



Local People.
Local Decisions.
Local Future.

Finchampstead Neighbourhood Development Plan

**Report on Public Consultation
carried out January-February
2021**

Table of Contents

Executive Summary.....	4
Background	5
Level of Support and Comments on Policies	7
1. AHD1 Development outside of development boundaries.....	7
2. AHD2 Development within development boundaries.....	10
3. AHD3 Green space and landscaping	13
4. AHD4 Independent living, care and vulnerable housing	14
5. AHD5 Affordable housing	15
6. AHD6 Provisions for Gypsy and Traveller communities	16
7. AHD7 Caravan and Mobile home sites	18
8. D1 Building heights	19
9. D2 Preserving the rural culture of the parish	20
10. D3 Infill, Small Plot Development and Development of Private Residential Gardens.....	21
11. ES1 Environmental standards for residential development	22
12. GS1 Key gaps between settlements.....	24
12.1 Comments relating to Specific Key Gaps	26
13. GS2 Green Wedges	31
14. IRS1 Protection and enhancement of local green spaces.....	34
14.1 Comments relating to Local Green Space Designations	35
15. IRS2 Protection of Iconic Views	37
16. IRS3 Protection of and enhancement of the historic character of the area.....	38
17. IRS4 Implement strategy to preserve the identity of Finchampstead Parish through green spaces	40
18. IRS5 Ecological green space biodiversity	41
19. IRS6 Trees.....	42
20. GA1 Improve environment and health from traffic pollution	43
21. GA2 Reduction in car usage with safe personal mobility options	45
22. TC1 Supporting business.....	47
23. TC2 Supporting business.....	48
24. TC3 Retail development – California Crossroads.....	49
25. TC4 Retail development – Finchwood Park	50
26. TC5 Protection of retail facilities.....	51

General Comments	52
Comments on Planning for Growth	56
Comments on Ability to meet Basic Conditions	59
Comments relating to Changes to Development Limits	62
Comments relating to housing targets following the demise of the proposed SDL at Grazeley.....	63

Executive Summary

A draft Neighbourhood Plan, to influence what development occurs in their area has been prepared by the Finchampstead Future team.

To have the FNDP approved as a formal input to Planning decisions we have to ensure that we consult with local people, organisations, businesses, landowners, etc. about our analysis and policy proposals, and that their views are considered and used to influence the plan as appropriate.

Part of this process is evidencing that the plan accurately reflects the needs of the area and the views of local people.

The first formal public consultation on a draft plan took place from 1st February to 19th March 2021.

This Report gives the results of that Consultation and provides details of the level of support received for each of the Policies, publishes the analysis of the feedback received, and identifies the changes proposed to be made to the plan in response to comments.

Allan Gibson
Chair, Finchampstead Future

September 2021

Background

Finchampstead Future, a group of volunteer local residents, working in partnership with Finchampstead Parish Council, is producing a Neighbourhood Plan under the Localism Act 2011.

The Neighbourhood Plan is a plan devised by local people to influence what development occurs in their area. When approved by an external examiner and voted for by local people in a referendum, it has statutory status and has to be taken into account when planning applications are considered. It sits alongside Wokingham Borough Council's Local Plan.

Local people will be invited to give us feedback on the development policies that we are proposing to help us deliver our vision “to embrace the need for change to meet the needs of a growing population whilst protecting those important things that have attracted generations of people to choose Finchampstead as a place to live and raise their families”.

A draft plan has been prepared by the Finchampstead Future team, building on extensive informal public consultation and engagement undertaken over the past two years, including a postal questionnaire to every household in the parish in September 2019.

Part of getting the FNDP through the approval process is evidencing that the plan accurately reflects the needs of the area and the views of local people. We have to ensure that we consult with local people, organisations, businesses, landowners, etc. about our analysis and policy proposals and that their views are considered.

As part of this, the first formal public consultation on a draft plan took place from 1st February to 19th March 2021.

Because of Covid-19 restrictions the majority of responses were received online. A Survey Monkey account was set up for people to record their responses to each of the Policies and the overall Plan. Comments were also received by email, and by letter.

All of the feedback given was recorded on a spreadsheet and then evaluated by our Project team, and changes and amendments to the FNDP were considered in light of representations.

This Report gives details of the level of support received for each of the Policies, publishes the analysis of the feedback received, and identifies the changes proposed to be made to the plan in response to comments.

The Policies listed in the Plan are as follows:

AHD1	Development outside of development boundaries
AHD2	Development within development boundaries
AHD3	Green space and landscaping
AHD4	Independent living, care and vulnerable housing
AHD5	Affordable housing
AHD6	Provisions for Gypsy and Traveller communities
AHD7	Caravan and Mobile home sites
D1	Building heights
D2	Preserving the rural culture of the parish
D3	Infill, Small Plot Development and Development of Private Residential Gardens
ES1	Environmental standards for residential development
GS1	Key gaps between settlements
GS2	Green Wedges
IRS1	Protection and enhancement of local green spaces
IRS2	Protection of iconic views
IRS3	Protection and enhancement of the historic character of the area
IRS4	Strategy to preserve the identity of Finchampstead parish through green spaces
IRS5	Ecological green space biodiversity
IRS6	Trees
GA1	Improve environment and health from traffic pollution
GA2	Reduction in car usage with safe personal mobility options
TC1	Supporting business
TC2	Supporting business
TC3	Retail development – California Crossroads
TC4	Retail development – Finchwood Park
TC5	Protection of retail facilities

Level of Support and Comments on Policies

1. AHD1 Development outside of development boundaries

Policy	Development proposals for permanent rural workers dwellings in the countryside will be supported when it can be demonstrated that a genuine need exists and that they comply with the relevant policies of the Local Plan. Such proposals must also comply with Policies GS1 and GS2 of this Plan.
Approval Rating	94%
Consultation Response	Total: 278 Agree: 261 Neutral: 0 Disagree: 17
General Comments	Comments from only 13% of surveys, the most common (5%) felt that the exception for rural workers was unnecessary and/or could be exploited.
Specific Objections	<p>From Bewley Homes</p> <ol style="list-style-type: none"> 1. This policy conflicts with Core Strategy Policies CP11 ‘Proposals Outside Development Limits (including Countryside)’ and CP9 ‘Scale and Location of Development Proposals’ and MDDP Policy CC02 ‘Development Limits’. These policies seek to protect the Countryside, but are more permissive of other forms of development, such as rural exception schemes. <p>From Boyer Planning</p> <ol style="list-style-type: none"> 2. Blanket policies which restrict all development (except permanent rural workers dwellings) outside of existing settlement boundaries are unhelpful and do not fulfil the purpose of a development plan document which is to facilitate future development. 3. Some land beyond the current settlement boundaries is brownfield land or land where some limited infilling and rounding off by the use of previously developed land could help to meet a local housing need by providing homes in sustainable locations. 4. The blanket approach suggested by the FNDP places an onerous restriction on virtually anything beyond the settlement boundary, and therefore places a similar level of control to land which has the more stringent statutory designation as Green Belt. 5. Policy AHD1 should be amended to allow for some limited development outside the settlement boundary where it can be demonstrated that it would not harm the wider character or function of the countryside. <p>From Bewley Homes</p> <ol style="list-style-type: none"> 6. Evidently, the emphasis in national policy is on proactively encouraging housing to enhance the sustainability of rural communities and the proposed Policy AHD1 is at odds with this. 7. The draft Neighbourhood Plan does not provide robust evidence to

	<p>support the 'blanket restriction' as currently envisaged.</p> <p>From Gladman</p> <p>8. The use of settlement boundaries as a limitation is inappropriate in circumstances where it would preclude the delivery of otherwise sustainable development from coming forward.</p> <p>9. Sustainable development proposals adjacent to the settlement boundaries of the settlements within the parish boundary that are proportionate to their size and role within the borough should be supported.</p> <p>From Catesby Estates</p> <p>10. Any additional residential development not located at Aborfield Garrison, even if it were in a sustainable location, would be contrary to the FNDP. This is self-evidentially contrary to national planning policy and would not contribute to sustainable development.</p>
Response	<ol style="list-style-type: none"> 1. WBC have not indicated any conflict between this policy and CP9 or CP11, nor MDDP Policy CC02. 2. Policy AHD1 refers to Development Limits, which define Development Locations and which are areas identified as acceptable for development. The purpose of this is to locate development in areas that are planned to be sustainable, rather than having them scattered across the parish. It is not inconsistent to seek to guide development away from other areas and towards supported locations. 3. Policy AHD1 refers to Development Limits, which define Development Locations and which are areas identified as acceptable for development. The purpose of this is to locate development in areas that are planned to be sustainable, rather than having them scattered across the parish. 4. Neighbourhood planning is defined by the Planning Practice Guidance (PPG) as a means of giving communities direct power to develop a shared vision for their neighbourhood and to shape the development and growth of their local area. It states that it allows communities to choose where they want new homes. The community, through the Regulation 14 consultation, has stated overwhelmingly that it wishes new homes to be built within the Development Locations set out in the FNDP and not in the countryside. 5. Policy AHD1 refers to Development Limits, which define Development Locations and which are areas identified as acceptable for development. The purpose of this is to locate development in areas that are planned to be sustainable, rather than having them scattered across the parish. 6. Finchampstead is a semi-rural community, in common with much of the area surrounding London. It is not 'rural' in the sense of other more remote areas. Neighbourhood planning is defined by the Planning Practice Guidance (PPG) as a means of giving communities direct power to develop a shared vision for their neighbourhood and to shape the development and growth of their local area. It states that it allows communities to choose where they want new homes. The community, through the Regulation 14 consultation, has stated overwhelmingly that it wishes new homes to be

	<p>built within the Development Locations set out in the FNDP and not in the countryside.</p> <p>7. The FNDP does not propose a ‘blanket restriction’. It highlights areas of specific sensitivity and offers guidance to where sustainable development will be supported. Policies for the remaining areas are aligned to those of WBC.</p> <p>8. The purpose of allocating areas as ‘Development Locations’ is to specifically support development in places which are sustainable. The purpose of an NDP is to support development in locations which are sustainable and supported by the local community, whilst guiding it away from other locations. Provided that housing needs are met by the NDP and the Local Plan, this is not unnecessarily restrictive.</p> <p>9. Policy AHD1 refers to Development Limits, which define Development Locations and which are areas identified as acceptable for development. The purpose of this is to locate development in areas that are planned to be sustainable, rather than having them scattered across the parish. The FNDP has consulted further with WBC on the matter of further housing allocations and the outcome is summarised in section 5.4 of the 2nd Edition of the FNDP, and detailed in the newly-added ‘Key Topic Paper – Additional Housing Allocations’.</p> <p>10. The FNDP has consulted further with WBC on the matter of further housing allocations, and the outcome is summarised in section 5.4 of the 2nd Edition of the FNDP, and detailed in the newly-added ‘Key Topic Paper – Additional Housing Allocations’.</p>
Changes to the Plan	<p>No change to the FNDP on points 1, 2, 3, 4, 5, 6, 7, and 8.</p> <p>On points 9 and 10, the FNDP has consulted further with WBC on the matter of further housing allocations. This is summarised in section 5.4 of the 2nd Edition of the FNDP, and detailed in the newly-added ‘Key Topic Paper – Additional Housing Allocations’.</p>

2. AHD2 Development within development boundaries

Policy	New development proposals must be contained within existing identified Development Locations.
Approval Rating	95%
Consultation Response	Total: 278 Agree: 263 Neutral: 1 Disagree: 14
General Comments	This policy received a very high level of support from residents.
Specific Objections	<p>From Boyer Planning</p> <ol style="list-style-type: none"> 1. Policy AHD2 is a further restrictive policy which confines all development to being within Development Locations. Whilst a neighbourhood plan can seek to protect areas from inappropriate development, to set a blanket restriction on any development outside of the Development Location is too restrictive and does not allow for situations whereby such development may be appropriate. 2. This draft Policy proposal is more restrictive than that set out in the NPPF which, whilst seeking to protect the countryside, does not set a blanket protection on such land but looks to protect areas of particular importance or character i.e. 'valued landscapes'. The approach to restricting development beyond the Development Limits places a similar level of control on development as if the land was in the Green Belt. 3. Some land is previously developed land where potential exists for some limited infilling and rounding off by the use of previously developed land which could help to meet a local housing need by providing homes in sustainable locations. 4. Policy AHD2 should be amended to allow for some limited development outside of the Development Locations where it can be demonstrated that it would not harm the wider character or function of the countryside and can achieve sustainable development. <p>From Bewley Homes</p> <ol style="list-style-type: none"> 5. The inference of the wording of draft Policy AHD2) is that existing settlement boundaries should be crystallised and not further altered. 6. This draft Policy also seeks to apply a blanket restriction on development outside of existing settlement boundaries. This conflicts with Core Strategy Policies CP11 'Proposals outside Development Limits' and CP9 'Scale and location of development proposals', MDDP Policy CC02 'Development Limits'. It is notable also that emerging Local Plan Update (at draft Policy SS13) is permissive of a number of different types of development in the Countryside, subject to compliance with a number of identified criteria.

