

Finchampstead 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: Finchampstead 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. The comments are listed by type of responder and then alphabetically within each subheading.

A total of 51 responses were received. Of these 10 were from statutory consultees; 13 was from a developer/landowner/agent; 25 were from individuals (residents or individual councillors); and 3 were from other organisations.

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| Statutory Consultee comments | | | |
| 1. | Berkshire Gardens Trust | General | Fully supports the principles set out in the Plan to protect the historic environment and green spaces. Confirms that no Historic England Registered Parks and Gardens lie within the parish but it does contain landscaped open spaces and supportive of the Plan recognising the importance of the landscape setting of the Conservation Area |
| | | Section 8.4 | Recommend consistent reference in this section, and throughout the document, to either 'rural setting' or 'semi-rural setting' and that the other 'general principles', designed to help development proposals recognise, respect and preserve the identity of Finchampstead Parish as a whole, need identifying. |
| 2. | Defence Infrastructure Organisation (Ministry of Defence) | General | No concerns with the Plan but wish to be consulted on relevant development proposals within Statutory Aerodrome Height safeguarding zone |

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| 3. | Finchampstead Parish Council (c/o Graham Jukes) | Local Green Space Topic Paper | <p>Comments provided in response to WBC's response to the Reg 16 consultation as agreed via an Executive Member Decision via a public meeting on 15th November 2022.</p> <p>Considers there to be inconsistencies in WBC's assessment of Local Green Spaces, particularly in relation to interpretation of 'local in character' and 'extensive tract of land'. Consider that all 13 areas proposed through the plan are justified based on the evidence set out in the latest edition of the LGS Topic Paper.</p> <p>LGS 1 St James' church: notes that the conservation area has no current management plan in place and consider LGS designation will add to the protections for the benefit of the community. Note that the designation for this area is welcomed by Historic England during the first consultation phase of the plan.</p> <p>LGS 5 Simons Wood: note that the area is smaller than other examples proposed for designation within the LPU Revised Growth Strategy. Clarifications around the boundary being that of National Trust land and access being via footpath network through the site and re-emphasis that visitor numbers and local knowledge demonstrate it is local in character.</p> <p>LGS 7a: disagree with the conclusion of WBC that it is not local in character and note that the area is smaller than other examples proposed for designation within the LPU Revised Growth Strategy. Highlights that the LGS Topic Paper is clear further areas 7b and 7c are not recommended for LGS designation and considers WBC's representations to be remiss in referring to these in forming its view.</p> <p>LGS 9 The Ridges: clarifications around the boundary being that of National Trust land and access being via whole northern boundary and two rights of way. Reiterate the view that the area is used extensively by local people and would benefit from additional protections.</p> |
| 4. | Historic England | General | No comments. |
| 5. | Natural England | General | Notes that providing the developer/s for the proposed 4 dwellings to be allocated through the Plan commit to contributing to SANG and SAMM in line with WBC's Thames Basin Heath policy and Policy NRM6 of the South East Local Plan, then no specific comments to make. |

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| 6. | NHS Buckinghamshire, Oxfordshire & Berkshire West Integrated Care Board | General | Note the housing growth projections contained within the Plan and are also pleased to note the intention to consider the impact on local health and social care infrastructure. This should include considering the use of S106/CILs funding for this purpose. |
| 7. | Surrey County Council | General | <p>Concern that new developments would lead to additional traffic heading south-east towards Surrey, especially the highly congested Meadows roundabout.</p> <p>Notes the Plan described the area as having poor public transport, therefore would wish to see the Plan explore proposals for transport improvements including better links to train stations.</p> |
| 8. | Thames Water | General | General comments relating to the emerging LPU and adopted Core Strategy rather than the Plan itself. |
| | | 5.4.1 Sites from Draft LPU January 2020 5.4.2 Sites added as a result of LPU Revised Growth Strategy (2021) | Comments provided regarding water and waste infrastructure implications of the 4 specific sites proposed to be allocated through the LPU: 31/33 Barkham Ride, Greenacres, Jovike, and Westwood Cottage. No concerns regarding the latter 3 sites, but consider water supply network and wastewater network upgrades required regarding 31/33 Barkham. (NB: consistent with comments received separately in response to LPU consultations). |
| 9. | Transport for London | General | No comments |
| 10. | Wokingham Borough Council | Policy ES1 | <p>Fully supports the principle of encouraging sustainable development. Comments that similar requirements were included within the Draft Local Plan Update, but further climate change evidence has been produced and that this and other policy requirements have yet to be subject to whole plan viability testing.</p> <p>Specific recommendations made to policy wording for clarity, to ensure part 1 is up to date with best practice, and to ensure part 3 is achievable.</p> |

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| | | Chapter 5 | <p>Clarification provided of how WBC calculated the indicative housing requirement as requested by the qualifying body.</p> <p>Support for the approach of allocating sites to contribute towards the requirement, with a recommendation that the proposed allocations are set out more formally in a new policy, rather than supporting text. Confirmation of WBC's view that the policies and allocations within the plan would meet and exceed the indicative housing requirement.</p> <p>Recommendation that reference be made to First Homes in section 5.7 'Social Housing' in order to accord with latest planning guidance.</p> <p>Recommendation that the typographical error in the policy prefixes be updated so the acronym reflects the title of the chapter.</p> |
| | | Policy ADH1 | <p>Recommendation that the requirements of ADH1 1.3 relating to Thames Basin Heaths (TBH) mitigation be moved from this policy to a standalone TBH policy or incorporated into IRS5 for clarity. This is given ADH1 relates to development outside of development limits, whereas TBH mitigation applies to all developments (within and outside development limits).</p> <p>Recommended modifications to section 1.3 given there is an established mitigation framework in place at the strategic level (agreed between Natural England and partner authorities), meaning the prescriptive requirements in the policy as drafted are unnecessary and unhelpful given they omit reference to Strategic Access Management and Monitoring (SAMM).</p> |
| | | Policy GS1 | <p>Support for the approach of identifying important local areas to prevent coalescence of built up areas. Minor modifications recommended to ensure the correct figure within the plan is referenced and minor presentational recommendations to aid clarity / usability.</p> <p>Additionally, suggestions made to improve the clarity and legibility of Figure 7 and associated key</p> |

