

## Shinfield Parish Council Draft Neighbourhood Development Plan

Summary of representations received by Wokingham Borough Council (WBC) as part of Regulation 16 publication and submitted to the independent Examiner pursuant to paragraph 9 of Schedule 4B to the 1990 Act

Parish/Town name: Shinfield Parish Council

Consultation date: 4 April 2016 to 16 May 2016

**Please note:** All the original representation documents will be included in the examination pack. The table below is a summary of the representations received so will not be verbatim.

| Ref | Respondent   | Topic                       | Summary of Comments  |
|-----|--|-----------------------------|--|
| 1   | Barton Willmore on behalf of the Shinfield Consortium                            | Policy 1                    | The principles of quality of built form and the relationship to its setting are unnecessary as they are already covered by extant policy (NPPF and Wokingham Borough Managing Development Delivery Local Plan).  |
|     |  | Policy 1                    | The wording of paragraph 1 should be amended to omit reference to village character statements as this serves to elevate the status of such guidance documents by referring to them within the draft Neighbourhood Plan policy and is not appropriate. |
|     |  | Policy 2 - Paragraph 11.1   | The consortium supports the wording in policy 2; that there is not a dominant house design or feature with the Parish and this 'mixture' should be maintained.   |
|     |  | Policy 6                    | Policy 6 does not correspond with the Local Plan and national policy due to the rigid stipulations for buffer zones of minimum fixed widths of 15m around a wide variety of features and habitat types.  |
|     |  | Policy 4 - Item 2           | Pricing policy of local bus services is not a matter that is within the control of developers.   |
|     |  | Policy 5 - Item 5           | The requirement for developers to introduce and enforce management of on street parking should be deleted from the policy as it is un-implementable requirement for developers.  |
|     |  | Policy 5 - Items 9 and 10   | Planning applications should not be expected to include a parking survey as this matter is determined with the Local Highway Authority during scoping discussions.   |
|     |  | Policy 8 - Item 3           | This states that introducing sustainable drainage in new developments is not essential. This does not reflect DEFRA's current best practice guidelines for Sustainable Drainage, nor the NPPG on Flood Risk.   |
| 2   | Abley Letchford Partnership on behalf of Shinfield Consortium transport, parking | Section 13 - Paragraph 13.3 | This statement should recognise the significant infrastructure improvements (bridge over the M4 and Shinfield relief road) that are being implemented in regards to the potential increase in congestion.  |

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|     | and flooding matters | Section 13 - Paragraph 13.8 | Population should be taken into consideration when considering traffic growth.   |
|     |                      | Policy 4 - Item 2           | The 4th bullet (recommended measure to make bus fares that match those provided by Reading Buses in the wider Reading area) of the policy should be deleted as this is not within the control of developers.   |
|     |                      | Section 14 - Paragraph 14.3 | The bullet point relating to tandem parking should be deleted from the paragraph.  |
|     |                      | Policy 5 - Item 4           | Proposed changes to wording; ' <u>...For example, the use of square edged Conservation kerbs and strategic shrub planting on grass areas has proved to be of assistance to discourage parking on pavements and verges.</u> '   |
|     |                      | Policy 5 - Item 5           | This should be deleted as these the introduction and enforcement of on-street parking management are not often under the control of the developer.   |
|     |                      | Policy 5 - Item 6           | Proposed changes to wording; ' <u>...overall level of off-street parking available at the time of the development should demonstrate that the retained levels of parking are appropriate for the use/size of the dwellings.</u> '  |
|     |                      | Policy 5 - Item 9 and 10    | Proposed changes to wording of item 9; ' <u>...Applications will normally be expected to include a parking survey where on-site parking cannot be fully accommodated.</u> '<br><br>Proposed changes to wording of item 10; ' <u>...Planning applications will normally be expected to include a parking survey where on-site parking cannot be fully accommodated.</u> ' |

