

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
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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	N/A	Policy Reference:	Policy TW1: Encouraging Sustainable Travel
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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 supports the principle of this policy.

It is recommended that the Policies Map, which aids the interpretation of Policy TW1, should be updated to include the following amendments to provide additional clarity for the decision-maker:

- The proposed Loddon Long Distance Path should be modified to reflect the route on the council’s latest Greenways plan, which is available to view and access on the website: <https://www.wokingham.gov.uk/EasySiteWeb/GatewayLink.aspx?allId=618819>
- Twyford Footpath 1, which is a key existing Public Rights of Way that runs over the railway line, should be included on the Policies Map (see below)
- The routes shown through the Loddon Nature Reserve are currently depicted as ‘TW1: Sustainable Travel Network – Existing Network’, which according to the council’s Public Rights of Way Officer are not part of the existing network, and should be identified as ‘TW1: Sustainable Travel Network – Opportunities for Improvement’

Additionally, it is recommended that Plan G on page 81 of the Plan should be amended to reflect the designations set out in the Policies Map. Some of the routes currently identified on Plan G do not align with the Policies Map, and this could introduce some confusion among decision-makers during the policy’s implementation.



Comment 2

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

Whole document?	Yes/No	Paragraph Number	N/A	Policy Reference:	Policy TW2: Sustainable Accessibility and Mobility
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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 supports the principle of this policy. However, we suggest that the policy and/or supporting text could helpfully refer to supporting sustainable deliveries, for example by encouraging and supporting opportunities for secure communal parcel drop areas in Twyford village centre to reduce the number of delivery vehicles on the local highway network.

Comment 3

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

Whole document?	Yes/No	Paragraph Number	N/A	Policy Reference:	Policy TW3: Twyford Railway Station
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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 supports the principle of this policy.

Comment 4

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

Whole document?	Yes/No	Paragraph Number	N/A	Policy Reference:	Policy TW4: A Thriving Village Centre
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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 broadly supports the proposed policy and approach to maintaining the viability and vitality of Twyford village centre. However, further consideration should be given to how the policy would interact and operate in conjunction with the local plan policies for retail centres.

By way of context, Policy CP13 (Town centres and shopping) of the Core Strategy (2010) and Policy TB15 (Major Town, and Small Town/District Centre development) of the Managing Development Delivery (MDD) local plan (2014) identifies a small / district centre for Twyford village. The extent of the policy designation in the local plan is larger than the proposed area for Twyford village centre set out in Policy TW4 of the Twyford Neighbourhood Plan.

Should the policy be retained, we would suggest a revision to the boundary of the proposed designation to align with the existing designation in the Core Strategy and MDD local plans, to avoid conflict with strategic policy.

Further, we would question whether the listed buildings and structures at Polehampton School House should be included within the village centre boundary.

Comment 5

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

Whole document?	Yes/No	Paragraph Number	N/A	Policy Reference:	Policy TW5: Village Centre Regeneration Area
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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 supports the principle of this policy.

Comment 6

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

Whole document?	Yes/No	Paragraph Number	N/A	Policy Reference:	Policy TW6: Improving Air Quality
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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 supports the principle of this policy. However, we suggest amendments to the policy to provide a more flexible approach, achieve general conformity with Policy CP1(8) of the adopted Core Strategy (2010) and the MDD local plan, and having regard to national policy, in particular paragraph 173 of the NPPF.

An example has previously been cited in Policy KBR34 of the Knightsbridge Neighbourhood Plan (adopted December 2018), which is considered to introduce a more flexible policy approach for managing development proposals that may cause or contribute to air quality impacts.

