



WOKINGHAM BOROUGH COUNCIL

A Meeting of an **INDIVIDUAL EXECUTIVE MEMBER DECISION** will be held in David Hicks 1 - Civic Offices, Shute End, Wokingham RG40 1BN on **WEDNESDAY 23 MARCH 2022 AT 9.40 AM**

Susan Parsonage
Chief Executive
Published on 15 March 2022

Note: Although non-Committee Members and members of the public are entitled to attend the meeting in person, space is limited due to the ongoing Coronavirus pandemic. You can, however, participate in this meeting virtually, in line with the Council's Constitution. If you wish to participate either in person or virtually via Microsoft Teams, please contact Democratic Services. The meeting can also be viewed live using the following link:

<https://youtu.be/IBFuuz689pQ>

Please note that other people may film, record, tweet or blog from this meeting. The use of these images or recordings is not under the Council's control.



WOKINGHAM BOROUGH COUNCIL

Our Vision

A great place to live, learn, work and grow and a great place to do business

Enriching Lives

- Champion outstanding education and enable our children and young people to achieve their full potential, regardless of their background.
- Support our residents to lead happy, healthy lives and provide access to good leisure facilities to complement an active lifestyle.
- Engage and involve our communities through arts and culture and create a sense of identity which people feel part of.
- Support growth in our local economy and help to build business.

Safe, Strong, Communities

- Protect and safeguard our children, young and vulnerable people.
- Offer quality care and support, at the right time, to prevent the need for long term care.
- Nurture communities and help them to thrive.
- Ensure our borough and communities remain safe for all.

A Clean and Green Borough

- Do all we can to become carbon neutral and sustainable for the future.
- Protect our borough, keep it clean and enhance our green areas.
- Reduce our waste, improve biodiversity and increase recycling.
- Connect our parks and open spaces with green cycleways.

Right Homes, Right Places

- Offer quality, affordable, sustainable homes fit for the future.
- Build our fair share of housing with the right infrastructure to support and enable our borough to grow.
- Protect our unique places and preserve our natural environment.
- Help with your housing needs and support people to live independently in their own homes.

Keeping the Borough Moving

- Maintain and improve our roads, footpaths and cycleways.
- Tackle traffic congestion, minimise delays and disruptions.
- Enable safe and sustainable travel around the borough with good transport infrastructure.
- Promote healthy alternative travel options and support our partners to offer affordable, accessible public transport with good network links.

Changing the Way We Work for You

- Be relentlessly customer focussed.
- Work with our partners to provide efficient, effective, joined up services which are focussed around you.
- Communicate better with you, owning issues, updating on progress and responding appropriately as well as promoting what is happening in our Borough.
- Drive innovative digital ways of working that will connect our communities, businesses and customers to our services in a way that suits their needs.

For consideration by

Wayne Smith, Executive Member for Planning and Enforcement

Officers Present

Ben Davis, Strategy & Commissioning (Place) Specialist

Callum Wernham, Democratic & Electoral Services Specialist

IMD NO.	WARD	SUBJECT	
IMD 2022/05	Remenham, Wargrave and Ruscombe	WOKINGHAM BOROUGH COUNCIL RESPONSE TO RUSCOMBE DRAFT NEIGHBOURHOOD PLAN CONSULTATION	5 - 24

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Agenda Item IMD5

INDIVIDUAL EXECUTIVE MEMBER DECISION

REFERENCE IMD: IMD 2022/05

TITLE	Wokingham Borough Council response to Ruscombe Draft Neighbourhood Plan Consultation
DECISION TO BE MADE BY	Executive Member for Planning and Enforcement - Wayne Smith
DATE, MEETING ROOM and TIME	23 March 2022 David Hicks 1 at 9.40am
WARD	Remenham, Wargrave and Ruscombe;
DIRECTOR / KEY OFFICER	Director, Place and Growth - Steve Moore

PURPOSE OF REPORT (Inc Strategic Outcomes)

To agree Wokingham Borough Council's formal response to the Ruscombe draft Neighbourhood Plan (Regulation 16) consultation.

RECOMMENDATION

That the Executive Member for Planning and Enforcement agrees that Wokingham Borough Council submits the comments contained in Enclosure 1 as this council's response to the Ruscombe Neighbourhood Plan: Submission Plan (October 2021)

SUMMARY OF REPORT

Neighbourhood development plans (commonly referred to as neighbourhood plans) allow communities to help shape how development is managed in their area and work alongside strategic planning policies set out in the council's local plans.

