

Twyford 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 of the Town and Country Planning Act (1990)

Parish/Town name: Twyford Parish

Consultation period: 12 October 2022 to 5pm 23 November 2022

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. As stated in the consultation material, any anonymous comments received during the consultation have not been considered. For completeness, this table records responses where they were received from those key stakeholders (contacted as listed in Appendix 1 of the [Statement of Community Involvement](#)) even if no specific comments were offered on the plan's content. The comments are listed by type of responder and then broadly by date received within each type. Where responses have suggested alterations, additions are shown as **bold** text, and deletions are ~~struck through and underlined~~.

A total of 22 responses were received. Of these 6 were from statutory consultees; 5 were from a developer/landowner/agent; 7 were from individuals (residents or individual councillors); and 4 were from another organisation.

Ref	Respondent	Topic	Summary of Comments
Statutory Consultee comments			
1.	Historic England	General	No comments.
2.	Natural England	General	No comments.
3.	Thames Water	Policy TW11: Water Infrastructure and Flood Risk	Broad support for the policy requirement to ensure development proposals meet the minimum water efficiency standard of 110 litres per person per day. Suggested amendments are made to the supporting text to clarify that the mechanism to achieve this would be via a planning condition attached to the planning permission. Suggested amendments to the policy wording and supporting text so that the policy refers to both water and wastewater infrastructure, as follows:

Ref	Respondent	Topic	Summary of Comments
			<p>a. The water and sewer networks can accommodate the additional demand for water and sewerage disposal either in its existing form or through planned improvements to the system to ensure sufficient wastewater treatment is in place in advance of the first occupation of the development;</p> <p>b. A Water Efficiency Standard of no more than 110 litres per person per day as set out in the National Technical Standards will be achieved in new development to reduce water usage and the volume of wastewater entering the foul sewer. Conditions will be applied to planning permissions to secure delivery of the standard through Building Regulations.</p> <p>5.73. The River Loddon runs through the west side of Twyford and approximately one quarter of land in Twyford lies within a flood risk area. Climate change has been shown to increase the likelihood of floods in the future. The Wokingham Borough Council Water Cycle Study – Phase 1 Scoping Study (2019) identifies that the Borough is classified as an area of serious water stress and justifies the higher optional standard for water efficiency of 110 litres per person per day. Given these characteristics, the policy serves a number of purposes. Firstly, it requires all proposals to demonstrate that there is sufficient water and sewage capacity to accommodate an increase in demand. This will involve early liaison with Thames Water ahead of the submission of any planning application to discuss water and sewerage requirements to serve their developments to ensure that any necessary upgrades to the water network are aligned with development. Where necessary, Thames Water will seek phasing conditions to ensure that development is not occupied until any necessary sewerage network upgrades have been delivered. It should be noted that local upgrades can take 18 months to 3 years to complete with 3-5 years for more strategic upgrades. In addition, Thames Water provide a free pre-planning service to discuss and advise on water and wastewater infrastructure requirements.</p>
4.	Transport for London	Paragraph 2.23	Suggested amendments to the supporting text to provide clarity that the Old Oak Common station would not be operational in advance of the start of the High Speed 2 (HS2) services. Old Oak Common station is expected to be an interchange for HS2, Great Western mainline and Elizabeth Line services.
5.	Transport for London	General	Transport for London should be consulted at an early stage on any development proposals that would affect Twyford railway station.

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			<p>Broadly support plan's proposals to encourage alternatives to additional parking, including improved walking and cycling links and public transport infrastructure and services. Further consideration could also be given to greater controls to avoid on-street car parking by Twyford railway station users.</p> <p>General support for the policy approach in seeking contributions from development proposals to support improvements to local walking and cycling routes and facilities at Twyford railway station.</p>
6.	Ruscombe Parish Council	Other non-planning matters: Make more use of the bridge in Stanlake Lane for through traffic	<p>Disagree with the plan's aspiration to encourage drivers to take an alternative route using the railway bridge at Stanlake Lane in Ruscombe Parish, which is considered to be unsafe for pedestrians.</p> <p>The suggested alternative route would include the junction of New Road, Ruscombe Lane, Waltham Road and Stanlake Lane in Ruscombe Parish which is congested and known for road traffic collisions.</p>
7.	Ruscombe Parish Council	Other non-planning matters: Making London Road shopping area more attractive and pedestrian-friendly	Disagree with the plan's aspiration in pedestrianising part of London Road and seeking an alternative route for vehicles through the car park at Waitrose, as this will have an adverse effect on congestion entering the village from Waltham St Lawrence and Hurst and encourage rat running through local roads in Ruscombe Parish.
8.	Ruscombe Parish Council	General	Comment suggests that members of Ruscombe Parish Council were not consulted on the draft neighbourhood plan and its proposals.
9.	Wokingham Borough Council	Policy TW1	Support with minor modifications.