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| | | Policy IRS1 | <p>Insufficient justification has been provided to identify the following four areas of land for Local Green Space designation:</p> <p>Local Green Space 1. St James/ Church and part Conservation Area – whilst the nominated area contains some features / buildings with historical value and interest, this is only one aspect of the guiding principles for LGS designation. Question the large extent of the Conservation Area being designated LGS designation, given existing policy framework for assessing proposals which affect this heritage asset and whether the proposed boundaries are clearly defined on the ground. Recommendation that it would be more appropriate for the small green and the grounds of the St James’ Church to be identified as two separate Local Green Space designations.</p> <p>Local Green Space 5. Simon’s Wood – insufficient clarity regarding the extent of public access and how boundaries have been defined.</p> <p>Local Green Space 7a. Moor Green Lakes Nature Reserve Crossroads Lane – site considered to be an extensive tract of land which is privately owned and with no guaranteed access over it beyond the public rights of way. Considered to be more akin to a blanket designation of open countryside adjacent to settlements which is expressly considered inappropriate for LGS designation in national planning practice guidance.</p> <p>Local Green Space 9. The Ridges and Wellingtonia Avenue – insufficient clarity regarding the extent of public access and how boundaries have been defined.</p> |
| | | Policy IRS3 | Broadly support the approach of identifying heritage assets and seeking appropriate conservation / enhancement. However, a lack of clarity or evidence to identify specific locally valued heritage assets despite this appearing to be the intention of the policy. Proposed modifications suggested in order future proof the policy and ensure that the significance of locally valued assets which may be properly evidenced in the future is given appropriate consideration through the decision-making process. |
| | | Policy IRS5 | Support in principle for the protection and enhancement of biodiversity. Various modifications suggested to policy wording and supporting text in order to remove negatively phrases sections, remove areas of internal |

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| | | | <p>inconsistency, and clarify that biodiversity net gain should be achieved through all development proposals regardless of whether compensation is provided on or off site.</p> <p>Recommendation that the Thames Basin Heaths elements might sit better in a separate policy to the other ecological matters, consistent with comments on ADH1 above.</p> |
| | | Policy GA2 | Support principle of the policy, but minor amendment suggested so that reference is made to WBC as a partner organisation regarding expanding the public right of way network. |
| Developer / landowner / agent comments | | | |
| 11. | Bewley Homes (c/o Boyer Planning) | Proposed Sites for Additional Housing Topic Paper | <p>Considers that no justification has been provided for why the 200 homes supported by the plan is an appropriate amount to meet need in the Parish and therefore the Plan has not had appropriate regard to national policies and guidance.</p> <p>Criticises the lack of transparent site assessment for the supported and omitted sites and considers the Plan fails to provide proportionate, robust evidence for site allocations, contrary to national guidance. Recommend that a Site Assessment and Capacity Study should be undertaken and published which identifies the criteria against which each of the sites were assessed.</p> <p>Criticises the allocations of Broughton Farm and Land to Rear of 6-8 The Village given WBC's previous assessments / decisions relating to these sites.</p> <p>Critiques the appropriateness of the Plan including sites which are contained within the emerging LPU. Considers the sites should be allocated in either the LPU or Neighbourhood Plan but not both, and that sites removed from the Neighbourhood Plan may need to be replaced with additional allocations.</p> <p>Plan makes no reference to the requirement of SANG in relation to proposed allocations of 50 dwellings or more, contrary to the Appropriate Assessment. Considers that if sites are not capable of providing SANG, alternative allocations which can provide SANG are required.</p> |

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| | | Sustainability Appraisal | Notes that the 'screening' hasn't been made available and therefore it is not possible to comment on whether the Plan is achieving sustainable development in terms of its housing allocations. Considers the Plan fails the basic conditions due to lack of robust evidence regarding the potential impact on the environment. |
| | | Separation of Settlements Topic Paper | <p>Considers the recognition of this Informal Built Area around St James Church to be unjustified given it comprises a few houses within the countryside. Considers it not to be the role of the Plan to identify 'settlements' which undermines the settlement hierarchy established in strategic policies. Objects to the principle of identifying risk of coalescence between isolated dwellings or small clusters of dwellings, and considers that this would mean it would be virtually impossible to achieve sustainable development at the edge of most settlements. Considers references to the area as a conservation area are irrelevant to the issue of separation.</p> <p>Considers the identification of the important area of separation between Finchampstead North and the Informal Built Area unnecessarily duplicates the requirements of CP11. Considers the Topic Paper does not provide a transparent and robust assessment of how each proposed Important Area of Separation adheres to the guidelines quoted and therefore the Plan fails to provide proportionate, robust evidence for their inclusion.</p> <p>Considers the proposed designation of the area around St James Church as a Local Green Space to be contradictory to its identification as an Informal Built Area, emphasising the inappropriateness of the latter.</p> <p>(NB: Supporting landscape rebuttal statement submitted which provides additional detail on the above points and others.)</p> |
| | | Omission site: Land at Church Lane | Notes that, notwithstanding the above comments regarding Important Areas of Separation, proposed development at Land at Church Lane contains SANG, and that the natural topography of the site and landscape led approach taken to development would impede views of housing, which would ensure the separate identity of Finchampstead North and the Informal Built Area are retained. Additionally notes references in the Topic Paper to the area being one of the most travelled; highlights that the proposed SANG at Land at Church Farm in this area would deliver additional walking routes for residents to enjoy. Highlights other considered benefits to development at this site, including: well contained by trees and |

