

## WBC Local Plan Update Consultation – March 2020

### Great Langborough Residents' Association Response

#### Housing Development

We accept that the Local Plan Update (LPU) needs to show how WBC will meet an appropriate share of the national housing targets. For many years, the target set by the Ministry of Housing, Communities & Local Government (HCLG) has been more than challenging.

We recommend that WBC continues to make the strongest case to HCLG to set these targets at an achievable level rather than a distributed quota of unrealistic national targets. We also recommend that WBC encourages HMG to promote and support practically the diversion of growth to other regions than South East England. We support the conclusions in the WBC topic paper "*Housing Need & Exceptional Circumstances*". We believe that it justifies deviating from the governments standard method of calculating the minimum number of homes in the Plan.

We support the strategy in the Public Consultation Document to continue for several years to focus the greater portion of development in the four existing Strategic Development Locations.

The local population is projected to keep growing. In the longer term, we support the WBC view that it will be impossible to accommodate projected demand by continuing to expand existing settlements. We take the view that all public services and transport infrastructure are already overloaded. This has a harmful impact on the environment, prosperity, public health and quality of life.

Therefore, we support the principle of the creation of a substantial new settlement. It needs a sufficiently large suitable land area to accommodate growth beyond the next few years. The **Policy SS3** proposal for the creation of a garden town at Grazeley would appear to have merit. Its location offers proximity to the M4 and the possibility of establishing a new railway station on an existing line. We recommend that, as far as possible, it should be established and developed along the classic New Town principle of self-contained business, employment, public and corporate services. It should require minimal frequent travel to and dependence upon facilities in other nearby settlements.

#### Water Efficiency

Wokingham Borough is classified as an area of serious water stress. The higher optional standard for water efficiency of 110 litres per person per day is justified. The draft LPU says (page 113 on): *8.41 Water is a valuable resource, and there is a clear need to ensure that the highest possible standards of water efficiency are in place.*

Fresh water supply is limited. It also requires energy to purify and distribute.

We recommend that the LPU should contain a stronger policy for grey water storage and use.

We approve the measures in **Policy DH8: Environmental standards for non-residential development** to incorporate greywater recycling and rainwater harvesting where possible.

However, there is no policy in the draft LPU for the retention and effective use of grey water in residential developments.

**Policy DH9: Environmental standards for residential development** should include some similar measure for housing. This should especially apply to large residential blocks.

## Climate Change

We support general statements of intent in a number of areas in **Policies SS8 Climate Change and SS9 Adaptation to Climate Change**. Also **Policy DH7 Energy** makes strong statements about the need to conserve energy.

The Council approved a motion declaring a Climate Emergency with a target of becoming carbon neutral by 2030 on 18th July 2019. At that time, WBC stated that a Climate Action Plan was being developed. It would set out the types of activities that will be embarked on to achieve these targets.

Over 18 months later, we are disappointed not to see an Action Plan with metrics or implementation dates in the Draft LPU.

We call for the publication very soon of key metrics, time scales, regulation introduction dates and commitment of financial resources.

We recommend that the Action Plan should be incorporated in the LPU. It should incorporate phrases such as "from (DATE) no new housing should have gas heating ...", "X percent of all houses should have solar panels and storage batteries installed ...", "on all buildings containing more than Y dwellings, rain water should be stored and used for flushing toilets".

## Safeguarded Routes

**Policy SS11: Safeguarded Routes** lists land that is safeguarded to support the delivery of strategic transport infrastructure. We support the general principle of excluding development that could interfere with these planned routes.

The South Wokingham SDR is planned to join the Finchampstead Road at the Tesco roundabout. There must be a clear plan for coping with the traffic congestion at this exit and at the two adjacent roundabouts. Replacing the bridges is expensive and could involve difficult closures to both road and rail. Easing traffic flow by improving the local road system is also costly. It would inevitably involve some land purchases in the area. This is a defined problem that needs a declared long term solution.

The proposed Third Thames Crossing from Thames Valley Park Drive/A3290 to South Oxfordshire may be justified on traffic flow criteria. It will inevitably involve other local authorities. The environmental impact must be a major factor in deciding whether to go ahead. If it is to happen, then considerable further work is needed on location and design.

We recommend that WBC should clarify where the planned Coppid Beech Park and Ride facility will be located and publish planned dates for the project.

## Rights of Way

### **Policy C8: Green and Blue Infrastructure and Public Rights of Way**

We support the improvement in accessibility and connectivity to existing green infrastructure assets. Development proposals should create suitable routes to connect to public transport, existing areas of green space and community services and facilities. This will encourage walking and cycling.

The existing Rights of Way Improvement Plan (ROWIP) referenced in paragraph 5.53 is non-specific and over 10 years old. It needs updating. There are some long term access issues.

We recommend the development of a revised plan detailing priority improvements and new routes.

Access to the countryside and waterways is highly desirable. However, it should be balanced with a need to protect wildlife habitat and protect footpath users from flood risks.