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			<p>The Policies Map should be updated to include the following amendments to provide additional clarity for the decision-maker:</p> <ul style="list-style-type: none"> - The proposed Loddon Long Distance Path should be modified to reflect the route on the council's latest Greenways plan - Include Twyford Footpath 1, which is a key Public Right of Way that runs over the railway line - Routes shown through the Loddon Nature Reserve are depicted as 'TW1: Sustainable Travel Network – Existing Network' which are not part of the existing network and should instead be identified as 'TW1: Sustainable Travel Network – Opportunities for Improvement' <p>Plan G should be amended to reflect the designations set out on the Policies Map.</p>
10.	Wokingham Borough Council	Policy TW2	<p>Support with minor modifications.</p> <p>The policy and/or supporting text could helpfully refer to supporting and encouraging sustainable deliveries in Twyford village centre to reduce the number of delivery vehicles on the local highway network.</p>
11.	Wokingham Borough Council	Policy TW3	<p>Support the principle of this policy.</p>
12.	Wokingham Borough Council	Policy TW4	<p>Support with modifications.</p> <p>Further consideration should be given to how the policy would interact and operate in conjunction with the local plan policies for retail centres.</p> <p>The extent of the policy designation for Twyford village in the Core Strategy and Managing Development Delivery (MDD) local plan is larger than the proposed area for Twyford village centre set out in Policy TW4 of the Twyford Neighbourhood Plan.</p> <p>A revision of the boundary of the proposed designation is recommended to align with the existing designation in the Core Strategy and MDD local plans, to avoid conflict with strategic policy.</p>

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			Question whether the listed buildings and structures at Polehampton School House should be included within the village centre boundary.
13.	Wokingham Borough Council	Policy TW5	Support the principle of this policy.
14.	Wokingham Borough Council	Policy TW6	<p>Support with modifications:</p> <p>B. 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.</p> <p>Development proposals requiring a Travel Plan or Transport Assessment will also be required to submit an air quality assessment.</p>
15.	Wokingham Borough Council	Policy TW7	Support the principle of this policy.
16.	Wokingham Borough Council	Policy TW8	<p>In its current form, the policy is considered not to meet the basic conditions with respect to (a) <i>having regard to national policies and advice</i> and (e) <i>general conformity with the strategic policies contained in the development plan for the area of the authority</i>. The policy would constrain development, including opportunities for higher density development in appropriate areas. Removing this opportunity 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, in a manner not supported by national policy or strategic policies set out in the Core Strategy and Managing Development Delivery local plan documents.</p> <p>If the policy is retained, it is recommended that a degree of flexibility is applied 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</p>

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			<p>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.</p>
17.	Wokingham Borough Council	Policy TW9	<p>Broadly support the principle of this policy but would query if the reference to the 'Woodland Carbon Code' should instead refer to the 'UK Forest Standard', as it has been noted that the 'Woodland Carbon Code' is a means to measure the quantity of carbon sequestered by woodland, compared to the latter which sets out a specific standard for woodland creation.</p>
18.	Wokingham Borough Council	Policy TW10	<p>In its current form, the policy is considered not to meet the basic conditions, namely with respect to <i>(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.</i></p> <p>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 requires the need to demonstrate that policy requirements and standards do not impact on deliverability.</p> <p>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, the requirements of Part L of Building Regulations ensure new homes built from 15 June 2022 produce 31% less carbon emissions compared to the 2013 standards. Policy TW10 should therefore be updated to reflect current best practice.</p> <p>Further, it is acknowledged in the Twyford Neighbourhood Plan, that this policy is to be applied in the interim and until such time that the LPU is adopted. Wokingham Borough Council 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 justify a similar policy approach in the LPU.</p>