Taking this approach into account, we suggest the following amendments to criteria B of Policy TW6 which would help to improve the clarity and effectiveness of the policy for the decision-maker:

'Development proposals, where applicable, will be required to demonstrate should aim to be at least 'Air Quality Neutral' standards during both construction and operation to avoid and not cause causing or contributing contribute to worsening air quality, including in the Twyford Crossroads Air Quality Management Area. Development proposals that would result in a significant increase in air pollution within or adjacent to the Twyford Crossroads Air Quality Management Area will only be justified in exceptional circumstances. This should be demonstrated through an air quality assessment, and if necessary, proposed mitigation measures.'

Developments proposals requiring a Travel Plan or Transport Assessment will also be required to submit an air quality assessment.'

Comment 7

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

Whole document?	Yes/No	Paragraph Number	N/A	Policy Reference:	Policy TW7: Nature Recovery and Climate Change
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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 supports the principle of this policy.

Comment 8

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

Whole document?	Yes/No	Paragraph Number	N/A	Policy Reference:	Policy TW8: Tree Canopy Cover
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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 Twyford Neighbourhood Plan must have regard to national planning policies and advice. Currently, Policy TW8 (Tree Canopy Cover) seeks to ensure that development proposals achieve a minimum 25% canopy cover. This policy requirement could have potential implications for any indicative site capacities, due to a possible reduction in the net developable area. In addition, some higher density development could be acceptable within some areas of Twyford Parish. Removing the opportunity for higher densities in appropriate areas would make less effective or efficient use of land and would reduce the quantum and variety of housing types to be able to respond to local needs, as sought in Policy CP5 of the Core Strategy (2010) and Policy TW12 (New Homes) of the Twyford Neighbourhood Plan.

The policy, in its current form, would constrain development, including opportunities for higher density development in appropriate areas in a manner not supported by national policy or strategic policies set out in the Core Strategy and Managing Development Delivery local plan documents.

The policy is therefore considered not to meet the basic conditions with respect to *(a) having regard to national policies and advice* and *(e) general conformity with the strategic policies contained in the development plan for the area of the authority*.

Should the policy be retained, we would suggest that it introduces a degree of flexibility by setting out certain circumstances where a lower canopy cover percentage may be more appropriate and justified. For example, circumstances could refer to those development proposals that are situated in Twyford village centre where higher density development is encouraged but where its achievement might be impacted by full implementation, or where landscape, townscape and ecological sensitivities would be adversely impacted by full implementation.

Comment 9

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

Whole document?	Yes/No	Paragraph Number	N/A	Policy Reference:	Policy TW9: Carbon Sequestration
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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 broadly supports the principle of this policy, but we would query whether the reference in the policy to the 'Woodland Carbon Code' should instead refer to the 'UK Forest Standard', as it has been noted by the council's Ecology Officer that the 'Woodland Carbon Code' is a means to measure the quantity of carbon sequestered by woodland, rather than set out a specific standard for creating woodland.

Comment 10

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

Whole document?	Yes/No	Paragraph Number		Policy Reference:	Policy TW10: Zero Carbon Buildings
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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 Twyford Neighbourhood Plan must have regard to national planning policies and advice and be in general conformity with the strategic policies contained in the council's development plan.

Policy TW10 (Zero Carbon Buildings) seeks to impose standards and requirements for energy efficiency improvements and carbon emissions reduction that are set beyond current national and local planning policy. Whilst the council continues to recognise the parish council's ambition, the planning system does require the need to demonstrate that policy requirements and standards do not impact on deliverability.

Requirements in Policy TW10 would seek to typically achieve 80% - 90% improvements in emissions over current Building Regulations Part L and is therefore set beyond national and local level policy. Given the introduction of the interim Future Homes Standard in national policy and guidance, the requirements of Part L of Building Regulations ensure new homes built from 15 June 2022 (subject to transitional arrangements) produce 31% less carbon emissions compared to the 2013 standards. Policy TW10 should therefore be updated to reflect current best practice.

