

## Ruscombe 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: Ruscombe Parish

Consultation period: 15 May to 26 June 2023

**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.

A total of 11 responses were received. Of these 7 were from statutory consultees; 3 were from individuals (residents or individual councillors); and 1 was from another organisation.

### Statutory Consultee comments:

Ref	Respondent	Topic	Summary of Comments
1.	Natural England	General	No comments.
2.	NHS Buckinghamshire, Oxfordshire & Berkshire West Integrated Care Board	Paragraph 6.4	Comment refers to Twyford Surgery and Wargrave Surgery being the nearest GP practices to the two proposed housing site allocations in the draft Local Plan Update, referenced in the plan. Primary Care infrastructure funding could provide the ability to improve the practices capacity to be able to support patient services.

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3.	Surrey County Council	General	No comments.
4.	Transport for London	General	No additional comments on the Ruscombe Draft Neighbourhood Plan, further to that provided in their response to previous consultations on the draft Plan. Previous comments included an update on the status of the Crossrail project and Elizabeth Line from Twyford and for development proposals to take account of Crossrail safeguarding directions where they are located close to the Great Western main railway line.
5.	Thames Water	General	Recommend early engagement with developers through their pre-planning service to discuss and advise for the delivery of water and wastewater infrastructure requirements using their pre-planning service.
6.	Waverley Borough Council	General	No comments.
7.	Wokingham Borough Council	Policy RU1	The policy provides limited value or additional detail to existing policy in the development plan. National policy and guidance are clear that neighbourhood plans should avoid repeating national or local plan policies. Modifications recommend either removing the policy or amending policy wording to provide additional local context for guiding and managing development within the neighbourhood area.
8.	Wokingham Borough Council	Policy RU2	<p>The design code guidance referred to in Policy RU2 is considered too prescriptive to be applied to all new development proposals within the neighbourhood area, and it is not clear which points should be adhered to when assessing development proposals. Also question whether the design code/guidance should apply to uses other than housing.</p> <p>Policy RU2 is not considered to meet the basic conditions as it would not contribute to the achievement of sustainable development. The site-specific design requirements set out in Appendix A Design Code will have implications on the indicative site capacities for two proposed housing allocations in the emerging Loal Plan Update (Land to the rear of 9-17 Northbury Lane</p>

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			<p>for 7 dwellings; Land between 39-53 New Road for 12 dwellings). The design code seeks to encourage larger plot sizes and lower densities, constraining development in a manner not supported by emerging strategic policy, nor envisaged by paragraphs 119 and 124 of the NPPF which place an emphasis in promoting an effective and efficient use of land.</p> <p>In addition, removing opportunity for higher densities in appropriate areas would not be making effective use of land and would reduce both quantum and variety of housing types to be able to respond to local needs, as sought in Policy CP5 of the Core Strategy (2010). As such the policy will not contribute to the achievement of sustainable development and is therefore considered to be contrary to the basic conditions. Policy RU1 of the Ruscombe Neighbourhood Plan promotes high-quality design, development and places which can be achieved through core principles established in Policy CP3 of the Core Strategy (2010) without the use of an overly restrictive design code/guide.</p> <p>The Design Code should clearly demonstrate how densities have been considered in the current local context. As an alternative, the policy could state that <i>'the density of any new development must be appropriate to its surroundings'</i> and ensure applicants have full regard to the specific typologies and principles set out in the Design Code.</p> <p>A consistent approach to parking would help to provide clarity and consistency.</p> <p>The National Model Design Code (June 2021) and National Design Guide (January 2021) set out detailed guidance to be considered in the production of local design codes, guides, and other design policies to promote successful design.</p>
9.	Wokingham Borough Council	Policy RU3	<p>Support the principle of the policy, with the exception of a minor amendment as follows:</p> <p>'Development proposals should <b>conserve</b> <del>sustain</del> and, where possible, enhance the historic environment, particularly the special architectural and historic significance interest of the designated Ruscombe Conservation Area and its setting. Features identified as positive</p>