Response	<ol style="list-style-type: none"> 1. Neighbourhood planning is defined by the Planning Practice Guidance (PPG) as a means of giving communities direct power to develop a shared vision for their neighbourhood and to shape the development and growth of their local area. It states that it allows communities to choose where they want new homes. The community, through the Regulation 14 consultation, has stated overwhelmingly that it wishes new homes to be built within the Development Locations set out in the FNDP and not in the countryside. 2. Neighbourhood planning is defined by the Planning Practice Guidance (PPG) as a means of giving communities direct power to develop a shared vision for their neighbourhood and to shape the development and growth of their local area. It states that it allows communities to choose where they want new homes. The community, through the Regulation 14 consultation, has stated overwhelmingly that it wishes new homes to be built within the Development Locations set out in the FNDP and not in the countryside. 3. Policy AHD2 refers to Development Limits, which define Development Locations and which are areas identified as acceptable for development. The purpose of this is to locate development in areas that are planned to be sustainable, rather than having them scattered across the parish. The FNDP will consult further with WBC on the matter of any further housing allocations. 4. Neighbourhood planning is defined by the Planning Practice Guidance (PPG) as a means of giving communities direct power to develop a shared vision for their neighbourhood and to shape the development and growth of their local area. It states that it allows communities to choose where they want new homes. The community, through the Regulation 14 consultation, has stated overwhelmingly that it wishes new homes to be built within the Development Locations set out in the FNDP and not in the countryside. 5. The FNDP does not 'crystallise' Development Boundaries. It should be noted that the Finchwood Park Development Location is relatively new and that the FNDP has accepted proposed amendments to the Finchampstead North Development Location in the draft LPU. Draft policy AHD2 supports development inside agreed Development Locations as opposed to piecemeal developments in the countryside. The community, through the Regulation 14 consultation, has stated overwhelmingly that it wishes new homes to be built within the Development Locations set out in the FNDP and not in the countryside. 6. WBC have not indicated any conflict between this policy and CP9 or CP11, nor MDDP Policy CC02.
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Changes to the Plan	<p>No change to the FNDP on points 1, 2, 4, 5, and 6.</p> <p>On point 3, the FNDP has consulted further with on the matter of further housing allocations and the outcome is summarised in section 5.4 of the 2nd Edition of the FNDP and detailed in the newly-added 'Key Topic Paper – Additional Housing Allocations'.</p>
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3. AHD3 Green space and landscaping

Policy	Specifies that for major development applications a landscape strategy should be submitted incorporating details of: Existing and proposed hard and soft landscaping A condition survey of all existing trees and hedgerows Measures taken to protect trees and hedgerows during construction.
Approval Rating	97%
Consultation Response	Total: 278 Agree: 270 Neutral: 1 Disagree: 7
General Comments	This policy received very high public support.
Specific Objections	<p>From Bewley Homes</p> <p>1. The measures specified in draft Policy AHD3 are already required in <i>the 'Wokingham Borough Council Local Validation List'</i> (June2019). There would seem to be limited merit in replicating established development management policies / tools.</p> <p>From BHS</p> <p>2. This is a positive approach to continued development. However, an opportunity could be missed here to encourage developers to look at local Public Rights of Way (PROWs) and see how their development could improve access i.e. creation of linkages between bridleways and byways, also routes for active travel and recreational opportunities for all non-motorised users. A useful addition to Policy ADH3 could read '<i>Survey of local Public Rights of Way (PROWs) and outline of measures to protect and enhance off road linkages for recreational and active travel purposes available to all non-motorised users.'</i></p>
Response	<p>1. WBC has not indicated any conflict between this policy and 'Wokingham Borough Council Local Validation List' (June 2019).</p> <p>2. This point is noted.</p>
Changes to the Plan	<p>1. No change to the FNDP</p> <p>2. The FNDP has been amended as per the recommendation</p>

4. AHD4 Independent living, care and vulnerable housing

Policy	Development proposals for older independent living housing accommodation for care homes and vulnerable communities will be supported provided they comply with Wokingham Borough Council (WBC) policy requirements.
Approval Rating	90%
Consultation Response	Total: 278 Agree: 252 Neutral: 2 Disagree: 24
General Comments	This policy received very high public support.
Specific Objections	There were no specific challenges to the policy.
Response	Not required
Changes to the Plan	No change to the FNDP.

5. AHD5 Affordable housing

Policy	All proposals for new housing must contain a proportion of affordable housing in accordance with Wokingham Borough Council CS policy CP5 and emerging policy H5 (Wokingham Borough Council Local Plan Update January 2020)
Approval Rating	84%
Consultation Response	Total: 278 Agree: 234 Neutral: 4 Disagree: 40
General Comments	This policy received a very significant level of public support. The main comment against was that the amount of affordable housing should be considered on a case by case basis, not as a fixed proportion.
Specific Objections	Only one specific challenge was made to the policy by Bewley Homes , that although they supported the general principle of the policy, they noted an implication that all residential developments should provide options for affordable housing and that if so, this would be <i>'contrary to the adopted and emerging Local Plan policies'</i> .
Response	WBC have given their prior approval to this draft policy, and that in practice there is a record of even the smallest developments within Finchampstead Parish making a contribution to affordable housing provisions.
Changes to the Plan	No change to the FNDP.

6. AHD6 Provisions for Gypsy and Traveller communities

Policy	States that extensions to existing Gypsy and Travelled sites will be supported provided there is a demonstrable need, that proposals comply with FNDDP/WBC policies, and there is mitigation of visual impact
Approval Rating	58%
Consultation Response	Total: 278 Agree: 162 Neutral: 2 Disagree: 114
General Comments	Most comments against the policy wanted there to be no extensions allowed, with many stating that Finchampstead had a large enough provision already.
Specific Objections	<p>From Heine Planning</p> <ol style="list-style-type: none"> 1. There is a challenge to the suggestion that there is insufficient space in the Parish for further Traveller sites and/ or the implication that the parish has its 'fair share' of sites. The 2017 analysis for Wokingham underestimates the real need for more Traveller sites in the district. 2. With a large number of sites already in this parish it is to be expected that there will be a need for more pitches to meet household formation. This needs to be addressed no differently to other accommodation needs and the PC needs to be at the forefront in ensuring equal and fair treatment regardless of accommodation type/ occupants. 3. The need is mostly for small family sites not for a few large sites. 4. If land can be found for 1830 dwellings there is no justification to suggest there is no space for more Traveller pitches. 5. National Policy makes clear this is a use of land appropriate in the countryside, especially on the edge of settlements. There is much scope within this large rural parish for such provision as there is much suburban settlements surrounded by countryside. 6. The proposed allocations are only for 9 further pitches/ households-that is an insignificant amount when contrasted with the scale of house building in this parish since the 1970's and the proposals at Finchwood Park. 7. It is very important the NDP ensures choice of accommodation by location, type, tenure and price/ affordability to ensure a balanced all-inclusive community that is fit for purpose. Some of the Traveller sites in this district are anything but fit for purpose and a disgrace that should not be tolerated. It is important when considering available pitches to consider not just the numerical supply but whether they provide suitable and appropriate accommodation.

Response	<ol style="list-style-type: none"> 1. The FNDP is not responsible for the WBC data. WBC has given their prior approval to this draft policy. 2. The FNDP agrees that planning policies must be consistent across all community groups. Current policies do not allow for simple additional dwellings on existing plots to allow for household formation. 3. The FNDP does not favour one any particular type of site. 4. Land has had to be made available for the current housing proposals. Doing so does not mean that yet more space automatically becomes available. 5. Provision for extra G&T sites is noted in Section 5.8 of the FNDP. 6. Provision for extra G&T sites is calculated according to need. The FNDP has not been advised of any known correlation between the need for house building and the need for G&T provision. 7. The FNDP supports the widest possible choice of accommodation. Any shortcomings of quality of current G&T sites is a matter for WBC or the FPC.
Changes to the Plan	No change to the FNDP.

7. AHD7 Caravan and Mobile home sites

Policy	Specifies that the number of caravan and mobile home sites in the parish should remain at the January 2020 number, that current boundaries should be maintained, and any expansion must be fully compliant with legislative standards.
Approval Rating	95%
Consultation Response	Total: 278 Agree: 265 Neutral: 1 Disagree: 12
General Comments	The main comment of responses against was that no further provision of mobile home sites should be made.
Specific Objections	There were no specific challenges to the policy.
Response	Not required
Changes to the Plan	No change to the FNDP.

8. D1 Building heights

Policy	Specifies that three-storey housing will be supported only within the Arborfield Strategic Development Location (Finchwood Park) and the Gorse Ride Regeneration Area.
Approval Rating	86%
Consultation Response	Total: 278 Agree: 239 Neutral: 2 Disagree: 37
General Comments	This policy received a high level of support from residents.
Specific Objections	One comment was received, from Bewley Homes : This policy should be amended to allow proposals for buildings of three storeys or greater where they are supported by an assessment to justify the scale of development in that location. In this way, the suitability of a proposal for a taller building(s) can be assessed on the basis of its specific design merits and degree of impact relative to its location. This approach would ensure consistency with national policy, as expressed at Section 12 of the NPPF.
Response	The FNDP supports three-storey development within the Development Location at Finchwood Park and also within the Gorse Ride Redevelopment area. Policy D1 also uses the phrase ' <i>...will generally only be supported within the area of the Strategic Development Location...</i> '. it is considered that this phrasing gives sufficient flexibility to support a genuinely exceptional proposal for three storey development elsewhere
Changes to the Plan	No change to the FNDP.

9. D2 Preserving the rural culture of the parish

Policy	Stipulates that any development proposals in the identified gaps between settlements should be located and designed to maintain the separation of the settlements and to complement the relevant landscaped characteristics of the gaps.
Approval Rating	92%
Consultation Response	Total: 278 Agree: 256 Neutral: 2 Disagree: 20
General Comments	This policy received an overwhelming level of support from residents. Most of the negative comments questioned if the policy was strong enough
Specific Objections	Two comments were received: <ol style="list-style-type: none"> 1. From Bewley Homes: Bewley consider that the proposed 'key gaps' are not justified and are not intended to promote sustainable development. 2. From Gladman: This policy recognises that sensitively designed development could occur in the areas identified and currently proposed as 'Key Gaps'. In recognising this, it raises the question for the necessity of and justification for the gaps that are being sought to be protected.
Response	There is an error in the title of this policy, which has been corrected to delete 'Building Heights' and re-titled as 'Preserving the rural character of the parish'. The 'Figure' reference is incorrect and has been deleted. It is accepted that Policy D2 can lead to a mistaken assumption that it refers to development in 'Key Gaps' whereas the intent is to offer guidance on development both within and outside of Development Limits. References to 'Key Gaps' in this policy have been deleted.
Changes to the Plan	The FNDP and Policy D2 has been amended as above.

