



WOKINGHAM BOROUGH COUNCIL

A Meeting of an **INDIVIDUAL EXECUTIVE MEMBER DECISION** will be held in LGF3 - Civic Offices, Shute End, Wokingham RG40 1BN on **THURSDAY 22 JUNE 2023 AT 3.00 PM**

A handwritten signature in black ink, appearing to read 'Susan Parsonage', written in a cursive style.

Susan Parsonage
Chief Executive
Published on 14 June 2023

Note: Non-Committee Members and members of the public are welcome to attend the meeting or participate in the 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 watched live using the following link:
<https://youtube.com/live/AI3mbRlXlbl?feature=share>

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

Lindsay Ferris, Executive Member for Planning and Local Plan

Officers Present

Ben Davis, Planning Policy Officer

Madeleine Shopland, Democratic & Electoral Services Specialist

IMD NO.	WARD	SUBJECT	
IMD 2023/12	Remenham, Wargrave and Ruscombe	WOKINGHAM BOROUGH COUNCIL RESPONSE TO THE UPDATED DRAFT RUSCOMBE NEIGHBOURHOOD PLAN CONSULTATION	5 - 20

Callum Wernham
Email
Postal Address

CONTACT OFFICER
Democratic & Electoral Services Specialist
callum.wernham@wokingham.gov.uk
Civic Offices, Shute End, Wokingham, RG40 1BN

This page is intentionally left blank

Agenda Item IMD12

INDIVIDUAL EXECUTIVE MEMBER DECISION

REFERENCE IMD: IMD 2023/12

TITLE	Wokingham Borough Council Response to the Updated Draft Ruscombe Neighbourhood Plan Consultation
DECISION TO BE MADE BY	Executive Member for Planning and Local Plan - Lindsay Ferris
DATE, MEETING ROOM and TIME	22 June 2023 LGF3 at 3pm
WARD	Remenham, Wargrave and Ruscombe;
DIRECTOR / KEY OFFICER	Director, Place and Growth - Giorgio Framaliccio

PURPOSE OF REPORT (Inc Strategic Outcomes)

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

RECOMMENDATION

The Executive Member for Planning and Local Plan agrees that Wokingham Borough Council submits the comments contained in Enclosure 1 as this council's response to the updated draft Ruscombe Neighbourhood Plan: Submission Plan (March 2023) and for subsequent consideration by the appointed independent examiner.

SUMMARY OF REPORT

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

Neighbourhood plans are able to set out more detailed policies and can also choose to allocate sites for development, however neighbourhood plans cannot promote less development than set out in the strategic policies for the area, nor undermine those strategic policies.

Ruscombe Parish Council ("the Parish Council") has submitted an updated draft Ruscombe Neighbourhood Plan ("the updated draft Plan").

The Council's Executive agreed on 20th April 2023, that the updated draft Plan could progress to consultation. In line with the regulations governing the neighbourhood plan process, the Council publicised the plan for six weeks and has invited representations on the plan's content. Consultation began on Monday 15th May 2023 and ends on Monday 26th June 2023. In the same way as any other stakeholder, consultation provides the Council with the opportunity to consider the plan and submit representations.

The updated draft Plan remains fundamentally the same as the Plan previously produced by the Parish Council. This plan was withdrawn without the examination process completing. There are some differences between the updated draft Plan to the Plan that was produced by the Parish Council in October 2021, this includes further

information in Appendix B to justify the proposed Buildings of Traditional Local Character and Appendix C to justify the proposed Local Green Space designations. Some policies have also been modified to reflect responses from the previous consultation and following discussions with the Council's officers.

The updated draft Plan includes policies on issues including housing; the natural and historic environment; community facilities; business and commercial development; open space and transport. The Plan does not include any site allocations for development but identifies some areas of land as Local Green Space.

Officers have reviewed the updated draft Plan and prepared recommended representations. Policy RU5 (Buildings of Traditional Local Character) identifies and proposes to classify fourteen buildings and/or structures as Buildings of Traditional Local Character (non-designated heritage assets). Whilst the information provided in Appendix B is considered by the Council's Conservation Officer to be sufficient in justifying their designation, further clarity would be welcomed regarding engagement with the owners of each proposed building, as recommended by current best practice and guidance produced by Historic England. Some minor modifications are also proposed to the supporting text to take account of recommendations from the Council's Conservation Officer.

