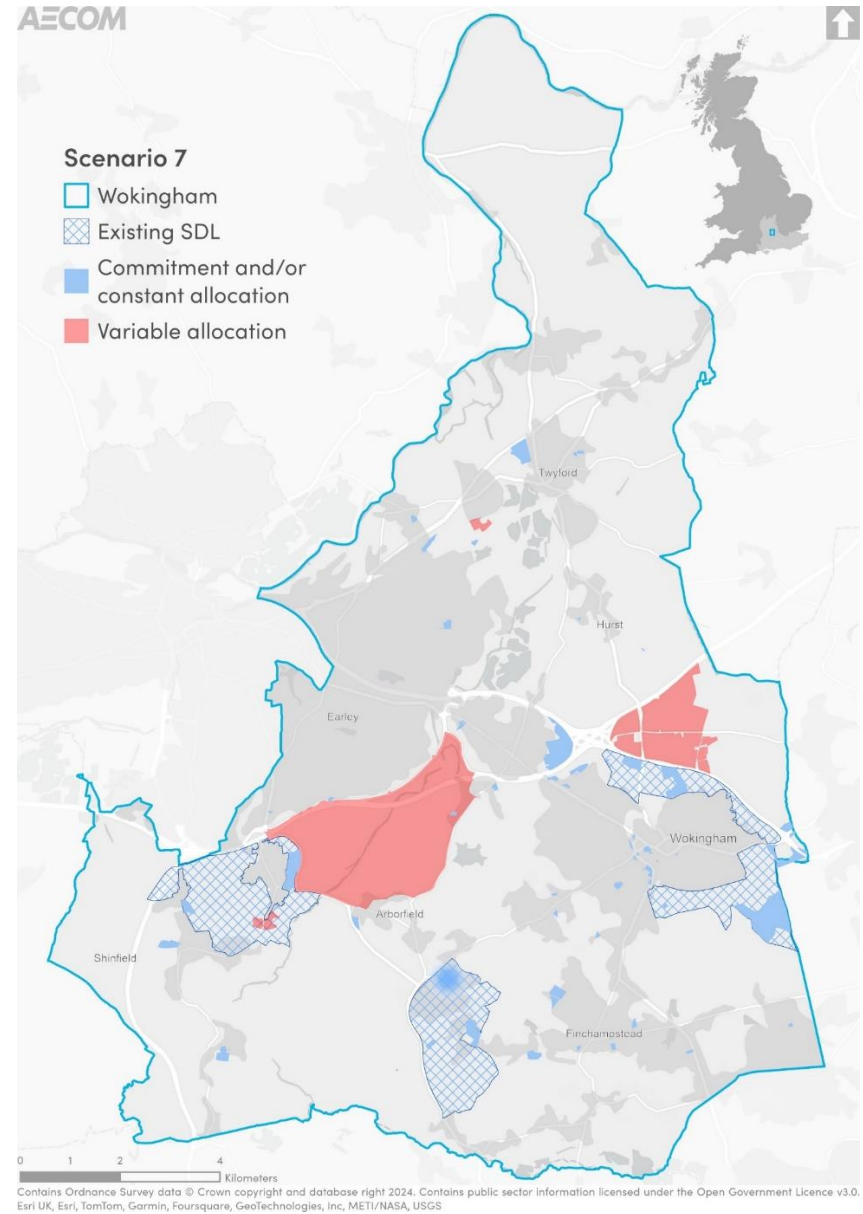
**Scenario 5:** Ashridge SDL, Barkham Sq, Blagrove Lane, Riverways Farm, small sites



**Scenario 6:** Loddon Valley SDL, East of Twyford/Ruscombe SDL, small sites



**Scenario 7:** Loddon Valley SDL, Ashridge SDL, small sites



## Growth scenarios appraisal

### Introduction

The table (or ‘matrix’) below presents a summary of the appraisal of reasonable growth scenarios presented above. The table includes a row for each component of the SA framework (introduced above), and within each row, the aim is to **1**) rank the scenarios in order of performance (with a star indicating best performing and “=” used where it is not possible to differentiate with confidence); and then **2**) categorise performance in terms of ‘significant effects’ using red / amber / light green / green.<sup>1</sup> It is important to note that the topics should not be assumed to have equal importance, or ‘weight’ in the decision-making process. As such, the intention is not for the appraisal matrix below to be used to arrive at a total performance score for each of the growth scenarios.

