

TO BE COPIED ONTO CPC LETTERHEAD

XX April 2025

Nigel McGurk  
Erimax  
Independent Examiner to the Cookham Neighbourhood Plan

c/o RBWM

By email to: INSERT RBWM EMAIL

Dear Nigel

**Cookham Neighbourhood Plan  
Response to Clarification Note**

Thank you for your clarification note dated 28 March in respect of the Neighbourhood Plan. We note and are grateful for your kind words on the Plan.

This response to your note is set out in two parts. The first (Part A), responds to clarification questions you have raised. For ease of reference, we have repeated your questions in Part A. The second (Part B), provides a response to the Regulation 16 representations. We would like to take this opportunity to thank you for inviting us with this opportunity to respond to respond to the representations.

The Parish is happy to assist the Examiner and provide further clarification or discuss in more detail if that would support the process. Otherwise, we very much look forward to receipt of your 'Fact Check' report.

Your sincerely  
For Cookham Parish Council

INSERT NAME  
INSET POSITION

## **PART A: RESPONSE TO MATTERS OF CLARIFICATION**

1. **Policy C-DP2:** Is there information and/or national or local planning policy references you can point me to in respect of what appears as an onerous requirement for all development to enhance rural character?

### **Response:**

Parts 1(a) to 1(i) of the policy make clear that they apply, as appropriate, based on the site and location, and do not therefore all apply to all developments. The Parish proposes that the opening part of Part 1 of the policy is rephrased along the following lines:

*'Proposals for development should maintain and, where practicable, enhance the rural character of the Parish, having regard to the attributes and guidelines in the Cookham Design Guidance an Codes and the Cookham VDS. Development should:'*

2. **Policy C-DP4:** The Policy requirement for all development affecting heritage assets to “*preserve and enhance*” and the Policy requirements in respect of non-designated heritage assets appears to conflict markedly with the approach set out in the National Planning Policy Framework. Please can you point me to information in justification of the departure from national policy in this way ?

### **Response:**

The Parish acknowledges that the most recent version of the NPPF refers to conserving and enhancing the historic environment and proposes that the words ‘preserve and enhance’ in Part 1 of the policy are replaced with ‘conserve and enhance’.

The policy wording, including the requirement for a Heritage Statement for non-designated heritage assets, was updated after the Regulation 14 feedback to reflect feedback and recommendations from RBWM. The Parish is happy for the Examiner to advise what amendments might be required to the Policy to avoid any conflicts with the NPPF.

**CNPWP would like to add to the end of Jon’s response, “while maintaining strong emphasis on preservation of heritage and non heritage assets in this historic parish”.**

3. **Policy C-DP5:** Please can you point me to information demonstrating how this land use planning Policy “*encourages*” access to employment and training; and how the Policy encourages micro and start-up businesses ?

### **Response:**

Having reviewed the wording of the policy and supporting text, the Parish appreciates that the Plan does not specifically put in place measures that ‘encourage’ employment, training, micro and start-up businesses. However, the Parish is supportive of proposals that deliver these uses and activities.

The ‘need’ for premises suitable for small and micro businesses is highlighted in the ‘Supplementary Market Analysis Employment Land Review’ undertaken by Aspinall

Verdi on behalf of RBWM and forming supporting evidence to the Local Plan. This states that SME occupiers drive the market in RBWM but that across the Borough as a whole the supply of premises for smaller businesses is 'very tight'.

As such, and subject to your consideration, the Parish proposes that Part 1 of the policy is rewording along the following lines:

*"Proposals for development that include premises for micro and start-up businesses, and which maximise opportunities for local people to access employment and training initiatives, will be supported."*

**CNWP agreed with Jon's wording, but add after supported, "so far as not contrary to greenbelts and/or other plan policies".**

4. **Policy C-DP6b:** Please can you point me to any information in respect of the Neighbourhood Plan's definitions of "stables" and "equine buildings;" and to any information in respect of distinctions, for example, between commercial stables, farm stables, ancillary residential stables etc ?

**Response:**

**WORKING PARTY TO PROVIDE INFO ON DEFINITIONS AND TO WHAT THEY WOULD LIKE THE POLICY TO APPLY TO**

**"The Parish Council would use ordinary Oxford English Dictionary definitions for 'stables' and 'equine development', though it accepts that perhaps 'equestrian development' would be better wording than 'equine development', as used for example only by Fytche Taylor Planning Limited at <https://www.ftplan.co.uk/equestrian> .**

5. **Policy C-EN2:** Part 4 of the Policy appears somewhat onerous – please can you point me to evidence that this part of the Policy is deliverable ? Given the Policy requirements as set out, I am particularly mindful that Figure 3 appears to lack specific defined boundaries. Please can you point me to information showing the precise boundary of each wildlife corridor and the areas of land within which development would be regarded as being "adjacent" ?