The recommended response also comments on Policy RU2 (Ruscombe Housing Design Code), which is considered to unnecessarily constrain suitable development which would deliver smaller homes, including on two sites proposed for allocation in the Revised Growth Strategy.

Representations are also recommended regarding the evidence that supports Policy RU8 (Local Green Spaces), which seeks to designate 10 areas of land as Local Green Space (LGS). It is considered that insufficient evidence has been provided to justify three of the ten areas of land as Local Green Space. The remaining seven areas are supported and align with the latest proposals in the Revised Growth Strategy consultation for the Local Plan Update.

Finally, minor modifications are recommended to Policy RU3 and Policy RU4 to either align with existing local and national planning policy and legislation or, where relevant, provide further clarity for decision takers.

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

Background

Neighbourhood plans help communities to shape how development is managed in their area. Neighbourhood plans work alongside strategic planning policies 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 cannot promote less development than set out in the strategic policies for the area or undermine those strategic policies¹.

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

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

Ruscombe Neighbourhood Plan

The Parish Council has prepared a neighbourhood plan covering their parish and has worked with members of the community who are interested in, or affected by, the plan through its preparation.

The Parish Council consulted residents and other interested parties on the scope and content of the neighbourhood plan. Consultation methods and community engagement activities used 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 a dedicated page on the Parish Council website. Further information is contained in the Consultation Statement and Appendices supporting the updated draft Ruscombe Neighbourhood Plan.²

By way of background, the Parish Council submitted a previous draft neighbourhood plan in October 2021, which was subject to Regulation 16 consultation and publication between February and March 2022. An independent examination of the Plan started in April 2022, but did not complete and no final report was issued.

The Parish Council chose to withdraw this draft Plan in February 2023 and has taken the opportunity to amend some aspects of policy and supporting evidence in light of previous representations, including this from the Council. The new updated draft Plan, subject of this report, was submitted to the Council in March 2023.

Updated draft Plan

Executive agreed on 20th April 2023, that the updated draft Plan and supporting documents could progress to consultation. Consultation began on Monday 15th May 2023 and ends on Monday 26th June 2023. The consultation provides the Council with the opportunity to make representations on the updated draft Plan's content, including supporting or objecting to any specific policies or proposals. As set out in the recommendations to the Executive report, any comments on the updated draft Plan are to be agreed through the Individual Executive Member Decision (IEMD) process.

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

² Ruscombe Updated Draft Neighbourhood Plan, available at:
<https://www.wokingham.gov.uk/EasySiteWeb/GatewayLink.aspx?allid=643979>

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.

Business Case (including Analysis of Issues)

Neighbourhood plans are required to be in general conformity with the strategic planning policies contained within Local Plans. Officers have engaged with the Parish Council in accordance with the Council’s legal duty to assist bodies preparing their neighbourhood plan and in accordance with the Council’s adopted Statement of Community Involvement. Several of the matters raised by officers have been addressed by the Parish Council in the updated draft Plan, primarily through general amendments to policies and supporting text which are welcomed. However, there remain a few concerns in some key policy areas, where it is recommended that the Council responds to the consultation to bring them to the attention of the examiner.

The updated draft Plan contains policies on issues including housing; the natural and historic environment (including identifying Buildings of Traditional Local Character); community facilities; business and commercial development; open space and transport.

The updated draft Plan does not include any site allocations for development but identifies some areas of land as Local Green Space. Local Green Space designation is a way for a community to identify and protect green areas that are of particular importance to them but should only be used where the green space meets a specific set of criteria in national policy.³

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 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 unnecessarily constrain development in a manner that it not supported by national planning policy or strategic policies in the Core Strategy and MDD 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 proposed housing allocations in the Local Plan Update and therefore, would not contribute to the achievement of sustainable development.
Policy RU5: Buildings of Traditional Local Character	The evidence and methodology used to assess the proposed buildings and/or structures as Buildings of Traditional Local Character is considered by the Council’s Conservation Officer to be sufficient in justifying their designation, however further clarity is welcomed regarding any engagement that has taken place with landowners during this process as recommended in current best practice and guidance produced by Historic England.

³ National Planning Policy Framework (NPPF) (2021), paragraph 102

Policy	Comment summary
Policy RU8: Local Green Spaces	The evidence and methodology used to justify the particular inclusion for three of the ten areas of land proposed for designation as Local Green Space (LGS), listed in Policy RU8, does not meet the criteria for designation set out in paragraph 102 of the NPPF. No objection is raised to the remaining seven areas proposed for designation through the updated draft Plan as these align with latest proposals in the Local Plan Update: Revised Growth Strategy.