### Summary discussion (continued overleaf)

The summary appraisal matrix shows a very **mixed picture**, serving to suggest that the choice between the RA growth scenarios is finely balanced. This is a strong indication of their ‘reasonableness’, in that all or most could arguably deliver on key objectives and their performance varies ‘at the margins’.

A good starting point is **Scenarios 6 and 7**, i.e. those scenarios involving two SDLs. In short, these scenarios perform notably well in terms of some objectives, but notably poorly in terms of others. Two SDLs could represent a highly proactive approach to planning for housing needs (including from a larger-than-local perspective), infrastructure, the economy and climate change mitigation. However:

- There are concerns with both Ashridge and East of T/R, and there are additional concerns in respect of delivering Ashridge in combination with Loddon Valley, particularly from a transport perspective.
- Concerns increase once account is taken of delivery uncertainties/risks associated with Ashridge (particularly from a transport perspective and given limited engagement with housebuilders). This is in contrast to East of Twyford/Ruscombe, which is in the control of a single housebuilder (albeit the level of work undertaken is less than would ideally be the case, e.g. there has been uncertainty regarding a new train station), and Loddon Valley, which has been the focus of consultation and much technical work led by the site promoters in close collaboration with the Council and partner organisations.

**Table B: Summary appraisal of the reasonable growth scenarios**

Topic	1	2	3	4	5	6	7
	LV, Barkham & small sites	LV, B'grove, R'ways & small sites	LV, Barkham, B'grove & R'ways	LV, Barkham, B'grove, R'ways & small sites	Ashridge Barkham, B'grove, R'ways & small sites	LV, ET/R, small sites	LV, Ashridge, small sites
Accessibility	★	★	★	★	2	★	★
Air and wider env quality	2	4	3	4	5	★	3
Biodiversity	2	4	3	4	6	★	5
Climate adaptation	3	3	3	3	★	2	2
Climate mitigation	3	3	3	3	2	2	★
Communities	2	3	2	2	3	★	★
Economy & employment	★	★	★	★	2	★	★
Historic environment	3	2	3	3	3	4	★
Homes	5	5	4	2	3	2	★
Land, soils, resources	2	2	2	2	★	3	2
Landscape	=	=	=	=	=	=	=
Transport	★	★	★	★	2	★	3
Water	4	3	5	6	★	3	2

<sup>1</sup> Red = significant negative effect; amber = negative effect of limited or uncertain significance; light green = positive effect of limited or uncertain significance; green = significant positive effect; no colour = neutral effect.

- East of T/R is located in the Green Belt (albeit at the edge) such that allocation would require 'exceptional circumstances' and, in turn, work to demonstrate that Green Belt release cannot be avoided (given strategic, settlement and site-specific factors taken into account in the round).
- Finally, in reality the reasonableness of these two scenarios is questionable from a housing perspective because there would be a need for a heavily stepped housing requirement (i.e. housing delivery would be at a problematic low level in the earlier years of the plan period). In practice, there could therefore be a need to allocate additional smaller sites, and potentially one of the smaller strategic site options.

Moving to the left, **Scenario 5** is a logical next port of call, as the only scenario that substitutes Loddon Valley for an alternative SDL, namely Ashridge. It is very difficult to draw upon the appraisal matrix to put forward a case for Ashridge being preferable to Loddon Valley (also see Appendix IV). This is particularly the case once account is taken of two factors: firstly, under 'climate change adaptation', whilst it is appropriate to flag Loddon Valley as associated with flood risk, in practice development will avoid flood zones and there is potential to achieve a flood risk betterment (albeit there is also a need to account for new road infrastructure within / crossing the flood zone); secondly, under 'climate change mitigation', whilst the Ashridge promoters completed a detailed study to explore built environment decarbonisation, in practice deliverability is uncertain plus the proposals are not strongly tied to the inherent characteristics of the site. Also, the approach proposed does not strongly align with the energy hierarchy ('fabric first').