**Response:**

A map of the corridors and the important habitats, wildlife spaces and designations connected by the proposed corridors is appended to this response.

**PREPARE AND ADD A MAP**

Part 4 of the Policy uses the word 'must' given the importance of identifying and creating green corridors as reflected in the NPPF which, at para 192(a) states that 'plans should identify, map and safeguard components of local wildlife-rich habitats... wildlife corridors and stepping stones that connect them...'.

Provision of green corridors are supported in the RBWM Open Space Study which forms part of the evidence base to the adopted Local Plan. This notes that these can

take the form of wildlife corridors, being linear strips of open space that combine habitats and species. The linking of habitats along existing green and blue infrastructure in Cookham does just this. Furthermore, the approach taken in the Neighbourhood Plan supports Policy NR2 (Parts 5d and 5e) of the Borough Local Plan which states that development proposals should recognise the importance of green corridors and avoid fragmentation of existing habitats. The Local Plan however does not define what or where green corridors are in the Borough. The Neighbourhood Plan thus develops this further by identifying important corridors in Cookham Parish. The Green Corridors in the Neighbourhood Plan have been identified in partnership with Wild Cookham: the local wildlife society championing local environmental issues, biodiversity and wildlife protection.

It is noted that the made Ascot, Sunninghill and Sunningdale Neighbourhood Plan, also in RBWM, includes a policy in respect of Green Corridors.

Part 4(a) of the Cookham Neighbourhood Plan is similar to that in Policy NP/EN5.1 of the Ascot Plan. The Ascot Plan uses the word 'should' rather than 'must' in terms of maintaining and enhancing the connectivity of corridors. It is recognised that the word 'must' appears more onerous than that in Ascot, albeit this is caveated with inclusion of the words 'as far as possible', and which thus brings a degree of flexibility that is consistent with the Ascot Plan. We would also note that since the Ascot Plan was drafted and prepared the importance of biodiversity and nature recovery has been given greater emphasis through the Environment Act and most recent versions of the NPPF as well as publication of the Green Infrastructure Framework and Design Guide by Natural England. Indeed, the Natural England guide states that 'core sites', being important spaces for biodiversity and geodiversity, should be protected from development as they are key components of the Nature Recovery Network. It also states that

*'core sites should also be interconnected, directly through the establishment of ground level corridors, such as hedgerows, green access routes, street trees, but also functionally through patches (stepping stones) that could include habitats on buildings.'*

The wording in Part 4(a) of the Cookham Neighbourhood Plan is thus considered appropriate.

In respect of Part 4(b), the wording used in the Cookham Neighbourhood Plan is almost identical to that in the Ascot Plan.

The Ascot Neighbourhood Plan confirms that the width of the corridors shall be taken as 10m or, where following a watercourse, 5m either side of this. The Plan itself does not define what is meant for the purposes of the word 'adjacent' in the policy.

In Cookham, para 5.14 of the Neighbourhood Plan specifies an appropriate width for the corridors. This is not specifically referenced in the Policy itself though as it is recognised that the width of a corridor may vary from place to place based on the environment through which it runs, the sensitivity of wildlife habitats the corridors connect, and the requirements of target species. To this end, para 3 of the Policy makes reference to the width of corridors being proportionate to target species.

In terms of the word 'adjacent' in the policy this is taken to mean development which immediately abuts / adjoins the corridor.

**CNPWP are comfortable with the above response.**

6. **Policy C-C13:** The Policy lists places that are already protected and as worded, it applies to adjacent areas. In the interests of precision and to avoid vagueness, is there any information you can point me to in respect of the actual location of these areas? Please can you point me to national or local planning policy requirements to maintain and enhance the *setting* of sites like those identified? Part b) – please can you point me to information in respect of adjacent sites in community use?

**Response:**

A map of the sites in Information Box 6 (as referenced in the policy) is appended to this response.