Next Steps

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

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

At this time, the Council will consider the examination report and 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.

If more than half the votes cast support for 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 in the neighbourhood area.

FINANCIAL IMPLICATIONS OF THE RECOMMENDATION

	How much will it Cost/ (Save)	Is there sufficient funding – if not quantify the Shortfall	Revenue or Capital?
Current Financial Year (2023/24)	Nil.	Not applicable.	Not applicable.
Next Financial Year (Year 2023/24)	Nil.	Not applicable.	Not applicable.
Following Financial Year (2024/25)	Nil.	Not applicable.	Not applicable.

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 20 April 2023.

SUMMARY OF CONSULTATION RESPONSES	
Director – Resources and Assets	No comments received.
Monitoring Officer	No comments received.
Leader of the Council	No comments received.

Reasons for considering the report in Part 2
N/A

List of Background Papers
National Planning Policy Framework Planning Practice Guidance: Neighbourhood Planning
Enclosure 1: WBC Response to the updated draft Ruscombe Neighbourhood Plan Consultation

Contact Ben Davis	Service Delivery and Infrastructure
Telephone No Tel: 07824545226	Email ben.davis@wokingham.gov.uk

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):	Senior 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?	No	Paragraph Number		Policy Reference:	Policy RU1
-----------------	----	------------------	--	-------------------	------------

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 recommend that the policy is either removed or amended to provide some additional local context and value for guiding and managing development within the neighbourhood area.

Comment 2

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

Whole document?	No	Paragraph Number		Policy Reference:	Policy RU2
-----------------	----	------------------	--	-------------------	------------

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 through the plan's preparation. 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 proposed 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 typologies include references to car parking, sometimes referring to parking in front gardens, whilst other typologies make no reference to parking. A consistent approach to parking would help to provide clarity and consistency.

We would also highlight the 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?	No	Paragraph Number		Policy Reference:	Policy RU3
-----------------	----	------------------	--	-------------------	------------

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 and acknowledges that the policy/supporting text has been modified to align with existing policy in the Council's development plan and national planning policy.

However, we would seek a minor change, to include the word 'conserve' in the policy and would therefore recommend the following amendment:

'Development proposals should **conserve** ~~sustain~~ and, where possible, enhance the historic environment, particularly the special architectural and historic significance interest of the designated Ruscombe Conservation Area and its setting. Features identified as positive characteristics of the Conservation Area and its immediate setting are defined in the Ruscombe Housing Design Code attached as Appendix A, to which all proposals must have full regard.'

Comment 4

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

Whole document?	No	Paragraph Number		Policy Reference:	Policy RU4
-----------------	----	------------------	--	-------------------	------------

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), moved into the supporting text of the plan or included as a 'Community Action' at the end of the Plan.

We would also point to a minor grammatical error in paragraph 2 of the policy, and suggest the following amendment:

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

Where development proposals are for 10 or more dwellings, more than a 1000m2 of new floor space, or where the site is greater than a hectare in size, applicants should demonstrate in the Statement of Community Involvement how they have engaged in a meaningful way with local residents and other stakeholders prior to submitting a planning application.

Comment 5

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

Whole document?	No	Paragraph Number		Policy Reference:	Policy RU5
-----------------	----	------------------	--	-------------------	------------

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 supports the principle of this policy, and it is acknowledged that the policy has been modified to align with Policy TB26 of the MDD local plan and national planning policy, which is welcomed.

The Managing Development Delivery (MDD) local plan sets out a process and set of criteria to be followed, with local importance to be expressed within a form of Statement of Significance. Following engagement with the Council’s Conservation Officer, the information contained in Appendix B is considered sufficient in providing a reasoned justification for the proposed Buildings of Traditional Local Character in Policy RU5 of the Plan and aligns with the criteria and methodology set out within Appendix 2 of the Council’s Buildings of Traditional Local Character – Policy and Procedures.