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| | | | vegetation; sustainably located in relation to services and facilities; commitment to sustainable construction; increased public accessibility via SANG and open space. |
| | | IRS5 | Considers the requirement for at least 10% biodiversity net gain is premature as it fails to acknowledge the 2 year transitional arrangements period before this becomes mandatory within the Environment Act. Proposes that this be amended to refer signpost up to date legislation / policy for flexibility. |
| | | GS1 | Considers there to be a lack of evidence to justify the identification of, and policy wording on, Important Areas of Separation which is contrary to the presumption in favour of sustainable development within the NPPF. |
| 12. | Catesby Estates (c/o Tetlow King Planning) | Omission Site: Land off Longwater Road | <p>Considers the site to be deliverable and able to provide 100% affordable housing of around 40 dwellings. Site considered to be suitable for development for reasons including: provides a logical extension to the settlement boundary; sustainably located within walking distance to key services; screened by mature vegetation; no technical constraints to development;</p> <p>Highlights WBC's evidence on affordable housing need being 407 per annum, historic shortfall in supply of affordable homes, and provides information on affordability and homelessness. Considers there to be an acute borough wide need, and that development of this site could help contribute towards meeting borough wide and local specific need.</p> |
| | | Housing requirement | <p>Considers it to be unclear whether a housing requirement has been defined for the Plan area. Express concern that the two proposed allocations within the Plan do not sufficiently address need and therefore have not been made in accordance with national policy and guidance which encourages neighbourhood plans to meet, and where possible exceed, housing requirements.</p> <p>Criticises the robustness of the Housing Need Assessment at Annex D. Consider the Plan to be premature in relation to the LPU, given the allocations in the latter plan are merely proposed rather than formally allocated and therefore carry limited weight.</p> |
| | | Section 5.4 | Considers the allocation of 2 sites comprising 4 dwellings to be insufficient to meet housing needs, and would equate to only one year's worth of windfalls. Concern expressed at the over-reliance on the SDL and |

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| | | | <p>Gorse Ride redevelopments to meet housing need. Note the acknowledged lack of a 5 year land supply at present.</p> <p>Highlights national policy and guidance in relation to rural exception sites and considers land off Longwater Road provides the opportunity to achieve this.</p> |
| 13. | Cole, Shirley (c/o ET Planning) | 5.4.1 Sites from Draft LPU January 2020 | <p>Welcome the intentions of the Plan to support development of site 'Jovike, Lower Wokingham Road' for 15 dwellings and support the Plan in general seeking to meet its pro-rata share of housing. However, notes that the Plan does not actually allocate the site, instead supporting this being achieved through the LPU, and therefore considers the Plan is not meeting its needs in full. Additionally, notes WBC's acknowledged lack of a 5 year housing land supply and delays in the LPU programme. Considers the Plan should explicitly allocate the full quantum of development sites referred to in chapter 5 and amend settlement boundaries accordingly, in order to satisfy the basic conditions.</p> <p>Notes that while the Plan seeks to allocate 2 sites for development, there is no policy within the Plan for this and so it is unclear if the plan is allocating them.</p> <p>Notes that the site name has changed since it was initially promoted and request references be updated to 'Hillside, Lower Wokingham Road, Finchampstead'.</p> |
| | | Omission Site: Jovike | Considers the site to be deliverable, located sustainably in relation to public transport and that it is capable of delivering approx. 15 units within 5 years. |
| | | General | <p>Various policies contain references to emerging policies within the LPU. This currently carries very limited weight and references should therefore be removed.</p> <p>Highlights areas of supporting text which reads as policy (para 5.4.5 and 5.5) which should be amended.</p> |
| 14. | Elivia Homes (c/o Tetra Tech Planning) | Policy ES1 | <p>Supports policy ES1 in principle with modifications. Consider section 2, which requires carbon neutrality, is too prescriptive and aspirational and may delay housing development and recommends it is deleted.</p> <p>Consider the requirements at section 4 for all developments to provide EV charging points doesn't allow flexibility to address unallocated parking spaces associated with flatted development, and recommend additional sentence to introduce flexibility.</p> |