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|     |  | Policy 8 - Item 2 | Proposed changes to wording; 'Existing open watercourses, ponds and ditches shall be preserved in new developments and substituted only where absolutely necessary or <u>otherwise appropriate.</u> '  |
|     |  | Policy 8 - Item 3 | Proposed changes to wording; 'The creation of Sustainable Drainage Systems (SuDS) in new developments is essential and must <u>should be promoted wherever practicable and should be incorporated into the site layout and landscape design...</u> '   |
|     |  | Policy 8 - Item 4 | Proposed changes to wording; 'No development will be permitted which reduces the ability of the flood attenuation areas <u>site</u> to alleviate flooding, or which <u>results in increases in surface water run-off rates that would have a detrimental effect off-site, unless suitable mitigation is put in place.</u> '  |
| 3   | Forbes-Laird Arboricultural Consultancy on behalf of Shinfield Consortium  | Policy 6 - Item 1 | Guidance regarding providing adequate protection for hedgerows within the development process through the safeguarding of 3 different options.   |
|     |  | Policy 6 – Item 1 | Hedgerows can be protected from development by retaining them outside domestic curtilage and within a strip of suitable width relative to their attributes. A 15m buffer is unsupported and unnecessary.   |
|     |  | Policy 6 – Item 2 | Draft Policy 6-2 seeks a buffer around veteran trees of at least 15 times the stem diameter. This is in conflict with the Shinfield West Approved Parameter Plan, and is also both unsupported and unnecessary.  |
|     |  | Policy 6 – Item 4 | Draft Policy 6-4 seeks a buffer of 15-30m around ancient woodland; there is neither evidence nor wider policy support for buffer of 30m depth. We consider that, for new development, a sensitive design response plus a 15m buffer is an adequate safeguard.  |
| 4   | Ecological Planning & Research LTD on behalf of the South of the M4 SDL consortium (The University of Reading, Taylor Wimpey and David Wilson Homes) | Policy 6 - Item 1 | Proposed changes to wording; '...will have at least a 15 metre wide buffer zone <u>of sufficient width to ensure that the value provided by that hedgerow (as determined by the survey) is adequately preserved. Any buffer zone will be measured from the central stem of the hedge, from the centre line of the hedge and will be comprised, usually on both sides, of soft landscaping that excludes any residential curtilage;</u> ' |
|     |  | Policy 6          | Rather than attempt to impose generic buffer widths on all hedgerows regardless of need or justification (which may or may not be sufficient to protect the valued hedgerow attribute(s)), Policy 6 part 1) should be reworded, to instead require developers to undertake an appropriate survey to ascertain what width of buffer would actually be required and appropriate, in order to preserve the particular value                 |

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|     |   |                   | and/or function of the retained hedgerows being considered.   |
|     |   | Policy 6 - Item 3 | Proposed changes to wording; 'Habitats of Principal Importance in England (Section 41 Habitats under the Natural Environment and Rural Communities Act (2006)), as defined by the act, which are appropriate for retention <u>and which are shown to have significant ecological importance as determined by the assessment of a survey of affected habitats to be carried out by the developer, will have a minimum 15 metre wide buffer zone of sufficient width to preserve that ecological value (as determined by survey). This will be comprised of soft landscaping that excludes any residential curtilage. Where habitats meet the description of a Section 41 Habitat type and are being retained but do not currently support significant ecological value, the developer should, where possible, put forward proposed management or other enhancement measures to improve the future ecological value of that habitat.'</u> |
|     |   | Policy 6 - Item 4 | Object to the restriction which requires the buffers for Ancient Woodland, LWSs and ponds to be comprised of 'native woodland planting' (i.e. and this only).   |
|     |   | Policy 6          | Clarity regarding hedgerows provided.   |
|     |   | Policy 7 - Item 2 | The requirement set out in the draft plan for 10% of dwellings to contain bird or bat roosting opportunities goes beyond the scope of the NPPF and WBC Core Strategy.   |
|     |   | Paragraph 9.15    | Describes Clares Green Field as a designated Wildlife Heritage Area. It is suggested that the correct and current title of this designation is now a Local Wildlife Site (LWS).   |
| 5   | Barton Willmore on behalf of the South of the M4 Consortium | Policy 1          | An amendment should be made to the policy wording to acknowledge that within 18 months of the making of the Neighbourhood Plan there is likely to be a requirement to accommodate further growth in the Parish to meet the needs arising from the review of the Local Plan.   |
|     |   | Policy 1          | The principles (quality of built form and the relationship to its setting) are unnecessary as they are already covered by extant policy (NPPF and Wokingham Borough Managing Development Delivery Local Plan).  |
|     |   | Policy 1          | The wording of paragraph 1 should be amended to omit reference to village character statements as this serves to elevate the status of such guidance documents by referring to them within the draft  |