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			characteristics of the Conservation Area and its immediate setting are defined in the Ruscombe Housing Design Code attached as Appendix A, to which all proposals must have full regard.' The term 'sustain' is not associated with heritage policy. Amending the phrase to 'conserve' would ensure the policy reflects paragraph 190 of the NPPF.
10.	Wokingham Borough Council	Policy RU4	<p>The policy is not considered a land-use planning policy as per national policy and guidance. If the neighbourhood planning group wish to proceed with this requirement, the Council would recommend that elements of the policy are either moved and incorporated into Policy RU1: Development Limit for Ruscombe, moved into the supporting text of the plan or included as a 'Community Action' at the end of the Plan.</p> <p>Recommend a minor grammatical correction to paragraph 2 of the Policy as follows:</p> <p><b>Where development proposals</b> are for 10 or more dwellings, more than a 1000m2 of new floor space, or where the site is greater than a hectare in size, applicants should demonstrate in the Statement of Community Involvement how they have engaged in a meaningful way with local residents and other stakeholders prior to submitting a planning application.</p>
11.	Wokingham Borough Council	Policy RU5	<p>Support the principle of this policy, and acknowledge that the policy has been modified to align with Policy TB26 of the MDD local plan and national planning policy.</p> <p>Following engagement with the Council's Conservation Officer, the information contained in Appendix B is considered sufficient in providing a reasoned justification for the proposed Buildings of Traditional Local Character and aligns with the criteria and methodology set out within Appendix 2 of the Council's Buildings of Traditional Local Character – Policy and Procedures.</p> <p>Further clarity would be welcomed regarding the extent the landowners of the identified buildings/structures have been engaged in this process. This is also recognised as best practice in guidance published by Historic England in their Local Heritage Listing: Identifying and</p>

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			<p>Conserving Local Heritage Advice Note 7 (Second Edition), which provides useful advice for identifying non-designated heritage assets in local plans and neighbourhood plans, as stated in Paragraph 33 and 55 of the guidance. There are currently no comments from when the landowners were engaged in February 2020 and September 2021.</p> <p>It is recommended that the Plan is supported by evidence clearly summarising the engagement between the qualifying body and the landowners of each building or structure, including details of any responses received.</p> <p>The Council's Conservation Officer has also recommended minor modifications to the supporting text of the Plan, and include:</p> <ul style="list-style-type: none"> <li>• References in the Plan to 'St. James Church Conservation Area' should be replaced with 'Ruscombe Conservation Area', which is the correct name for the designation.</li> <li>• Under the 'Foreword', amend the third aim as follows: '<i>To preserve and <b>or</b> enhance the character of the St James's Church <b>Ruscombe</b> Conservation Area and its setting.</i>'</li> <li>• Paragraph 2.6 includes a list of specific buildings, but reference should be made to their listing under statutory legislation, e.g., Planning (Listed Buildings and Conservation Areas) Act 1990</li> <li>• Paragraph 3.7 under 'Designated Heritage Assets etc (TB24)' suggest deleting 'etc'. The Plan could also benefit with a definition of a designated heritage asset, as per Annex 2 of the National Planning Policy Framework.</li> <li>• Paragraph 3.7 under - 'Archaeology (TB25)' – The Plan could benefit in identifying the four archaeological sites on a map.</li> <li>• Paragraph 5.15 – this should also refer to the Secretary of State for the Department of Culture, Media, and Sport (DCMS) who is the responsible authority for designating listed buildings, in consultation with Historic England.</li> <li>• Appendix B - With respect to the dating of a number of the properties, further clarity and confirmation regarding the age of some properties would be welcomed, notably with</li> </ul>

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			respect to I) Ruscombe Cottage, IX) Southbury Farm, X) Lake Cottage, XIII) Keepers Cottage and XIV) Lake Farm.
12.	Wokingham Borough Council	Policy RU7	Support the principle of this policy and acknowledges the recent changes to the latest version of the plan. This assist applicants by demonstrating how an existing community use identified in the policy would no longer be viable, and to provide further clarity for how a decision taker would take this matter into consideration when assessing development proposals. The modified text also aligns with paragraph 3.85 of the Council's Managing Development Delivery (MDD) local plan.
13.	Wokingham Borough Council	Policy RU8	<p>Support seven of the ten areas of green space proposed for designation. The assessment of the proposed sites (along with other nominations) is set out in the Local Green Space Topic Paper (November 2021). However, within this policy context, the Council consider that insufficient justification has been provided by the qualifying body to identify the following three areas of land for Local Green Space designation:</p> <ul style="list-style-type: none"> <li>• <b>Local Green Space iv. New Road Pond</b> – the site comprises a small area of incidental open space along New Road which offers no particular recreational, ecological or tranquillity value and therefore does not warrant further consideration as a Local Green Space designation. The proposed area is within the wider setting of the Ruscombe Conservation Area and would be covered by relevant policies in the Development Plan, national policy, and legislation.</li> <li>• <b>Local Green Space vii. Crossroads Lane</b> – the site comprises a small area of amenity greenspace at the crossroad junction of Stanlake Lane, New Road, Waltham Road and Ruscombe Lane, which offers very limited recreational value and therefore does not warrant further consideration as a Local Green Space designation.</li> <li>• <b>Local Green Space ix. Land at London Road</b> – the site comprises a small area of amenity greenspace and roadside verge which offers very limited recreational value and therefore does not warrant further consideration as a Local Green Space designation.</li> </ul>