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| | | Policy ADH1 | Notes that this is the only policy which refers to SANG and therefore questions whether the title should be updated to reflect this. Additionally, suggests recommendation to allow flexibility to contribute to private SANG as a legitimate measure to mitigate impact. |
| | | Policy ADH2 | Supports the policy but recommends amendment to require that all sites 'optimise the efficient use of land'. Considers the plan should thereby ensure all land supported for development is achieving the much housing as possible while reflecting constraints and providing good design. |
| | | Policy D3 | Considers it to be unnecessary duplication to require 10% biodiversity net gain when this is set to become law. Considers that seeking to require this prior the appropriate mechanisms for achieving 'biodiversity credits' (in effect appropriate off site mitigation) being formalised, will lead to delays in deliverable sites coming forward. Therefore recommends deletion of section 6 of this policy. |
| | | Policy IRS5 | As per comments on D3, Considers it to be unnecessary duplication to require 10% biodiversity net gain when this is set to become law. Recommends deletion of policy wording. |
| | | Policy GA1 | <p>Concerns that points 1 and 2 of the policy will be difficult to implement as not every development proposal will have the ability to quantify and respond to the requirements.</p> <p>Considers the promotion of sustainable transport should be prioritised over vehicular traffic, and sustainable transport infrastructure may modestly impede vehicular traffic movements, but this should not preclude development. Recommends point 1 is amended to better reflect the NPPF and point 2 amended</p> <p>Supports the requirements of point 4 that all new public rights of way are given bridleway status only where this would not compromise other non-motorised vehicles. Considers this should be subject to agreement with WBC's Public Rights of Way team and subject to a road safety audit.</p> |
| | | Policy GA2 | <p>Concerns that not every application will be able address the requirements of this policy and therefore may not be supported. Additionally, some requirements relate to off site matters which may not be achievable in practice.</p> <p>Consider reference to Barkham Ride as a 'high risk' area s subjective and not supported by accident data and therefore should be omitted.</p> |

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| | | | Support the principle of providing additional Greenways. |
| | | Sections 5.4.1 – 5.4.5 | <p>Supports the inclusion of site '31-33 Barkham Ride' (5FI003). However, considers that the site can accommodate a greater number of dwellings, believing site 33 Barkham Ride capable of providing up to 70 dwellings on its own while respecting the density and character of the area. Considers an increase in numbers would negate the need to allocate sites of fewer than 5 dwellings, which would normally comprise windfall at the borough level rather than allocations.</p> <p>Recommend that the sites supported for development be allocated through the Plan via specific policy, rather than seeking to rely on the LPU to bring them forward.</p> |
| 15. | First West Homes | Policy ADH1 and ADH5 | The proposed NP is not in line with national policy on First Homes. Recommends policy ADH5 and the definition at 5.7 be amended to include reference to First Homes. Further recommendation that ADH1 recognises that First Homes qualify as social housing and are therefore an exception that can be built outside of settlement boundaries. |
| 16. | JoHe Developments LLP (c/o Rosalind Graham, Solve Planning) | General | Disagree with statements on collaborative working (Para 1,6) given client's land 'Scott's Yard, 59 Nine Mile Ride, Finchampstead' has been drawn to the attention of the Qualifying Body through numerous consultation but has been overlooked in the plan and supporting documents. Considers there to be positive local support through previous schemes proposed at the site. |
| | | Section 3 – Vision and Objectives | Objects to the plan not having proper regard to the NPPF regarding the general role of small and medium sites contributing to meeting housing needs and the role that neighbourhood plans have in facilitating allocations of this nature. Considers client's land to be PDL which could be significantly enhanced through development, in a way that would accord with the Plan's objectives, as well as contributing to deliverable supply within the next 5 years. |
| | | Section 4 – Sustainability and Sustainable Development | Objects to the approach taken to the allocation of additional sites not reflecting the objectives of the plan to focus on sustainable development that protects the natural environment. Considers there to be inconsistency between the Plan's support for development at Greenacres (which contains a large part of greenfield land) and client's brownfield site, which would satisfy the Plan's objectives regarding the natural environment. |

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| | | Section 5 – Appropriate Housing Development | <p>Considers ‘Scott’s Yard, 59 Nine Mile Ride, Finchampstead’ accords with the principles of the NPPF in supporting the development of PDL and small / medium sites to contribute towards meeting housing needs. Considers there to be potential for environmental and biodiversity enhancements in accordance with local and national policy and guidance, and that the site is better related to the existing settlement pattern than other sites supported by the plan.</p> <p>Confirmation that an application has been submitted for full planning permission for 4 detached dwellings, which is currently under consideration. This includes elements of self build.</p> |
| | | Misc | <p>Additional information provided, but not summarised in detail here:</p> <ul style="list-style-type: none"> • 59 Nine Mile Ride – Site location plan • 59 Nine Mile Ride – Existing Site Analysis • Reg 14 representations dated 18.03.21 • Reg 14 representations dated 17.11.21 • LPU call for sites submission form • Copy of LPU Revised Growth Strategy representations • 59 Nine Mile Ride Planning Statement (Part 1 and 2) • 59 Nine Mile Ride – proposed block plan |
| 17. | Paul Newman Property Consultants Limited | 5.4.2 Sites added as a result of LPU Revised Growth Strategy (2021) | <p>Supports the identification of the land at Greenacres Farm, Nine Mile Ride as an area acceptable for development.</p> <p>Notes that part of the site has been identified in the Central and Eastern Berkshire Joint Minerals Plan as a preferred waste area. Proposes the site should come forward as a mixed use development site, which should comprise of a mixture of employment and new build residential development and provides indicative masterplan to achieve this.</p> |
| 18. | Prior, Nicholas | GS1 and general | <p>Objects to the extent of the identified Key Local Gap (KLG) known as ‘Land either side of the A321, north of the junction with Nine Mile Ride’ with criticisms of how its boundaries relate to the Local Wildlife Site (LWS) designation and its identified purposed. In particular, objects to the inclusion of Silverstock Manor (as landowner) within the proposed KLG. Objects to it being characterised as ‘last remaining green space’ given surrounding woodland and LWS. Does not consider the site complies with the criteria for designation, nor is it consistent with the ‘Ride’ character that the Plan is seeking to protect, especially in comparison with land to the south east. Therefore requests that this property be removed from the identified gap. Concern</p> |

