

**Specific amendments to Pre-Submission Shinfield Parish Draft Neighbourhood Plan recommended:**

Details of additions in **bold** and deletions from text shown in ~~strikethrough~~.

Paragraph 8.5 (page 7)

The evidence for these statistics should be included within the document (i.e. as an appendix).

Paragraph 9.15 (page 9)

The information about Clares Green Field SANG is not accurate. As the other SANG descriptions list only the location, it would be more appropriate to only include the location for this SANG.

Paragraph 10.5 (page 10)

This paragraph should be removed in its entirety as it has been superseded by other documents and events, i.e. the South East Plan has been revoked and the Core Strategy has been adopted. This paragraph is likely to be challenged during examination.

Policy 1: Location of Development (page 11)

Include **and** between 1) and 2):

- 1) It does not erode the separation between existing settlement boundaries; **and**

Following the bullet list under 3), include **and** after the third bullet:

- *Significantly enhance its immediate setting;* **and**

Section 11. General Design Principles

It would be useful if this section provided a detailed description of the character of the existing parish and then the policy would state that new developments should be designed to contribute positively towards the character of the local area.

Paragraph 11.3 (page 12)

This paragraph should be removed as it is too prescriptive and therefore contrary to national policy. In addition, there is no justification as to why terraces should be short nor an explanation of what this means (i.e. short in height or length).

Policy 2: General Design Principles (page 13)

6) *Where appropriate, provision of suitable and unobtrusive storage facilities for refuse and recycling;* **and**

7) *Design of road and service layouts to ensure the sustainable retention, where appropriate, of existing landscape features, including trees **and historic landscape features**, and to allow space for new sustainable landscape works without the need for maintenance and upgrades to services damaging landscape works, as they mature.*

*In new residential developments, provision of an appropriate mix of size, built form and garden size, including style, design and character, will be supported in order to provide variation within a scheme, as long as this respects local distinctiveness. This can be achieved through the use of distinctive materials, differing layouts and positioning of*

*dwellings, and the retention of existing trees, and provision of new trees, within new gardens and in the public realm.*

*Developments designed to aid independent living for older residents **such as extra care housing** will generally be supported.*

#### Policy 3: Sustainable Development (page 14)

The Government has created a new approach for the setting of technical standards for new housing which includes sustainability standards. The Code for Sustainable Homes has been withdrawn, which renders MDD policy CC04 1.a) out of date. Building Regulations part L is the new standard for energy use in residential development, which is very similar to Level 4 of the Code for Sustainable Homes. This policy should be re-worded to reflect this, in particular point 1).

#### Section 13: Transport and access (page 15)

Bullet 11 in paragraph 17 of the NPPF identifies the core planning principles which should underpin both plan-making and decision-taking. The 11th principle is to '*actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable*'. The proposed transport policies do not sufficiently encourage active transport. The policies should be reconsidered with a greater focus on public transport, walking and cycling.

The supporting text in Section 13 does not include reference to committed transport interventions which include the Eastern Relief Road (under construction), the MereOak Park & Ride (opening in September 2015), the approved South of the M4 Public Transport Strategy (fully funded and secured by Section 106), and also the Arborfield Relief Road (funding secured by Section 106 from major applications within Arborfield, with detail design underway for the roads delivery).

The policies in Section 13 focus exclusively on residential development, missing key land uses such as the new Shinfield Neighbourhood Centre (including a public transport interchange), the Science Park and new schools.