Neighbourhood plans can set out more detailed policies and can also choose to allocate sites for development, however neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies¹.

Ruscombe Parish Council has prepared a neighbourhood plan covering their parish. The parish council has consulted residents and other interested parties on the scope and content of the plan.

The parish council submitted the neighbourhood plan and supporting information to the council in October 2021. Executive agreed, on 27 January 2022, that the neighbourhood plan could progress to consultation². In line with the regulations governing the neighbourhood plan process, the council has publicised the plan for six

¹ National Planning Policy Framework (NPPF) (2021), paragraph 29

² Ruscombe Neighbourhood Development Plan – Regulation 16 Consultation and Future Examination, Examination Executive report, available at:

<https://wokingham.moderngov.co.uk/documents/s53191/Ruscombe%20Neighbourhood%20Plan.pdf>

weeks and invited representations on the plan's content. Consultation began on Tuesday 8th February 2022 and ends Friday 25th March 2022.

In the same way as any other stakeholder, the consultation provides the council the opportunity to consider the plan and submit representations. As set out in the recommendations to the Executive report, the council's comments would be agreed through the Individual Member Decision process, which is the purpose of this report.

The Ruscombe Neighborhood Plan contains policies on housing, the natural and historic environment, community facilities, business and commercial development, open space and transport. It does not include any proposed site allocations for development but does propose the designation of 10 areas as Local Green Space, which if accepted would protect them from inappropriate forms of development.

In line with best practice, officers have regularly engaged with the parish council during the plan making process. Matters raised by officers have generally been addressed, but there remain a few issues where it is recommended the council responds to the consultation, to bring them to the examiner's attention and consideration.

The primary focus of the recommended response is Policy RU2: Ruscombe Housing Design Code, which is not considered to meet the basic conditions as it would constrain development in a manner not supported by national policy or strategic policies in the Core Strategy and Managing Development Delivery local plan documents. The policy would also have significant implications on the indicative site capacities for two draft housing allocations in the emerging Local Plan Update.

Representations are also recommended regarding Policy RU5: Buildings of Traditional Local Character. Additional evidence is needed to justify the classification of fourteen buildings and structures as 'Buildings of Traditional Local Character,' (non-designated heritage assets). In particular, the information contained in Appendix B should include more reasoned justification by more closely following the criteria set out within the Council's Buildings of Traditional Local Character – Policy and Procedures.³

Further representations are also recommended in respect of the plan's evidence and methodology used to justify the inclusion of three areas of land for Local Green Space designation. It is recommended the remaining seven areas are supported, as these are consistent with the proposals contained in the council's Revised Growth Strategy consultation for the emerging Local Plan Update.

Finally, minor modifications are recommended to policies RU3, RU4, RU5, RU10 and RU11 to align with existing local and national policy and legislation.

The full recommended response is set out in Enclosure 1 to this report.

³ Wokingham Borough Council - Appendix 2: Criteria and Procedure for Considering a Nomination for Listing as a Building of Traditional Local Character, available at:
<https://www.wokingham.gov.uk/EasySiteWeb/GatewayLink.aspx?allId=439061>

Background

Neighbourhood development plans, more common referred to simply as neighbourhood plans, allow communities to help shape how development is managed in their area. Neighbourhood plans work alongside strategic planning policy set out in the council's local plans. They can set out more detailed policies for their area. This can include allocating sites, the provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment and setting out other development management policies.

Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies⁴.

Where a community wants to take up the opportunities offered by neighbourhood plan, legislation enables two types of organisations to lead it:

- a parish or town council; or
- a neighbourhood forum.

Ruscombe Neighbourhood Plan

Ruscombe Parish Council has prepared a neighbourhood plan covering their parish. The parish council has worked with other members of the community who are interested or affected by the plan.

The parish council has consulted residents and other interested parties on the scope and content of the neighbourhood plan. Consultation methods and community engagement activities used when preparing the plan include (but were not limited to) a survey questionnaire to residents, public meetings, leaflet distribution to all households and businesses in Ruscombe parish, social media campaign and dedicated page on the Ruscombe Parish Council website. Further information is contained in the Consultation Statement supporting the submitted Ruscombe Neighbourhood Plan.⁵

Having prepared its neighbourhood plan, the parish submitted the Plan with supporting information to the council in October 2021. Under the regulations governing the preparation of neighbourhood plans, the council is required to publicise the plan for a minimum of 6 weeks and invite representations to be made. On 27 January 2021, Executive agreed that the neighbourhood plan could progress to consultation. Consultation began on Tuesday 8 February 2022 and ends Friday 25 March 2022.

