

## Enclosure 1

### National Planning Policy Framework

Q1. Do you agree with the changes proposed in Chapter 2?

Yes.

Wokingham Borough Council supports the proposed revisions which include reference to the 17 Global Goals for Sustainable Development and the change of reference to sustainable patterns of development and places.

Q2. Do you agree with the changes proposed in Chapter 3?

Yes.

Wokingham Borough Council welcomes the inclusion that policies for large scale development should be set within a long term vision.

Whilst supporting the revision, we strongly request the government consider further changes to ensure that national planning policy understands and reflects the delivery profile from large scale development. In places such as Wokingham Borough, strategic scale allocations will be necessary to deliver high quality development which provide the opportunity for residents and workers to access local services and facilities. Simply put, non-strategic options are often not accessible to services and facilities, nor do they capable of supporting necessary infrastructure interventions.

The government should make it expressly clear that the setting of a housing requirement and requirements for other uses can reasonably reflect a realistic delivery profile, without mechanisms such as the Local Housing Need and the five year housing land supply requirements creating unrealistic expectations and pressure to allow less sustainable development.

Q3. Do you agree with the changes proposed in Chapter 4? Which option relating to change of use to residential do you prefer and why?

Wokingham Borough Council supports Option 1 in the most part but requests the removal of the term “wholly” as unnecessary and an obvious area for challenge which is at odds with other parts of the NPPF.

It is essential that local authorities remain able to utilise Article 4 Directions to avoid unacceptable impacts based on local circumstances. The suggested alternative option which references the protecting an interest of national significance is inappropriate and flawed. It is accepted that rights should be removed from the smallest geographical area practical to address the identified issue.

Q4. Do you agree with the changes proposed in Chapter 5?

Yes.

Wokingham Borough Council supports the proposed revisions. The clarification of infrastructure including a genuine choice of transport modes is welcomed. Masterplanning forms part of our core approach to planning for managing development, having been utilised in the creation of the adopted Core Strategy local plan and in the emerging Local Plan Update.

Q5. Do you agree with the changes proposed in Chapter 8?

Yes.

Wokingham Borough Council supports the proposed revisions.

Q6. Do you agree with the changes proposed in Chapter 9?

Yes.

Wokingham Borough Council supports the proposed revisions.

Q7. Do you agree with the changes proposed in Chapter 11?

Yes.

Wokingham Borough Council supports the proposed revisions. Masterplanning forms part of our core approach to planning for managing development, having been utilised in the creation of the adopted Core Strategy local plan and in the emerging Local Plan Update.

Q8. Do you agree with the changes proposed in Chapter 12?

No.

Whilst Wokingham Borough Council supports most of the proposed revisions, however, we are concerned that existing guidance produced by prior to the National Design Guide and National Model Design Code may be argued as carrying less weight, and that references to street trees require expansion to cover their continued health.

Our strategic development locations are supported by adopted Supplementary Planning Documents which provide design parameters. In addition, we have an adopted Borough Design Guide. It is essential that the role of these documents in achieving quality outcomes are not undermined. We request that the text is altered to clarify that the continuing relevance of existing design guidance and codes. If this is unachievable within the NPPF, clarity should be provided through an amendment to the supporting Planning Practice Guide.

The proposed new paragraph 130 refers to measures to secure the long term maintenance of trees. We feel it is essential that this paragraph is amended to refer in addition to providing sufficient

space to allow trees to grow and thrive, including the maintaining adequate root protection areas and limiting excessive shading to residential properties.

Lastly, proposed new paragraph 133 requires clarification to ensure that the significant weight given to design is not interpreted as outweighing other adverse impacts such as an unsustainable location or other environmental or social impacts.

Q9. Do you agree with the changes proposed in Chapter 13?

Yes.

Wokingham Borough Council supports the proposed revisions.

Q10. Do you agree with the changes proposed in Chapter 14?

Yes.

Wokingham Borough Council supports the proposed revisions.

Q11. Do you agree with the changes proposed in Chapter 15?

Yes.

Wokingham Borough Council supports the proposed revisions.

Q12. Do you agree with the changes proposed in Chapter 16?

Yes.

Wokingham Borough Council supports the proposed revisions.

Q13. Do you agree with the changes proposed in Chapter 17?

Yes.

Wokingham Borough Council supports the proposed revisions.

Q14. Do you have any comments on the changes to the glossary?

Yes.

Wokingham Borough Council supports the proposed revisions.

National Model Design Code

- Q15. We would be grateful for your views on the National Model Design Code, in terms of
- a) the content of the guidance
  - b) the application and use of the guidance
  - c) the approach to community engagement

Wokingham Borough Council have the following comments on design and the design codes.

Moves to improve the tools available to improve design outcomes are welcomed. Design guides and codes can be very useful, and the principle of wider use of them is reasonable and to be supported. However, the increased use of local design guides and codes is highly dependent on sufficient resources in terms of time, money and skills being available. This will need to be addressed within the resourcing strategy mentioned in the White Paper, and an assumption that resources currently directed to development management can be reallocated to design guides will not be sufficient.

Quality is strongly influenced by the permission regime through which the scheme is scrutinised. It is certainly worth stating and openly recognising that some of the poorest development that has taken place has come through the permitted development route, including offices changing to residential.

The permitted development regime and its continued expansion by government, undermines this objective by removing the role of the local planning authority as assessor for many types of development. We would strongly urge the government to abandon the expansion of the permitted development regime as unnecessary. In addition we would strongly advocate any regime that remained to link to local design codes.

It is unlikely that the government's noble ambition to achieve beauty could derive from a list of rules and guidance alone. The success of design codes will also depend on how the development industry react to the definition of greater standards and the governments defence. In the case of the Sherford urban extension, a grouping of Bovis Homes and Linden Homes (now combined as Vistry) and Taylor Wimpey publicly fell out with the council and the Prince's Foundation which had drawn up a design code with the community. The group indicated they would go slow, undermining the council's ability to demonstrate a five year supply of deliverable sites. The outcome was that the council was forced to water down the design code, contrary to the community's wishes.

It is vital that good design is supported holistically across national planning policy and its interpretation and implantation by the Planning Inspectorate. It would be wholly wrong for good design to be outweighed by a wish to build houses or other developments. We would strongly urge the government to review wider mechanisms in the National Planning Policy Framework such as the five year housing land supply to ensure the laudable aims of increasing design quality are not undermined.

Wokingham Borough Council have the following comments on the National Model Design Code.

The National Model Design Code provides a good balance between text and images, and avoids the traps of being overly long or complex.

Accessibility could be improved by including a matrix at the end setting out the key design points and referring back to the relevant pages of the document for further details.

An explanation of enclosure ratio is required within the public spaces text section (page 24). We read this as building heights and front to front separation distances but is not clear to users.

The enclosure ratio for suburban primary streets seems overly flexible with a suggested range of 28m-35m. This may give the expectations of significantly lower density development. Having a defined primary route through a suburban street helps with wayfinding and placemaking and generally we have looked to define these areas through taller buildings and higher density housing. For such sites within Wokingham Borough we have used widths up to around 25m. Incorporating storey heights also gives the impression that these streets will be fronted by two storey buildings.

The description of local streets within the public spaces section as not being through routes for cars may encourage cul-de-sac forms of development. In our opinion, moving through an area on local roads should not be ruled out if designed well. We suggest local streets should be connected streets with vehicle speeds managed through the design process.

Q16. We would be grateful for your comments on any potential impacts under the Public Sector Equality Duty.

Wokingham Borough Council have no comments relating to impacts under the Public Sector Equality Duty.

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