**INSERT MAP OF SITES LISTED IN INFORMATION BOX 6.**

In terms of 'setting' the Parish proposes an alternative form of wording for your review and consideration, replacing part 1(b) with new Part 2 which says:

*'Proposals for development adjacent to the areas benefitting from public access should, as appropriate to the site, scale and location, be sensitive to and not cause harm to their character.'*

**WORKING PARTY TO PROVIDE INFORMATION ON ADJACENT SITES IN COMMUNITY USE**

**CNPWP do not agree with proposed response. The term setting is used in BLP policy HE1.1 which answers the examiners questions. It is therefore known and understood by this planning authority, and has in the past been interpreted as 50m.**

**CNPWP comments on adjacent sites is not understood; this policy relates to development on sites adjacent to open space with public access.**

7. **Policy C-L12:** Please can you point me to information in respect of how the Policy seeks to "protect" facilities (noting that the Policy should not simply reference, or repeat the requirements of an existing adopted Policy in another Plan)?

**Response:**

The Parish recognises that Parts 1 and 2 add little to the adopted Local Plan which contains more detailed clauses in respect of retaining and avoiding loss of community facilities. Inclusion of reference to the list of facilities in Information Box does though make clear which facilities the Local Plan policy should apply to. This clarification could however be made within the supporting text instead. A sentence could be added to the end of para 7.4 of the Neighbourhood Plan to explain that the facilities will be subject to Parts 2 and 6-9, as appropriate, of the Local Plan.

## **PART B: RESPONSE TO REGULATION 16 REPRESENTATIONS**

The responses below group the representations by consultee 'type', e.g.: statutory consultee, agent, landowner etc. Given the format of the response from RBWM this is addressed separately.

### **RESPONSES FROM STATUTORY CONSULTTEES**

#### **Historic England**

We note that Historic England makes no specific comments on the Neighbourhood Plan.

#### **National Highways**

We note that National Highways makes no specific comments on the Neighbourhood Plan.

#### **Natural England**

Beyond provision of their standard advice note issued to all Neighbourhood Plan groups, it is noted that Natural England makes no specific comments on the Neighbourhood Plan.

#### **Southern Water**

We note that Southern Water makes no specific comments on the Neighbourhood Plan.

#### **Thames Water**

There are three main parts to this response. Taking each in turn:

- a. Thames Water recommends that a new policy is inserted into Section 7 of the Neighbourhood Plan in respect of providing adequate water and wastewater infrastructure for new developments. Whilst Cookham Parish Council agrees with the comments made by Thames Water, it is not considered necessary for these to be incorporated in the Neighbourhood Plan as this is already addressed in the Borough Local Plan and does not need repeating. Policy IF1 (part 1) of the Borough Local Plan states that development proposals must deliver infrastructure to support the spatial strategy, or make financial contributions to this, and Policy IF7 (parts 3 – 6) specifically refers to water supply and sewerage infrastructure.
- b. Thames Water recommends insertion of new clause in Policy C-DP7 in respect of water efficiency. Whilst the Borough Local Plan does refer, in the Spatial Portrait (section 3), to more efficient use of energy and resources, this does not link directly to a policy on water efficiency. The Borough Sustainability SPD (July 2024) does however provide information on water efficiency and which is aligned with the suggested policy text from Thames Water. Given the Neighbourhood Plan will have more 'weight' than the SPD, the Parish Council is happy for the suggested policy text to be incorporated into the Neighbourhood Plan, with cross references to the Sustainability SPD and explanatory text provided by Thames Water being incorporated, as appropriate, into the supporting text to the policy.
- c. Thames Water requests insertion of additional text in Policy C-EN3b. This would appear to strengthen the policy whilst avoiding duplication with the Borough Local Plan. As such, the Parish Council ~~is happy to accept~~ this suggestion.

**CNPWP would like 'strongly supports' instead of 'is happy to accept'.**

## RESPONSES FROM LANDOWNERS / LOCAL BUSINESSES AND ORGANISATIONS

### Holy Trinity PCC

The supported expressed for the Neighbourhood Plan by the PCC is noted and welcomed.

Comments on Policy C-DP4 are noted. The Parish Council does not consider this warrants an amendment to the Neighbourhood Plan.

Comments on the designation of The Paddock as a Local Green Space are noted. The purpose of designating the site is not to preclude activities that take place on The Paddock, but rather to retain that space for the ongoing enjoyment by the community, recognising its historic significance and recreational value, including the activities referenced in the Regulation 16 response form the PCC. To this extent, the Parish is aligned with the PCC.