#### Paragraph 13.1 (page 15)

*With the M4 motorway running through the northern portion of the parish, the A33 running along the western fringe, and the A327 running through Shinfield village, the parish is well connected and well served by major routes. **In addition, the Shinfield Eastern Relief Road and the Park and Ride on the A33 are currently under construction.***

#### Paragraph 13.3 (page 15)

*Throughout the development of this Neighbourhood Development Plan, residents have continually raised concerns about the levels of traffic congestion, both current and anticipated. Whilst the A33 relief road is dual carriageway, many of the local roads crossing the parish are narrow country or residential roads, and main junctions regularly see congestion at peak times. **Although the Borough Council have secured a good level of infrastructure through Section 106 contributions for the major developments that have been approved for the parish,** ~~t~~*The parish council anticipates that this congestion will further increase.**

Paragraph 13.4 (page 15)

*It is expected that ~~many the major proportion of~~ new residents will be travelling, generally by private vehicle, out of the parish to their workplaces, all of which will add to pressure on surrounding areas. In addition to this, the proposed development of some 3,500 new homes at Arborfield, **although they will include a suitable package of mitigation and funding to deliver identified transport interventions**, will affect all parts of our parish and beyond, as many of these new residents will travel through the parish to Reading, the M4 motorway and beyond. [Reason for change: There is good evidence within Shinfield that there are increased resident numbers using the recently improved public transit facilities. Further sustainability improvements have been identified and secured, in particular My Journey which is a significant improvement over typical Travel Plans.]*

Paragraph 13.5 (page 15)

*Many of our local primary routes were designed and constructed many years ago and were not built to cope with volumes of traffic or the size of modern vehicles. For example, Hyde End Road, a key access road connecting Shinfield to Spencers Wood, has barely sufficient width for two commercial vehicles to pass at key bends. Local residents have for some time been campaigning for lower consistent speed limits throughout the parish where roads vary from 30 mph to 40 mph without any specific thought to level of traffic or needs of pedestrians or other road users. **However, Wokingham Borough Council has secured traffic management improvements, including speed reductions within Shinfield parish.***

Paragraph 13.6 (page 15)

*Vehicle ownership within Wokingham Borough is one of the highest in the UK. The 2011 Census showed that car ownership rates were 1.6 vehicles per household in Wokingham Borough, compared to an average of 1.1 per household across England. Shinfield Parish however has a car ownership rate of 1.637 vehicles per household. [The car ownership rate for Shinfield Parish is essentially the same as for Wokingham Borough.] An average of 1.6 car parking spaces per dwelling was the Council's previous parking guidance. Whilst car ownership is in line with this old guidance, the adopted MDD parking policy is substantially increased.*

Paragraph 13.7 (page 15)

*~~The 2011 Census indicated that the 4,403 dwellings in Shinfield used 7,211 vehicles,~~ [This equals 1.637, as expected from the previous paragraph. However, the text states that '4,403 dwellings in Shinfield used 7,211 vehicles'. Car usage is not the same as car ownership. Car ownership can be high, but it is the usage that impacts on the local highway network. This text should be re-worded or deleted.]*

Paragraph 13.8 (page 15)

*54% of these dwellings have two or more cars and only 8.2% have no vehicle at all. [Is this evidence provided within the appendices of the plan?]*

Paragraph 13.9 (page 16)

*~~Analysis carried out in 2013 in Arborfield by the Arborfield Resident's Association, that measured peak hour residential trip rates, indicated an average trip rate of 0.766 per household. This is 45% more than the rates used for the WBC Local Transport Plan. This indicates that any planned improvements to the road network to mitigate the impact of the new development will fall short of the necessary additional capacity required. With the~~*

~~Central Government predicted increases in private vehicle ownership of 20% by 2026 and 46% by 2040, the future for traffic congestion in the Thames Valley is bleak, unless more progressive transport solutions are found.~~ [This information is not correct. The issue has been raised previously at Planning Committee meetings and Community Forums. The data referred to here is not robust and nor is it included for review within the appendices of the plan. WBC has very robust data on trip generation and car usage by households which has been used and entered into a traffic model to forecast impacts and model the effects of infrastructure improvements such as the Shinfield Eastern Relief Road. The data cited here is not robust and is not even in Shinfield Parish. This section should be deleted.]

#### Policy 4: Accessibility and Highways Safety (page 16)

Traffic speeds and volumes are two separate issues that require very different measures to address. Including a separate policy on traffic volumes is recommended. Such a policy should include encouragement and infrastructure for bicycle, pedestrian and public transport.