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14.	Wokingham Borough Council	Policy RU10	Support the policy. It is acknowledged that the policy has been modified to set out how development proposals should contribute towards improving non car related modes of travel.
15.	Wokingham Borough Council	Policy RU11	<p>Support the policy approach as it reflects Policy CC07 of the MDD local plan.</p> <p>Further, it is acknowledged that the policy has been modified to ensure that development proposals provide and retain appropriate levels of parking in line with the Council's adopted parking standards and regard had to the Council's Highway Design Guide.</p> <p>The policy also recognises the role of garages in providing car parking spaces subject to providing sufficient internal space and consideration of impacts on active frontages.</p>
16.	Wokingham Borough Council	Paragraph 3.16	It is recommended that paragraph 3.16 of the supporting text of the draft Plan is amended to reflect that the Central and Eastern Berkshire Joint Minerals and Waste Local Plan was adopted by the Council in January 2023 and forms part of the Council's Development Plan and used to make decisions on relevant planning applications.

**Developer / landowner / agent comments:**

No comments received.

Individual's comments:

Ref	Respondent	Topic	Summary of Comments
1.	Colin Bell	General	Supports the plan proposals. Comments around respecting the local character and distinctiveness of Ruscombe village, whilst contributing to its needs for housing, business, and social activity. Comments considered that the plan has taken a thoughtful and positive approach to future development that meets all the above.
2.	Kathryn Bell	General	Support the plan proposals. Comments around respecting the local character and distinctiveness of Ruscombe village, whilst contributing to its need for housing, business, and social activity. Comments considered that the plan has taken a thoughtful and positive approach to future development that meets all the above.
3.	Pamela Frost	General	<p>Object to the plan as it is considered to provide contradictory and misleading information, which fails to address problems in the area, including housing needs and traffic issues.</p> <p>Comments that whilst the plan refers to the value of conservation areas and protected wildlife species, there should be speed limit controls through these areas.</p> <p>It is suggested that the maps in the Plan are of poor quality and design, which do not aid explanation.</p> <p>Comments that viewing Burratta's and the business park as a community asset could encourage more people to park on Milton Way impacting on residential amenity. The business park should be investigated on its operational hours.</p> <p>Comments that section 5.32 refers to Stanlake Road as a quiet road, but this is considered to be very busy. Limited reference is made in the Plan to New Road, Ruscombe Lane and Stanlake Road being unsuitable for larger vehicles accessing the Business Park. Speed limits on these roads should be controlled and reduced.</p>



Other organisations:

Ref	Respondent	Topic	Summary of Comments
1.	The British Horse Society	Vision page 24	Comments that the sentence: 'Encourage walking & cycling in the neighbourhood plan area & to better manage the harmful effects of traffic & parking' should be amended to account for horse riding in addition.
2.	The British Horse Society	Policy RU9	Comments that the policy does not account for horse riding. Any routes that allow cycling should have bridleway classification and allow horse riders. Suggested amendment to paragraph as follows:  '...enhance facilities for pedestrians, cyclists and horse riders to encourage safe walking, cycling and <b>horse riding access</b> ....'.
3.	The British Horse Society	Policy RU10	Welcome acknowledgement of horse riders in the supporting text to this policy (paragraphs 5.32 and 5.34.)  Paragraph 5.35 should refer to the Council's Rights of Way Improvement Plan (ROWIP). It was suggested that this document should be acknowledged in the neighbourhood plan.  Suggestion that taking cycle routes off road where possible is the best way to achieve safe cycling and horse-riding routes. Enhancement and improved linkages on the bridleway network are preferable to on road cycleways.
4.	The British Horse Society	Appendix A, General Principles G3	Comments that horse riding should be referred to in this design principle to avoid a situation where bridleway spec routes are created, off road, improving connections between other bridleways and byways, but with horse rider use excluded.

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5.	The British Horse Society	Appendix C, Local Green Space report; test 4	Comments that the Public Rights of Way network holds value to the community for recreation and health and wellbeing, but this is not acknowledged in the assessment. Ruscombe Parish does not offer the community an entirely off-road bridleway circuit. All users must use quiet lanes and busy roads to make up a circular walk, bike or horse ride. Any vision for the future should include this, for improved recreational opportunities, active travel and to help address the inequality within the off-road network. Circular, off road, bridleway routes are very desirable for the benefit they offer the whole community.