## Parking

**Policy ER9: Wokingham Town Centre** (page 73 on) includes item *j. Ensuring appropriate car parking to facilitate a viable and sustainable town centre.*

However, parking is not a distinct part of the Local Plan. It is to be the subject of a separate Supplementary Planning Document (SPD).

We recommend a Transport Policy that promotes and funds public transport. This should reduce the pressure on town centre parking.

The strategies for parking in and public transport to town centres should be integrated with the strategies for attracting and supporting flourishing retail, food & beverage and entertainment businesses. WBC revenue ambition from parking should be balanced with the need to attract customers to town centre businesses.

A revised Parking Strategy should be a priority.

## Affordable Housing

**Policy H5 Affordable Housing** is quite specific on percentages to be provided in various categories.

We have been critical of WBC performance in this area in the past. In some years, delivery of affordable housing lagged behind delivery of the total number. We are encouraged by the statement in paragraph 7.46. We applaud the intent of WBC to seek the maximum provision of affordable housing on all qualifying sites with vigour. We support the intolerance of attempts to circumnavigate the provision of affordable housing or the payment of commuted sums.

If developers choose to pay commuted sums, they should be ring fenced. The funds should be used by WBC to develop itself the necessary numbers of affordable dwellings.

We would like to see more areas opened to self-build options. If the current experiment of 21 self-build houses at Wheatsheaf Close Sindlesham is successful, then more self-build will also help the Affordable Housing numbers and introduce variety in the building stock.

## Quality Design

**Policy DH1: Place Making and Quality Design** includes an intent to: *"Reinforce or create a positive sense of place and local distinctiveness through design that respects the local natural and historic character of the area, paying particular attention to urban grain, layout, rhythm, density, scale, bulk, massing, proportions, detailing and trees."* and *"Incorporate appropriate innovation in design to improve the quality of an area and the way it functions."*

We support the creation of a positive sense of place and local distinctiveness.

On future projects, we recommend more focus on the quality and innovation of design. We look forward to more interesting design features than have been seen in the recent Wokingham Town centre developments. There should be more active encouragement and public funding of public art to enhance town centre attractiveness.

## Public Art

The Appendices in pages 160 onwards give additional guidance for development in the SDLs. All contain a short statement in the Key Design Principles to include: *Public art integrated within the design of the development.* We are pleased to see this statement. We need to avoid blandness in new builds. We have learnt from the Town Centre Regeneration that public art needs to be integrated into the design and budget. It is part of creating a sense of place and enjoyment. Retro fitting Public Art after the buildings are in place is expensive and less effective. It tends to demonstrate the absence of a clear policy. Public art is a key element of quality design when creating a public space.

On that basis, we would like to see the policy on public art clearly stated in the Local Plan. The statement 1.f on page 102 makes no specific reference to its need. We would like to see an overarching policy statement: to the effect that all developments must address the need for public art from their concept to execution. Embedding an artistic consultant is the usual route to achieving this.

## Core Employment Areas

We support the principle expressed in **Policy ER2: Core Employment Areas** that most industrial development should be encouraged to be in key employment areas. WBC should encourage aggressive efforts to attract new tenants to occupy existing vacant industrial buildings.

There are some industrial areas that are badly sited and might better be relocated. We recommend that WBC evaluates a plan to relocate most of the industrial activity in Molly Millars Lane, Wokingham **Policy ER1: 1(d)** to a more suitable area. The new area should be more accessible to commercial vehicles. It should have easier connections to the main trunk highway routes. Commercial vehicles should not be routed through busy residential and town centre areas to reach industrial businesses.

WBC should actively encourage the establishment of a major film studio in the Borough. There is a substantial risk of loss of employment from the relocation of a number of European HQ locations out of the UK. A new studio could bring 3,000 jobs to fill that gap in the future. Last year the creative arts sector was generating more than £100 billion for the national economy. It is one of the fastest growing sectors of the economy. Wokingham is well placed to take advantage of that growth.

We recommend that WBC identifies potential risk buildings where developers could seek to provide low quality accommodation in unsuitable locations. This could arise from the inappropriate use of permitted development. WBC should also encourage HMG to modify significantly the introduced right for change of use from offices (B1(a)) to residential use (C3) with only limited local authority control.

## Wokingham Town Centre

We support a continuing focus on developing the capacity and attractiveness of the largest town centre in the Borough as expressed in **Policy ER9 Wokingham Town Centre.** It should aim to serve most of the primary shopping and leisure needs of the residents of Wokingham Town. To achieve maximum prosperity it should aim to attract and retain high levels of usage by residents in surrounding smaller settlements. It must develop and retain a distinctiveness in character and offerings that make it a desirable frequent destination for a wider population.

The capital expenditure on major Wokingham Town Centre developments in Elms Field, Peach Place and Carnival Pool to date is considerable. However, we would support further tactical investments where significant premises and important services may be at risk.

WBC needs a plan to preserve and enhance the value of this amenity to residents and visitors. Left to itself, it will not generate sufficient continuing financial return.

We would encourage more continuing high profile marketing of Wokingham Town Centre to enhance the variety and prosperity of its retail and other service businesses.