Further clarity would be welcomed regarding the extent the landowners of the identified buildings/structures have been engaged in this process. This is also recognised as best practice in guidance published by Historic England in their Local Heritage Listing: Identifying and Conserving Local Heritage Advice Note 7 (Second Edition), which provides useful advice for identifying non-designated heritage assets in local plans and neighbourhood plans, in particular:

Paragraph 33 of the guidance states:

‘The management of any non-designated heritage asset on a local heritage list will be easier if it is included on the list with the knowledge of the owner. Owners should be advised of the intention to locally list an asset, including an explanation of the planning implications’ (our emphasis)

Paragraph 55 of the guidance states:

‘Particular attention should be given to responses received from the owners of assets as these will assist in developing future management strategies. Although there is no statutory requirement to consult owners before adding an asset to the local list, inviting comments may provide information that is important for understanding its significance’ (our emphasis)

Currently, the consultation documents indicate that landowners were engaged in February 2020, however no details are provided regarding any comments received. The Consultation Statement (October 2021) indicates that two landowners were further consulted in September 2021, similarly no details of the process nor the outcome are provided for in the Plan.

It is recommended that the Plan is supported by evidence clearly summarising the engagement between the qualifying body and the landowners of each building or structure, including details of any responses received.

The Council's Conservation Officer has also recommended some minor modifications to the supporting text of the Plan, and include:

- References in the Plan to 'St. James Church Conservation Area' should be replaced with 'Ruscombe Conservation Area', which is the correct name for the designation.
- Under the 'Foreword', amend the third aim as follows: '*To preserve ~~and~~ or enhance the character of the ~~St James's Church~~ **Ruscombe** Conservation Area and its setting.*'
- Paragraph 2.6 includes a list of specific buildings, but reference should be made to their listing under statutory legislation, e.g., Planning (Listed Buildings and Conservation Areas) Act 1990
- Paragraph 3.7 under 'Designated Heritage Assets etc (TB24)' suggest deleting 'etc'. The Plan could also benefit with a definition of a designated heritage asset, as per Annex 2 of the National Planning Policy Framework.
- Paragraph 3.7 under - 'Archaeology (TB25)' - The Plan could benefit in identifying the four archaeological sites on a map.
- Paragraph 5.15 - this should also refer to the Secretary of State for the Department of Culture, Media and Sport (DCMS) who is the responsible authority for designating listed buildings, in consultation with Historic England.
- Appendix B - With respect to the dating of a number of the properties, further clarity and confirmation regarding the age of some properties would be welcomed, notably with respect to I) Ruscombe Cottage, IX) Southbury Farm, X) Lake Cottage, XIII) Keepers Cottage and XIV) Lake Farm.

Comment 6

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

Whole document?	No	Paragraph Number		Policy Reference:	Policy RU7
-----------------	----	------------------	--	-------------------	------------

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 and acknowledges that the supporting text at paragraph 5.25 of the updated draft Plan has been modified. The modifications provide further guidance to assist applicants by demonstrating how an existing community use identified in the policy would no longer be viable and to provide further clarity for how a decision taker would take this matter into consideration when assessing development proposals. The modified text also aligns with paragraph 3.85 of the Council's Managing Development Delivery (MDD) local plan.

Comment 7

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

Whole document?	No	Paragraph Number		Policy Reference:	Policy RU8
-----------------	----	------------------	--	-------------------	------------

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 were included for consultation in the 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/?categoryesct91f252ff-550d-4cfa-a838-92ef2cb5f83c=10784>

Comment 8

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

Whole document?	No	Paragraph Number		Policy Reference:	Policy RU10
-----------------	----	------------------	--	-------------------	-------------

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 policy approach is supported. It is acknowledged that the policy has been modified to set out how development proposals should contribute towards improving non car related modes of travel, for example traffic calming measures and active travel improvements; and would address some of the issues and opportunities highlighted in the supporting text, with respect to infrastructure provision for pedestrians and cyclists.

Comment 9

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

Whole document?	No	Paragraph Number		Policy Reference:	Policy RU11
-----------------	----	------------------	--	-------------------	-------------

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 policy approach of reflecting the relevant Local Plan policy, in this case MDD Policy CC07, is welcomed. Further, it is acknowledged that the policy has been modified to ensure that development proposals provide and retain appropriate levels of parking in line with the Council's adopted parking standards and regard had to the Council's Highway Design Guide.

The policy also recognises the role of garages in providing car parking spaces subject to providing sufficient internal space and consideration of impacts on active frontages.

Comment 9

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

Whole document?	No	Paragraph Number	3.16	Policy Reference:	N/A
-----------------	----	------------------	------	-------------------	-----

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.

It is recommended that paragraph 3.16 of the supporting text of the draft Plan is amended to reflect that the Central and Eastern Berkshire Joint Minerals and Waste Local Plan was adopted by the Council in January 2023 and forms part of the Council's Development Plan and used to make decisions on relevant planning applications.