With regards to Scenarios 1 to 4, which would all involve allocation of one SDL in the form of Loddon Valley Garden Village, a good starting point is **Scenario 4**, which arguably performs relatively poorly. Specifically, whilst it is flagged as representing a very proactive approach to providing for housing needs, there is a significant concern in respect of wastewater treatment capacity (albeit this is highly uncertain, in light of the available evidence, and given typically good potential to deliver upgrades to WwTWs). Also, there are some concerns with Riverways Farm (including from an air quality perspective) and Blagrove Lane (including from a biodiversity perspective). Furthermore, whilst not reflected in the order of preference assigned to the scenarios, there is an element of concern around Barkham Square and Blagrove Lane delivering in combination from a landscape and transport perspective. Contrasting Scenario 4 to Scenarios 1 and 3, it can be seen that Scenario 4 is preferable only in terms of 'housing' objectives.

Finally, focusing on **Scenarios 1 to 3**, the decision is clearly finely balanced, but points to note are in respect of the following: Air quality – there is a constraint at Twyford, but the predicted negative effect reflects a precautionary approach; Biodiversity – Blagrove Lane and (to a lesser extent) Hyde End Road (a small site) are subject to a degree of constraint;

Communities – Barkham Square is very notably able to deliver or facilitate Gypsy and Traveller pitches, plus there are limited concerns regarding direct impacts to nearby communities; Historic environment – Barkham Square is flagged as the more constrained of the three small strategic sites, and as this is a new allocation Historic England will wish to comment formally, but concerns are unlikely to be significant; and Water – there is a concern that sites in combination could risk capacity breaches at Wargrave and (in particular) Arborfield WwTWs. Also, and as discussed, whilst the appraisal concludes that these scenarios perform broadly on a par under the landscape and transport headings, there is a degree of concern with delivering Barkham Square and Blagrove Lane in combination. Having said that, there could also be a transport opportunity, and perhaps even a 'landscape' opportunity if the opportunity is taken to comprehensively plan for the long term future of the sensitive sector of land between Wokingham and Shinfield / the A327 / Arborfield / Finchampstead North / Nine Mile Ride.

## The preferred growth scenario

The following statement is WBC officers' response to the appraisal:

"We broadly agree with AECOM's appraisal findings. Loddon Valley is preferable to Ashridge, whilst the scenarios with two SDLs are associated with drawbacks and uncertainties. Loddon Valley is associated with a range of benefits relative to the other two options, including in terms of delivering a county park, biodiversity improvements, flood betterment, sustainable bus services, and employment in proximity.

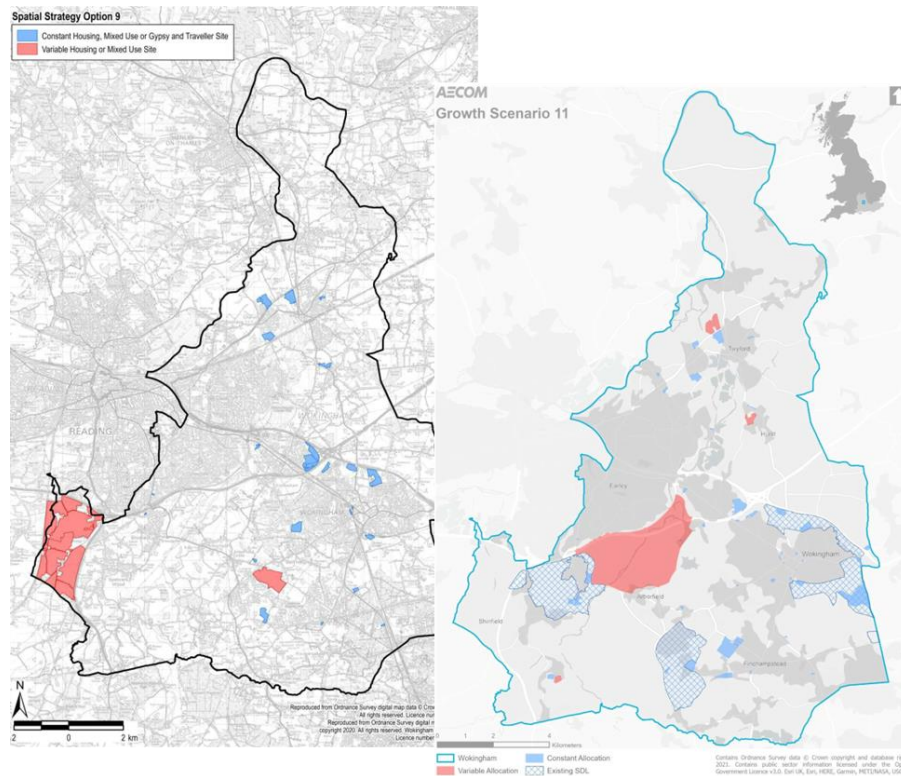
The Council has remained alive to the possibility of a high growth strategy throughout plan preparation but a preferable approach – in light of appraisal, consultation and ongoing engagement – is to provide for 'standard method' LHN in full which, at the current time (notwithstanding the Government's draft proposals, at the time of writing), means a housing requirement set at 748 dpa.