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			<p>If the policy is retained, it is recommended that the following amendments to criteria (A) and (B) of Policy TW10 would align with national and local planning policy and be in general conformity with strategic policies of the council's development plan:</p> <p>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.</p> <p>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 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.</p> <p>It is also recommended 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. In addition to operational performance, this statement can also cover other wider sustainability factors, notably landscape, biodiversity and sustainable travel and accessibility.</p> <p>Further modifications to criteria (D) of Policy TW10 as follows:</p> <p>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.</p>

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			Finally, the requirement for <i>'all planning permissions granted for new and refurbished buildings'</i> 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.
19.	Wokingham Borough Council	Policy TW11	Broad support for the proposed policy and approach.
20.	Wokingham Borough Council	Policy TW12	Broad support for the proposed policy and approach.
21.	Wokingham Borough Council	Policy TW13	<p>Broadly support the principle of this policy but 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.</p> <p>Wokingham Borough Council has commissioned housing needs evidence as part of the emerging Local Plan Update (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 subsequent evidence does not justify a similar policy approach in the LPU.</p>
22.	Wokingham Borough Council	Policy TW14	Broad support for the proposed policy and approach.
23.	Wokingham Borough Council	Policy TW15	Support for the proposed policy and approach, which is supported by locally specific evidence in the form of Design Guidelines and Codes.
24.	Wokingham Borough Council	Policy TW16	Support for the proposed policy and approach.
25.	Wokingham Borough Council	Policy TW17	Support for the proposed policy and approach.

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26.	Wokingham Borough Council	Policy TW18	<p>Support with modifications 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:</p> <p>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 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.</p>
27.	Wokingham Borough Council	Policy TW19	Support for the proposed policy and approach.
Developer / landowner / agent comments			
28.	First West Homes Ltd	Policy TW13	Disagree with the proposed discount percentage for First Homes as this policy requirement would impact on the viability of sites in Twyford. Comment suggests that the discount should remain at 30% to ensure that the homes delivered are affordable.
		Policy TW14	Disagree with criteria A(ii) of the policy as this implies that only one First Homes exception site should be built in the plan period, which is contrary to national guidance and the Written Ministerial Statement.
29.	Boyer Planning obo Bridge House Care Village	General	Maps showing the proposed designations lack clarity as the approved site layout for Bridge House Care Village is not reflected on the base plan, including Phase One which is built out. Some of the proposals relating to that site will mean that some of the policies and objectives in the Neighbourhood Plan will not be achievable.
30.	Boyer Planning obo Bridge House Care Village	Policy TW1	The Twyford Sustainable Travel Plan identifies incorrect annotation of the Public Right of Way network, notably the right of way shown traversing the western edge of the Henley-Twyford railway line through the Bridge House Care Village site does not exist. The route shown travels through private residential gardens and could impact on the amenity of residents.

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			<p>A second route is shown traversing the River Loddon within the garden of the Bridge House Care Home and the wider proposed Care Village garden which also does not exist as the land is privately owned with no public access.</p> <p>It is recommended that references to existing Public Rights of Way, as shown on page 25 of the Twyford Neighbourhood Plan, are removed.</p>
31.	Boyer Planning obo Bridge House Care Village	Policy TW2	<p>The policy is considered strategic in nature and duplicates existing policies in the Core Strategy and MDD local plans, and likely to be superseded by the policies in the emerging Local Plan Update. The policy is not consistent with paragraph 13 of the National Planning Policy Framework.</p>
32.	Boyer Planning obo Bridge House Care Village	Policy TW6	<p>Further clarity is needed as to whether the policy is to apply to all development proposals where occupiers are particularly sensitive to air pollution regardless of where they are located within Twyford. It is also not clear what action other types of development are expected to deliver in order to meet the policy requirement.</p>
33.	Boyer Planning obo Bridge House Care Village	Policy TW8	<p>The proposed requirement for a 25% tree canopy cover on development sites may not be appropriate and could be difficult to deliver in light of other Local Plan policies, particularly related to Biodiversity Net Gain, which is considered strategic in nature.</p> <p>A requirement to deliver 25% tree canopy cover on development sites, such as at Bridge House Care Village would be detriment of other habitat types.</p> <p>It is suggested that the policy should be reworded to reflect the fact that there will be site specific ecology and habitat requirements on each individual site, which will need to be taken into account, in line with adopted Local Plan policy and could be in conflict with the neighbourhood plan policy.</p> <p>Whilst other types of green infrastructure can be provided, the list is very limited and does not take into account the specific ecological requirements that might need to be provided for or to meet the requirements relating to renewable energy and sustainability.</p>