In point 1), it might be useful to say that 'signage should be consistent and appropriate in scale to the context' rather than 'suitable signage', to ensure prevention of sign pollution but provide sufficient signage.

Insert 'and' between 2) and 3) in Policy 4.

#### Section 14. Parking (page 17)

The Wokingham Borough Managing Delivery Development Local Plan (MDD) policy CC07 states that planning permission will only be granted where the proposal demonstrates how the proposed parking provision meets the standards set out in Appendix 2 of the MDD and that the new scheme retains an appropriate overall level of off-street parking. It further explains that the parking requirements are designed to acknowledge differences between development proposals and the transport facilities and infrastructure serving different areas, as well as the role of smarter choices and demand management measures in promoting sustainable travel patterns. The parking requirements for dwelling houses found in Appendix 2 of the MDD are based on accessibility and the character of the area and are divided into three categories: urban, town, and fringe and village. Shinfield Parish contains both town and fringe and village classifications. Paragraph 2.3.4 in the Parking Standards Study Report which underpins Wokingham's borough-wide parking policy states that most new housing in the borough is located in identified Strategic Development Locations (SDLs) which will be supported by improvements in transport infrastructure and services which will be designed to encourage more sustainable travel patterns. *'The provision of parking is an important element in the overall design of these SDLs, as parking is a major factor in influencing travel. A careful balance needs to be achieved between allowing Wokingham residents to own cars, whilst encouraging use of alternative modes of travel and not allowing car parking to dominate the urban landscape.'* The proposed parking policy in the neighbourhood plan would both undermine this policy and is not in general conformity with the borough's strategic policy.

**What is the justification for not following the healthcheck recommendation to remove the parking policy?** Shinfield Neighbourhood Plan Healthcheck *Recommendation 7: The Neighbourhood Plan should be re-drafted to delete the new parking policy in preference for a statement that the Neighbourhood Plan complies with the development plan in this*

*respect, and all necessary consequential changes to the plan should be made to reflect this development plan compliance.*

Paragraph 184 of the NPPF states that *'Neighbourhood plans and orders should not promote less development than set out in the Local Plan or undermine its strategic policies.'* The proposed parking policy could undermine the strategic borough-wide policy. The policies in this section should be consistent with and build on existing WBC policies.

Paragraph 14.1 (page 17)

As stated in paragraph 13.6 and 13.7 in this document, 0.037% is not a significant increase in car ownership for Shinfield Parish compared to the Borough-wide rate. Therefore, the evidence to support the last sentence in this paragraph is not robust.

Paragraph 14.3 (page 17)

It is unlikely that garages are used as car parking spaces, which explains why there appear to be more than 130 vehicles regularly parked on the street.

Paragraph 14.4 (page 17)

Looking at the data in the Car Parking Survey, how the current WBC parking standards apply to this development is not included and therefore it is not clear how the figure of 72% has been arrived at or whether it is accurate.

Paragraph 14.5 (page 17)

Bullet 2 – As discussed in paragraph 13.6 and 13.7 in this document, the rate of car ownership in Shinfield Parish is 0.037% higher than the average across the Borough. This slight increase does not justify deviating from the Borough-wide parking strategy.

Bullet 3 – Is there any evidence to suggest that tandem parking is not sufficient?

Bullet 5 (page 18) – Deardon Way was never intended as a bus route as it is a cul-de-sac. For the Mitford Fields development, a bus could be contracted to do this route as the roads have been designed adequately. Whilst parking was based on old standards and increased parking has occurred on street, this was not the deciding factor preventing a bus travelling through the site. Rather the decision was related to viability and longevity of a good public transit strategy serving the local area and the wider Strategic Development Location. Regarding the Shinfield Park development, a bus can make the route and could be contracted to serve this route if it were deemed viable.