By way of context, the highest growth scenario appraised at the current time might enable the housing requirement to be set at c.830 dpa, but scenarios appraised previously in 2020 and 2021 would have enabled the housing requirement to be set at an even higher figure (circa 860 and 930 dpa respectively). The figure below shows the highest growth scenarios previously appraised in 2019/20 and in 2021.

Focusing on Scenarios 1 to 4, the Council agrees with AECOM's conclusion that the decision is finely balanced. The two variable small sites are ultimately quite strongly supported, including because they help with ensuring a good mix of sites within the overall supply profile/trajectory. Of the three smaller strategic sites appraised Barkham Square is preferred for a number of reasons, including its location on the edge of an

existing SDL, and its ability to support additional Gypsy and Traveller pitches. Blagrove Lane and Riverways Farm are both associated with issues/challenges, and there are in combination effects to consider. In addition, from a strategic perspective there is no numerical requirement to allocate either of these sites, because allocating the ‘constant’ site plus Loddon Valley plus Barkham Square plus the two variable small sites leads to total supply over the plan period 10% above the requirement (LHN).”

**Figure G:** High growth scenarios previously appraised in 2020 (left) and 2021 (right).



N.B. whilst neither of these previously appraised high growth scenarios represents the current preferred approach, the fact that these scenarios have been appraised and published for consultation as part of the plan-making process (along with numerous other scenarios) supports the case for the preferred approach being ‘justified’ and specifically “an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence” (NPPF para 35)

## SA findings at this stage

Part 2 of the SA Report presents an appraisal of the Local Plan Update as a whole.

### Appraisal of the Proposed Submission LPU

The appraisal conclusions reached for the LPU as a whole broadly align with those reached for Growth Scenario 1, although in two cases it is considered appropriate to ‘upgrade’ the appraisal conclusion after having taken account of proposed development management policies (which for the most part do not factor-in to the appraisal in Section 6, to ensure an unbiased appraisal of the growth scenarios). Specifically, this is the case for climate change mitigation and communities / health.

The outcome is that the appraisal predicts a **positive effect** under five topics, and in three cases it is possible to conclude that the positive effect will be ‘significant’. Specifically, a significant positive effect is predicted under the accessibility (to community infrastructure), communities/health and homes topic headings. A less significant positive effect (‘moderate or uncertain’) is then predicted for climate change mitigation and the economy (although there is an argument for predicting significant positive effects),

The appraisal then predicts a **negative effect** under two headings – landscape and water – but in neither case is the effect predicted to be significant. Landscape is an inherent constraint to growth locally whilst the conclusion under water reflects a precautionary approach ahead of further investigations / certainty in respect of wastewater treatment.

Under the remaining topic headings the appraisal predicts a **neutral effect**, but that is not to say that the appraisal does not flag a range of specific issues and tensions with sustainability objectives.

Taking each of the sustainability topics in turn:

**Accessibility** – the proposed spatial strategy performs very well, primarily due to a focus on directing growth broadly in line with the settlement hierarchy and towards strategic sites able to deliver new community infrastructure, most notably new education facilities including a new secondary school at Loddon Valley Garden Village that will be well-located / in line with borough-wide schools strategy. Of the other two strategic allocations, Barkham Square will not deliver a primary school and there is some uncertainty at South Wokingham SDL extension (but it will deliver a neighbourhood centre), but both are well located in terms of accessing community infrastructure (with capacity) within adjacent SDLs.

A robust DM policy framework is proposed and there is confidence that the net effect will be to ensure that community infrastructure is delivered in line with the policy intent, accounting for development viability considerations. Overall a **significant positive effect** on the baseline is predicted, accounting for established objectives, which is in line with the conclusion reached for growth scenario 1 in Section 6.