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34.	Boyer Planning obo Bridge House Care Village	Policy TW9	The policy is considered strategic in nature and should therefore be addressed through the emerging LPU.
35.	Boyer Planning obo Bridge House Care Village	Policy TW10	The policy is considered strategic in nature and should therefore be addressed through the emerging LPU. No consideration appears to have been given to the likely viability implications of the policy and other Local Plan priorities such as affordable housing. If retained, the title of the policy should be amended to read ' Net Zero Carbon Buildings '
36.	Boyer Planning obo Bridge House Care Village	Policy TW11	National policy confirms that the management of flood risk and drainage infrastructure is a strategic matter and identifies the circumstances when a flood risk assessment (FRA) will be required and when the Environment Agency or Local Lead Flood Authority (LLFA). Policy requirements are also set out in the Core Strategy and MDD local plan as well as the emerging LPU.
37.	Boyer Planning obo Bridge House Care Village	Policy TW15	Given the Design Code is a substantial document, it should be consulted upon separately from the neighbourhood planning process in order that it can be afforded appropriate scrutiny.
38.	Boyer Planning obo Bridge House Care Village	Policy TW16	The policy is considered strategic in nature and is addressed through the Core Strategy and MDD local plans and the emerging LPU.
39.	Boyer Planning obo Bridge House Care Village	Policies Map & Inset 1	The Public Rights of Way shown within the Bridge House Care Village should be removed as they do not exist.
40.	Boyer Planning obo Croudace Homes	Policy TW1	The proposed cycle route identified through the proposed Local Plan site allocation at Bridge Farm is currently a private street and there are no existing Public Rights of Way, however the masterplan for the current planning application (ref: 212720) does propose a pedestrian/cycle prioritised route along the private street. Minor changes to Plan G are welcomed.

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41.	Boyer Planning obo Croudace Homes	Policy TW2	The policy is considered strategic in nature and duplicates existing policies in the Core Strategy and MDD local plans, and likely to be superseded by the policies in the emerging Local Plan Update. The policy is unlikely to be consistent with paragraph 13 of the National Planning Policy Framework.
42.	Boyer Planning obo Croudace Homes	Policy TW6	Whilst the policy has merit in seeking to address recognised air quality issues associated with the Twyford Crossroads Air Quality Management Area (AQMA), the policy is considered strategic in nature as Wokingham Borough Council is the authority responsible for local air quality management. The policy is unlikely to be consistent with paragraph 13 of the NPPF.
43.	Boyer Planning obo Croudace Homes	Policy TW7	<p>Support the policy approach and the plan which identifies the land bordering the River Loddon as providing riparian and floodplain woodland opportunities. The development proposal at Bridge Farm would introduce riparian and terrestrial biodiversity enhancements, however, the Environment Agency may restrict the quantum of new tree planting along the river to protect the functioning of the flood plain.</p> <p>It would be appropriate to amend references to ‘riparian woodland opportunities’ and ‘floodplain woodland opportunities’ by omitting reference to ‘woodland’. The policy should make reference to ‘riparian biodiversity opportunities’ and ‘floodplain biodiversity opportunities’.</p>
44.	Boyer Planning obo Croudace Homes	Policy TW8	<p>Recognise the benefits of increasing tree coverage, but it is considered that the policy requirement to achieve a minimum 25% tree canopy cover would be difficult to implement for the following reasons:</p> <ol style="list-style-type: none"> 1. The Environment Act (2021) will require developments to achieve at least 10% net gain in biodiversity over the baseline. The current Biodiversity Metric promotes the provision of alternative habitats and so the provision of 25% canopy cover could impede the delivery of other habitats 2. The requirement is likely to impede the provision of other forms of open space and green infrastructure 3. Implications in achieving appropriate densities in Twyford. Lower levels of development density may lead to a less efficient use of land.