10. D3 Infill, Small Plot Development and Development of Private Residential Gardens

Policy	Specifies criteria for supporting infill and small plot development proposals within an existing Development Location. The criteria include fitting in with the character of the area, access, landscaping and building form.
Approval Rating	92%
Consultation Response	Total: 278 Agree: 255 Neutral: 1 Disagree: 22
General Comments	This policy received an overwhelming level of support from residents.
Specific Objections	<p>From Boyer Planning</p> <ol style="list-style-type: none"> 1. Policy D3 sets eight separate criteria and requires that all of the criteria should be met before development may be deemed acceptable. This is unduly onerous and offers no flexibility for some limited development which may meet most, but not all, of the criteria. 2. The Policy should be amended by the deletion of criteria 8 to allow for development beyond the Development Location where it can be demonstrated that limited development and rounding off using previously developed land would not harm the wider character or function of the countryside and can contribute to achieving sustainable development.
Response	<p>All the criteria in this policy serve a purpose and it is intended that they should be met - they are not intended to be 'optional'.</p> <p>The policy is intended primarily to guide and influence development within Development Locations (where development is generally supported) and particularly that of private residential gardens.</p> <p>This policy is not intended to support development of residential gardens beyond Development Locations and in the countryside.</p>
Changes to the Plan	No change to the FNDP.

11. ES1 Environmental standards for residential development

Policy	States that proposals for residential development will be supported provided: Minor developments deliver at least a 19% improvement in dwelling emission rates compared to Building Regs Major developments' designs aim to deliver carbon neutral homes Conversions and extensions over 500 square metres of existing dwellings seek to achieve an 'excellent' standard for domestic refurbishment Provision is made for electric vehicle charging where garages or vehicle parking spaces are provided.
Approval Rating	93%
Consultation Response	Total: 278 Agree: 258 Neutral: 3 Disagree: 17
General Comments	This policy received an overwhelming level of support from resident.
Specific Objections	<p>From a Resident:</p> <ol style="list-style-type: none"> 1. Whilst the principle of delivering new development to high environmental standards is supported, requiring developments to deliver in excess of the requirements of the Building Regulations is unduly onerous and will place an unnecessary and unrealistic burden on developers and homeowners. To require minor developments (<10 homes) to achieve at least a 19% improvement in dwelling emissions rates compared to the requirements of the Building Regulations which are nationally set requirements/standards, is unreasonable. It is not the role of a Neighbourhood Plan to place such burdens on development which is already controlled countrywide by the Building Regulations or through a Borough-wide approach in the Wokingham Local Plan. Policy ES1 should therefore be amended to remove the minimum standards for environmental improvement. <p>From Bewley Homes:</p> <ol style="list-style-type: none"> 2. Draft Policy ES1 sets out a number of proposed standards, which are likely to run in conflict with the emerging Local Plan Update and which may therefore be over-ridden when the new Local Plan is adopted. Proposed Policy ES1 should be redrafted so that it defers to policies to be introduced through the emerging Local Plan Update. 3. The 'Building Research Establishment Environmental Assessment Method' (BREEAM), as applied in the UK, is not relevant to residential development. BREEAM criteria are only applied to commercial (i.e. non-residential) developments. 4. The proposed requirement for all major residential developments to be carbon neutral, exceeds that set out in the 'Future Homes Standard Consultation', which anticipates that all new homes will be 'zero carbon neutral ready', by 2025. 5. The draft policy does not accord with national planning policies and would

	<p>fail to address the basic conditions. However, it may be possible to revise this proposed policy in such a way that it could promote high environmental standards. We recommend that the advice of the LPA is sought in this respect.</p> <p>From Gladman:</p> <p>6. This policy seeks for major residential development to be designed to achieve carbon neutrality. Whilst this is an important issue it is not considered that the FNP is the appropriate mechanism to be setting such expectations.</p> <p>From Barkham Parish Council:</p> <p>7. In light of recent events regarding the solar farm, there is no mention of renewable energy in the document, which the Finchampstead Neighbourhood Plan Group may wish to consider.</p> <p>From Crowthorne Village Action Group:</p> <p>8. The provision of charging points for EV's is welcomed. It's a source of some amazement that when the government has already mandated that sales of fossil fuelled cars is to be stopped from 2030, Borough councils still do not require new build homes to have provision for charging Electric Vehicles. As a consequence, because the homes aren't providing charging points, the utility companies do not see a need to provide a suitably specified network infrastructure to support charging points.</p>
Response	<ol style="list-style-type: none"> 1. WBC has not indicated that Policy ES1 is inappropriate for the FNDP. 2. WBC has not indicated that Policy ES1 is likely to conflict with the emerging LPU. 3. The BREEAM New Construction standards can be used to assess the design, construction, intended use and future-proofing of new building developments, including the local, natural or manmade environment surrounding the building. The standards can be used to assess most types of new buildings, including new homes. 4. WBC has not indicated that Policy ES1 is inappropriate for the FNDP. 5. The advice of the LPA (WBC) has already been sought in the drafting of this policy. 6. WBC has not indicated that Policy ES1 is inappropriate for the FNDP. 7. The FNDP notes that the solar farm in Barkham is outside of the FNDP area. There are no plans to site a renewable energy source in the area of the FNDP. 8. The FNDP notes the support from Crowthorne Village Action Group.
Changes to the Plan	No change to the FNDP.

12. GS1 Key gaps between settlements

Policy	The FNDP has identified five locations which represent Key Gaps' between defined settlements or other areas of habitation within the parish and these should be generally excluded from any development proposals. Development proposals within the identified 'Key Gaps' will be supported only where they would preserve the visual and physical separation between the areas of habitation and would not unacceptably affect the setting and identity of the parish. Development proposals which either individually or cumulatively would have an unacceptable impact on the role, function and appearance of the identified 'Key Gaps' will not be supported.
Approval Rating	96%
Consultation Response	Total: 278 Agree: 267 Neutral: 0 Disagree: 11
General Comments	This Policy was overwhelming approved by respondents to the consultation. Of those who opposed the policy, half of these requested that some or all of the Key Gaps should be removed, whereas the other half thought the policy too weak and that it should be expanded.
Specific Objections	<p>From Bewley Homes:</p> <ol style="list-style-type: none"> 1. The categorisation of 'Areas of Habitation' is in itself not justified, because it is inconsistent with the typologies set out in the Core Strategy (at Policy CP9) and in the emerging Local Plan Update (at draft Policy SS2). These policies set out the settlement hierarchy for the Borough and determine patterns of sustainable development. It is not the role of a Neighbourhood Plan to attempt to alter or otherwise undermine a settlement hierarchy, with this being a strategic matter that is established through Local Plans. 2. Small clusters of dwellings, which accommodate no (or very limited) local services, do not comprise a settlement, nor do they necessarily have a specific identity. Indeed, most of the identified Areas of Habitation are not even named hamlets. In this way, they should operate as a functional unit for analysis. Rather, they are simply dwellings or buildings in the Countryside. 3. It is not appropriate to identify a risk of coalescence with isolated dwellings or small clusters of buildings. If this were the case, then it would be virtually impossible to achieve sustainable residential growth at the edge of most settlements across the country. 4. The location and size of the proposed Key Gaps indicates that the underlying objective is not to prevent Areas of Habitation being subsumed, but to prevent the expansion of Finchampstead North, as may be required to meet future housing needs. <p>From Catesby Estates</p> <ol style="list-style-type: none"> 5. '... regardless of their landscape or ecological qualities, it is a robust conclusion that these locations require special protection due to these development pressures'. This is a misuse of the Neighbourhood Plan process and does nothing to significantly boost housing land supply and is

	<p>not in compliance with the basic conditions. The Neighbourhood Plan is seeking to prevent development.</p> <p><i>"...to the preservation of the last actual or perceived green gap between settlements and need to be fully protected"</i>.</p> <p>However, this statement is completely undermined by para 5.5 which states that these green gap sites have been specifically identified because they have been submitted to the Council as part of a Call For Sites or have recently been subject to applications.</p> <p>From a Resident:</p> <ol style="list-style-type: none"> 6. Some Key Gaps include 'Brownfield' sites which may be better options for housing development rather than 'Greenfield' areas. 7. Some of the concepts used to define 'Key Gaps' are ill-defined, such as 'a sense of departure and arrival'
Response	<ol style="list-style-type: none"> 1. Wokingham Borough Council has not objected to the use of term 'Areas of Habitation', nor have they indicated a conflict with the Core Strategy or the Local Plan update. 2. The term 'Areas of Habitation' has not been applied to isolated dwellings or small clusters of buildings. 3. The purpose of the location and size of the Key Gaps is to prevent the coalescence of settlements, which is part of the WBC Core Strategy. Therefore, it is logical that the Key Gaps will be located adjacent to or in between current Development Locations. Only two of the five proposed Key Gaps are adjacent to Finchampstead North. 4. The purpose of Policy GS1 is to guide development away from areas of specific sensitivity (in this case, to prevent the coalescence of settlements) and towards locations where sustainable development will be supported. These are noted elsewhere in the FNDP. 5. It is accepted that the wording in Paragraph 5.5 is open to misinterpretation. 6. It is known that some Key Gaps do include some small existing commercial developments, which are potential 'brownfield' development sites. 7. It is accepted that some of the concepts used to define key gaps could be expressed more clearly and the definitions improved.
Changes to the Plan	<p>The FNDP has been amended in Section 1.2 to give a clearer explanation of the term and the rationale behind it for points 1 and 2.</p> <p>No change to the FNDP in relation to points 3 and 4.</p> <p>The FNDP has been amended in Section 5.5 to remove any ambiguity as to the purpose of Key Gaps, for point 5.</p> <p>The FNDP has been amended in Section 7.3 to give a clearer explanation of the hierarchy of planning priorities within such locations to address point 6.</p> <p>The FNDP has been amended in Sections 7.1 and 7.3 to give a clearer explanation of 'Key Gaps' to address point 7.</p>

12.1 Comments relating to Specific Key Gaps

<p>Comments</p>	<p>Comments specific to Key Gap 1: <i>The fields either side of the B3016 in front of Sand Martins Golf Course, as a visual separation between Finchampstead and Wokingham (also known as ‘Washington Fields’)</i></p> <p>1.1. From Gladman: The justification for this gap relies heavily on the dismissed appeal on the site and the very large amounts of local opposition there were to this planning application. This appeal was determined on the delivery of the housing needs from the adopted Core Strategy and not considered against the future housing needs of the emerging LPU.</p> <p>1.2. From Gladman: A scheme could be designed on this site, in accordance with draft Policy D2, which helps support that sense of separation between Finchampstead North and Wokingham.</p> <p>1.3. From Sand Martins Golf Club: In relation to the Wellington Trust Land (which straddles the Finchampstead Road) we consider this land provides an important rural gap between the settlements of Wokingham and Finchampstead which prevents them from merging. The proposed designation as a ‘Key Gap’ reflects the findings of the Inspector at the Gladman Inquiry and is consistent with Local Plan Policy CP11 that seeks to protect the separate identity of settlements.</p> <p>Comments specific to Key Gap 2: <i>An area either side of the A321, designated by WBC as ‘Local Wildlife Site’ and additionally, the property known as ‘Silverstock Manor’, and on the south west side of the road, a strip of land extending 100 metres back from the road, from the boundary of the area designated as ‘Local Wildlife Site’ to the northern boundary of the property known as ‘Kingsmere House’.</i></p> <p>All of the comments received regarding this Key Gap were specific to the inclusion of the property known as ‘Silverstock Manor’ within the area defined as a Key Gap.</p> <p>From Residents:</p> <p>3.1. The FNDP gives an incorrect description of ‘Silverstock Manor’, stating that it has one barn, whereas it has four substantial outbuildings in a concrete courtyard.</p> <p>3.2. Silverstock Manor should not be considered a Local Wildlife Area or an environmentally sensitive location.</p> <p>3.3. Silverstock Manor is a ‘Brownfield Site’ and should be prioritised for development over ‘Greenfield’ locations.</p> <p>3.4. Replacing the old very tall and large barns with smaller houses would cover the housing needs, be less prominent on the visual front and with a very good landscaping plan, the area would be greatly improved both visually and environmentally.</p>
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- 3.5. The existing frontage gives the site a very residential feel and look and the site can be easily seen from the Sandhurst Road either over the bunds or through the 20 metre entrance and gates. The point that the house and outbuildings etc cannot be seen from the main Sandhurst Road is false.
- 3.6. There are over approximately 50 houses along the Sandhurst Road (1/2 mile) going from one end to the other with houses all the way down and at each end. Therefore, this is a residential road. There are pockets of small woodland but these do not create the effect that the FNDP states.
- 3.7. Silverstock Manor has a substantially built brick frontage of 30 metres wide (2.1 metres high) along the road front, that does not suggest the departure from one settlement or the arrival to the next, but a continuation of residential properties of differing sizes from one end to the other of the Sandhurst Road.
- 3.8. The question of the gap to the community is completely misleading. The community does not use these areas (put forward as "key gap" areas) as they are private property (illegal to do so) so there is no fact or value at all here with this FNDP comment.
- 3.9. Permission has also been granted at Silverstock Manor (as shown on approved applications) for a very large mansion house of over 5,317 sq ft (not one small residence) on this property since the inspector's comment stated in this file, which the FPC fail to mention.