- **Air and wider environmental quality** – the proposed spatial strategy does not generate any significant concerns from an air quality perspective, including recalling that the baseline situation is one whereby growth continues to come forward but in a relatively unplanned way. LVGV is not ideally located in transport terms, and there is an extensive AQMA affecting the centre of Reading, but there will be good potential to minimise the need to travel and achieve high levels of transport modal shift. Another issue at LVGV is noise and air pollution from the adjacent M4, but steps can be taken to avoid and mitigate this (at a financial cost). The modest growth strategy for the north of the Borough is also supported given a problematic AQMA affecting Twyford, although equally the opportunity to deliver a bypass road is not set to be realised. Finally, with regards to the Wokingham AQMA, both South Wokingham SDL extension and Barkham Square will likely result in additional car trips through the AQMA, but there is no reason to suggest a significant concern. Overall a **neutral effect** on the baseline is predicted, in line with the conclusion reached for growth scenario 1.
- **Biodiversity** – the proposed spatial strategy does not generate any significant concerns, with the three main proposed allocations subject to limited constraint and all able to deliver new strategic greenspace (SANG) that should prove well-targeted from a biodiversity perspective. LVGV is inherently sensitive on account of the Loddon valley / corridor, but sensitivities are more associated with land to the north of the river, where the expansion of TVSP is likely to come forward regardless of a garden village to the south, and the opportunity to deliver a major new country park is of larger-than-local (e.g. regional) significance. Certain of the other proposed allocations are also subject to a degree of biodiversity constraint, including in the vicinity of Longmoor Bog SSSI, but concerns are overall of limited significance, and a degree of tension with biodiversity objectives is largely unavoidable in the context of local plan-making. With regards to DM policy, the key point to note is that the proposal is not to require BNG over-and-above the nationally required 10%, but otherwise a suitably proactive approach is taken through site-specific policy, and at the current time plan-making is being undertaken without the benefit of a Local Nature Recovery Strategy (LNRS; which is currently in preparation for Berkshire). Overall a **neutral effect** is predicted.

- **Climate change adaptation** – the proposed spatial strategy does not generate any significant concerns, once account is taken of the potential to avoid flood zones through masterplanning and design-in Sustainable Drainage Systems (SuDS). LVGV is inherently sensitive, including noting downstream flood risk and the need for infrastructure within / across the flood zone, but detailed work has concluded the potential to avoid any worsening of flood risk, and ongoing consideration can be given to strategic flood water attenuation as part of work to design and deliver a new country park along the river corridor. The two other largest allocations – Barkham Square and South Wokingham SDL extension – are also bisected by fluvial flood zones, and at both there is a need for ongoing scrutiny of the steps taken through masterplanning to buffer and potentially enhance the flood zones. Finally, certain of the PDL allocations are located in a flood risk zone, but this is not unusual in the national context, and the key thing is that flood risk factors into decision-making in respect of site capacity (including accounting for non-residential uses on the ground floor) and development management policy. Overall a **neutral effect** is predicted, but it is recognised that the Environment Agency will wish to comment through the consultation.
- **Climate change mitigation** – the spatial strategy has some merit in terms of built environment decarbonisation (the focus of discussion here), particularly given the focus of growth at LVGV and two other strategic sites, but equally it is difficult to conclude that built environment decarbonisation has been a key focus of spatial strategy / site selection and masterplanning work undertaken to date. This being the case and given the urgency of decarbonisation given the committed net zero target date / trajectory, Section 6 predicts a 'moderate or uncertain' negative effect for growth scenario 1 (the preferred scenario). However, within this section added consideration is given to proposed DM policy and, in this regard, proposals are very strongly supported. Specifically, the DM policy approach involves requiring net zero development to an exacting standard (in line with the energy hierarchy and with an energy-based approach to calculating performance) and is considered to be at the forefront of national best practice (with numerous emerging local plans taking this approach, particularly in parts of the country with strong development viability). On this basis it is considered appropriate to predict a **'moderate or uncertain' positive effect** on the baseline, accounting for established objectives/targets. However, this conclusion is reached on balance, because it is crucially important to take all steps to realise built environment decarbonisation opportunities through spatial strategy and site selection, rather than relying overly on DM policy with cost implications such that there is a risk of having to make compromises at the planning application stage.