The consultation provides the council, with the opportunity to make representation on the neighbourhood plan's content, including supporting or objecting to any specific policies or proposals. As set out in the recommendations to the 27 January 2022 Executive report, any comments are to be agreed through the Individual Executive Member Decision process, which is the purpose of this report.

In responding to the consultation, the council can ensure the independent examiner fully considers those issues that may have implications when making decisions on planning applications. These issues can then be appropriately addressed by an appointed examiner through the examination process.

⁴ National Planning Policy Framework (NPPF) (2021), paragraph 29

⁵ Ruscombe Neighbourhood Plan – Consultation Statement (October 2021), available at: <https://www.wokingham.gov.uk/EasySiteWeb/GatewayLink.aspx?allId=614722>

Business Case (including Analysis of Issues)

Neighbourhood plans are required to be in general conformity with the strategic planning policies contained within the Local Plan. Officers have regularly engaged with the parish council in accordance with the council's legal duty to assist bodies preparing neighbourhood plans and in accordance with the council's adopted Statement of Community Involvement. Matters raised by officers through this engagement have largely been addressed and reflected in the neighbourhood plan, but there remain a few issues where it is recommended the council responds to the consultation to bring them to the examiner's attention and consideration.

The neighbourhood plan contains policies on housing, the natural and historic environment, community facilities, business and commercial development, open space and transport. It does not include any proposed site allocations for development but does propose the designation of 10 areas as Local Green Space which would protect them from inappropriate forms of development.

The full recommended response is set out in Enclosure 1 to this report. The following is a summary of the recommended response to the key issues.

Policy	Comment summary
Policy RU1: Development Limit for Ruscombe	Suggested amendments to policy wording to improve clarity for decision takers and to provide local detail for guiding and managing development in the neighbourhood area (parish of Ruscombe).
Policy RU2: Ruscombe Housing Design Code	The policy does not meet the basic conditions as key design principles such as encouraging larger plot sizes or lower densities would constrain development in a manner that is not supported by national policy or strategic policies in the Core Strategy and Managing Development Delivery local plans. Further, the design guide/code promotes high-quality design and development which are core principles of the development plan, in particular Policy CP3 (General Principles of Development) of the Core Strategy (2010). The policy would also have significant implications on the indicative site capacities for two draft housing allocations in the emerging Local Plan and would therefore not contribute to achievement of sustainable development.
Policy RU3: Enhancing Ruscombe Conservation Area	Minor suggested wording to policy to align with existing local policy in the development plan, national policy and legislation.
Policy RU4: Community Engagement in Planning	The policy is not considered to constitute a land-use planning policy, relating to engagement, and would be standard practice in the planning application process. Policy should either be incorporated as additional criteria in Policy RU1, moved to the supporting text or removed from the plan.
Policy RU5: Buildings of Traditional Local Character	Concerns expressed regarding the evidence and methodology used to justify and classify fourteen buildings / structures as 'Buildings of Traditional Local Character'. In particular, Appendix B provides insufficient justification for the buildings / structures identified. The evidence should follow more closely the criteria set out in the Council's 'Criteria and Procedure for Considering a Nomination for Listing as a Building of Traditional Local Character'. ⁶ Suggested amendments to policy wording to align with national policy.
Policy RU7: Community Facilities	Minor suggested wording to supporting text for greater clarity to assist decision takers.
Policy RU8: Local Green Spaces	Concerns expressed to the evidence and methodology used to justify the inclusion of some areas of land for Local Green Space designation. In particular, the Ruscombe Draft Neighbourhood Plan proposes three additional areas for Local Green Space designation which have not been taken forward for consideration in the current Revised Growth Strategy: Local Plan Update consultation document ⁷ . Further information is contained in the Local Green Spaces Topic Paper (November 2021), which supports the Revised Growth Strategy consultation ⁸ . Notwithstanding, the Council supports the remaining seven areas proposed for designation in the Ruscombe Neighbourhood Plan.