It is worth noting the outcome following an examination of the Rollesby Neighbourhood Plan 2020-2035, in Great Yarmouth Borough, where the submitted plan sought to introduce energy efficiency standards at 20% above Building Regulations. However, during the examination process, the examiner concluded in their final report (page 23) (dated 15 November 2021) that (emphasis added):

'The supporting text refers to the possibility of planning policies requiring energy efficiency standards 20% above building regulations and refers to the Code for Sustainable Homes. This is correct, the PPG does say that development plan policies can set energy performance standards at this level. However, this relates to local planning policies not qualifying bodies. It refers to the Planning and Energy Act 2008 which allows local planning authorities to set energy efficiency standards in their development plan policies.

The WMS, referred to above, explains that neighbourhood plans should not set out any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings (our emphasis added), instead these must be contained in local plans. This element then requires modification to ensure it has regard to national policy and guidance.

Subject to these modifications, the policy will have regard to national policy, contribute to the achievement of sustainable development and be in general conformity with strategic policy.'

For clarity, the examiner's recommended modification to Policy HO2: Housing Mix of the Rollesby Neighbourhood Plan was as follows:

- Change the fourth paragraph of the policy to read: *New housing is encouraged to be designed to a high energy efficiency standard."*
- Change the supporting text at paragraph 56 on page 14 of the Plan to read:

“Planning practice guidance allows *local planning authorities to require* planning policies to require energy efficiency standards 20% above building *regulations*. *This is encouraged to be used for Policy HO2 unless the guidance changes and more rigorous standards can be applied.*”

Further, it is acknowledged in the Twyford Neighbourhood Plan that this policy is to be applied in Twyford Parish in the interim and until such time that the Local Plan Update (LPU) is adopted. WBC has commissioned further climate change evidence as part of the emerging LPU which will inform policy development moving forward. Currently, the proposed requirements within the Draft LPU have not been subject to whole plan viability testing, and therefore there is a potential risk of conflict with strategic policy if the evidence does not justify a similar policy approach in the LPU.

The policy, in its current form, is therefore considered not to meet the basic conditions, namely with respect to (a) *having regard to national policies and advice*, and (e) *being in general conformity with the strategic policies contained in the council’s development plan*.

Should the policy be retained, we would suggest the following amendments to criteria (A) and (B) of Policy TW10, to align with national and local planning policy and be in general conformity with strategic policies of the council’s development plan:

- A. All development **proposals** ~~must~~ **should aim to** be ‘zero carbon ready’ by design to minimise the amount of energy needed to heat and cool buildings through landform, layout, building orientation, massing and landscaping. Consideration should be given to resource efficiency at the outset and whether existing buildings can be re-used as part of the scheme to capture their embodied carbon.
- B. Wherever feasible, all buildings **should be capable of achieving Future Homes Standards and/or Future Buildings Standards (or any equivalent standard)**. **In addition, buildings that achieve** ~~be certified to~~ a Passivhaus (or equivalent standard) with a space heating demand of less than 15KWh/m²/year **will be viewed favourably**. ~~Where schemes~~ **Development proposals** that maximise their potential to meet this standard by proposing of terraced and/or apartment building forms of plot size, plot coverage and layout that are different to those of the character area within which the proposal is located, ~~this~~ will be supported, provided it can be demonstrated that the scheme will not have a significant harmful effect on the character area.

We would recommend that the requirements related to the submission of a Whole Life Carbon Assessment (in criteria D) and Energy Statement (in criteria E), could helpfully be combined and their content incorporated within an overall Sustainability Statement. As per the Council’s latest Local Validation List (June 2021) a Sustainability Statement is a useful and helpful approach in demonstrating the sustainability principles of development proposals, including showing the predicted energy demand of the proposed development and explaining the degree to which a development can meet current energy efficiency standards. In addition to operational performance, the Sustainability Statement can also cover other wider sustainability factors, notably landscapes, biodiversity and sustainable travel and accessibility.