Comments specific to Key Gap 3:

From the edge of the Development Location around the 'old village', either side of the B3016 south of the 'old village' as far as the Blackwater River.

From Catesby Estates:

- 3.1. It is unclear what the gaps purpose is given the Country Park immediately to the south. The subject site is self-evidently not "the last remaining green space" given it is adjacent to a country park. There is no risk of coalescence and undermining the semi-rural character of the village.

Comments specific to Key Gap 4:

The fields immediately to the west of the A327 north from the junction with Park Road and New Mill Road to a point in line with the northern perimeter of the proposed SANG on the eastern side of the road.

From a Resident:

- 4.1. There is a confusion of road names in this location. It is Park Lane and New Mill Road. The green fields mentioned to the west of this location are known in some places as Finchampstead Leas.
- 4.2. Though outside of the Parish, there is also a risk of confusion with Farley Hill.

Comments specific to Key Gap 5:

Three fields, north and east of White Horse Lane and south of Green Acres farm,

	<p><i>bordered by White Horse Lane to the west and south, the boundary of Green Acres Farm to the north, Bridleway 11 to the east and footpath 5 and the boundary of Wheatlands Farm to the west. This protection also includes the hedgerows and trees which border White Horse Lane on both sides of the road adjacent to these three fields.</i></p> <p>From Bewley Homes:</p> <p>5.1. Finchampstead North is identified as a Modest Development Location in the adopted and emerging Local Plan. It is also a settlement which is not heavily constrained. Because of this status, it will invariably be expected to accommodate future housing growth.</p> <p>5.2. It is a conceptual stretch to suggest that the handful of agricultural and equestrian buildings along White Horse Lane constitutes ribbon development.</p> <p>5.3. Regardless of the merits or otherwise, of a 'Key Gap' policy (in-principle), it is evident that new development could be accommodated to the south of Finchampstead North, and still provide a significant buffer, as would indeed be required in order to protect the setting of identified heritage assets in this location.</p> <p>5.4. Overall, the location of the proposed 'fields north of White Horse Lane/Furze Hill Key Gap' appears to be more concerned with inhibiting a future strategic development to the south of Finchampstead North, than it is with preventing coalescence. This is especially the case, in instances where such designations are proposed on land that is sustainably situated and which is not otherwise constrained.</p> <p>5.5. The area included within this proposed Key Gap is not subject to significant landscape constraints.</p>
Response	<p>1. The purpose of the location and size of the Key Gaps is to prevent the coalescence of settlements, which is part of the WBC Core Strategy. The appeal referred to in the FNDP recognised the significance of this location in that regard.</p> <p>2.1 The disparity concerning the number of buildings on the site rather contradicts the point that the whole site is easily visible from the road. The FNDP description of the site is has been amended to improve accuracy.</p> <p>2.2 The FNDP does not state that Silverstock Manor is part of the Local Wildlife Site, nor does it attach any environmental sensitivity or attributes to it.</p> <p>2.3 The FNDP does not dispute that parts of Silverstock Manor is previously developed land (i.e. a 'Brownfield' location) but is happy to describe it so more explicitly.</p> <p>2.4 The FNDP does not dispute that high quality landscaping can improve the visual appearance of any development location. The Policy relates not to landscaping but to protect against the coalescence of settlements.</p> <p>2.5 The FNDP does not agree that the existing frontage of Silverstock Manor</p>

	<p>‘...gives the site a very residential feel...’, nor that it represents ‘a continuation of residential properties of differing sizes from one of residential properties of differing sizes from one end to the other of the Sandhurst road. The FNDP is clear that the A321 is not a residential road at this location but accepts that it would be useful to make clear that the character of ribbon development is established elsewhere and not within this identified gap.</p> <p>2.6 The houses along the Sandhurst Road are not evenly distributed and there is a considerable break in the run of dwellings at the location described.</p> <p>2.7 Again, the houses along the Sandhurst Road are not evenly distributed and there is a considerable break in the run of dwellings.</p> <p>2.8 There is no suggestion in the FNDP that the public have access to this land, other than by using the Public Right of Way along the north-west boundary. The purpose of the Policy and of the value attached by the community to this proposed ‘Key Gap’ is to prevent the coalescence of settlements, an objective overwhelming supported by local residents.</p> <p>2.9 Existing buildings or existing planning permissions for individual buildings do not negate the existence of this gap, especially if the permission is for a building set back some significant distance from the road.</p> <p>3.1 The above comment is noted, and confirmation of the Country Park designation will be sought from WBC.</p> <p>4. The above corrections are noted.</p> <p>5.1. The Development Location of Finchampstead North is indeed identified as a Modest Development Location in the adopted and emerging Local Plan. Areas for future housing growth already exist within the Development Location. The FNDP has consulted further with WBC on the matter of further housing allocations and the outcome, including additional areas adjacent to Finchampstead North, is summarised in section 5.4 of the 2nd Edition of the FNDP, and detailed in the newly-added ‘Key Topic Paper – Additional Housing Allocations’.</p> <p>5.2. The development along the northern half of White Horse Lane consists of a number of large (and some very new) residential properties as well as agricultural and equestrian centres.</p> <p>5.3. There is no dispute that space exists to accommodate development in Finchampstead South. The FNDP supports sustainable development within the Development Location of Finchwood Park, which is in Finchampstead South.</p> <p>5.4. The purpose of Policy GS1 is to guide development away from areas which would result in the coalescence of settlements. This risk of coalescence has been identified in those five small locations across the parish and identified in this policy. It is the purpose of this policy to recognise the important function that these parcels of land have as gaps which preserve the distinct</p>
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	<p>character of the surrounding areas.</p> <p>The purpose of Policy GS1 is to guide development away from areas which would result in the coalescence of settlements. It is not determined by our dependent upon other landscape constraints.</p>
<p>Changes to the Plan</p>	<p>No change to the FNDP in relation to points 1, 2.4, 2.8, 2.9, 5.1, 5.3 and 5.5</p> <p>The FNDP Topic Paper – Key Gaps has been amended to reflect an accurate description of Silverstock Manor for point 2.1.</p> <p>The FNDP Topic Paper – Key Gaps has been amended to improve clarity for point 2.2, 2.3, 2.5, 2.6, 2.7, and 5.2</p> <p>The FNDP has been amended to remove this location described in 3.1 from designation as a ‘Key Gap’.</p> <p>The FNDP Policy GS1 and Topic Paper – Key Gaps has been amended to address point 4</p> <p>The FNDP section 7.3 has been amended to give a clearer explanation of ‘Key Gaps’ to address point 5.4</p>

13. GS2 Green Wedges

Policy	Identifies two 'Green Wedges' - open areas around and between parts of settlements which prevent the coalescence of adjacent places and provide recreational opportunities. It specifies development proposals within these areas will be supported only if visual and physical separation is maintained.
Approval Rating	96%
Consultation Response	Total: 278 Agree: 267 Neutral: Disagree: 11
General Comments	This policy received a very high level of support from residents. Most of the negative comment questioned if the policy was strong enough.
Specific Objections	<p>From Bewley Homes:</p> <ol style="list-style-type: none"> 1. The draft Neighbourhood Plan acknowledges that neither Green Wedge Parcels A or B are sensitive enough to be identified as Key Gaps. The justifications cited in support of the proposed Green Wedges are not compelling and are clearly put forward because of concerns about the potential future southern expansion of Finchampstead North. 2. If the motivation was genuinely to preserve the identity of small clusters of dwellings, then the Key Gaps and Green Wedges identified to the south of North Finchampstead, would instead be drawn closely around the proposed Areas of Habitation. However, that Green Wedge Parcels A and B are proposed on land immediately to the south of the main settlement, reveals their true purpose, which is to attempt to rule out Finchampstead North as a potential location for future housing growth. 3. It is not appropriate for the Neighbourhood Plan to identify coalescence issues in relation to isolated dwellings or small clusters of buildings. Indeed, the only reason the Neighbourhood Plan seeks to adopt this approach, is because it provides a mechanism to block future housing development around existing larger settlements. <p>It is clear that the designation of this land as Green Wedges is not motivated by a desire to conserve and enhance landscape of high quality. It is simply to frustrate and block any form of development in the area for the life of the FNDP. The "scattering of dwellings around Wick Hill and Spring Gardens" is not a settlement. There is no need or justification for securing a gap between these areas.</p> <ol style="list-style-type: none"> 4. Heritage constraints would have to be addressed as part of any future strategic housing development to the south of Finchampstead North. Heritage assets are protected through the planning application process, and it would be possible to provide appropriate buffers, open space and landscaping, as part of comprehensive master planning approach. It is suggested that the loss of the "bowl" will be extremely harmful to setting of the village and the conservation area around St James Church to the south. However, it would be possible to develop the land in question in a careful and considerate manner, which would not harm the setting of the

	<p>village or the designated heritage asset. It is not an essential consequence of development that unacceptable material harm will be caused to designated heritage assets and other settings.</p> <p>5. The statement regarding previous allegedly fraudulent development schemes in this location is mischievous, as well as totally irrelevant, and it should be deleted from the FNDP. The ownership status of the land is not a planning matter, whether or not any alleged fraud has taken place. Ownership disputes cannot and should not be used to determine planning policy or decisions.</p> <p>From Pegasus – Vortal Homes Ltd:</p> <p>6. This policy relies on references to precedents in Taunton and Deane and Creech St Michael, which are locations with no recognisable ties to Finchampstead.</p> <p>7. The Wokingham Core Strategy 2010 designates the land in question as countryside. The Borough Council saw nothing special in the land sufficient to justify its designation as anything other than countryside. They did not designate it as an Area of Outstanding Natural Beauty (AONB), Green Belt (GB), Conservation Area, SSSI or even as an Area of Landscape Value of any type. The Borough Council did not give the land any special designation, because it is not anything other than countryside. No further designation can be justified.</p> <p>8. The description of the land in question paints a picture of a “shallow bowl”, which contributes to “a sense of openness and tranquillity”. In fact, the 2 sites consist of sloping agricultural fields with a busy main road running through them. Walking along this stretch of road, between Finchampstead North and Finchampstead Village is unpleasant, because of the close proximity of traffic travelling in both directions. There is no sense of tranquillity and views are obstructed by high hedges on both sides of the road.</p>
Response	<p>1. Bewley Homes is correct to recognise the clearly expressed concerns of the residents of Finchampstead about the potential future southern expansion of Finchampstead North into the area in question. The purpose of an NDP is to support development in locations which are sustainable and supported by the local community, including in areas adjacent to the Finchampstead North Development Location, whilst guiding it away from other locations which are more valued by the community.</p> <p>The FNDP is not motivated to protect the identity of small clusters of dwellings per se but is indeed motivated to protect against the coalescence of small communities into larger ones. The specific purpose of policy GS2 is to prevent the expansion of the Finchampstead North Development Location into the particularly visible and valued fields concerned. Policy GS2 does not rule out Finchampstead North as a potential location for future housing</p>