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| | | | <p>expressed regarding the potential loss of income if the designation is retained in the adopted Plan. Considers the gaps / wedges in general to be vaguely defined and their intention is a misuse of planning policy in order to prevent potential development sites coming forwards. Highlights inaccuracies / lack of clarity within Figure 7 and Figure 23 of the Plan which misrepresent the site.</p> <p>Welcomes recognition of a housing requirement of 53 dwellings and considers additional development is required to tackle affordability issues in the local area. Considers Silverstock Manor to be a suitable location for development for reasons including: it is previously developed land and therefore national guidance supports development; unconstrained as regards ecology (supported by studies through previous planning applications); not subject to flood risk (supported by studies through previous planning applications); close to local services and amenities, including schools and public transport; previous planning approvals at the site; good vehicular access; lack of vegetation coverage. Considers the site to be demonstrably more suitable for housing development compared to alternative sites which are supported by the Plan, and that development here should therefore be supported.</p> <p>Various criticisms raised about the Plan preparation process and the expertise, objectivity, suitability of the Qualifying Body and notes previous complaint made to the Qualifying Body to this effect. Considers there to have been various inaccuracies and misrepresentations about the Silverstock Manor site in numerous versions of the Plan and the Qualifying Body's consultation material, including regarding the number of buildings on site, which will have negatively influenced consultation responses to the Plan. In particular, criticises the objectivity of the Qualifying Body's site assessment process, including lack of site visit prior to and following an invitation, incomplete recognition of its planning history, and how submitted evidence has been properly considered. Criticism also expressed in relation to accuracy of WBC's HELAA assessment.</p> <p>Criticisms expressed around the objectivity of the engagement process carried out by the Qualifying Body with the use of emotive language of an anti-development nature.</p> <p>Highlights a GDPR breach in the NP Steering Group minutes and considers this reflects poor management and misuse of the NP process.</p> <p>Considers there to be a conflict of interest issue with the consultants who assisted with the preparation of the Plan.</p> |

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| | | | <p>Considers that previous representations from other landowners have been taken on board, but his own representations have not been appropriately considered in a consistent or objective manner, and believes there to be a conscious bias against this site.</p> <p>General criticisms made of WBC's historic approach to development of the site, which is considered to be unfair, when compared with other sites in the area and references to the perceived corrupt way decisions have been made.</p> <p>Notes that unsatisfactory resolution of the identified issues would lead to legal proceedings being considered.</p> |
| 19. | Roberts, T | 5.4.2 Sites added as a result of LPU Revised Growth Strategy (2021) | Supportive of reference to 31 Barkham Ride in the Plan, and confirms as the landowner that it remains available for development. |
| 20. | T A Fisher & Sons (c/o ET Planning) | 5.4.2 Sites added as a result of LPU Revised Growth Strategy 2021 | <p>Welcome the intentions of the Plan to support development of site 'Westwood Cottage, Sheerlands Road' for 10 dwellings and support the Plan in general seeking to meet its pro-rata share of housing. However, notes that the Plan does not actually allocate the site, instead supporting this being achieved through the LPU, and therefore considers the Plan is not meeting its needs in full. Additionally, notes WBC's acknowledged lack of a 5 year housing land supply and delays in the LPU programme. Considers the Plan should explicitly allocate the full quantum of development sites referred to in chapter 5 and amend settlement boundaries accordingly, in order to satisfy the basic conditions. However, considers reference to a number should be removed for each site as this could change through the emerging LPU.</p> <p>Notes that while the Plan seeks to allocate 2 sites for development, there is no policy within the Plan for this and so it is unclear if the plan is allocating them.</p> |

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| | | Omission Site: Westwood Cottage | <p>Considers the site to be capable of accommodating 30 dwellings within a sustainable location with no constraints that would preclude development. Site considered available and deliverable in the short term with a development partner on board.</p> <p>Requests that the site be referred to as 'Westwood Yard' rather than 'Cottage' for accuracy, as the promotion has since been amended to omit land containing the cottage.</p> |
| | | Policy ES1 | Notes that ES1 seeks to introduce energy standards for new dwellings and considers this to be contrary to planning practice guidance and a Written Ministerial Statement. Recommends rewording to remove the introduction of new standards. |
| | | Policy ADH1 | Considers the policy to be more restrictive than national policy regarding new development in the countryside. The NPPF allows isolated homes in stated circumstances, which extends beyond rural workers dwellings. Notes that the policy also does not refer to commercial development contrary to local and national policy, |
| | | Policy ADH2 | Considers the policy wording regarding higher densities at Finchwood Park should be extended to the whole of the SDL. Notes that the policy wording seems to support higher quantum of development at Westwood Cottage. |
| | | Policy ADH5 | Considers the policy wording to be unclear and unnecessarily duplicates requirements of existing policy. |
| | | Policy IRS2 | Considers a map showing the views should be incorporated within the main body of the Plan rather than an Annex. |
| | | Policy IRS5 | Considers a requirement for at least 10% net gain, in advance of the Environment Act coming into force, would require justification through a Local Plan, and the adopted development plan does not contain this requirement. Therefore, consider reference to 10% should be removed. |
| | | General | Various policies contain references to emerging policies within the LPU. This currently carries very limited weight and references should therefore be removed. |