- **Communities** – key issues relate to: A) providing for Gypsy and Traveller accommodation needs; and B) place-making and avoiding impacts to communities / addressing community concerns. There is a strong degree of support for the spatial strategy in both respects, e.g. in respect of Gypsies and Travellers it is important to be clear that the approach taken to providing for accommodation needs is proactive to a level that goes beyond what is typical across the South East (although supply from allocations still falls short of the identified need figure). Section 6 predicts a ‘moderate or uncertain’ positive effect for growth scenario 1 (the preferred scenario) but having taken account of the proposed DM policy framework it is considered appropriate to upgrade this conclusion to a **significant positive effect**. A robust DM policy framework is proposed – both site/area-specific and borough-wide – and it is clear that the needs of communities are prioritised to a good extent in the context of limited funds / development viability parameters.
- **Economy** – the spatial strategy performs well in that the minimum employment need figure set out in the ELNS (2023) is provided for in full (and exceeded). However, the conclusion is a **‘moderate or uncertain’ positive effect**, rather than a significant positive effect, because the supply would fall well short of the upper-end ELNS target figure (albeit this is a strategic and aspirational figure). A robust DM policy framework is also proposed, and this is of considerable importance, as there is a need to ensure a proactive approach to supporting windfall sites and windfall applications for the intensification of existing employment sites in order to boost supply.
- **Historic environment** – whilst there are inevitably some tensions with historic environment objectives, the spatial strategy is overall judged to perform strongly, and the historic environment is a focus of area/site-specific policy (plus there is borough-wide DM policy in line with national expectations). Focusing growth at Loddon Valley GV is ultimately supported from a historic environment perspective, and whilst Barkham Square is subject to a notable degree of constraint, concerns are likely of limited significance, including accounting for the proposed layout / approach to masterplanning (but Historic England will wish to comment further, recognising that this is a new proposed allocation since the RGS stage, 2021). Overall, a **neutral effect** is predicted, accounting for established objectives and recognising that the baseline situation is one whereby growth continues to come forward without an up-to-date plan.
- **Homes** – the key consideration is a proposal to provide for housing needs in full over the plan period at a steady rate, i.e. the proposal is to set the housing requirement at Local Housing Need (LHN) for each year within the plan period. LHN is currently 748 dpa (although the Government is consulting on a significantly higher figure at the time of writing, and neighbouring authorities also see higher figures under the proposals).

Furthermore, when looking across the plan period as a whole the total supply exceeds the housing requirement (housing need) by c.10%, with a ‘supply buffer’ of this nature important as a contingency for delivery issues. Aside from the question of total growth quantum, there is also considered to be a good mix of sites, in terms of location and size/type, which is important in terms of ensuring a robust supply profile/trajectory and also providing for locally arising housing needs. However, there could be the potential to focus growth at existing settlements to a greater extent (as opposed to focusing growth at a garden village and two extensions to existing SDLs) and there is an acknowledged ‘housing’ case for alternatively weighting growth more towards the north of the Borough. Finally, with regards to DM policy, affordable housing is prioritised to a good extent (accounting for both total percentage requirement and required tenure mix), in the context of development viability parameters and competing objectives such as net zero. Overall it is considered appropriate to predict a **significant positive effect** in the context of current understanding of LHN.

- **Land, soils and natural resources** – the spatial strategy will result in extensive loss of productive agricultural land and a proportion of this will comprise land that is ‘best and most versatile’ (BMV), but it is difficult to quantify the effect with any certainty, and there is limited guidance nationally on what extent of loss is ‘significant’. Also, there is a need to consider that loss would continue under a baseline scenario, and that the Borough does not stand-out as particularly constrained in the sub-regional context. Aside from the loss of productive / BMV agricultural land, another consideration is sterilisation of mineral resources, but there are no significant concerns. Overall a **neutral effect** is predicted.
- **Landscape** – there is a need to predict a **‘moderate or uncertain’ negative effect**, even after having accounted for the proposal to support a series of local landscape designations and DM policy that includes clear requirements for green infrastructure aimed at ensuring developments are well-contained within the landscape. Whilst there is a strong case for LVGV in landscape terms (particularly given the proposal to deliver a new country park of regional significance, and notwithstanding inherent sensitivities associated with the Loddon Valley) there are concerns regarding landscape character in the southern half of the Borough with a long term perspective. However, it is important to be clear that there are no easy options in the Wokingham Borough context, in terms of avoiding or minimising landscape impacts, as discussed in Section 6. Whilst there are no nationally designated landscapes, the effect of decades of urban expansion just beyond the edge of the London metropolitan Green Belt means that there are inherent risks to settlement separation and landscape / settlement character.