	<p>growth in any other area. Indeed, areas for future housing growth already exist within the Development Location. The FNDP has consulted further with WBC on the matter of further housing allocations and the outcome, including additional areas adjacent to Finchampstead North, is summarised in section 5.4 of the 2nd Edition of the FNDP and detailed in the newly-added 'Key Topic Paper – Additional Housing Allocations'.</p> <ol style="list-style-type: none"> 2. The term 'Areas of Habitation' has not been applied to isolated dwellings or small clusters of buildings. 3. The FNDP does not dispute that high quality landscaping can improve the visual appearance of any development location and that mitigations can be in put in place to reduce the impact on heritage assets. However, the FNDP asserts that the best way of preserving the heritage assets and the countryside around them would be to avoid any development in this area. The FNDP support sustainable development within Development Locations. 4. The statement regarding previous allegedly fraudulent development schemes in this location is factual. Its relevance is to demonstrate the excessive demands for development in this location as evidence as to why further protections are necessary. 5. The FNDP is unaware of any limit of proximity when referring to precedents. 6. There is no suggestion in the FNDP that the Wokingham Core Strategy 2010 designates the land in question as anything other than countryside. However, WBC has noted the FNDP designation of Green Wedges and is supportive of it. 7. The road bisecting the two proposed Green Wedges is the B3016 and not a 'busy main road', although this would clearly change if either of the schemes promoted by Bewley Homes and Vortal Homes came into being. The FNDP is unaware of any research that indicates 'walking along this stretch of road ...is unpleasant' but is aware of its very frequent use by local walkers, both individually and as groups. The best value of this area, however, is to be had from the two Public Rights of Way which cross it, the views to be had from them and the general sense of tranquillity imparted by this open countryside.
Changes to the Plan	<p>The FNDP Section 5.4 has been amended to show acceptable locations for additional development, including an extension to the Finchampstead North Development Location. These are detailed in the newly-added 'Key Topic Paper – Additional Housing Allocations'. This gives greater clarity in response to points 1 & 2 above.</p> <p>The FNDP Sections 1.2 and 7.4 have been amended to give a clearer explanation and the rationale behind it for points 3 and 8.</p> <p>No change to the FNDP in relation to points 4, 5, 6 and 7.</p>

14. IRS1 Protection and enhancement of local green spaces

Policy	Identifies a number of Local Green Spaces of importance to the local community and specifies that development will only be permitted in very special circumstances.
Approval Rating	86%
Consultation Response	Total: 278 Agree: 240 Neutral: 2 Disagree: 36
General Comments	This policy received a very high level of support from residents. Most of the negative comment questioned if the policy was strong enough.
Specific Comments	<p>From Gladman</p> <p>1. A number of the proposed designations are in fact extensive tracts of land and should be deleted from the draft FNP for not meeting the requirements of national policy and guidance. There is no set figure for what constitutes an extensive tract of land but from numerous examiner's reports from other neighbourhood plans across the country the consensus seems to be that anything greater than 2 hectares fails this test.</p> <p>From BHS</p> <p>2. This is a very informative background document. I was pleased to see historic and potential horse rider use has been noted in some locations.</p> <p>From Berkshire Gardens Trust</p> <p>3. We very much welcome the work included in the Parish's Local Green Spaces Topic Paper and on Informal Green Spaces in identifying the historic value of the green spaces. We suggest that a plan of the boundary of the designated Green Space is mapped in each case (as shown for example in Site 2). Further research may reveal further historic interest as at California Park.</p>
Response	<p>The FNDP agrees that there is no set figure for what constitutes an extensive tract of land. However, the FNDP has reviewed a number of locations and removed five from the proposed list of designations. These are listed in Section 14.1 <i>Comments relating to Local Green Space Designations</i>.</p> <p>The Comments of support given in points 2 and 3 are noted.</p>
Changes to the Plan	Changes to the Plan are detailed in Section 14.1 <i>Comments relating to Local Green Space Designations</i> below

14.1 Comments relating to Local Green Space Designations

The following comments were made regarding the designation of Local Green Spaces.

Comments	
	<p>1. Shepperlands Farm, Park Lane, Finchampstead We welcome the inclusion of BBOWT's Shepperlands Farm Nature Reserve in the Draft Plan as a Local Green Space and that the local community value it as such. (From BBOWT)</p> <p>2. Fleet Copse, between Fleet Lane and Longwater Lane, Finchampstead The area includes much of our residential curtilage and even our swimming pool. The area is far greater than the 20 Hectares quoted, I estimate it to be some 35 Hectares. Even at 20 Hectares it would still represent an extensive tract of land and is therefore inappropriate for LGS status. Its boundaries are demonstrably not well defined by Longwater Lane and Fleet Hill. The paper refers to it being a wildlife site and yet the area identified is far greater than the wildlife site and the paper omits other wildlife sites. Much of the area is not local in the sense that it is greater than 400m from the settlement boundary. The area already has sufficient protection from development by reason of: It is outside the settlement boundary. It is covered by Forestry Commission rules on woodland and by the wild life designation. Some of the area was included in the recent LPU call for sites. It was excluded and determined 'not suitable for development in the next 15 years'.</p> <p>3. Washington Fields, Finchampstead Road, Finchampstead Comment: (From Gladmans) The site does not meet the necessary requirements and should be removed from the emerging FNP. The landowners wish to submit a formal objection to their land being proposed as a Local Green Space.</p> <p>4. Sand Martins Golf Club, Finchampstead Road, Finchampstead</p> <p>It is considered that the landscape and amenity value of the site is already sufficiently protected by the planning system through Policy CP11/ emerging Policy SS13, which only allows sustainable development that protects and enhances the existing landscape and biodiversity of the area. The Neighbourhood Plan should not be seeking to adopt a more onerous policy in the overarching Local Plan.</p> <p>FNDP Policy IRS 1 and the proposed designation of the golf course as Local Green Space, should not be allowed to stifle sustainable development that meets the economic, social and environmental objectives set out in the NPPF.</p>

	<p>The Club considers that the Local Green Space designation does not reflect the provisions of the adopted or emerging Local Plan and is therefore contrary to the guidance included within the NPPF.</p> <p>We are particularly concerned that such a designation could be interpreted by some that the local footpath network confers the right to access the privately owned golf club which would represent a significant health and safety issue.</p> <p>We, therefore, request that the golf course remains designated as <i>'Countryside beyond the Development Limits'</i> and object to this particular Local Green Space designation.</p> <p>5. The following locations have also been reassessed by the FNDP. It is now considered that these should no longer be proposed for designation as a Local Green Space.</p> <ul style="list-style-type: none"> • Finchampstead War Memorial to Blackwater Valley, • Jubilee Road B3016 / Rectory Hill B3348 to Blackwater • Bannisters and West Court area, Park Lane, Finchampstead • Longwater Road Nature Reserves, Longwater Road, Finchampstead • Waverley Way open space, Waverley Way, Finchampstead
Response	<ol style="list-style-type: none"> 1. This comment of support is noted. 2. Following reassessment, this location will no longer be proposed for designation as a Local Green Space. 3. Following reassessment, this location will no longer be proposed for designation as a Local Green Space. 4. The concept of, and protection offered by Local Green Spaces is recognised in the NPPF. IF the FNDP is approved by WBC, the proposed LGS designations will be adopted into the emerging Local Plan. Therefore, the FNDP will be consistent with the emerging LPU and will not demonstrate a more onerous policy. LGS designations are permitted to restrict development in those locations but designation as an LGS together with the policies contained in the FNDP will enable the golf course to develop and function sustainably while confirming that it is a valuable asset for the community. For the life of this FNDP the area will benefit from the added protection afforded by the LGS designation. While there are a number of Rights of Way that cross the property of the Golf Course, the FNDP does note the concerns about safety raised by the owners.
Changes to the Plan	<p>No change to the FNDP in relation to points 1 and 4.</p> <p>The FNDP Section 8.1 and the Key Topic Paper – Local Green Spaces have been amended to remove the proposed green space designation for the locations mentioned in points 5, thus also addressing points 2 & 3.</p>

15. IRS2 Protection of Iconic Views

Policy	Development proposals will be required to demonstrate that they do not have an adverse impact on the landscape setting, in particular the outstanding views.
Approval Rating	98%
Consultation Response	Total: 278 Agree: 272 Neutral: 0 Disagree: 6
General Comments	This policy received almost universal public support.
Specific Objections	There were no specific challenges to the policy.
Response	Not required
Changes to the Plan	No change to the FNDP.

16. IRS3 Protection of and enhancement of the historic character of the area

Policy	Aims to protect the historic heritage of the parish. It identifies a list of locally valued heritage assets and requires that development proposals should protect and enhance them where possible.
Approval Rating	99%
Consultation Response	Total: 278 Agree: 274 Neutral: 0 Disagree: 4
General Comments	This policy received almost universal support from residents.
Specific Objections	<p>From Bewley Homes:</p> <ol style="list-style-type: none"> 1. As currently drafted, Policy IRS3 identifies a mixture of designated heritage assets, potential non-designation heritage assets and other features that would not readily be defined as heritage assets (as per the definition in NPPF Section 13). It is therefore not certain that this policy could be applied effectively for the purpose of decision-taking and determining planning applications. 2. There is no need to identify designated heritage assets (listed buildings, Scheduled Ancient Monuments, etc) within this policy, as they are already identified by Historic England and benefit from robust statutory and non-statutory protections. 3. It is recognised that this draft Policy is well-intentioned and the creation of a 'Local List' of non-designated heritage assets is supported in the PPG. However, the identification of non-designated heritage assets within such a list has to be based on sound evidence. Draft Policy IRS3 may be more effective and consistent with national planning policies, if it were reconfigured to identify a Local List of proposed non-designated heritage assets. The evidence for identifying buildings as such should be set out in a separate 'topic paper' and prospective candidates should be subject to a detailed assessment (undertaken by a professional) to determine if they merit the status of a non-designated heritage asset. <p>From Berkshire Gardens Trust:</p> <ol style="list-style-type: none"> 4. We suggest some small amendments to the NDP's Policy IRS3. The three main heritage categories include archaeology, built form and historic landscapes which enjoy separate designations and planning policy. We suggest that this is made more explicit. 5. We are pleased to see that IRS3 includes a reference to the setting of historic assets.
Response	<ol style="list-style-type: none"> 1. The FNDP policy requires the scale of harm to be determined in any development proposal which is a relevant and appropriate consideration.

	<ol style="list-style-type: none"> 2. This is an opinion. We are aiming to protect the areas in which the asset sits to ensure the character of the area is maintained. 3. The community regard the named non-designated heritage sites as intrinsic to the valued landscape of the area. The Berkshire Gardens Trust comment (4&5 below) is helpful in supporting our view that these assets and the areas in which they are located should be protected. 4. We note the supportive comments identifying the three non-heritage site categories into which the FNDP identified areas fall. We do not consider however, that reclassifying these areas into these categories provides any advantage. 5. This comment of support is noted.
Changes to the Plan	No change to the FNDP

17. IRS4 Implement strategy to preserve the identity of Finchampstead Parish through green spaces

Policy	Stipulates that proposals for development will be supported when they make provision to preserve the semi-rural look, character, topological features, protect the green spaces and retain informal green gaps.
Approval Rating	94%
Consultation Response	Total: 278 Agree: 261 Neutral: 3 Disagree: 14
General Comments	This policy received a high level of support from residents.
Specific Objections	There were no specific challenges to the policy.
Response	Not required
Changes to the Plan	No change to the FNDP.

18. IRS5 Ecological green space biodiversity

Policy	Aims to protect ecological green space and biodiversity within Finchampstead. It specifies that development will only be permitted if it can be demonstrated that it will not have an adverse impact on local biodiversity or wildlife of a Local Wildlife Site.
Approval Rating	97%
Consultation Response	Total: 278 Agree: 270 Neutral: 0 Disagree: 8
General Comments	Most of the negative comment questioned if the policy was strong enough.
Specific Objections	One specific comment was received, from Bewley Homes : Whilst well intentioned, this draft Policy duplicates proposed Local Plan Update Policy NE1 'Biodiversity and Nature Conservation', MDDP Policy TB23 'Biodiversity and Development' and Core Strategy Policy CP7 'Biodiversity'. As such, draft Policy IRS5 is unnecessary and should be removed from the Neighbourhood Plan to avoid duplication.
Response	Given the timings of the emerging plans, WBC and FNDP consider it reasonable for the wording to be included within the FNDP.
Changes to the Plan	No change to the FNDP.

19. IRS6 Trees

Policy	Seeks to protect important trees and woodland in the parish. It states that development proposals should seek to retain mature or important trees, groups of trees or woodland on site.
Approval Rating	97%
Consultation Response	Total: 278 Agree: 270 Neutral: 0 Disagree: 8
General Comments	This policy received an overwhelming level of support from residents. Most of the negative comment questioned if the policy was strong enough.
Specific Objections	One specific comment was received, from Bewley Homes : Whilst well intentioned This proposed policy duplicates draft Local Plan Update Policies NE1 'Biodiversity and Nature Conservation' and Policy NE3 'Trees, Woodland and Hedgerows'. It also duplicates Core Strategy Policy CP7 and MDDP Policy CC03 'Green Infrastructure, Trees and Landscaping'. Taking this into account, proposed Policy IRS6 is unnecessary and should be deleted.
Response	Given the timings of the emerging plans, WBC and FNDP consider it reasonable for the wording to be included within the FNDP.
Changes to the Plan	No change to the FNDP.

