

PART A: Contact Details	
<b>Name:</b>	James McCabe
<b>Are you responding as a:</b>	<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 .....
<b>Job title / role (if applicable):</b>	Senior Planning Officer
<b>Responding on behalf of:</b>	
<b>Organisation name (if applicable):</b>	Wokingham Borough Council
<b>Address:</b>	Wokingham Borough Council Civic Offices Shute End Wokingham
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	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.  Yes, please notify me <input type="checkbox"/>

**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:	IRS3
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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. The council supports the identification of 'locally valued natural assets'. However, there are no specific elements of the policy that guide the future use of the identified 'locally valued natural assets' so it is unclear how a decision taker is expected to take them into consideration. The following minor additions (in italics) would address these concerns:

3. *Proposals must conserve, and where possible enhance, Locally valued natural assets.* Locally valued natural assets have been identified within the plan as follows (see Map K):

- a) The Coombes woodland and adjacent areas
- b) The Holt woodland
- c) Rhododendron avenue along Bearwood Road

**Comment 2**

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

Whole document?	Yes/No	Paragraph Number		Policy Reference:	IRS4
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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. The council supports the identification of 'locally valued heritage assets'. However, there are no specific elements of the policy that guide the future use of the identified 'locally valued heritage assets' so it is unclear how a decision taker would take these assets into consideration. The following minor additions would address these concerns:

1. Development proposals will need to demonstrate how they protect or enhance the historic and natural character of the area, specifically:
  - a) Arborfield Cross Conservation Area
  - b) Chamberlain's Farm Area of Special Character
  - c) The Barkham Street Area of Special Character
  - d) Designated heritage assets, The local historic environment, including *Listed buildings and their setting of Listed buildings, and Scheduled Monuments*
  - e) Locally valued *heritage assets (as listed below)* and *any other non-designated heritage asset that may be historically significant buildings identified through the decision making process.*

**Comment 3**

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

Whole document?	Yes/No	Paragraph Number		Policy Reference:	AD2
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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's development plan approach to housing mix and affordable housing is set out in policy CP5 of the Core Strategy. Policy AD2 proposes additional detail to how allocations of affordable housing are managed by introducing a priority of occupation to people who live within the parishes and to key workers. Currently, the allocation of affordable housing to occupants is managed outside of the planning system by the council's housing allocations team. The council prioritises allocation to those who live in the borough as part of the Housing Register (for social rented properties) and for shared ownership properties the council also requests a local connection (either live or work in the borough) which is stipulated as part of the nominations agreement (see the council's [Allocations Policy](#)). In terms of housing register applicants, priority is then given to the banding the applicant falls into and whether their need is exceptional. The Council has thus far not implemented local connection eligibility criteria for its Housing Register - applicants from out of area are placed in Band 4, which is the lowest priority band, unless exceptional circumstances apply.

Policy AD2 does not recognise the varying needs of applicants on the housing register, instead seeking to prioritise housing purely based on local connection which is measured only by living in the area. No consideration is given to those working in the area. The policy could therefore impede the allocation of affordable housing to those with the greatest need, contrary to the council's approach. The council also does not consider that planning applications are the appropriate mechanism for managing allocations of affordable housing, which is a function of the council's local housing authority duties.

The Housing Needs Analysis does not set out a desired mix of bedroom size and neither evidence nor policy clearly define starter homes or specialist housing for older people which the Analysis finds there is a need for. Likewise, the Housing Need Analysis does not justify a need for key worker housing and nor does the plan contain any narrative on this need. While the council supports the principle of key worker accommodation, and

a definition of 'key worker' is offered within the plan, there needs to be proportionate evidence to justify such specific policy requirements.

The policy requires potential occupants to have lived in the parishes for 10 years, but this figure has not been evidenced and justified within the supporting 'Housing Need Analysis' and is an overly onerous criterion for planning applications. Furthermore, the 10 year period must be continuous, thereby excluding those who may wish to move back to the area to be close to family (for example young people who have attended university).

The plan as a whole contains a lot of context regarding the strategic development at Arborfield Garrison. This development will bring a number of smaller rented units into the local market which would help to address concerns about lack of affordable accommodation for young people set out in AD2. In addition, the Housing Needs Analysis also states in its conclusion that: "the requirement for social housing is low" (page 15), in which case the plan cannot justify such a specific policy requirement contained in AD2.

#### Comment 4

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

Whole document?	Yes/No	Paragraph Number		Policy Reference:	AD3
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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.

With regards to criterion 3 of policy AD3, SANG is required as mitigation for additional dwellings in proximity to the Thames Basin Heaths SPA (TBH SPA). It is required at a rate to adequately mitigate the adverse effects that might otherwise occur from additional visitor pressure on the TBH SPA.

The framework for mitigation for additional dwellings within a 5km linear mitigation zone of the TBH SPA has been assessed and approved by Natural England. This sets out the requirement for SANG, rate of provision and notional catchment for a SANG of a particular size. A deviation from this framework would also need to be assessed and agreed by Natural England as appropriate.

The framework was based on visitor survey evidence of use of the TBH SPA, the distance travelled to visit the TBH SPA, and the needs and expectations of those visitors. There is a recognition that, unmitigated, there remains a potential for development beyond the 5km linear mitigation zone to also have an adverse effect on the Thames Basin Heaths but, depending on size of the development and remoteness, the scale of this adverse effect will diminish. On this basis a 5km to 7km linear mitigation zone exists to identify the larger developments and consider, on a case by case basis, the requirement for mitigation.

Considering the bespoke requirement within the 5km to 7km linear mitigation zone could allow for an equal requirement for SANG to be identified. This would need to be based on a robust survey evidence that overcomes the findings of the previous surveys which showed that use of the TBH SPA for recreation diminishes the further away potential visitors reside. For criterion 3 of AD3 to hold weight, it needs to be supported by evidence to show such a mitigation requirement. No such evidence supports Policy AD3, which is therefore contrary to local plan policy and the council's agreed approach with Natural England.

The policy also introduces a requirement for SANG's on sites of 0.4ha or greater. As well as the framework for TBH SPA mitigation, Natural England have published guidance on SANG requirements – criteria of what SANGs should and should not contain with reference to what kind of experience is required to provide a viable alternative to visiting the SPA.

The framework sets the minimum SANG size at 2ha. This size of SANG would provide mitigation for approximately 104 average sized dwellings in the 400m to 5km linear mitigation zone. It is practical for smaller development parcels to pool their SANG creation requirement to meet the minimum size.

The guidance includes a minimum circular walk requirement of 2.3km. In practice this overriding requirement makes it impossible to provide a standalone SANG that is only 2ha in size, albeit 2ha might be appropriate within a suite of SANGs. There are other criteria in the guidance that also make it preferable to have a larger SANG compared to several smaller SANGs that are not connected to each other (that do not form a suite of SANGs).

When assessing the viability and effectiveness of a SANG it is clear that both its size and proximity to the development that is being mitigated are key considerations. Wokingham Borough Council is committed to seeking a sustainable transport approach that encourages SANGs to be created within walking distance of the developments they are mitigating but it must also consider the potential for a SANG to have a larger catchment, as set out in the approved framework, and to require a carpark to service this larger catchment, as set out in guidance. The 0.4ha threshold does not consider the specifics of a site's location and whether there are existing SANGs nearby which could mitigate the impacts of development. It would therefore be very difficult to achieve in practice, notwithstanding any inconsistencies in the council's established approach to TBH SPA mitigation.

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