**CAN THE WORKING PARTY ADD COMMENTARY HERE ON THE CONSULTATION PROCESS? IT APPEARS THAT THE CHURCH COMMISSIONERS WERE CONTACTED AS OPPOSED TO HOLY TRINITY PCC ITSELF, WHICH IS PERHAPS WHERE THE CONFUSION LIES.**

The Parish believes the Paddock warrants designation, and that the response from the PCC would appear to support this. ~~If, however, the Examiner is of the view that this designation should be removed from the Plan, it could be the focus of an early review to potentially include it, subject to further consultation with the PCC (which the Parish is more than happy to undertake).~~

**CNPWP would like to replace this paragraph with “The Parish Council regards this approach in any event and draws particular attention to the Abbey historic importance of the with special and archaeology as set out in paragraph 4.14 (CNP)”.**

Comments on the projects (Project 02 in particularly) are noted. The intention is that all projects identified in the Plan would be subject to further consultation with the public and appropriate bodies, including the PCC and others. The Parish is happy to make reference to the PCC in the appropriate project box and welcomes the opportunity to discuss the project idea with them (and partners) at an appropriate time. ~~The Parish is also happy to insert an additional sentence into the introduction to the appendix to clarify that all projects would be subject to further consultation and partnership working.~~

**CNPWP would like to take out this last paragraph.**

Suggested addendums to Appendix 7 are noted and welcomed. The Parish is happy to update the text as recommended.

The suggested corrections are noted. The Parish Council is happy to amend the Plan to reflect these comments.

### Copas Farms Estate

The representation is duly noted. The content is similar to that contained within the response from Stantec on behalf of The Copas Partnership and Copas Traditional Turkeys. To avoid duplication, responses to both representations are combined within the next section.

## **RESPONSES FROM AGENTS**

### **Lichfields obo Church Commissioners for England**

This representation effectively seeks to promote a development site through the Neighbourhood Plan. The Neighbourhood Plan does not do this. This does not mean that it 'fails' the tests of the Basic Conditions. Planning Practice Guidance is clear on this. It states: 'the specific planning topics that a Neighbourhood Plan covers is for the local community to determine'.

Crucially, and beyond the three allocated sites in the Local Plan, there is not a specific housing figure for Cookham Parish in the Local Plan. There is thus no requirement for the Neighbourhood Plan to allocate sites. Indeed, the Planning Practice Guidance states that 'Neighbourhood Plans are not obliged to contain policies addressing all types of development'. It goes on to state that 'Housing requirement figures for Neighbourhood Plan areas are not binding as neighbourhood planning groups are not required to plan for housing', and 'where strategic policies set out a housing requirement for a designated neighbourhood area, the neighbourhood planning body does not have to make specific provision for housing, or seek to allocate sites to accommodate the requirement (which may already have been done through the strategic policies or non-strategic policies produced by the local planning authority)'. This is exactly the position in Cookham.

The representation also states that the Neighbourhood Plan does not meet the basic conditions because the Plan period is set beyond that established in the Local Plan. Whilst it is normal for the plan periods to be aligned, this is not a requirement of the Basic Conditions. Neither the Basic Conditions nor Planning Practice Guidance specify what timeframe must apply to the Plan period.

The representation states that with changes to Green Belt policy, the Neighbourhood Plan should be drafted to help facilitate change and release of the Green Belt. The Parish does not agree. The NPPF and Planning Practice Guidance make clear that, given the strategic nature of the Green Belt review process, it can only be undertaken by the local authority as part of the Local Plan review. It is not for the Neighbourhood Plan to identify areas or sites that should be released from the Green Belt. Indeed, the only instance in which this might occur is if a Green Belt assessment has been undertaken by the local authority and this identifies that land needs releasing from this to meet their housing requirements, and that it says that the Neighbourhood Plan group can identify which parcels in that Neighbourhood Plan area might be most appropriate for release. The Local Plan does not do this. Indeed, the evidence to the Local Plan states that the Green Belt between Cookham and Maidenhead performs strongly against and contributes strongly to the purposes of the Green Belt. There is no reason to expect this to change. This is not to say that RBWM will not need to undertake a review of the Green Belt again as part of the review and update of the Local Plan. Rather, that if sites are to be promoted for development in the Green Belt, the Neighbourhood Plan is the incorrect vehicle for this, i.e.: the Local Plan is the right and proper place for this. Indeed, the representation states it will be doing this. Equally, the Parish will engage with the Local Plan process.