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| | | | Highlights areas of supporting text which reads as policy (para 5.4.5 and 5.5) which should be amended. |
| 21. | T A Fisher & Sons (c/o Woolf Bond) | General | Note that the LPU is emerging and has not yet progressed to Regulation 19 and therefore this limits the extent that the Plan can rely on the LPU's emerging approach, especially untested evidence. |
| | | Section 5.4, Additional Housing Topic Paper | <p>Notes that the section 5.4 supports a number of sites for development, but considers there to be no robust assessment of the reasons why these sites have been selected compared to others omitted. Specifically notes that the Additional Housing Topic Paper makes no reference to omission sites, including client's land (land west of Finchampstead Road, Finchampstead), and therefore considers the Plan is not supported by robust, proportionate evidence base.</p> <p>Objects to the inclusion of draft allocations from an early Regulation 18 LPU, object to the inclusion of Gypsy and Traveller pitches within housing supply on the basis of Highlight a 2014 appeal decision, and notes that the Revised Growth Strategy consultation proposed to allocate 31/33 Barkham Ride for 66 dwellings rather than 70 referenced in the Plan.</p> <p>Considers the proposed allocations for 4 dwellings, at Broughton Farm and Land to the rear of 6-8 The Village, are of a size typically regarded as windfalls and that their inclusion conflicts with NPPF paragraph 70. Notes that there is no policy within the Plan that formally allocates the sites. Concludes that this section of the Plan should be omitted.</p> |
| | | Policy ADH1 | <p>ADH1 makes no reference to the requirement that development proposals also contribute towards Strategic Access Management & Maintenance (SAMB). Supportive of need to avoid impacts on the Thames Basin Heath SPA, however notes that no explanation given as to why the mitigation elements of ADH1 do not also apply to development within development limits. Considers the TBH element of the policy to be unnecessary given IRS5 also covers these matters.</p> <p>Supports the policy approach towards agricultural worker's dwellings but considers this should be broadened to other types of development that may be supported in the countryside. Suggested amendments for consistency with approach of Shinfield Neighbourhood Plan Policy 1.</p> |
| | | Policy GS1 and The Separation | Notes that supporting text to this policy refers to emerging LPU policies rather than adopted policy. Considers there to be no adopted strategic policy on which GS1 can rely, contrary to regulations. |

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| | | of Settlements Topic Paper | Object to the inclusion of land to the west of Finchampstead Road as being within a proposed Green Wedge. Considers that the Plan and supporting evidence has not provided sufficient justification, or appropriate criteria for determining the extent of, the green wedge as proposed. Notes that land to the west of Finchampstead Road in the client's ownership comprises well screened residential gardens which offer no recreational value to the public. Conclude that the Green Wedge should be omitted from the plan or alternatively reduced to omit the land in client's control. |
| | | Omission Site: Land west of Finchampstead Road | Considers the site suitable for development given its sustainable location and lack of constraints which would preclude development. The site is controlled by a local housing developer and therefore deliverable in the short term. Notes the lack of objective assessment through the Plan process of discounted sites. |
| | | Misc | Additional information provided, but not summarised in detail here: <ul style="list-style-type: none"> • Details of land controlled by TA Fisher (land west of Finchampstead Road, Finchampstead) (SLAA site ref 5FI019) • Appeal decision for Hedgerley Stables, Nelson Lane, Hurst (PINS ref APP/X0360/A/14/2216096) • Appeal decision for land off Finchampstead Road (PINS ref APP/X0360/W/32131631 and 3212916) |
| 22. | Vortal Homes Ltd (c/o Jim Bailey, RPS) | Policy GS1 and Topic Paper – The Separation of Settlements | <p>Object to the identification of 'Fields south of the Development Limits of Finchampstead North and north of the ridge line at Church farm' as an important area of separation which contains land controlled by client. Consider the need to maintain separation between a defined settlement and an 'informal built area' to be tenuous and that the designation 'Important Areas of Separation' is vague and indefinable with no clear definition provided, and therefore recommend it be removed. Consider various titles / descriptions given to 'Fields south of the Development Limits of Finchampstead North and north of the ridge line at Church farm' to be unhelpful.</p> <p>Considers client's land to the east of B3016 to be well contained by topography and vegetation, with a suburban character, meaning it does not share the characteristics of land to the west which are used to justify Important Area of Separation.</p> <p>(NB: it appears comments have been made on a previous version of the Topic Paper, rather than the updated version available on the Parish website, due to an outdated link within the Plan.)</p> |

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| | | Section 5.4 site allocations and Topic Paper – Proposed Sites for Additional Housing | <p>Object to the allocation of sites ‘31-33 Barkham Ride’ (5FI003) and ‘Greenacres’ (5FI004).</p> <p>Considers site 5FI003 is not PDL as relied upon within the Plan and Topic Paper, is subject to constraints which make it unsuitable for development, and that the Plan’s support is inconsistent with its wider aims to maintain gaps between settlements.</p> <p>Questions the viability of site 5FI004 given its ‘quasi-brownfield’ status and associated high land value. Considers allocation contrary to the existing development plan policy concerning employment development and that the Topic Paper’s desire for SANG to be provided onsite limits the developable area. Suggests the site is not available for development as the client has spoken to landowners of Greenacres and been advised there is no intention to sell the site for housing development.</p> |
| | | Chapter 5 Appropriate Housing Development | Suggest policy allocating ‘Land south and east of the Doctors Surgery up to the Finchampstead Road near to the junction with Church Lane, up to the edge of the fields on Wick Hill’ for up to 200 homes. A range of development guidelines suggested, covering matters including: affordable housing, housing mix, public rights of way, design, landscaping, biodiversity, sustainability. |
| 23. | Washington Trust (c/o Philip Soar, Darcy Soar) | Section 5.4.5, Policies ADH1 and ADH2, and Annex D | <p>Objects to the nature of development limits being too tightly drawn and considers a review necessary to provide further flexibility. Considers client’s site ‘Land East of Finchampstead Road’ should be included within development limits.</p> <p>Objects to ADH1 on the basis it offers an inflexible approach to housing development beyond development limits. Considers the proposed allocations for 4 dwellings in the plan and policies to facilitate windfall development are inadequate given the way development limits are defined which will not facilitate sufficient growth.</p> <p>Objects to assumptions in Annex D - Housing Need Assessment regarding utilising Finchampstead’s percentage of existing housing stock to inform percentage of future housing need.</p> |
| | | Policy GS1 | Object to the inclusion of Land East of Finchampstead Road within the identified Green Wedge, considering it does not satisfy the function of such and given the existing housing in the vicinity. Confirmation the land is not available for recreational use. |