- **Transport** – the spatial strategy directs growth strongly in line with the settlement hierarchy and to strategic sites suited to achieving a degree of trip internalisation and investment in transport infrastructure/services. None of the strategic sites are ideally located from a transport perspective – with LVGV located between strategic transport corridors, South Wokingham SDL extension some way distant from Wokingham town centre and Barkham Square an extension to a modest development settlement (Arborfield Green) – but it is not clear that there is a preferable strategy (see Sections 5, 6 and 7). Much detailed work has been undertaken to explore transport issues and opportunities, e.g. with a view to a targeted approach to bus services and cycle infrastructure, and a robust DM policy framework is proposed, but overall it is appropriate to predict a **neutral effect** on the baseline. This is an improvement on the equivalent conclusion reached at the RGS stage (2021).
- **Water** – whilst few concerns were raised through the consultation in 2021, and a Stage 2 WCS was subsequently completed that raises few concerns, the WCS has not been able to account for the latest proposed allocations and does not explore the implications of growth scenarios. It appears clear that there is an issue at Arborfield WwTW, but the significance of this issue is unclear, given the potential to secure capacity upgrades. If nothing else, it serves to shine a light on the importance of integrating water environment objectives into ongoing work around masterplanning and design at LVGV. Taking a precautionary approach, it is appropriate to flag a **‘moderate or uncertain negative effect**. It will be for the Environment Agency and Thames Water to comment further through the current publicity period.

There will be the potential to make improvements to the plan through the forthcoming examination in public. Improvements to the plan might seek to further bolster positive effects identified through this appraisal, and there will certainly be the potential to further explore tensions with sustainability objectives. As part of this, it may be possible to adjust the balance that has been struck in respect of DM policy requirements in the context of development viability, e.g. feasibly compromising on one or more objectives in order to boost the requirement for biodiversity net gain to 20%.

A small number of recommendations are made; however, it is inherently difficult to confidently make recommendations because actioning them will have implications that are difficult to foresee and account for here. For example, whilst it would be easy to recommend further policy stringency in respect of biodiversity net gain, this would have cost/viability implications such that there could be a need to accept trade-offs in respect of wider objectives (e.g. affordable housing or net zero). Equally, whilst it would be easy to recommend further site-specific policy, there is always a risk of being overly prescriptive, such that there is reduced flexibility at the DM stage, potentially impacting delivery.

## Cumulative effects

The SEA Regulations, which underpin the SA process, indicate that stand-alone consideration should be given to ‘cumulative effects’, i.e. effects of the Local Plan in combination with other plans, programmes and projects that can be reasonably foreseen. In practice, this is an opportunity to discuss potential long term and ‘larger than local’ effects. The following bullet points cover some key considerations:

- **Reading** – whilst current understanding is that there is no unmet need arising from Reading, there may be the potential for this situation to change in the future, and under such a scenario there would be a need for a sub-regional strategic approach to growth with close consideration given to transport connectivity and other wide-ranging factors.

There is also a need for close collaboration in wider respects, including in terms of strategic planning for transport and wider infrastructure capacity, including making the most of transport corridors as public and active travel routes, e.g. aiming for fast and frequent bus services and high quality segregating cycle lanes. There is a clear need for more work in this regard, e.g. noting the following figure from the Reading Local Plan Partial Update Scope and Content consultation document (2023) and the new emphasis on effective collaboration in the Draft NPPF (2024). Recent delivery of P&R facilities across Reading/Wokingham is a good example of joint working.