The Neighbourhood Plan reflects and is in conformity with the strategic policies of the Local Plan. If that is to be updated and new strategic policies adopted they would, as is normal in the course of planning, supersede sections in the Neighbourhood Plan as relevant.

Furthermore, the Neighbourhood Plan does not seek to frustrate development as claimed in the representation, but rather seeks to ensure that is located and designed appropriately and sensitively to context. This is expressed for example in Policy C-CI1 of the Neighbourhood Plan which seeks to prevent visual coalescence between settlements which is different to saying there must be no development anywhere between the settlements.

The representation does not require any amendments to be made to the Neighbourhood Plan.

### **Stantec obo The Copas Partnership and Copas Traditional Turkeys**

This section combines our responses to the representation from Stantec as well as that submitted by Copas Farms Estate. Both stress the importance of the agricultural sector, changes that have taken place and the need to modernise. This is well recognised by the Parish.

The representation from Stantec very helpful proposes amendments to the wording of Policy C-DP6a. Changes proposed in respect of Part 1a-e are noted and accepted by the Parish. The removal of Part 1f is however not agreed. As the submitted Topic Paper demonstrates, the frequency with which agricultural buildings in Cookham are changed from agricultural use to residential accommodation is a particularly local issue resulting in development creeping into the countryside which otherwise would not be permitted.

**WORKING PARTY TO REVIEW AND AMEND / ADD TO AS APPROPRIATE**

**Insert “or other non agricultural use” after residential accommodation 2<sup>nd</sup> paragraph.**

The suggested removal of Part 2 is not agreed by the Parish either. It is to be noted that the wording of the policy does not make the production of a ‘whole farm plan’ an absolute requirement. Rather, it encourages such plans to be prepared to help assess the cumulative impact of development. The Parish sees production of such a plan being a ‘good neighbour’ approach to change and development, and thus enabling the applicant, parish and wider community to work together to deliver change which works for all.

The Parish also disagrees that Part 3 of the policy should be removed. The representations make the point that reuse of farm buildings is permitted under the agricultural diversification policy in the Local Plan. However, this policy relates to reuse for agricultural purposes. The reality in Cookham is that many buildings are instead repurposed for alternative uses, including residential. ~~Upon review, it is noted that Part 3 and Part 1f slightly overlap with each other and these could be combined.~~

**Remove the last paragraph as part 3 (is encouragement and not obligatory) refers to existing, part 1f refers to new build. CNPWP prefers for these to be kept separate.**

The representations express concern with regard to Information Box 5 and its preference to avoid use of pesticides and herbicides. The reasons given are acknowledged. However this is not a policy and is clearly worded as a recommendation. There is no obligation for this to be enforced. However, we note in the representation from Copas Farms Estate that Part 4 of Policy C-DP6a in respect of low carbon farming techniques is considered to be reasonable and that the representation from Stantec does not propose any changes to this either. As such, the Parish does not consider it necessary to make any change to Information Box 5.

The representation from Stantec also comments on Biodiversity Policy C-EN1 and suggests that the purchase of off-site biodiversity credits should be allowed as an alternative to off-

site delivery of biodiversity net gain within the parish. Whilst recognising that this is an approach that is acceptable, it runs the risk of net gain not actually being delivered and those gains being remote from the actual site and location where change is taking place. Indeed, research published by Wildlife and Countryside Link ([available online](#)), found that the amount of land secured for offsite habitat creation and enhancement is well below that expected by the Government (only 13% of the land area that Defra estimated would be generated annually for net gain has been secured). Until the approach to net gain is amended to reflect the risks of non-delivery, the focus should be on delivery on-site or where there are clear, demonstrably deliverable opportunities for off-site gains in close proximity to the application site.

The Parish prefers a cascade approach to delivery of biodiversity net gain and subject to consideration by the Examiner, would be comfortable with Part 1 and 2 of the policy being reframed along the following lines:

1. *Other than where except by national guidance, proposals for development must manage impacts on biodiversity and secure a minimum biodiversity net gain of 10% (or minimum target to be established by RBWM in future guidance) following a cascade approach:*
  - a. *Opportunities should be taken to provide and enhance biodiversity on-site in the first instance*
  - b. *Where on-site delivery is not practicable off-site enhancements should be delivered within the Neighbourhood Plan area and as close as possible, where feasible, to the development site.*
  - c. *Provision of financial contributions in lieu of biodiversity net gains, or delivery elsewhere in the Borough, will only be supported where the applicant has been able to demonstrate that both on and off-site delivery in the Neighbourhood Plan area is not possible.*
2. *Biodiversity net gain will be demonstrated through use of the most up-to-date version of the Defra biodiversity metric (or any successor document to this) and submission of a biodiversity net gain plan submitted as part of planning application material. This will be informed by current site conditions and with any proposed habitats creation being appropriate to local content. The biodiversity net gain plan will show how net gains will be managed for a period of at least 30 years.*
3. *Where off-site net gains are to be provided within the Plan area it should be shown how these support projects identified in the RBWM Biodiversity Action Plan (Information Box 5)*

## RESPONSES FROM RESIDENTS AND OTHERS

Six responses have been received from residents and others. All are essentially supportive of the Neighbourhood Plan. In particular:

- Comments express support for the approach to agricultural and equestrian development (C-DP6a and b). This is welcomed as it is an area of particular local concern (and is addressed further elsewhere in these responses).
- The importance of the gap between Maidenhead and Cookham is stressed. This is welcomed and reflects the findings in the RBWM Edge of Settlement Analysis undertaken for the Borough Local Plan which notes how this gap contributes very strongly to the purpose of the Green Belt (and which is discussed further in these responses). Linked to this, it is noted that the Maidenhead Neighbourhood Forum is supportive of the Plan and that policies for the neighbouring areas are aligned.
- One comment suggests that the Plan should say more on the potential development of small sites. Given the Local Plan allocates land in Cookham for development the decision was taken not to allocate further land. The Parish Council does though recognise that proposals for small sites will continue to come forward. The Plan does not preclude this but does expect that policies within it will be used to inform an appropriate design response.
- One comment suggests that a policy should be included that supports all forms of sustainable travel, and which will help resolve traffic issues in Cookham. Whilst supportive of this position, the Borough Local Plan does, at Policy QP1 (Part 2b), require development to contribute to transport and, at Policy QP3 (Part 1d), requires development to maximise the use of sustainable modes of transport. Policy IF2 expands on this and establishes various criteria for new development to meet in respect of sustainable transport. It is not necessary for the Neighbourhood Plan to repeat this. However, concern about local traffic impacts is recognised and well understood. The Plan includes a series of projects in Appendix 9 that are not directly related to land-use and transport matters and which the Parish is keen to develop further with relevant partners. This includes, at Project 10, a desire to deliver traffic management solutions, including a Parish-wide traffic management plan.

## RESPONSE FROM RBWM

Comments from RBWM on the Neighbourhood Plan are set out in the table below, with an additional column added to this which sets out the response to the comments from Cookham Parish Council.

Section / Paragraph	RBWM Comment – Regulation 16	Response from Cookham Parish Council
<b>General Comments</b>		
General	References to the NPPF should be updated. Please ensure all references to policy documents are up to date.  Please also ensure that the correct date is added to the front page of the Plan.	NPPF references: Noted and agreed  Date on front page: Noted. To be updated as and when Plan modified for the referendum stage
<b>Policy C-DP1</b>		
1 and 2	Noted. However, the Council’s Regulation 14 comment still stands. The Council is concerned that what is being suggested is a more onerous site appraisal (for example, like a Design and Access Statement) that would not be proportionate for all forms of development.	The Parish is unclear why RBWM is concerned with Parts 1 and 2 of the Policy. The NPPF emphasises the importance of good design and this feeds through into the Borough Local Plan in Policy QP3 which, at part 3, states that proposal for development must respect and enhance the local, natural and historic character. The Local Plan however doesn’t define what is meant by local character and how this should be interpreted. The NPPF and supporting material emphasises the role and importance of design codes. A Design Guide and Codes document has been prepared for the Neighbourhood Plan which builds upon the Borough-wide Design Guide and the Cookham Village Design Statement. Important characteristics are identified with illustrated guidance then presented which shows how these should be responded to in Cookham. This therefore supports application of Policy QP3 in the Local Plan and achievement of design objectives in the NPPF.  The approach taken is common to many Neighbourhood Plans, where a Design Code has been prepared alongside the Plan and embedded in policies.