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			4. The policy is considered strategic in nature, as it seeks to set a blanket / overarching direction and aims to shape the broad characteristics of development.
45.	Boyer Planning obo Croudace Homes	Policy TW9	<p>The policy is considered strategic in nature as it requires development proposals to either provide woodland planting in accordance with the Woodland Carbon Code or make a financial contribution to the council's Carbon Offset Fund.</p> <p>The policy is also likely to impact on development viability which has not been given sufficient consideration at this stage.</p>
46.	Boyer Planning obo Croudace Homes	Policy TW10	<p>The policy is considered strategic in nature and should therefore be addressed through the emerging LPU. No consideration appears to have been given to the likely viability implications of the policy and other Local Plan priorities such as affordable housing.</p> <p>Sustainable design / energy efficiency requirements should not be set at the level of the Parish or Neighbourhood Area, as it is likely to impact on development viability and delivery.</p> <p>There is no evidence base to support the specific definitions, criteria and standards proposed.</p> <p>If retained, the title of the policy should be amended to read 'Net Zero Carbon Buildings'</p>
47.	Boyer Planning obo Croudace Homes	Policy TW11	National policy confirms that the management of flood risk and drainage infrastructure is a strategic matter and identifies the circumstances when a flood risk assessment (FRA) will be required and when the Environment Agency or Local Lead Flood Authority (LLFA). Policy requirements are also set out in the Core Strategy and MDD local plan as well as the emerging LPU.
48.	Boyer Planning obo Croudace Homes	Policy TW13	<p>Do not dispute that housing affordability is a key issue in Twyford, but the level of discount proposed would impact on development viability, which has not been tested.</p> <p>The level of assessment is not sufficient to justify the 50% deduction, as the housing market has changed since 2008. It is suggested that the plan has regard to current best practice and guidance, notably '<i>Testing the Viability of Proposals within your Neighbourhood Plan</i>'.</p>

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49.	Boyer Planning obo Croudace Homes	Policy TW15	Necessary to ensure the Twyford Design Guidelines and Codes Report is consistent with the MDD local plan and other standards applied through Supplementary Planning Documents (SPDs). The report is an extensive and complex document which should be subject to consultation in its own right, rather than treated as an addendum to the plan.
50.	Lichfields obo Berkeley Strategic Land Ltd	General	<p>Response focuses on a number of issues identified within the Twyford Neighbourhood Plan that can only be sufficiently addressed through the allocation and delivery of Castle End Gardens (Land at Twyford/Ruscombe).</p> <p>The future challenge of increased demand for rail travel at Twyford is a key concern for residents and is an issue acknowledged in the Twyford Neighbourhood Plan. Castle End Gardens benefits from an existing public transport services and infrastructure and work undertaken by Berkeley has demonstrated that it would be feasible to create a new railway station alongside a local bus interchange and cycle hub and further parking spaces. This would reduce traffic congestion and air pollution in Twyford village centre and support objectives of the neighbourhood plan, notably Policy TW3.</p> <p>Castle End Gardens also offers a means to deliver an Eastern Relief Road between the A4 and the south of the village at Stanlake Lane, as well as other enhancements to the A4 as a sustainable transport corridor along with widening of the A3024 Waltham Road bridge.</p> <p>Delivery of Castle End Gardens would support the vitality and vibrancy of existing community infrastructure (Policy TW4) and support the development of a sustainable new community.</p> <p>The development would provide new local facilities such as a new primary school and secondary school expansion, flexible community spaces, a healthcare facility and co-working space.</p>
51.	Turley obo David Wilson Homes Southern	Policy TW1	Support the principle of encouraging sustainable travel, which is a key reason (amongst other factors) for promoting land to the north of the A4 through the emerging LPU.