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| Individual's comments | | | |
| 24. | Amos, J | General | Supportive of the plan proposals and the principle of having a plan in place to guide development and protect against speculative development proposals. |
| 25. | Amos, Patricia | General | Supportive of the plan's aims and policies which strikes a balance between recognising some development is necessary and appropriate in places but also providing protection against speculative development. Comments that public transport in the parish is poor, and considers the plan should have contained more around improving public transport. |
| 26. | Ballard, Bob | LGS Topic Paper | Objects to the area of Fleet Copse, as landowner of significant area of the copse, being subject to special planning constraints. Disagrees with various conclusions within the topic paper, including whether the copse is visible from public footpaths, the distinctiveness of its fauna, and whether the land is an extensive tract. Consider there to be adequate planning protections without special designation. |
| 27. | Blackford-Mills, Rhiannon | Section 5.4.3 – Additional Development Sites | Objects to the allocation of land to the rear of 6-8 The Village for 2 dwellings in the Finchampstead Neighbourhood Plan. Considers there to be better alternatives for development and that the site is unsuitable for reasons including loss of view, increased noise levels, impact on character, and impact on biodiversity. |
| 28. | Clayton, Simon | General | Supportive of the plan proposals to manage development in a way that allows new communities to integrate with existing and preserving the semi-rural, community character of the parish. General comments around the borough being a target for development due to its location and attractiveness and recognition of the planned growth at the Arborfield strategic development location. |
| 29. | Colvin, Derek | Section 5.4.3 – Additional Development Sites | Objects to the allocation of land at Broughton Farm, Heath Ride for 2 dwellings. Considers the development to be unsuitable infill which will set a dangerous precedent for the ride. Objections on grounds of traffic and highways safety grounds and impact on environment. |

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| 30. | Cowan, Allan | Section 5.4.3 – Additional Development Sites | Objects to the allocation of land at Broughton Farm, Heath Ride for 2 dwellings. Considers the site to be unsuitable for development for reasons including traffic and access. Highlights previous applications and appeals which have been refused / dismissed. |
| 31. | Gallagher, Jim | General | Supportive of the plan proposals which strike a sensible balance between the needs of existing residents with the need for future development and local businesses. |
| 32. | Gibson, Allan | General | <p>Supportive of the plan proposals and the principle of having a plan in place which will help conserve the attractive semi-rural character of the parish and protect against speculative development proposals.</p> <p>Particular strong support for the proposed Green Gaps, Wedges, and Local Green Space which will protect valued local areas, with the view that the current strategic plan does not provide sufficient safeguards for these assets.</p> |
| 33. | Gilbert, Graham | Sections 10.1 and 10.2 | Comments provided as a resident and on behalf of Sarum Hill Gospel Halls Trust (SHGHT). The trust expects, due to its growing membership, to require additional meeting facilities in the coming years. Supports the Plan seeking to protect existing community facilities, and highlights the NPPF recognition that planning policies and decisions should recognise that sites to meet local community needs may have to be found beyond existing settlements for new facilities. |
| 34. | Graves, Sam | Section 5.4.3 – Additional Development Sites | Objects to the allocation of land at Broughton Farm, Heath Ride for 2 dwellings. Considers the site to be unsuitable for development and highlights previous applications and appeals which have been refused / dismissed. Reasons for objection include inappropriate infill development contrary to existing character, impact on wildlife and traffic and highways safety grounds. |
| 35. | Hollis, Jeff | Section 5.4.3 – Housing requirement | Objects to the housing requirement presented within the plan. Considers that the committed development within the parish as part of the Arborfield Garrison Strategic Development Location and the Gorse Ride redevelopment already results in the parish accommodating a disproportionate number of homes compared to the rest of the borough. Considers no further development beyond those commitments should be supported. |

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| | | Development limits | General objection to development occurring outside of development limits – principally in reference to the proposed allocations as part of the emerging Local Plan Update – due to loss of vital green space and failure to comply with existing policies (NB: certain policies referred to in the adopted development plan would be updated and superseded by the Local Plan Update). |
| | | Section 5.4.2 and 'Proposed sites for Additional Development' Topic Paper. | Objects to development of the Greenacres site, due to concerns including settlement coalescence and loss of green space. Welcomes the wording within the Topic Paper around the Qualifying Body's preference for development to be contained to the area of previously developed land within the site, and recommends this be incorporated into the plan itself. Highlights a discrepancy between the quantum provided in the plan and Topic Paper and WBC's HELAA assessment (NB: Greenacres proposed allocation is for 100 dwellings as set out in the Local Plan Update Revised Growth Strategy (2021)). |
| 36. | Hutterli, J | Section 5.4.3 – Additional Development Sites | <p>Objects to the allocation of land to the rear of 6-8 The Village for 2 dwellings in the Finchampstead Neighbourhood Plan.</p> <p>Considers the site is unsuitable for reasons including lack of services and facilities, impact on highways safety, increased traffic and noise pollution.</p> |
| 37. | Macey, Colin | Section 5.4.3 – Additional Development Sites | Objects to the allocation of land at Broughton Farm, Heath Ride for 2 dwellings. Considers the site to be unsuitable for development and highlights previous applications and appeals which have been refused / dismissed. Reasons for objection include access, traffic and highways safety grounds, impact on existing character. |
| 38. | Marrons Planning OBO 13 local residents | General | Plan considered to fail the following basic conditions: general conformity with the strategic policies; having regard to national policies and guidance; and contributing to the achievement of sustainable development. |
| | | Section 5.4.3 – Additional Development Sites | Objects to the allocation of land at Broughton Farm, Heath Ride for 2 dwellings. Considers the site to be unsuitable for development and highlights previous applications and appeals which have been refused / dismissed and failure of the Plan to carry out an appropriate site assessment. |