RU10: Managing Traffic	Minor amendments suggested to also refer to financial contributions towards improving non car related modes of travel, including walking and cycling.
RU11: Car Parking	Minor amendments suggested to ensure clarity, and consistency with the relevant council parking policies, including the Highways Design Guide (2019).

Next Steps

Once the consultation has closed, all representations and associated documents will be sent to an appointed examiner who will consider the plan.

There is no prescribed timeframe in which examination should take place. The examiner will decide whether the examination takes place in the form of a public hearing, or written representations, and will be guided by any relevant Covid-19 measures and published guidance in place at that time.

Where considered necessary, the examiner will recommend amendments required for the plan to satisfy the basic conditions and will conclude whether or not the plan can proceed to a referendum.

Following receipt of the examiner's recommendations, the council will come to a formal view on whether the plan meets the basic conditions and, if so, will be responsible for arranging and undertaking the referendum.

Based in experience elsewhere, a referendum could take place in Ruscombe Parish in autumn 2022. If more than half the votes cast support the plan, the council must adopt it through a resolution of Council. At this point it would become part of the statutory development plan, and so carry significant weight when making decisions on planning applications and appeals.

FINANCIAL IMPLICATIONS OF THE RECOMMENDATION

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

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

⁶ Wokingham Borough Council - Appendix 2: Criteria and Procedure for Considering a Nomination for Listing as a Building of Traditional Local Character, available at:

<https://www.wokingham.gov.uk/EasySiteWeb/GatewayLink.aspx?allId=439061>

⁷ Wokingham Borough Council Revised Growth Strategy: Local Plan Update (Nov 2021 – Jan 2022)

⁸ Wokingham Borough Council Local Green Space Topic Paper (November 2021), available at:

<https://www.wokingham.gov.uk/planning-policy/planning-policy-information/revised-growth-strategy-consultation/?categoryesct191f252ff-550d-4cfa-a838-92ef2cb5f83c=10784>

Following Financial Year (Year 3)	Nil	n/a	n/a
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Other financial information relevant to the Recommendation/Decision
No financial implications arise as a result of this consultation exercise. However, the council is required to facilitate and fund both the examination and referendum processes. Whilst costs are initially incurred, government grant may be applied for retrospectively that will compensate for the expenditure.

Cross-Council Implications
No cross-council implications arise as a result of this consultation exercise. However, if the plan progresses to referendum, the council would be required to arrange the referendum. This would be led by Electoral Services.

Public Sector Equality Duty
An Equalities Impact Screening Report was produced and published as an enclosure to the report for Executive on 27 January 2022.

SUMMARY OF CONSULTATION RESPONSES	
Director – Corporate Services	No comments received
Monitoring Officer	Responded to confirm no comments.
Leader of the Council	No comments received

List of Background Papers
Enclosure 1: WBC Response

Contact Ben Davis	Service Delivery and Infrastructure
Telephone No Tel: 0118 974 6217	Email Ben.Davis@wokingham.gov.uk

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PART A: Contact Details	
Name:	Ben Davis
Are you responding as a:	<input type="checkbox"/> Resident in Wokingham Borough <input type="checkbox"/> Resident outside the Borough <input checked="" type="checkbox"/> Local Authority <input type="checkbox"/> Statutory Body <input type="checkbox"/> Councillor / Clerk <input type="checkbox"/> Society / Community Group <input type="checkbox"/> Business / Agent <input type="checkbox"/> Landowner / Developer <input type="checkbox"/> Other interested party Please specify
Job title / role (if applicable):	Planning Policy Officer
Responding on behalf of:	N/A
Organisation name (if applicable):	Wokingham Borough Council
Address:	Wokingham Borough Council Civic Offices Shute End Wokingham
Postcode:	RG40 1BN
Email address:	Ben.Davis@wokingham.gov.uk
	<p>If you would like to be notified of Wokingham Borough Council's decision whether to 'make' the Plan (to bring it into legal force), please tick the box below.</p> <p>Yes, please notify me <input type="checkbox"/></p>

PART B

Please use as many or as few comments boxes as you wish.

Comment 1

To which part of the Neighbourhood Plan does your representation relate?

Whole document?	Yes/No	Paragraph Number		Policy Reference:	Policy RU1
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Do you support, support with modifications, oppose, or wish to comment on this policy/paragraph? (Please tick one answer)

Support Support with modifications Oppose Wish to comment

Please give details of your reasons for support/opposition, or make other comments in the box below, including any specific changes you wish to see to the Plan. Please be as precise as possible.