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|     |   |                             | Neighbourhood Plan policy and is not appropriate.   |
|     |   | Policy 5 - Item 5           | The requirement for developers to introduce and enforce management of on street parking should be deleted from the policy as it is un-implementable requirement for developers.   |
|     |   | Policy 8 - Item 3           | This states that introducing sustainable drainage in new developments is not essential. This does not reflect DEFRA's current best practice guidelines for Sustainable Drainage, nor the NPPG on Flood Risk.                              |
| 6   | Abley Letchford Partnership on behalf of the South of the M4 Consortium transport, parking and flooding matters | Section 13 - Paragraph 13.3 | This statement should recognise the significant infrastructure improvements (bridge over the M4 and Shinfield relief road) that are being implemented in regards to the potential increase in congestion.                                 |
|     |   | Section 13 - Paragraph 13.8 | Population should be taken into consideration when considering traffic growth.  |
|     |   | Policy 4                    | The 4th bullet (recommended measure to make bus fares that match those provided by Reading Buses in the wider Reading area) of the policy should be deleted as this is not within the control of developers.                              |
|     |   | Section 14 - Paragraph 14.3 | The bullet point relating to tandem parking should be deleted from the paragraph.   |
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| 7   | Forbes-Laird Arboricultural Consultancy on behalf of the South of the M4 Consortium | Policy 6 - Item 1 | Guidance regarding providing adequate protection for hedgerows within the development process through the safeguarding of 3 different options.  |
|     |   | Policy 6 – Item 1 | Hedgerows can be protected from development by retaining them outside domestic curtilage and within a strip of suitable width relative to their attributes. A 15m buffer is unsupported and unnecessary.  |
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|     |   | Policy 6 – Item 4 | Draft Policy 6-4 seeks a buffer of 15-30m around ancient woodland; there is neither evidence nor wider policy support for buffer of 30m depth. We consider that, for new development, a sensitive design response plus a 15m buffer is an adequate safeguard.   |
| 8   | Donatella Cillo - (Environment Agency)  | General           | No further comments to add to our previous response dated 31 July 2015.   |
| 9   | Robert Lloyd-Sweet (Historic England)   | Policy 2          | Proposed changes to wording; “This should respond to, and integrate with, the character of the local area and <u>sustain the positive characteristics of the local area identified with the</u> <del>be compatible with any</del> relevant adopted Village Character or Design Statement.”  |
| 10  | J M Edwards (Individual)  | Paragraph 5.1     | How is ‘vibrancy’ measured within the document?   |
|     |   | Paragraph 5.2     | What influence does the Parish have in achieving the second objective: ( <i>‘To develop a vibrant and prosperous neighbourhood by encouraging development that supports a good range of housing, schools, shops and services that meets the needs of local people and protects the quality of the local environment’</i> ); Schools do not have spare capacity to sufficiently support new families moving to the area. |
|     |   | Paragraph 9.6     | Has the park and ride been successful? Is the service still viable considering its poor usage? A second option to this service is required.   |
|     |   | Paragraph 9.9     | More information is required about the proposed Community Centre.   |

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|     |  | Paragraph 9.10       | How is a safer access to the Infants School going to be achieved?  |
|     |  | Paragraph 10.1 et al | Further information is required on how developers will minimise the disruption to residents. How can the Council resolve day-to-day problems? Could enforcement officers' contact details be provided?   |
|     |  | Paragraph 10.5       | Assurance is required that article 8 of the Human Rights Act will not be contravened; privacy to current residents is sacrosanct.  |
|     |  | Paragraph 13.1       | Improvements to the traffic flow have not worked. They have worsened due to additional houses and cars.  |
|     |  | Paragraph 13.6       | Speed limits across the area need to be revisited.   |
|     |  | Paragraph 13.7       | Vehicle ownership figures need to be revisited   |
|     |  | Paragraph 13.9       | Bus routes must have a pull-in in order to mitigate the effect on the traffic.   |
|     |  | Paragraph 14.3       | Parking standards need to be revisited with possible use of enforcement to manage the roads  |
|     |  | Policy 8 - Item 4    | Image provided of flooded field that has been approved for housing.  |
| 11  | Richard Ford (Runnymede Borough Council) | General              | No comments  |
| 12  | Savills on behalf of Thames Water        | Policy 3             | Proposed changes to wording: "In line with Core Strategy Policy CP4: Infrastructure Requirements (or its superseding Policy) developers will be required to demonstrate that there is adequate network capacity for all utility provision, for the site, to serve the development and that it would not lead to amenity impacts for existing users." |
| 13  | Gladman                                  | General              | It cannot be appropriate to progress the neighbourhood plan to examination until consideration has been given to the need for additional housing land and/or reserve sites to ensure that emerging evidence of housing need (from the SHMA) is addressed.  |
|     |  | Policy 1             | Do not support the Plan's intention through policy 1, which seeks to contain any future growth within the settlement boundaries.   |
|     |  | Policy 1             | The reference made to 100% affordable housing should be deleted in light of a recent Court of Appeal ruling dated 11th May 2016.   |