- **Bracknell** – Wokingham Borough must also effectively collaborate with Bracknell Forest, including in respect of sensitive landscape gaps, transport corridors and SANG / local nature recovery.
- **Other local authorities** – as things currently stand there is less need for close collaboration with Royal Borough of Windsor and Maidenhead, South Oxfordshire, West Berkshire and Hart. However, moving forward there could be a need for closer collaboration, including in the context of potentially increased standard method housing need figures. Also, the new Draft NPPF proposes new policy in respect of Green Belt and includes a major new focus on collaboration between neighbouring authorities. Also, the Government has set out the aspiration of moving towards a new regime of formal sub-regional strategic planning. The sub-region clearly has a range of issues to deal with, including development needs associated with London / the London suburbs, Slough, Reading and the Blackwater Valley, all in the context of the TBHSPA, AWE Burghfield and wider constraints. Amongst other things, the possibility of a new road crossing of the River Thames could require ongoing consideration, including with a view to minimising pressure on the historic crossings at Sonning, Henley, Marlow, Cookham and Maidenhead.

- **Employment land** – providing for warehousing and logistics needs is a key sub-regional consideration along the M4 corridor and within the wider Thames Valley, such that there is a need for effective collaboration with neighbouring authorities. Providing for film studio needs is similarly a key sub-regional consideration. Also, at this point there is a need to reiterate that potential flexibility to accommodate a relocated Royal Berkshire Hospital is an ongoing factor, with both TVSP and Thames Valley Park identified as the Trust’s preferred options if relocation goes ahead.
- **Thames Basin Heath SPA** – the matter of in-combination impacts to the SPA is a focus of a stand-alone Habitats Regulations Assessment (HRA), noting that eleven authorities manage the SPA in partnership. Despite many years of effective collaboration to deliver SANG, following work under the South East Plan (2009; also see (see [tbhpartnership.org.uk](http://tbhpartnership.org.uk)) there remains room for improvement e.g. a single online portal showing existing SANGs as well as information on SANGs with capacity and SANG options.
- **Landscape scale net gain** – there is a need to focus efforts on achieving conservation and ‘net gain’ objectives, in respect of biodiversity and wider ecosystem services, at functional landscape scales, including those discussed within the Wokingham LCA (also catchment scales). A Local Nature Recovery Strategy (LNRS) will be forthcoming, under the Environment Act, but steps must be taken in the interim.
- **Land and water** – self-sufficiency of food production is increasingly a key national consideration, as is effective planning for water resources at the scale of river catchments and groundwater aquifers. In agricultural land terms Wokingham is not particularly constrained in the regional context, but there are some concerns around water quality including relating to capacity at wastewater treatment works.



*Sub-regional collaboration on transport is key*

## Next Steps

Once the period for representations on the Local Plan / SA Report has finished the intention is to submit the plan for examination in public alongside a summary of the main issues raised through the Regulation 19 publication period. Once found to be sound following examination the Local Plan will be adopted, at which time an SA ‘Statement’ will present prescribed information including “measures decided concerning monitoring”.

Section 11 of the main report suggests a number of indicators, for example:

- Biodiversity – design a regime for ensuring that decision making in respect of biodiversity net gain as part of planning applications is undertaken under a strategic spatial framework – informed by the LNRS – and then monitor effectiveness.
- Community infrastructure – the Borough is already at the forefront of good practice in respect of reporting information on progress at SDLs, including around community infrastructure ([www.wokingham.gov.uk/major-developments](http://www.wokingham.gov.uk/major-developments)). There is a need to build upon this and also integrate into ongoing local plan monitoring and evaluation.
- Climate change mitigation – monitoring should focus on clarity. This can be a confusing policy area, but it is very important that the interested public can understand / engage and scrutinise applications.
- Economy and employment – the nature of need/demand for office floorspace and industrial/logistics floorspace changes very quickly. Regular monitoring of delivery would assist with future assessments.
- Homes – this topic is already a focus of the monitoring, but additional indicators could be explored, for example with figures broken down further by settlement and by housing type and tenure. Also, there is an increasing focus on tenure split for affordable housing, which might feed into monitoring. A focus on Gypsy and Traveller accommodation could also serve to inform future needs assessments.
- Transport – understanding of strategic transport infrastructure issues and opportunities changes significantly over time (e.g. informed by Transport for the South East and the transport policy work led by Wokingham’s neighbouring county and unitary authorities), hence there is a need to consider local plan implications on an ongoing basis.
- Water – there is a need for monitoring of the situation regarding wastewater treatment capacity and potentially also wider water quality. Also, there is a need to monitor water efficiency standards achieved.