2 b)	Noted. However, the amended text states that, ‘...which are defined as those in excess of two-storeys...’ This is inconsistent with the definition of a tall building provided in strategic BLP Policy QP3a. The Council would recommend that this is amended to ensure consistency with the BLP.	<p>The RBWM Building Height and Tall Building SPD post-dates the Borough Local Plan and includes more information on appropriate building heights in the Parish. This makes clear that, in Cookham, the prevailing building, or context height, is one to two storeys. The SPD assesses locations where tall buildings might be appropriate in Cookham which, based on the definition in Policy QP3a of the Local Plan, would equate to a four storey building. The SPD does not consider there to be potential for any tall buildings in Cookham. It notes that a building of a maximum of three storeys may be suitable in close proximity to the railway station, subject to townscape and heritage sensitivities, but that there are no opportunities for tall buildings as this would overwhelm the context. In short, the SPD effectively recommends that the prevailing building height of one to two storeys in Cookham should be retained and that anything over two storeys is in effect a tall building in the context of Cookham. This is the position reflected in the Neighbourhood Plan.</p> <p><b>CNPWP commented that in the 2<sup>nd</sup> sentence all commas should be removed, highlighted in yellow.</b></p>
5	Noted. However, the Council’s Regulation 14 comment still stands. The Council recommends that the language is reviewed. Words like ‘must’ should be carefully considered/reviewed, using words like ‘should’ as an alternative provide greater flexibility.	<p>The Parish considers it important that affordable housing is well-integrated within development. Research undertaken by the NHBC for the former Homes &amp; Communities Agency (see: <a href="https://www.nhbc.co.uk/binaries/content/assets/nhbc/foundation/tenure-integration-in-housing-developments.pdf">https://www.nhbc.co.uk/binaries/content/assets/nhbc/foundation/tenure-integration-in-housing-developments.pdf</a>) highlights the importance of planning for mixed tenure developments, supporting social inclusion and community cohesion. This is reflected in the NPPF which highlights the benefits of mixed tenure sites. Replacement of the word ‘must’ with ‘should’ would, in the Parish’s view, weaken the intention of the policy. However, and in the interest of taking the Plan forward, the Parish is happy to be guided by the Examiner and amend the wording if considered appropriate.</p> <p><b>CNPWP agreed they want to take out the last sentence.</b></p>
<b>Policy C-DP3</b>		

2	Noted. However, the Council’s Regulation 14 comment still stands. This clause of the Policy should be removed as it is covered by other policy or rewritten to ensure compliance with national Green Belt policy.	<p>DOES THE WORKING PARTY WISH TO COMMENT ON THIS? WE COULD SIMPLY SIGNAL TO THE EXAMINER THAT WE ARE HAPPY FOR THE CLAUSE TO BE REMOVED</p> <p>CNPWP would like the response to be:</p> <p>The Parish Council does not see how CDP32 is contrary to national greenbelt policy, if it does comply they do not see any reason why it should be removed.</p>
<b>Policy C-DP4</b>		
2	Noted. However, this text should be added to Clause 2. ‘Applications should include a Heritage Statement that describes the significance of the heritage asset(s) affected and setting where relevant. At the very minimum the Historic Environment Record should be consulted.’	The Parish is happy to include the wording in the Policy as suggested by RBWM.
<b>Policy C-DP5</b>		
2 b)	Noted. However, the Council’s Regulation 14 comment still stands. The Council is not sure what is meant by ‘complement’? For example, does this mean visually or functionally complement? The Council is concerned that this is too vague and potentially too restrictive and how this would be assessed?	The word ‘complement’ is to be taken to mean the design and function of the proposed use. In terms of function, issues such as noise, odour and other disturbances would help determine whether a use is complementary or not.
<b>Agricultural Buildings</b>		
4.23	Noted. The Council understand the intention behind the Policy. However, whilst the Topic Paper has been submitted to justify the Policy, there is still a concern that this Policy may not be in full compliance with paragraph 56 of the NPPF. It could also be considered contrary to what the Government is trying to achieve via the use of agricultural permitted development rights. Therefore, the Council’s Regulation 14 comment still stands.	Reference back to the Reg 14 responses from RBWM indicate that the concern with this para is primarily associated with the last sentence in respect of attaching a condition to approvals to say that buildings should be removed if no longer required for agricultural purposes. The purpose of this is to avoid the conversion of such buildings into residential use and which is enabling otherwise unacceptable development to creep into the Green Belt. This, as the Topic Paper shows, is a particular and ongoing issue in Cookham which the Local Plan has not adequately addressed and why a locally specific policy on