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52.	Turley obo David Wilson Homes Southern	Policy TW4	Support the aspiration for a thriving village centre and development promoted at Twyford will accommodate working-age professionals and local expenditure.
53.	Turley obo David Wilson Homes Southern	Policy TW5	Policy requirements for developers to make direct and proportionate contributions to delivering the Twyford Village Regeneration Scheme will need to satisfy the legal tests set out in Regulation 122 and policy tests in the National Planning Policy Framework.
54.	Turley obo David Wilson Homes Southern	Policy TW7	Further clarity as to why the policy refers to 'development proposals that lie within or adjoining the network'. Does the policy requirement only apply where sites, or development, immediately adjoins the network.
55.	Turley obo David Wilson Homes Southern	Policy TW8	Policy requirements are considered onerous and likely to have significant implications on the deliverability of development and the objective of making the most efficient use of land in sustainable locations. The Neighbourhood Plan is also not supported by any evidence to demonstrate that this requirement is feasible, or that it can be viably achieved.
56.	Turley obo David Wilson Homes Southern	Policy TW9	The policy is not supported by any analysis as to the feasibility or viability of all sites larger than 2 hectares in size providing woodland to the necessary standards required to satisfy the policy requirement. The policy is considered onerous and likely to have significant implications on the deliverability of development.
57.	Turley obo David Wilson Homes Southern	Policy TW10	The scope of Policy TW10 goes significantly beyond additional and optional standards in relation to energy and water efficiency. Furthermore, there is no analysis that the policy is feasible or viable. The requirement for monitoring post-occupation is considered too onerous, unenforceable and outside of the scope of planning controls.
58.	Turley obo David Wilson Homes Southern	Policy TW12	The Housing Needs Assessment that supports the policy does not appear to set out any specific evidence of the mix of dwellings which is required on individual development sites.
59.	Turley obo David Wilson Homes Southern	Policy TW13	The increased discount from full open market value compared to the minimum figure of 30% expressed in the Planning Practice Guidance should be subject to an evidence-based planning

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			judgement about the need for a higher minimum discount and how it can meet the needs of different groups.
60.	Turley obo David Wilson Homes Southern	Policy TW15	Any street typologies proposed should comply with Wokingham Borough Council's Highways adoption standards to ensure that roads approved through the planning process can be adopted.
Individual's comments			
61.	Mike Corker	General	Broad support for the plan's proposals and approach to managing future development in Twyford Parish, but sceptical in its future implementation.
62.	Nick Dinsdale	General	Disagree with the proposed housing site allocation at Land at Bridge Farm in the emerging Local Plan Update, due to flood risk, pressure on education facilities and congestion, notably the A321 and Twyford Village Centre.
63.	Nick Dinsdale	Other non-planning matters: Making London Road shopping area more attractive and pedestrian-friendly	Agree that the Twyford Crossroads Air Quality Management Area is an important issue, but this will naturally resolve itself through the electrification of vehicles and the government's proposed ban on new diesel and petrol cars by 2030.
64.	Nick Dinsdale	Other non-planning matters: Making London Road shopping area more attractive	Disagree with the plan's aspiration in seeking an alternative route for through traffic by using the car park at Waitrose to avoid further congestion around the Twyford Crossroads Air Quality Management Area (AQMA).

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		and pedestrian-friendly	
65.	Richard Morris	Other non-planning matters: Make more use of the bridge in Stanlake Lane for through traffic	Comment suggests that consideration should be given to the blind bends on the B3018 between Dolphin School and Stanlake turn or the pinch point at the bridge over Twyford Brook.
66.	Richard Morris	Other non-planning matters: Relocate traffic queues in the High Street further west	Comment suggests that the future aspiration to relocate traffic lights nearer to Charvil village would lead to further congestion along other key routes, notably Waltham Road and Stanlake Lane.
67.	Richard Morris	Other non-planning matters: Making London Road shopping area more attractive and pedestrian-friendly	Disagree in investigating a future alternative route to the Twyford Crossroads by using Waitrose car park, as larger vehicles would not be capable of turning in to the precinct. Comment suggests making Springfield Park a one-way system. Agree that the Twyford Crossroads Air Quality Management Area is an important issue but this will naturally resolve itself through the electrification of vehicles and the ban on new diesel and petrol cars
68.	Richard Morris	Other non-planning	Comment suggests that consideration should be given to standardised parking management and enforcement to ensure consistency across the parish.