20. GA1 Improve environment and health from traffic pollution

Policy	Addresses the environmental and health impacts of traffic congestion and pollution. It specifies that development will be supported where it integrates with arterial routes and does not impede traffic flow or cause congestion; protects rural roads from increased traffic; connects schools and community facilities; provides off-road parking; safer cycling and mitigates noise and air pollution.
Approval Rating	97%
Consultation Response	Total: 278 Agree: 269 Neutral: 2 Disagree: 7
General Comments	This policy received an overwhelming level of support from residents.
Specific Objections	<ol style="list-style-type: none"> 1. From Bewley Homes: Some aspects of proposed Policy GA1 are reasonable and Bewley welcomes the draft policy's support for safe and active travel connections between settlements (to support services), as well as the promotion of cycling and the provision of parking within developments. 2. The first parts of the policy (concerning 'pinch points', 'unacceptable congestion' and rural lanes), are not consistent with national planning policies. The correct and established threshold to be applied when evaluating highways and transport-related impacts, is clearly set out at NPPF paragraph 109. This states that; <i>"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."</i> It is not appropriate for a Neighbourhood Plan to attempt to apply a different or otherwise more restrictive test than this. Therefore (as presently drafted) Policy GA1 does not accord with national planning policies, nor can it be said to accord with proposed Local Plan Update Policy C2 'Mitigation of Transport Impacts and Highways Safety and Design', which takes account of the NPPF's requirements. From BHS: 3. Suggested alteration to Policy GA1: Support safe active travel connections and routes between settlements, schools, green spaces and support services such as doctors and dentists and local retail outlets. Give new routes bridleway status so they can be used by all non-motorised users and remain in perpetuity. 4. Thank you for recognising the need to protect these rural, historic lanes. It is important to protect them from increased traffic but also to ensure their beauty as country lanes is recognised and protected as best as possible. Often the measures taken to prevent 'rat runs' result in the addition of urbanising features such as speed bumps, road markings and other traffic calming devices which detract from the countryside appeal.

	<p>Suggested alteration to Policy GA1: Protect the rural lane network from increased traffic flows, especially as 'rat-runs' whilst protecting their historic nature from urbanisation in the process. These include Barkham Ride, Commonfield Road, Park Lane, Whitehorse Lane, Dell Road and Lower Sandhurst Road / Ambarrow Lane.</p> <p>5. 'Local Networks: Vehicle and Pedestrian In addition to enhancing leisure usage, there is an excellent opportunity to develop the network into a series of 'personal arterial routes' through upgrading the material condition to permit safer <i>walking, cycling</i> including improved gateway access and egress...' Please make the sentence walking, cycling and horse riding.</p> <p>From a Resident</p> <p>6. The principles and design requirements of Gear Change and LTN 1/20 should be specifically referenced in this plan and all PC policies. These documents lay out how to increase active travel. The positions taken in this document are correct, but must be aligned with this new Government Direction. Without adherence to these policies road and travel improvement will not be funded - so Parish policies must be compliant.</p>
Response	<ol style="list-style-type: none"> 1. The FNDP notes the support of Bewley Homes towards certain aspects of this policy. 2. The Local Highways Authority (WBC) has not objected to the wording of this policy. Significant concerns about 'pinch points', 'unacceptable congestion' and rural lanes were raised in the initial resident's survey and it would be remiss of the FNDP not to reflect this. The FNDP believe that the best way of alleviating these concerns is to support the WBC policy of focusing development within Strategic Development Locations, such as Finchwood Park, where the necessary infrastructure, including highways and transport, are provided as part of the development plan. 3. The FNDP agrees with sentiment raised by the BHS but believes that a fixed policy that <u>all</u> new routes should be designated as bridleways may hinder the development of alternative options such as bespoke cycle paths. However, the policy could be amended to seek Bridleway status unless to do so would compromise other non-motorised uses of such a path. 4. The FNDP accepts the points made by the BHS regarding urbanisation. 5. The FNDP accepts the points made by the BHS regarding 'Personal Arterial Routes'. 6. The FNDP notes then points made and will include references to LTN 1/20 in the plan.
Changes to the Plan	<p>No change to the FNDP in relation to points 1 and 2.</p> <p>The FNDP Section 9.4 and Policy GA1 has been amended to include suggestions made in Points 3, 4, 5 and 6.</p>

21. GA2 Reduction in car usage with safe personal mobility options

Policy	This Policy focuses on reducing car usage and safe personal mobility options. It supports development which encourages greenways, footpaths, byways and bridleways; maintains verges, pavements and overgrown footpaths.
Approval Rating	96%
Consultation Response	Total: 278 Agree: 268 Neutral: 0 Disagree: 10
General Comments	This policy received an overwhelming level of support from residents.
Specific Objections	<p>From BHS:</p> <ol style="list-style-type: none"> Page 48 '<i>Inter-connectivity with adjoining Parishes: walking and cycling.</i> Please would you add horse riding to this title. This section is an excellent piece, it includes information about bridleways and access for all, also contains policy GA2 which mentions horse riding. Page 80 '<i>L. Informal Green Spaces.</i> ' Footpaths are the only routes specifically listed here for protection in this table but the figure used appears to be for all PROWS combined. If the WBC ROWIP is correct 34.2km is the length of all PROWS in Finchampstead - footpaths, bridleways, restricted byways and BOATs combined. If so please would you change the word footpath to 'Public Rights Of Way' or 'PROWs'. If however you'd prefer to keep the protection for routes that don't allow any motorised traffic at all, I believe the figure for footpaths (19.64km), bridleways (5.37km) and restricted byways (6.22km) combined comes to 31.2km. The space calculation should then also be altered, if 3.0m is allowed for bridleways and 5m for restricted byways and BOATS, using the total of 34.2km the figures would be as follows; 39.2m² of footpaths, 16.1m² of bridleways, 31,1m² of restricted byways and 14.9m² of BOAT making a grand total of 101.3m² <p>From Residents:</p> <ol style="list-style-type: none"> There is a need for better linkages for the footpaths and walking routes around the parish such that "circular" walks of varying lengths are possible. There are some places where footpaths end with few or no good options for the walker, then faced with walking in the road against the flow of traffic as no ongoing footpath or pavement exists. It would be great to have a variety of walks in the parish with options for short and long walks, where the safety of the walker is paramount. Cycleways/bridleways positioned away from roads are strongly supported provided there is some connectivity - too many footpaths/bridleways start/end on busy roads. A parking area is need on Longwater Road to enable more residents to enjoy the newly accessible disused gravel workings to the West.

Response	<ol style="list-style-type: none"> 1. The FNDP notes the support of the BHS for this policy. The FNDP accepts the points made by the BHS regarding <i>‘Inter-connectivity with adjoining Parishes’</i>. 2. The FNDP accepts the points made by the BHS regarding footpaths and informal green spaces. 3. The FNDP acknowledges the point regarding the provisions for circular walks and although the FNDP supports this, it will be referred to Finchampstead Parish Council for attention. 4. The FNDP notes the support of for this policy. The FNDP will refer the issues of better connectivity for cycle paths to Finchampstead Parish Council for attention. 5. The FNDP acknowledges the point regarding the parking on Longwater Rd. This will be referred to Finchampstead Parish Council for attention.
Changes to the Plan	<p>The FNDP Section 9.4 and Policy GA2 have been amended to include the comments in points 1 and 2</p> <p>No change to the FNDP in relation to points 3, 4 and 5.</p>

22. TC1 Supporting business

Policy	Aims to support local business. It specifies that proposals for small employment development within Development Areas will be supported if appropriate to the character of the area and they do not have unacceptable impact on nearby residential use. Conversion of existing buildings in the Countryside for commercial use can be supported if well-designed and respecting of the character of the area. Proposals for new non-agricultural buildings in the Countryside will generally not be supported.
Approval Rating	96%
Consultation Response	Total: 278 Agree: 267 Neutral: 0 Disagree: 11
General Comments	This policy received very high public support.
Specific Objections	There were no specific challenges to the policy.
Response	Not required
Changes to the Plan	No change to the FNDP.

23. TC2 Supporting business

Policy	Focuses on the existing Core Employment Area [Hogwood Estate] and specifies that development will be supported where it contributes to the safeguarding and retention of employment and enterprise.
Approval Rating	97%
Consultation Response	Total: 278 Agree: 270 Neutral: 1 Disagree: 7
General Comments	This policy received very high public support.
Specific Objections	There were no specific challenges to the policy.
Response	Not required
Changes to the Plan	No change to the FNDP.

24. TC3 Retail development – California Crossroads

Policy	California Crossroads local centre should be supported and strengthened by maintaining its predominately Class E(a) retail uses, to ensure its vitality and viability and to continue to be the focus of local community. Development proposals that protect and enhance this role and function will be supported.
Approval Rating	96%
Consultation Response	Total: Agree: 267 Neutral: 0 Disagree: 11
General Comments	This policy received an overwhelming level of support from residents.
Specific Objections	One specific comment was received, from a Resident: I read the sentence about residents keen to 'maintain' the community feel. I would say that if I had to criticise the area for something it would be that there isn't enough of a community feel. There could be so much more. The one pub we have is great but not enough. The shops at Cali crossroads are also great but something like a coffee shop with a bakery would make such a difference. It would be somewhere for people to spend a bit of time and chat instead of just pass through like the co-op.
Response	The FNDP will consider amendments to this policy which may facilitate the conversion of retail premises into cafes.
Changes to the Plan	An amendment to the FNDP to address this point will be considered if this issue is supported at Reg 16 consultation.

25. TC4 Retail development – Finchwood Park

Policy	Supports the existing outline consent to provide a small retail facility within the new Finchwood Park community to ensure its vitality and viability.
Approval Rating	94%
Consultation Response	Total: 278 Agree: 262 Neutral: 3 Disagree: 13
General Comments	This policy received very high public support.
Specific Objections	There were no specific challenges to the policy.
Response	Not required
Changes to the Plan	No change to the FNDP.

26. TC5 Protection of retail facilities

Policy	Protection of retail facilities – development proposals that result in the loss of day-to-day shopping facilities will be discouraged unless demonstrated that the retail use is no longer viable.
Approval Rating	97%
Consultation Response	Total: 278 Agree: 271 Neutral: 2 Disagree: 5
General Comments	This policy received very high public support.
Specific Objections	There were no specific challenges to the policy.
Response	Not required
Changes to the Plan	No change to the FNDP.

General Comments

The following general comments were made on the FNDP.

Comments	<p>From JoHe Developments LLP:</p> <ol style="list-style-type: none"> 1. There is potential to maximise development in existing built-up areas for example along Nine Mile Ride where our client’s site is. The site is considered appropriate for intensification to provide residential dwellings because: <ul style="list-style-type: none"> • It is a brownfield site. • It is a sustainable location with potential to meet some housing demand in this location. • It would provide up to 6 residential dwellings (potentially with an element of self-build). <p>From Bewley Homes:</p> <ol style="list-style-type: none"> 2. It is specified that there has to be robust evidence to support particular policies proposed in a Neighbourhood Plan. It is not permissible to rely on conjecture or assertions. Nor is it sufficient (for example) to rely on a survey of local opinion, in order to suggest that a particular policy is justified because of the aspirations or concerns of the local community. At NPPF paragraph 11, it is confirmed that all <i>“Plans and decisions should apply a presumption in favour of sustainable development.”</i> With it being added that; <i>“For plan-making this means that plans should positively seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change.”</i> <p>From Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust:</p> <ol style="list-style-type: none"> 3. Sections 4.1 and 8.5 of the draft plan state that “developments should not result in a biodiversity net loss and where possible achieve a biodiversity net gain.” The wording on biodiversity net gain in the National Planning Policy Framework (NPPF) was amended in 2019 and now puts a stronger emphasis on achieving a net gain rather than ensuring no net loss. The emerging Environment Bill will set-out the statutory obligations of this decision in detail. The consultation has suggested that legislation will set the minimum gain required in biodiversity units at 10% over base value. We therefore recommend that the draft plan sets out the minimum net gain that should be achieved (at least 10%). 4. Protection and enhancement of the natural environment; We welcome the inclusion of this section but recommend some amendments to the text to ensure it reflects existing legislation and national and local policy and point you to Wokingham Borough Council’s Core Strategy 2010 Policy CP7 Biodiversity. We would suggest that Section 8.5 reflects the wording in that policy. Section 8.5 includes ‘Habitats’ and ‘Trees’ and we would suggest that you include ‘Species’ either in combination with habitats or alone. <p>From Bellway:</p> <ol style="list-style-type: none"> 5. We generally commend the Parish Council’s endeavours and collaborative approach to preparing the draft Neighbourhood Plan (“NP”) and offer our
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comments on a positive basis in order assist the Parish Council in preparing a Plan that is fit for purpose having regard to satisfying the basic conditions. Bellway have a controlling interest in land at Greenacres Farm, to the south of Nine Mile Ride, Finchampstead and welcome the opportunity to discuss the merits of the site.