We would also suggest amendments to criteria (D) of Policy TW10 as follows:

- D. All ~~planning applications for major~~ **Major** development **proposals** are also required to be accompanied by a Whole Life-Cycle Carbon Emission Assessment, **having regard to any national guidance and current best practice** ~~using a recognised methodology~~, to demonstrate actions taken to reduce embodied carbon resulting from the construction and use of the building over its **lifetime** ~~entire life~~.

Should the policy be pursued, it would need to be supported by additional viability evidence to demonstrate that the policy requirements in the plan as a whole are achievable and deliverable in practice, as per paragraph 16(b) of the National Planning Policy Framework and the Planning Practice Guidance.

Finally, the requirement for ‘*all planning permissions granted for new and refurbished buildings*’ to provide a post occupancy evaluation (as proposed in criteria (C) of Policy TW10) and to be enforced via a planning condition is not likely to meet the necessary tests set out in Paragraph 55 of the NPPF as it would place unreasonable burdens on the developer/applicant. Further, the introduction of this requirement would have significant resource implications for the Local Planning Authority.

Comment 11

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

Whole document?	Yes/No	Paragraph Number	N/A	Policy Reference:	Policy TW11: Water Infrastructure and Flood Risk
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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 broadly supports the proposed policy and approach.

Comment 12

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

Whole document?	Yes/No	Paragraph Number	N/A	Policy Reference:	Policy TW12: New Homes
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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 supports the proposed policy and approach, which is supported by locally specific evidence in the form of a Housing Needs Assessment.

Comment 13

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

Whole document?	Yes/No	Paragraph Number	N/A	Policy Reference:	Policy TW13: First Homes
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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 broadly supports the proposed policy and approach, but we would question the appropriateness in relying on local plan viability evidence published in 2008 as justification for introducing a minimum 50% discount from full open market value.

In addition, WBC has commissioned housing needs evidence as part of the emerging LPU which will inform policy development moving forward. Currently, the proposed requirements within the Draft LPU have not been subject to whole plan viability testing, and therefore there is a potential risk of conflict with emerging strategic policy if the subsequence evidence does not justify a similar policy approach in the LPU.

Comment 14

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

Whole document?	Yes/No	Paragraph Number	N/A	Policy Reference:	Policy TW14: First Homes Exception Sites
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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 broadly supports the proposed policy and approach.

Comment 15

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

Whole document?	Yes/No	Paragraph Number	N/A	Policy Reference:	Policy TW15: Design Codes
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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 supports the proposed policy and approach, which is supported by locally specific evidence in the form of Design Guidelines and Codes.

Comment 16

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

Whole document?	Yes/No	Paragraph Number	N/A	Policy Reference:	Policy TW16: Buildings of Traditional Local Character
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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 supports the proposed policy and approach.

Comment 17

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

Whole document?	Yes/No	Paragraph Number	N/A	Policy Reference:	Policy TW17: Twyford Community Hub (Old Polehampton School)
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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 supports the proposed policy and approach.

Comment 18

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

Whole document?	Yes/No	Paragraph Number	N/A	Policy Reference:	Policy TW18: Community Facilities
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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 broadly supports the proposed policy and approach. Minor amendments are suggested to criteria (B) of the policy wording regarding the evidence that may be required by applicants in order to demonstrate that the existing use is not viable. Suggested amendments would help to bring the policy in line with national planning policy and local policy, in particular paragraph 3.85 of the Managing Development Delivery (MDD) local plan (2014).

B. In addition to the provisions of relevant Local Plan policies which safeguards community facilities from unnecessary loss, proposals to change the establish use of a facility and ~~its~~ **their** ancillary land must demonstrate that the ~~land use~~ **is no longer viable suited to any other community use (through the production of evidence that genuine and sustained efforts to promote, improve and market the facility at a reasonable value have been undertaken)** or that the use can be satisfactorily re-located for the benefit of the local community.

Comment 19

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

Whole document?	Yes/No	Paragraph Number	N/A	Policy Reference:	Policy TW19: Early Years Provision
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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 supports the proposed policy and approach.

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