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		matters: Parking for rail-user at Twyford Station	
69.	Frazer Broomby	General	<p>The consultation included a large amount of information for residents to digest with multiple documents.</p> <p>Disagree with the council's approach and distribution of housing across the Borough and the impact on the environment. Comments not specifically related to the proposals in the neighbourhood plan, but noted that solutions have been identified to improve congestion and air quality at Twyford Crossroads AQMA, but these have not been progressed to date.</p>
70.	Elizabeth Ashley	General	Fully supportive of the plan's proposals.
71.	Helen Howard	Other non-planning matters: Make more use of the bridge in Stanlake Lane for through traffic	<p>Disagree with the plan's aspiration to identify improvements to the bridge at Stanlake Lane for through traffic due to safety concerns.</p> <p>Stanlake Lane is a congested route that is nearing maximum capacity at during peak times. Traffic congestion stretches to the roundabout junction at Waltham Road and the crossroads connecting Stanlake Land and New Road.</p> <p>Insufficient data has been provided to justify the feasibility of the project.</p> <p>Stanlake Lane is situated on the boundary of Ruscombe and Twyford Parish. The proposed solutions would require urbanisation of an existing road, introduction of a footpath and other physical measures which would be contrary to the principles of the Ruscombe Neighbourhood Plan, in seeking to protect and preserve the countryside.</p> <p>Agree that the Twyford Crossroads Air Quality Management Area is an important issue, but this should resolve itself through the electrification of vehicles.</p>

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72.	Helen Howard	Other non-planning matters: Making London Road shopping area more attractive and pedestrian-friendly	Disagree with the plans to create an alternative route around the crossroads using the car park at Waitrose, as there is an absence or justification as to whether the proposal could safely accommodate this additional traffic.
73.	Gary Richards	General	Comments not specifically related to the proposals in the neighbourhood plan but refer to the proposed housing site allocation at Bridge Farm in the Local Plan Update, in particular concerns expressed due to risk of flooding, highway impacts, ecological impacts, pressure on existing infrastructure and services and the coalescence of settlements.
Other organisations			
74.	Sport England	General	No comments.
75.	Berkshire Archaeology	General.	Generally supportive of the plan's vision and objectives, but suggest greater reference is made to the preservation, investigation and recording of buried archaeological remains.
76.	Berkshire Archaeology	Paragraph 3.4	Suggested amendment to the supporting text to refer to Policy TB25 of the Managing Development Delivery (MDD) local plan regarding archaeological remains. Twyford contains a number of Areas of High Archaeological Potential (AHAPs) around its edges, notably at Whistley Green, Hurst and Goff's Barn, north of Loddon Park Farm. Further areas are also identified beyond Twyford Parish, such as in Ruscombe to the east and Charvil to the west.
77.	Berkshire Archaeology	Policy TW15: Design Codes	Suggested amendment to Part B of Policy TW15 to ensure development proposals have regard to areas of archaeological remains, as identified in Policy TB25 of the MDD local plan.

Ref	Respondent	Topic	Summary of Comments
78.	British Horse Society	General	Various suggested opportunities for the plan to consider bridleways or horse riders, including a reference to Wokingham Borough's Rights of Way Improvement Plan.
79.	British Horse Society	Plan G: Twyford Sustainable Travel Network	Comment suggests that the map of active travel routes does not show or consider horse riders.
80.	British Horse Society	Twyford Design Guidelines and Codes	<p>Comment suggests that key statements and principles in the Design Guidelines and Codes report do not mention or consider bridleways or byways or any improvements to health and wellbeing and recreational opportunities.</p> <p>Figure 15 shows the street hierarchy in Twyford Parish but does not reference routes identified in the Rights of Way Improvement Plan or walking and cycling opportunities. A proposal was suggested to identify a circular route incorporating the proposed Greenways and Loddon Long Distance Path which would benefit the residents of Twyford and neighbouring parishes for recreational opportunities and active travel for walking, cycling and horse riding.</p>
81.	Berkshire Gardens Trust	General	Supportive of the plan's approach to protect the historic environment, including the setting of the Conservation Area, but the plan is currently silent on the landscape setting of listed buildings. Amendments suggested to include a brief description of the key features that contribute to the significance of Twyford Parish's heritage assets and their setting, notably the churchyard at St Mary's Church and existing non-designated heritage assets.
		Design Guidelines and Codes – DC01.2 Heritage, views and landmarks	<p>Suggested amendments to the Design Guidelines and Codes report to include an additional point under DC01.2 Heritage, views and landmarks, as follows:</p> <p>'New development and changes of use should conserve the landscape setting of historic assets and the contribution the landscape setting makes to the significance of the asset. The setting may include open space, boundary treatment, trees, water features, views and historic structures.'</p>