From T A FISHER:

6. We generally commend the Parish Council's endeavours and collaborative approach to preparing the draft Neighbourhood Plan ("NP") and offer our comments on a positive basis in order assist the Parish Council in preparing a Plan that is fit for purpose having regard to satisfying the basic conditions.

From BHS:

7. Pedestrians are fortunate in having access to 100% of it with 57% footpaths allowing exclusive use for walkers. Sadly, bridleway users i.e. all cyclists and horse riders currently only approx. 15.71% of the network, well below the national average of 22% which is considered woefully short. There should be an addition to policy IRS1 in this NDP to increase the percentage of access available to all non-motorised users. It could read as follows:
'To address the imbalance in available access to all non-motorised users, this NDP supports the Greenways and ROWIP schemes and aims to increase bridleway and restricted Byway access to 50% by the review of this document in 2036'.
8. Thank you for including horse riders. All non-motorised users will benefit enormously from any new or re classified routes given bridleway status. Giving more routes bridleway status is the way forward to provide more extensive off-road access for all non-motorised users. Sadly, footpaths often restrict access by those who should have access but are denied by kissing gates and stiles i.e. disabled, elderly, parents with pushchairs and prams.
9. Thank you for supporting the Greenways scheme and observing the dangerous roads. No specific alternative off road, safer routes are suggested here, perhaps it is not the focus of a Neighbourhood plan to highlight where a specific route could be taken, this may be too contentious without prior approval of landowners. However, I believe a list of desired off-road links with bridleways status between specific locations could be included. Please see suggested list below for possible inclusion as 'aims' in appendix V for use by all non-motorised users.
 - California Country Park to the new Longwater Nature reserves
 - Longwater Nature Reserves/Moor Green Lakes to bridleway 26
 - Simons Wood to California Country Park
 - California Shops to Bohunt Secondary School
 - Finchampstead Village South to FBC
 - Finchampstead Village South to Bohunt Secondary School
 - Blackwater River Route, from Loddon Long distance path and Farley Hill via Eversley Village to Mill Lane Sandhurst.
10. Please could the Rights of Way Improvement Plan (ROWIP) also be included as a scheme this NDP recognises and supports.

	<p>From a Resident:</p> <p>11. Whilst recognising the challenges you face defining, "Areas of Habitation", the area of unadopted byways and BOATs, called "The Rides" in previous plans, comprising around 180 habitations should surely be included as a specific "Area". This could include Heath Ride, Kiln Ride Extn, most of Hollybush Ride, Roman Ride, Wick Hill Lane (in all its forms). Possibly, Wellingtonia Avenue and The Ridges could be included.</p> <p>12. In section 2.3, Para 1 - paragraph needs to specifically include "Byways" (i.e. Restricted Byways and Byways Open to All Traffic). You have covered this rather better in Section 9.</p> <p>13. Mention of "improvements to California Crossroads" makes me plead that the hare-brained scheme proposed by WBC some time ago should be consigned to the dustbin.</p> <p>From Natural England:</p> <p>14. The neighbourhood plan area abuts the Thames Basin Heaths Special Protection Area (SPA), specifically Bramshill Site of Special Scientific Interest (SSSI). Any development within the zones of influence for the SPA must abide with saved policy NRM6 of the South East Plan and policy CP8 from Wokingham BC's Core Strategy to 2026. The plan should mention this requirement.</p> <p>From a Resident:</p> <p>15. What is the definition for 'mobile homes' used in the plan?</p>
Response	<p>1. The FNDP notes the interest in the site at Scott's Yard, 59 Nine Mile Ride for Residential Development</p> <p>2. Neighbourhood planning is defined by the Planning Practice Guidance (PPG) as a means of giving communities direct power to develop a shared vision for their neighbourhood and to shape the development and growth of their local area. It states that it allows communities to choose where they want new homes, shops and offices to be built, have their say on what those new buildings should look like and what infrastructure should be provided.</p> <p>3. We welcome the comments received from BBOWT and the plan will be amended to incorporate the comments made.</p> <p>4. We welcome the comments from BBOWT. We have reviewed the comments in the light of the reference to the inclusion of the word species and to the WBC core strategy 2010 CP7. We believe that the FNDP narrative and policy IRS5 adequately reflects the WBC core strategy and no changes other than the insertion of the word "Species" are necessary</p> <p>5. The FNDP notes the support of Bellway. The FNDP notes the interest in land at Greenacres Farm.</p> <p>6. The FNDP notes the support of T A Fisher.</p>

	<p>7. This comment is noted and will be passed to Finchampstead Parish Council for further attention.</p> <p>8. This comment is noted and will be passed to Finchampstead Parish Council for further attention.</p> <p>9. The list of desired off-road links with bridleways status between specific locations is not a specific Planning matter to be covered by the FNDP, but this point will be passed to Finchampstead Parish Council for further attention.</p> <p>10. The FNDP note BHS support for the ROWIP.</p> <p>11. The definition of "Areas of Habitation" has been raised under other submissions.</p> <p>12. This point is noted.</p> <p>13. The planned improvements to California Crossroads are already approved by WBC and are outside of the scope of this plan.</p> <p>14. We welcome the comments from Natural England and have included in Policy IRS5 the detailed requirement suggested.</p> <p>15. The definition of 'Mobile Homes' will be clarified.</p>
<p>Changes to the Plan</p>	<p>The FNDP Sections 4.1 and 8.5 have been amended to reflect the suggested amendments in point 3.</p> <p>The FNDP has been amended to insert the word "Species" are necessary to address point 4.</p> <p>The FNDP Section 9.4 has been amended to include a reference of support for the WBC ROWIP, as requested in point 10.</p> <p>The FNDP Section 1.2 has been amended to give a clearer explanation of the term "Areas of Habitation" and the rationale behind it to address point 11.</p> <p>The FNDP Section 2.3 has been amended to include a reference to 'Byways' as requested in point 12</p> <p>The FNDP Policy IRS 5 has been amended to reflect the suggestions in point 14.</p> <p>The FNDP Section 5.9 has been be amended to give a clearer definition of 'Mobile Homes', to address point 15.</p> <p>No other changes to the FNDP in this Section.</p>

Comments on Planning for Growth

The following comments were made on Planning for Growth in the FNDP.

Comments	<p>From a Resident:</p> <ol style="list-style-type: none">1. Whilst the FNDP is a comprehensive and well-structured document, it does not plan for the growth of Finchampstead nor does it identify where new homes, shops and offices should be built.2. It is more restrictive on development beyond the Development Location and is therefore more restrictive on development in the countryside, more so than the policies set out in the National Planning Policy Framework (NPPF). As such, it appears to be written exclusively to control and restrict, rather than to facilitate and plan, for future development. <p>From Pegasus on behalf of Vortal Homes Ltd, and from Catesby Estates:</p> <ol style="list-style-type: none">3. The FNDP does not propose any development allocations. With regard to housing, it relies solely on existing permitted development at Finchwood Park. Paragraph 5.2 states that 1,152 new dwellings are needed in the plan period. It is suggested that the Arborfield SDL will deliver all of these dwellings by 2036. The Housing Need Assessment at Annex D states that 1,500 homes will be delivered at Finchwood Park and 250 homes at Arborfield Green. Promises of housing delivery 5, 10, 15 years into the future may or may not be met. For this reason, it would be prudent for the FNDP to take a precautionary approach and for it to allocate land for housing development in the plan period. <p>From Gladman:</p> <ol style="list-style-type: none">4. The FNDP does not include site allocations. Instead, it is considered that strategic allocation in the emerging Local Plan Update will meet the Parishes housing needs. Gladman contend that this approach is incorrect and that the strategic allocations in the emerging Local Plan Update are meeting the wider borough's housing needs, not the Finchampstead specific housing needs, albeit an element of this need may be met on these sites. <p>From Catesby Estates:</p> <ol style="list-style-type: none">5. The development plan for Finchampstead currently comprises of saved policies from the Wokingham Core Strategy, adopted January 2010 and Managing Development Delivery Local Plan adopted February 2014. The housing requirement in the Core Strategy was based on the now revoked South-East Plan and is clearly no longer fit for purpose. In any event, the National Planning Policy Framework (NPPF) makes clear that as the strategic policies in the Core Strategy were adopted more than 5 years ago and have not been updated, local housing need should be calculated using the standard method (NPPF Para 73). For Wokingham, the Core Strategy had an annual requirement of 662 dwellings per annum whilst the standard method requires 789 dwellings per annum. <p>From Residents:</p> <ol style="list-style-type: none">6. I believe it is wrong to start from the premise that the Parish Council need not identify any further sites for development. If villages and parishes had
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	<p>identified more development land following a 'dispersal strategy' agreed with the Local Authority some of the 'great carbuncles' which have appeared on the edge of some of the larger settlements and in fact engulfed them could well have been avoided.</p> <p>7. You have gone to the effort of zoning areas yet appear to have ignored what those areas may need to invigorate and rejuvenate them and the community.</p> <p>8. In view of what we have experienced over the last 12-15 months it is important to realise that lifestyles and working practices will change substantially so in view of a plan which takes the Parish through to 2036 it is not considering the impact that these changes will have on parishioners' lifestyles when it should be so doing.</p>
Response	<ol style="list-style-type: none"> 1. The FNDP identifies the SDL at Finchwood Park as the core development area during the life of the Plan. In line with the WBC Core Strategy of managing development through SDLs, this will also ensure that appropriate community facilities are also provided. The FNDP also promotes the growth of commercial development at Hogwood Park. 2. Neighbourhood planning is defined by the Planning Practice Guidance (PPG) as a means of giving communities direct power to develop a shared vision for their neighbourhood and to shape the development and growth of their local area. It states that it allows communities to choose where they want new homes. The community, through the Regulation 14 consultation, has stated overwhelmingly that it wishes new homes to be built within the Development Locations set out in the FNDP and not in the countryside. 3. The FNDP has consulted further with WBC on the matter of further housing allocations and the outcome is summarised in section 5.4 of the 2nd Edition of the FNDP and detailed in the newly-added 'Key Topic Paper – Additional Housing Allocations' 4. The FNDP identifies the SDL at Finchwood Park as the core development area during the life of the Plan. This allocation greatly exceeds the housing need of Finchampstead Parish. While it is of course true that this location will meet the housing need of the wider borough, it must be correspondingly true that other development locations within the wider borough will also help to meet the housing needs of Finchampstead. 5. The FNDP will consult further with WBC on the matter of any further housing allocations. The FNDP has consulted further with WBC on the matter of further housing allocations and the outcome is summarised in section 5.4 of the 2nd Edition of the FNDP and detailed in the newly-added 'Key Topic Paper – Additional Housing Allocations' 6. The FNDP identifies the SDL at Finchwood Park as the core development area during the life of the Plan. The FNDP also supports the WBC Core Strategy of managing development through SDLs, some of which may be adjacent to existing communities but some of which, notably Finchwood Park are not.