Whilst consistent with local strategic policy in the Core Strategy (2010), Policy RU1 provides limited detail to add value to existing policy in the development plan. National planning policy and guidance is clear that neighbourhood plans should avoid repeating national or local plan policies. We would recommend that the policy is either removed or amended to provide some additional local context for guiding and managing development within the neighbourhood area.

Comment 2

To which part of the Neighbourhood Plan does your representation relate?

Whole document?	Yes/No	Paragraph Number		Policy Reference:	Policy RU2
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Do you support, support with modifications, oppose, or wish to comment on this policy/paragraph? (Please tick one answer)

Support Support with modifications Oppose Wish to comment

Please give details of your reasons for support/opposition, or make other comments in the box below, including any specific changes you wish to see to the Plan. Please be as precise as possible.

The council has previously highlighted concerns regarding the content of the Design Code, including its purpose and how it will be used to make decisions on future development proposals. To reemphasise, a design code would need to illustrate the existing character of the area (typology) and set out a reasoned justification for the specific parameters. Currently, the design code guidance is too prescriptive to be applied to all new development proposals within the neighbourhood area, and it is not clear which points should be adhered to when assessing development proposals. We would also question whether the design code/guidance should apply to uses other than housing.

Further concern is also expressed to the site-specific design requirements set out in Appendix A, which will have implications on the indicative site capacities for two identified housing allocations (Land to the rear of 9-17 Northbury Lane for 7 dwellings; Land between 39-53 New Road for 12 dwellings) in the emerging Local Plan Update. Encouraging larger plot sizes and lower densities as inferred to in Code R11 would constrain development in a manner not supported by national policy or emerging local strategic policy. In particular paragraphs 119 and 124 of the National Planning Policy Framework (NPPF) place an emphasis on planning policies and decisions *'promoting an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions'* and *'supporting development that makes efficient use of land'*.

In addition, some higher density development could be acceptable within some areas of the parish. Removing opportunity for higher densities in appropriate areas would not be making effective use of land and would reduce both quantum and variety of housing types to be able to respond to local needs, as sought in Policy CP5 (Housing mix, density and affordability) of the Core Strategy (2010). As such the policy will not contribute to the achievement of sustainable development and is therefore considered to be contrary to the basic conditions. Further, Policy RU1 of the Ruscombe Neighbourhood Plan promotes high-quality design, development and places which can be achieved through core principles established in Policy CP3 (General Principles of Development) of the Core Strategy (2010) without the use of an overly restrictive design code/guide.

It is therefore recommended that the Design Code should clearly demonstrate how densities have been considered in the current local context. As an alternative, the policy could state that *'the density of any new development must be appropriate to its surroundings'* and ensure applicants have full regard to the specific typologies and principles set out in the Design Code.

Furthermore, some only typologies include references to car parking, sometimes referring to parking in front gardens, whilst typologies make no reference to parking. A consistent approach to parking would help to provide clarity and consistency.

We would also highlight the recent publication of the National Model Design Code (June 2021) and National Design Guide (January 2021) by Government which are material planning considerations in the decision-making process and set out detailed guidance to be considered in the production of local design codes, guides and other design policies to promote successful design.

Comment 3

To which part of the Neighbourhood Plan does your representation relate?

Whole document?	Yes/No	Paragraph Number		Policy Reference:	Policy RU3
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Do you support, support with modifications, oppose, or wish to comment on this policy/paragraph? (Please tick one answer)

Support Support with modifications Oppose Wish to comment

Please give details of your reasons for support/opposition, or make other comments in the box below, including any specific changes you wish to see to the Plan. Please be as precise as possible.

The council fully supports the principle of this policy. However, we recommend that the following amendment would help to align with existing policy in the development plan and national policy:

'Development proposals should ~~sustain~~ conserve and, **where possible**, enhance the historic environment, particularly the special architectural and historic ~~interest~~ **interest significance** of the designated Ruscombe Conservation Area and its setting.'

(Remainder of policy is unchanged)

We recommend that the title of the policy should be amended to 'Ruscombe Conservation Area' to reflect our suggested amendments to the policy wording above.

We also recommend some specific amendments to the submitted plan to reflect our suggested modifications to the policy. In particular:

Page 2 under 'aims' – To **preserve or enhance** ~~conserve~~ the character of the St. James' Church Conservation Area **and its setting**.