Paragraph 14.6 (page 18)

The Manual for Streets, which is the national standard published by the Department for Transport for road infrastructure, advises that 6.1 metres is an adequate width and has a minimum required width of 5.5 metres. The approved applications for the South of the M4 SDL include provisions for buses to run through the site. In addition, funding has been secured for traffic management which can be used for any necessary parking restrictions.

Policy 5: Parking (page 19)

To understand the impact of the proposed parking provisions in Policy 5, WBC Highways officers looked at a current pre-application that has been received for Shinfield Parish and calculated the required parking under the Shinfield standards and under the WBC standards, as can be seen in the table below.

	<b>Current WBC adopted parking</b>	<b>Proposed Shinfield NP parking</b>
	18 allocated parking spaces	22 parking spaces
	7 unallocated/visitor parking spaces	2 visitor spaces
<b>Total required</b>	<b>25</b>	<b>24</b>

As can be seen in the table, the current WBC adopted parking standards would require a higher level of parking provision than the proposed Shinfield parking standards. As the text in the plan indicates, this is not the intention of this policy. The WBC standards are based on a robust and extensive study by WSP. The proposed Shinfield standards do not have a clear evidence base upon which they are formulated. The parking policy as found on page 19 in the pre-submission plan should be removed and recommendation 7 from the Healthcheck report should be complied with:

*Recommendation 7: The Neighbourhood Plan should be re-drafted to delete the new parking policy in preference for a statement that the Neighbourhood Plan complies with the development plan in this respect, and all necessary consequential changes to the plan should be made to reflect this development plan compliance.*

It is not clear in the policy whether garages should count as part of the car parking provision. The existing WBC policy of assuming usage of 50% of garages as part of the car parking provision and having garages with a minimum length of 6 metres are an established and practical approach.

What is the evidence that tandem parking is not sufficient/appropriate? WBC are not aware of any evidence that shows this. Without robust evidence, the following sentence should be deleted: *'Tandem drives should not be constructed on primary roads, particularly those identified as bus routes or potential bus routes, as these lead to additional on-street parking.'*

Small parking areas usually indicate limited parking which will cause additional on street parking. Current WBC standards seek unallocated parking spaces and visitor spaces within these areas to assist with parking requirements. Evidence to support this is contained within the adopted parking standards study report. The following sentence should be deleted: *'Communal car parking areas in residential schemes should be small and close to buildings where there is appropriate natural surveillance.'*

Bollards and railings are generally discouraged and conflict with design guidance in the Borough Design Guide limiting street furniture. WBC parking policy, which is being delivered throughout new developments, aims to reduce this happening. Therefore, the following sentence should be deleted: *'Applicants will be required to demonstrate measures which will discourage parking on pavements and verges.'*

How will developers be encouraged to introduce and enforce parking management? Who will provide the enforcement? It is not clear how the following sentence would work in practice and therefore should be deleted: *'Developers will be encouraged to introduce and*

enforce parking management from occupation of houses until such times as roads are adopted by the local highways authority.'

Policy 5: Parking (continued) (page 20)

**Houses in Multiple Occupation (HMOs) and Sub-Divisions**

Conversions of dwellings to multiple occupation and sub-divisions generally intensify the use of the property and can increase demand for parking because of the greater number of adult occupants living in the property. There may also be a greater demand for visitor parking than if it were in single family occupation. **Converting a dwelling into an HMO for between three and six unrelated residents is permitted development, and therefore an application for planning permission is not required for this use. Converting a dwelling to a larger HMO, for seven or more unrelated residents, requires an application for planning permission and therefore the parking provision standards below will apply.**

~~The required level of parking provision may vary depending on the location and the specifics of the proposal. However, the minimum should be for the provision of one parking space per bedroom either on-site. or on-street depending on the parking capacity available in the area, unless otherwise justified by providing details, for example, as to what measures will be taken to deal with anticipated traffic impacts of the scheme. Applications will normally be expected to include a parking survey. On-street parking may be considered depending on the location of the proposed HMO in relation to the highway network (i.e. fronting a main road or located within a cul-de-sac or development estate). Should on-site parking not be achievable applications will be expected to include an independent parking survey.~~

For sub-divisions of houses or conversions of office or other non-residential accommodation into apartments **which require planning permission**, the standards will be as per the Residential Parking Standards set out ~~above~~ **within the Council's MDD**. Planning applications will normally be expected to include a parking survey **should on-street parking be considered**.