	<p>7. The FNDP identifies the SDL at Finchwood Park as the core development area during the life of the Plan. In line with the WBC Core Strategy of managing development through SDLs, this will also ensure that appropriate community facilities are also provided. The FNDP also promotes the growth of commercial development at Hogwood Park.</p> <p>8. The FNDP accepts that the impact of the Covid-19 crisis is likely to have an impact upon lifestyles and working practices. Whilst the plan may require future adjustment as a consequence, the exact nature of this impact cannot yet be predicted and the adoption of the FNDP should not be delayed until an indeterminate time in the future.</p>
Changes to the Plan	<p>The FNDP has consulted further with WBC on the matter of further housing allocations and the outcome is summarised in section 5.4 of the 2nd Edition of the FNDP and detailed in the newly-added 'Key Topic Paper – Additional Housing Allocations'. This addresses points 3 and 5.</p> <p>No other changes to the FNDP in this Section.</p>

Comments on Ability to meet Basic Conditions

The following comments were made against Basic Conditions in the FNDP.

Comments	<p>From Bewley Homes:</p> <ol style="list-style-type: none"> 1. The draft Neighbourhood Plan does not attempt to define 'capacity', nor is it supported by meaningful evidence to quantify or otherwise justify the assertion that there is an absence of capacity to accommodate housing growth. <p>From Boyer Planning:</p> <ol style="list-style-type: none"> 2. The plan is restrictive on development beyond the Development Location and is therefore more restrictive on development in the countryside, more so than the policies set out in the National Planning Policy Framework (NPPF). As such, the FNDP fails to meet one of the 'basic conditions' for a Neighbourhood Plan, i.e. <i>"having regard to national policies and advice contained in guidance issued by the Secretary of State..."</i>. 3. Housing growth at Finchwood Park and Gorse Ride is already planned for and comprised within an existing development plan and benefit from planning permission. The FNDP therefore fails to plan for any additional housing growth during the Plan period. 4. The FNDP fails to achieve a basic requirement by simply supporting housing growth that is already part of the current development plan (which is currently being updated) and by imposing restrictive and inflexible, rather than supportive and pro-active, policies to control future development. 5. The Parish Council have not taken the opportunity to consider allocating small and medium-sized sites for housing in their area and have used the Neighbourhood Plan to restrict any further growth beyond what is in the current development plan and what is already consented. <p>From Bewley Homes</p> <ol style="list-style-type: none"> 6. Finchampstead North is identified, in the adopted Core Strategy (at Policy CC9) and in the emerging Local Plan Update (at PolicySS2), as a 'Modest Development Location'. This means that the settlement is a suitable location for housing and other forms of development. Given the status of the settlement, it is incorrect to suggest that there will be no future residential developments beyond existing commitments at Finchwood Park and Gorse Ride, before 2036. <p>From Gladman</p> <ol style="list-style-type: none"> 7. The level of protectionist policies that are being applied across the parish raise the question on whether the neighbourhood plan as a whole can be shown to be contributing towards sustainable development. <p>From Catesby Estates:</p> <ol style="list-style-type: none"> 8. A neighbourhood plan which limits the amount of development to be delivered in an area fails to comply with the core requirement of the NPPF to meet the housing needs of an area.
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	<p>9. The Finchampstead Neighbourhood Development Plan in its current form does not meet Basic Conditions A, D and E as is required for a Neighbourhood Plan to pass examination.</p>
<p>Response</p>	<ol style="list-style-type: none"> 1. The definition of 'Capacity' will be clarified. 2. The purpose of allocating areas as 'Development Locations' is to specifically support development in places which are sustainable. The purpose of an NDP is to support development in locations which are sustainable and supported by the local community, whilst guiding it away from other locations. Provided that housing needs are met by the NDP and the Local Plan, this is not unnecessarily restrictive. 3. Some Planning Permissions have been granted for Finchwood Park but a great deal of the proposed development has not yet come forward for Planning Permission. The same is also true of Gorse Ride. Although outline proposals may be discussed, as with any proposed development, these can and do change up to the point where Planning Permission is sought. Housing allocations that have not received planning permission are accepted as part of the total allocation within the area of an NDP. 4. See Para 3 above. Also, the FNDP will support development within the existing Development Locations. Aside from any increase in density at Finchwood Park Development Location, these include a site in the Finchampstead North Development Location previously identified by WBC as having capacity for some 40 dwellings. 5. The FNDP has consulted further with WBC on the matter of further housing allocations and the outcome is summarised in section 5.4 of the 2nd Edition of the FNDP and detailed in the newly-added 'Key Topic Paper – Additional Housing Allocations' 6. In conjunction with WBC, the plan supports small developments within the Development Locations. The FNDP has consulted further with WBC on the matter of further housing allocations and the outcome is summarised in section 5.4 of the 2nd Edition of the FNDP and detailed in the newly-added 'Key Topic Paper – Additional Housing Allocations' 7. The FNDP supports 14 areas of Local Green Space and five other small locations which act as barriers to the coalescence of settlements. Sustainable development is supported within Development Locations and especially in those parts of the Arborfield Strategic Development Locations which fall within the parish (Finchwood Park) and by the redevelopment of the Gorse Ride Estate. The FNDP has consulted further with WBC on the matter of further housing allocations and the outcome is summarised in section 5.4 of the 2nd Edition of the FNDP and detailed in the newly-added 'Key Topic Paper – Additional Housing Allocations'. 8. Section 5.2 of the FNDP sets out the housing needs of the parish and confirms that all general and affordable housing needs within the parish will

	<p>be exceeded by the numbers allocated at the Arborfield Strategic Development Locations which fall within the parish (Finchwood Park) and by the redevelopment of the Gorse Ride Estate, both of which are due for completion within the Plan period. The FNDP has consulted further with WBC on the matter of further housing allocations and the outcome is summarised in section 5.4 of the 2nd Edition of the FNDP and detailed in the newly-added 'Key Topic Paper – Additional Housing Allocations'.</p> <p>9. The FNDP in its current form meets the 'Basic Conditions' set out in the NPPF (See FNDP Basic Conditions statement).</p>
<p>Changes to the Plan</p>	<p>The FNDP Section 5.4 has been amended to give greater clarity, particularly by deleting the phrase 'Capacity' and now referring to 'Suitable Locations', to address point 1.</p> <p>The FNDP has consulted further with WBC on the matter of further housing allocations and the outcome is summarised in section 5.4 of the 2nd Edition of the FNDP and detailed in the newly-added 'Key Topic Paper – Additional Housing Allocations' to address point 5, 6, 7, and 8.</p> <p>No other changes to the FNDP in this Section.</p>

Comments relating to Changes to Development Limits

The following comments were made regarding Development Limits in the FNDP.

Comments	<p>From Solve Planning:</p> <ol style="list-style-type: none"> 1. Nine Mile ride is a continuous frontage of residential development with a built-up area with a strong residential character, yet it is not included in the settlement boundary. This area would offer the potential for redevelopment to meet the Borough's housing demand in a sustainable location. Inclusion within the settlement boundary would enable the area to all under the remit of Policy ADH2. <p>From Bewley Homes:</p> <ol style="list-style-type: none"> 2. The reference to existing settlement boundaries is misleading. It is probable that future Local Plan Reviews and future reviews of the Neighbourhood Plan (prior to 2036), will result in further changes to settlement boundaries within the parish and particularly at Finchampstead North. The Neighbourhood Plan cannot be used as a vehicle to try to prevent this, given the over-riding Government objective of meeting housing needs and achieving sustainable development.
Response	<ol style="list-style-type: none"> 1. The FNDP states that for the purposes of this plan, The FNDP accepts the WBC position of using the term 'Development Limits' rather than "Settlement boundaries', the difference being that 'Development Limits' define the perimeter of a Development Location, within which sustainable development will be supported. There are a number of areas of settlement (otherwise defined as 'Areas of Habitation') within the parish which are not considered suitable as Development Locations. The FNDP does not consider that there is a need to extend the Finchampstead North Development location along Nine Mile Ride 2. The FNDP does not rule out the need for changes to Development Limits in the future. This has recently been done to accommodate the Development Location at Finchwood Park. However, the plan does specifically seek to inhibit the extension of Development Limits in a place which would erode the last remaining gap between existing development locations or other Areas of Habitation, impinge upon designated Local Green Spaces, or erode Green Wedges.
Changes to the Plan	<p>The FNDP has consulted further with WBC on the matter of any changes to existing Development Limits in relation to point 1 and 2. Recommendations have been added to Section 5.4 in the 2nd Edition of the FNDP</p>

Comments relating to housing targets following the demise of the proposed SDL at Grazeley

As of March 2021, WBC is currently investigating alternatives to the Grazeley Garden Town which has been rendered undeliverable following the extension of the Emergency Planning Zone around the Ministry of Defence Atomic Weapons Establishment at Burghfield.

Statement from WBC:

“A legislative change caused emergency planning requirements around the Atomic Weapons Establishment at Burghfield to be extended so that for the first time they include the Grazeley area. The Defence Nuclear Organisation, part of the Ministry of Defence, now objects to the Grazeley garden town proposal and is requesting its removal from the local plan.

In light of the changed circumstances, the council is looking at alternatives. As undertaken for other potential areas, masterplanning is being used to explore the potential of two areas: one just south of the M4 corridor between the villages of Shinfield, Arborfield and Sindlesham; the other being an area of land within the existing South Wokingham major development. The new areas will be considered alongside others across the borough, to inform the future direction of the local plan. Consultation on a revised local plan is expected later this year [2021].”

WBC therefore need to find alternative locations for these homes and whilst they anticipate that most will be in the form of large developments elsewhere in the Borough, they have given us an early indication that additional housing will need to be spread across the borough, including an increased need for further housing in Finchampstead.

The following comments were made regarding the Grazeley SDL in the FNDP.

Comments	<p>From Solve Planning:</p> <ol style="list-style-type: none"> 1. The very significant material change for future housing in the Borough with the removal of the proposed allocation at Grazeley means that the Council, and therefore Neighbourhood Plan areas, must seek additional sites to meet this future need. <p>From Bewley Homes:</p> <ol style="list-style-type: none"> 2. The PPG is clear that a draft Neighbourhood Plan is not tested against the policies in an emerging Local Plan. Therefore, it must be tested against the existing Local Plan, from which the allocation of housing at Grazeley has now been removed. <p>From Gladman:</p> <ol style="list-style-type: none"> 3. The Council is currently investigating alternatives to the Grazeley Garden Town. There have been delays to the timetable for the emerging LPU timetable and it is not yet clear what implications this may in turn have for the proposed strategy of the LPU and whether locations such as Finchampstead Parish will be required to make a greater contribution towards the housing needs of the wider borough. <p>From T A Fisher:</p> <ol style="list-style-type: none"> 4. Additional housing sites will be required at each of the Borough’s
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	<p>settlements in order for the increased housing need to be met. Finchampstead will need to play its role in helping to provide for sustainable growth patterns.</p>
Response	<ol style="list-style-type: none"> 1. Wokingham Borough Council is actively seeking alternative sites for an SDL following the abandonment of the majority of the planned development at Grazeley. The FNDP has consulted further with WBC on the matter of further housing allocations and the outcome is summarised in section 5.4 of the 2nd Edition of the FNDP and detailed in the newly-added 'Key Topic Paper – Additional Housing Allocations'. 2. The existing Local Plan can deliver the required housing numbers to meet the borough targets up to at least [2030]. Alternative locations to replace Grazeley are under consideration and will be consulted upon in Q3 2021. The FNDP will seek maximum alignment with the emerging Local Plan update but it is already accepted that the FNDP will be tested against the existing Local Plan. 3. While it is possible Finchampstead Parish will be required to make a modestly increased contribution towards the housing needs of the wider borough, there is scope for increased densification of the development at Finchwood Park, which would be supported by the FNDP as being within the Development Limits for that area. Policy AHD2 also supports development within the existing Development Limits and there is some scope for this. The FNDP has consulted further with WBC on the matter of further housing allocations and the outcome is summarised in section 5.4 of the 2nd Edition of the FNDP and detailed in the newly-added 'Key Topic Paper – Additional Housing Allocations'. 4. The Core Strategy of WBC is to focus development in Strategic Development Locations to allow for suitable infrastructure development alongside, rather than to simply expand each of the Borough's existing settlements. The FNDP supports this strategy.
Changes to the Plan	<p>Amendments to the FNDP have been made to section 5.4 of Edition2 of the FNDP to address points 1 and 3.</p>