Page 23 – Preserving ~~and~~ **or** enhancing the distinct character of local areas, including the **St. James' Church Conservation Area and its setting**

Page 24 under 'objectives' – To preserve ~~&~~ **or** enhance the character of the St. James' Church Conservation Area **and its setting**

Comment 4

To which part of the Neighbourhood Plan does your representation relate?

Whole document?	Yes/No	Paragraph Number		Policy Reference:	Policy RU4
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Do you support, support with modifications, oppose, or wish to comment on this policy/paragraph? (Please tick one answer)

Support Support with modifications Oppose Wish to comment

Please give details of your reasons for support/opposition, or make other comments in the box below, including any specific changes you wish to see to the Plan. Please be as precise as possible.

Whilst the council fully acknowledges the need for applicants to engage local communities and other stakeholders in their development proposals, Policy RU4 is not considered a land-use planning policy and is standard practice in the pre-application process. As per national policy and guidance, neighbourhood plans form part of the statutory development plan and should only deal with the development and use of land. If the neighbourhood planning group wish to proceed with this requirement, the council would recommend that elements of the policy are either moved and incorporated into Policy RU1: Development Limit for Ruscombe,

(similar to Policy AD1 of the made Arborfield and Barkham Neighbourhood Plan¹) or moved into the supporting text of the plan.

Comment 5

To which part of the Neighbourhood Plan does your representation relate?

Whole document?	Yes/No	Paragraph Number		Policy Reference:	Policy RU5
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Do you support, support with modifications, oppose, or wish to comment on this policy/paragraph? (Please tick one answer)

¹ Arborfield and Barkham Neighbourhood Plan 2019-2036 (April 2020), available at: <https://www.wokingham.gov.uk/EasySiteWeb/GatewayLink.aspx?allId=516387>

Please give details of your reasons for support/opposition, or make other comments in the box below, including any specific changes you wish to see to the Plan. Please be as precise as possible.

The Council supports the principle of this policy. However, we consider that, in its current form, the plan's evidence has provided insufficient justification for classifying fourteen buildings or structures as 'Buildings of Traditional Local Character'. In particular, the information contained in Appendix B should include more detailed and reasoned justification, following more closely the criteria and methodology set out within Appendix 2 of the Council's Buildings of Traditional Local Character – Policy and Procedures.

We also recommend that the following amendments to Policy RU5 would help to align with existing policy in the development plan and national policy and would provide greater clarity to assist decision takers.

'Development proposals affecting non-designated heritage assets, including Buildings of Traditional Local Character listed above, will be supported where they **can demonstrate that they retain and sustain, or where practical (where possible) enhance the traditional, historical, local, and special significance of the building or structure and its setting** significance of the asset. ~~Proposals which cause harm to the asset or its setting will not be supported unless the public benefits outweigh the harm to the significance of the asset'.~~

In weighing applications that directly or indirectly affect non-designated heritage assets, including Buildings of Traditional Local Character, a balanced judgement will be taken having regard to the scale of any harm or loss and the significance of the heritage asset.

Comment 6

To which part of the Neighbourhood Plan does your representation relate?

Whole document?	Yes/No	Paragraph Number		Policy Reference:	Policy RU7
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Do you support, support with modifications, oppose, or wish to comment on this policy/paragraph? (Please tick one answer)

Support Support with modifications Oppose Wish to comment

Please give details of your reasons for support/opposition, or make other comments in the box below, including any specific changes you wish to see to the Plan. Please be as precise as possible.

The council fully supports the principle of this policy. However, regarding the second paragraph of the policy, there is no specific element of the policy that clarifies how a decision taker would take this matter into consideration through their development proposals. We recommend that the following amendment to paragraph 5.25 of the supporting text would help an applicant to demonstrate that the existing uses identified in criteria (i) and (ii) are no longer viable and would align with paragraph 3.85 of the Managing Development Delivery (MDD) local plan:

'These community facilities within the Parish are therefore valued by the local community and offer a valuable resource to support community life. The policy therefore identifies these on the Policies Map, and seeks to avoid their loss. **In demonstrating that an existing use is not viable, applicants must produce evidence that genuine and sustained efforts to promote, improve and market the facility at a reasonable value have been undertaken. The policy,** but also recognises that improvements or extensions to some may be necessary to ensure they remain viable. In these cases, other planning policies will still need to be addressed e.g., heritage.'