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|     |   | Policy 1          | Proposed changes to wording; ‘When considering development proposals, the Shinfield Neighbourhood Plan will take a positive approach to new development that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework.<br>Development proposals adjacent to the existing settlement will be permitted provided that the adverse impacts do not significantly and demonstrably outweigh the benefits of development.’ |
|     |   | Policy 3          | The policy regarding sustainable development should be deleted from the neighbourhood plan as this area will be covered by building regulations.  |
|     |   | Policy 6          | Consideration of buffer zones for will need to be considered on a case by case basis, it is not appropriate for the SNP to implement a policy which seeks to apply 15m buffer zones without identifying which areas should be protected.  |
|     |   | Policy 7          | The SNP should be consistent with the requirements of chapter 11 of the Framework and should not attempt to impose additional requirements in regards to biodiversity.  |
| 14  | E Halson<br>(Swallowfield Parish Council) | Policy 7          | Paragraph 3 of the policy needs to make the term ‘wildlife corridor’ more explicit to include terrestrial, aquatic and aerial corridors.  |
|     |   | Paragraph 15.2    | The paragraph makes reference to deer, none of which are a BAP priority species. Would it be better in add "hare, water vole and hedgehog" after bats as other relevant examples of small mammals?  |
|     |   | Policy 4          | Shinfield Parish Council needs to work with neighbouring parishes, districts, authorities and WBC to ensure that there is properly integrated cross-border approach to the delivery of Wokingham Local Transport Plan 3 (or any future revisions/replacements).   |
|     |   | Policy 4 - Item 3 | Delete the final words "within the parish".   |
|     |   | Policy 4          | Proposed addition to wording; "All development proposals shall take into consideration the requirement for routes to integrate with the wider area outside Shinfield Parish including neighbouring parishes, the Boroughs of Wokingham and Reading and the district of West Berkshire."   |
|     |   | Policy 6 - Item 2 | Proposed addition to wording; "All trees with TPO protection and..."  |
|     |   | Policy 6 - Item 5 | Proposed changes to wording; "...should be designed in such a way as to encourage public access and enjoyment of the zone <u>having due regard for the protection of the habitat</u> and with appropriate provision for its maintenance."   |

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|     |   | Policy 7 - Item 2 | Proposed rewording of the item; "The scheme provides biodiversity enhancement through the provision of artificial and natural habitat features such as bat roosting and bird-nesting opportunities, hibernacula and "bug hotels" in order to encourage native wildlife and specifically UK BAP (Biodiversity Action Plan) Priority species."                  |
| 15  | Andrew Hiley<br>(Transport for London)                | General           | Guidance provided regarding the provision of well-connected developments to areas where Crossrail will be running.  |
| 16  | Anne Chalmers<br>(Thames Valley Police)               | Policy 2          | Proposed changes to wording; "...will be expected to demonstrate good use of space, <u>create safe and sustainable environments via good quality design and appropriately detailed specification...8) Design out opportunities for crime and anti-social behaviour, following best practice guidance principles of 'Safer Places' and 'Secured by Design'</u> |
| 17  | David Wetherill<br>(Turley on behalf of Bewley Homes) | General           | Bewley Homes considers that the Shinfield Neighbourhood Plan should be prepared on the basis of being capable of helping to meet the greater need for housing (the figures that have arisen from the Berkshire SHMA). As it is currently drafted, the Neighbourhood Plan is likely to represent an obstacle to the delivery of new housing.                   |