~~Inconsiderate parking can also lead to harm and adverse impact on highway safety. In order to minimise any potential impact of new developments with less than optimum parking on site and competition for existing on-street parking a Parking Survey and Assessment will be required to be submitted with an application where the use of off-site parking facilities is proposed to meet the needs of the development. [This paragraph repeats information in the first three paragraphs of this policy and so is not necessary.]~~

**Parking Surveys**

The Parking Survey shall be accompanied by a scaled plan (in the form of a dimensioned sketch) annotated to indicate private accesses, on-street parking bays, unmarked roadside parking, waiting restrictions (single yellow lines **etc.**), provision of suitable barriers to prevent parking on pavements or green verges and public car parks up to 100 metres distance from the development. The plan should also indicate areas unsuitable for parking within this distance.

The information submitted with the parking survey will also need to include:

- 1) The likely levels of car ownership amongst occupants;
- 2) An assessment of parking activity in an identified vicinity of the application site. The parking activity would need to be recorded regularly and typically between 6 am and 11pm ~~on one weekday and one weekend day~~ **for up to one week (including a Tuesday, Wednesday and Thursday), and including one weekend day** by an independent assessor;
- 3) The results of the survey would be required to provide mapped records of the parked vehicle locations at each regular count interval and vehicle identities and would need to be at a time unaffected by seasonal variation (not in school holidays, or leading up to Christmas, for example);
- 4) Proximity to public transport.

#### Section 15. Natural Environment (page 21)

##### Paragraph 15.4 (page 21)

Regarding the field in Spencers Wood known as “The Common”, WBC has no evidence that this is a semi-natural unimproved grassland.

##### Policy 6: Trees, Hedgerows and Woodland (page 23)

3) Habitats of Principal Importance in England (Section 41 Habitats under the Natural Environmental and Rural Communities Act (2006) **which are appropriate for retention** will have a minimum 15 metre wide buffer zone of soft landscaping that excludes any residential curtilage;

4) Ancient Woodlands, Local Wildlife Sites and ponds which are appropriate for retention will have a **15 - 30** metre wide buffer zone of native woodland planning that excludes any residential curtilage;

##### Policy 8: Flooding (page 24)

SuDS is Sustainable Drainage Systems—the ‘Urban’ has been dropped. Please make this change in the third paragraph of this policy.

#### Section 16. Community and Recreation (page 25)

##### Policy 9: Assets of Community Value (page 26)

Only the first paragraph in this policy is actual policy; the second and third paragraphs are supporting text and so should not be within the green policy box.

*Assets of community value are defined as buildings and pieces of land that are essential to the social foundation of the area. **There is a formal designation process. Applicants can apply to Wokingham Borough Council to designate assets of community value.***

*The parish council will seek to ~~have register~~ identified assets **of community value designated by** ~~with~~ Wokingham Borough Council and retain a working list of sites identified as valuable to the community.*

Policy 10: Community and Sports Facilities (page26)

All developments shall contribute towards formal and informal sport and leisure activities and recreation and social facilities within the parish, **in line with Wokingham Borough Council Community Infrastructure Levy Charging Schedule and/or negotiated through Section 106 agreements** ~~either through the provision of facilities or through financial contributions towards sports, leisure and recreation projects.~~

Section 17: Business and Commercial Development

Policy 11: Commercial Development

2) *The scale of the development would complement the local area*

What does this mean? Please provide clarification.

## Appendix 2: Shinfield Parish Map

Please replace the existing map of Shinfield Parish on the back cover of the draft plan with the map below. The existing map includes a layer for Tree Preservation Orders, which is out of date and has been removed in the map below. For a high resolution copy of this map, please contact Rebecca Bird.