Comment 7

To which part of the Neighbourhood Plan does your representation relate?

Whole document?	Yes/No	Paragraph Number		Policy Reference:	Policy RU8
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Do you support, support with modifications, oppose, or wish to comment on this policy/paragraph? (Please tick one answer)

Support Support with modifications Oppose Wish to comment

Please give details of your reasons for support/opposition, or make other comments in the box below, including any specific changes you wish to see to the Plan. Please be as precise as possible.

Policy RU8: Local Green Spaces must be in general conformity with paragraphs 101 to 102 of the National Planning Policy Framework (NPPF) and national Planning Practice Guidance (PPG), which states in particular that designation of land as Local Green Space should be used to protect green areas of particular importance to the community. Paragraph 102 of the NPPF sets out the following criteria, where the green space is:

- a) in reasonably close proximity to the community it serves;
- b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- c) local in character and is not an extensive tract of land.

It is important to only identify areas of Local Green Space that are supported by robust evidence and community support demonstrated for each individual area proposed to be designated.

The Council supports seven of the ten areas of green space proposed for designation, which are included for consultation in the emerging Revised Growth Strategy for the Local Plan Update². The assessment of the proposed sites (along with other nominations) is set out in the Local Green Space Topic Paper (November 2021)³. However, within this policy context, the Council consider that insufficient justification has been provided by the qualifying body to identify the following three areas of land for Local Green Space designation:

Local Green Space iv. New Road Pond – the site comprises a small area of incidental open space along New Road which offers no particular recreational, ecological or tranquillity value and therefore does not warrant further consideration as a Local Green Space designation. The proposed area is within the wider setting of the Ruscombe Conservation Area and would be covered by relevant policies in the Development Plan, national policy and legislation.

Local Green Space vii. Crossroads Lane – the site comprises a small area of amenity greenspace at the crossroad junction of Stanlake Lane, New Road, Waltham Road and Ruscombe Lane, which offers very limited recreational value and therefore does not warrant further consideration as a Local Green Space designation

Local Green Space ix. Land at London Road – the site comprises a small area of amenity greenspace and roadside verge which offers very limited recreational value and therefore does not warrant further consideration as a Local Green Space designation.

² Wokingham Borough Council Local Plan Update: Revised Growth Strategy Consultation (Nov 2021 – Jan 2022), available at: <https://www.wokingham.gov.uk/planning-policy/planning-policy-information/revised-growth-strategy-consultation/>

³ Wokingham Borough Council Local Green Spaces Topic Paper (November 2021), available at: <https://www.wokingham.gov.uk/planning-policy/planning-policy-information/revised-growth-strategy-consultation/?categoriesect191f252ff-550d-4cfa-a838-92ef2cb5f83c=10784>

Comment 8

To which part of the Neighbourhood Plan does your representation relate?

Whole document?	Yes/No	Paragraph Number		Policy Reference:	Policy RU10
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Do you support, support with modifications, oppose, or wish to comment on this policy/paragraph? (Please tick one answer)

Support Support with modifications Oppose Wish to comment

Please give details of your reasons for support/opposition, or make other comments in the box below, including any specific changes you wish to see to the Plan. Please be as precise as possible.

RU10: Managing Traffic

The policy approach is supported in principle. However, the policy should be amended to refer to financial contributions towards improving non car related modes of travel. This would help to address some of the issues and opportunities highlighted in the supporting text to Policy RU10, regarding infrastructure provision for pedestrians and cyclists.

Comment 9

To which part of the Neighbourhood Plan does your representation relate?

Whole document?	Yes/No	Paragraph Number		Policy Reference:	Policy RU11
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Do you support, support with modifications, oppose, or wish to comment on this policy/paragraph? (Please tick one answer)

Support Support with modifications Oppose Wish to comment

Please give details of your reasons for support/opposition, or make other comments in the box below, including any specific changes you wish to see to the Plan. Please be as precise as possible.

RU11: Car Parking

The policy approach of reflecting the relevant Local Plan policy, in this case MDD Policy CCo7, is welcomed. However, to ensure clarity and consistency, several amendments are recommended.

Firstly, to be comprehensive the policy should also refer to the standards set out in Appendix 2 of the MDD. The policy should also refer to Electric Vehicle Charging (EVC) spaces as set out in the Wokingham Borough Highways Design Guide (2019). More broadly, the policy should also recognise the role of garages in providing car parking spaces.

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