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| | | | <p>Considers the allocation to be inconsistent with the emerging LPU and highlights the fact the site was discounted from assessment in its HELAA for being detached from the settlement boundary.</p> <p>Considers the site to be unsuitable for development for reasons including impact on trees, landscape, biodiversity, and impact on character which could set a precedent for future development.</p> |
| 39. | Merolla, Leona | Section 5.4.3 – Additional Development Sites | <p>Objects to the allocation of land to the rear of 6-8 The Village for 2 dwellings in the Finchampstead Neighbourhood Plan.</p> <p>Considers the site to be unsuitable for development for reasons including loss of green space, impact on biodiversity, lack of existing infrastructure, traffic and highway safety issues.</p> |
| 40. | Neudegg, Peter | Section 5.4.3 – Additional Development Sites | Objects to the allocation of land at Broughton Farm, Heath Ride for 2 dwellings. Considers the site to be unsuitable for development and highlights previous applications and appeals which have been refused / dismissed. |
| 41. | Pearce, Andrew J. | General | Indicates support for the whole document. |
| 42. | Pisacane, Paul | Section 5.4.3 – Additional Development Sites | Objects to the allocation of land at Broughton Farm, Heath Ride for 2 dwellings. Considers the site to be unsuitable for development and highlights previous applications and appeals which have been refused / dismissed. |
| 43. | Rees, Gareth | Annex H | Objects to the inclusion within Annex H of the Gypsy and Traveller site at 'The Orchard, 88a Reading Road, Finchampstead, RG40 4RA' |

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| 44. | Rowe, Joanne | Section 5.4.3 – Additional Development Sites | <p>Objects to the allocation of land to the rear of 6-8 The Village for 2 dwellings in the Finchampstead Neighbourhood Plan.</p> <p>Considers the site to be unsuitable for development for reasons including traffic and highway safety issues, the suitability of the location for social housing, character impact, and impact on privacy.</p> |
| | | Section 5.4.3 – Housing requirement | Objects to the use of historic small site windfall data being used to justify future housing targets, given past 'garden grabbing' development is not a sustainable way to manage growth in the future. |
| 45. | Savage, Brian | Section 5.4.3 – Additional Development Sites | Objects to the allocation of land at Broughton Farm, Heath Ride for 2 dwellings. Considers the site to be unsuitable for development and highlights previous applications and appeals which have been refused / dismissed. Reasons for objection include inappropriate infill development contrary to existing character, which will set a dangerous precedent for the ride, impact on wildlife and traffic and highways safety grounds. |
| 46. | Sheehan, Mike | Section 5.4.2 and 'Proposed sites for Additional Development' Topic Paper. | Conditional support for the plan's recognition of proposed housing allocation 5FI004 Green Acres Farm, Nine Mile Ride (proposed through the emerging Local Plan Update). This is subject to development being contained on the previously developed area of the site and the western area of greenfield land being designated as SANG. |
| 47. | Slocombe, Stuart and Ros | General | <p>Supportive of the plan proposals and the principle of having a plan in place to guide development and protect against speculative development proposals.</p> <p>Considers the parish has accommodated its fair share of Traveller sites compared with other areas and further expansion should be resisted.</p> |
| 48. | Veitch, Gordon | General | Fully supportive of plan proposals and the hard work that has gone into it. |
| Other organisations | | | |

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| 49. | Berkshire Archaeology | General and IRS3 | <p>Supportive of the plan proposals and pleased with the repeated reference to the historic environment throughout the plan.</p> <p>Specific recommendation that policy IRS3 mentions the potential for previously unknown archaeological features to be encountered during development. Suggestion that MDD policy TB25 is cross-referenced as well as the numerous “Areas of High Archaeological Potential” as defined in the “Policies Map”. Information provided around the important role of development in uncovering archaeological finds.</p> |
| 50. | British Horse Society | General | <p>Supports policy GA1 and the inclusion of horse rider use in the plan in general. However, considers the GA1 wording “(except for where doing so would compromise other non-motorised uses of such a path)” could be discriminatory if access along the pathway is given to cyclists and not horse riders.</p> <p>Disagrees with the statement at 9.4.4 that the PROW network provides high levels of inter-connectivity, considering that provision for horse riders and cyclists is not equivalent to that for walkers. It is considered that there is potential within the parish to greatly improve active travel connectivity for non-walkers consistent with the improvements seen with the California Greenway. An indicative diagram is provided showing existing, planned and desired provision.</p> <p>Additional requests for ‘horse riding’ to be recognised in policy GA2, various areas of supporting text, and in Annex U – Finchampstead Parish Council Project List.</p> |
| 51. | Sport England | General | <p>Standing advice provided, no specific comments provided on the plan.</p> |