		<p>this is required in the Neighbourhood Plan. To this extent, it is considered compliant with para 56 of the NPPF. <b>WORKING PARTY TO ADD FURTHER AS APPROPRIATE</b></p> <p><b>Remove “residential” and replace with “non agricultural” use.</b></p> <p><b>Add sentence “There is always the opportunity for a further planning application to remove a condition, but a condition does change a permitted development change of use”.</b></p>
<b>Policy C-DP6a – Agric Dev</b>		
1 f)	<p>Noted. However, the Council’s Regulation 14 comment still stands. The Council questions the requirement for this condition and raise concerns over whether such a condition would meet the tests for imposition.</p>	<p>Please see response above</p>
2	<p>Noted. However, the Council’s Regulation 14 comment still stands. The wording of clause 2 is unclear/not very concise - 'future strategy' / 'scrutinised' / 'sever land'? Paragraph 16(d) of the NPPF states that plans should, “contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals”. It is not clear how Development Management Officers at the Council would be able to assess this part of the policy, and we would be concerned that an examiner might choose to delete the policy, or this part of it on that basis. There could also be some conflict with BLP Policy ED4 on Farm Diversification. Although it is worth noting that ED4 is not a Strategic Policy. The Council also query whether a ‘whole farm plan’ could be reasonably requested for any / all development? This could be very onerous for small scale projects and the Council would wish to encourage, not deter agricultural businesses. It is also noted that the Council could not refuse Planning Permission on the basis of future plans and consequently this is not considered to be effective. The Council suggests that this clause is removed.</p>	<p>The Topic Paper that was submitted alongside the Plan provides examples of agricultural developments and proposals that have resulted in land being severed and allowing wider change to come forward.</p> <p>The production of a Whole Farm Plan is intended to address this. It is to be noted that the policy does not ‘require’ productions of a whole farm plan, but rather encourages their productions and submission. This would help the decision maker and wider community understand the long term intentions for the farm, the implications of these, and how activities can best be managed in the interests of all. Production of a Whole Farm Plan, whilst not a requirement, should be seen and taken to be a good practice approach and which will help smooth the planning application process, managing consultation and the engagement process.</p> <p><b>WORKING PARTY TO ADD FURTHER TEXT AS APPROPRIATE</b></p> <p><b>CNPWP agree text, nothing further to add.</b></p>

3	<p>Noted. However, the Council’s Regulation 14 comment still stands. As above with Clause 2 of this Policy, some of the wording here is not very clear or is ambiguous. Planning Practice Guidance states that policy should be concise, precise, and supported by appropriate evidence. The Council is not sure how the decision maker would apply this policy? Again, the Council would recommend the removal of this clause, or if the clause is not to be removed, it should be amended.</p>	<p>Following further review, this Part of the Policy duplicates Part 1f to some extent. They could be amalgamated. The reasons for part 1f are given above.</p> <p><b>Delete comments, for the reasons given in paragraph 4 of the response to Stantec, namely that paragraph 3 (encouragement and not obligatory) relates to existing buildings and 1f relates to new buildings, they serve different purposes and the opinion of the Parish Council should be they remain separate.</b></p>
<b>Policy C-DP6b – Equestrian Dev</b>		
General	<p>Noted. However, the Council’s Regulation 14 comment still stands. The Council understands the reasoning behind this policy but questions the need for it given the existing BLP policies. We also have concerns about the Policy being too prescriptive.</p>	<p>The Regulation 14 comment from RBWM questioned whether the reference to the Code of Practice was relevant and it was questioned whether it was indeed a planning consideration. The response from the Parish set out in the Regulation 14 report makes clear that reference to the Code is appropriate as it establishes space standards that need to be met in respect of stables and grazing areas, and thus the size of the building that is appropriate. The importance of this is (a) the welfare of animals, and (b) future development.</p> <p>As clearly stated in the Topic Paper, there are numerous examples of such buildings being erected and then very quickly being sold and converted for residential use. By reference to the space standards above the policy limits the risk of over-sized stabling being erected for the purposes of conversion to residential use.</p> <p>There is a live example of the above, with the sales particulars of the Hills Lane site in Cookham Dean (SL6 9NT) stating that this is an equestrian site, with newly erected stables, but that it has speculative development potential in a prime residential location. The particulars go on to state that the buildings were erected as recently as 2023 but that have excellent potential for conversions into an exclusive rural retreat.</p> <p>It is exactly this type of change that the policy is seeking to guard against. The Neighborhood Plan has no issue with proposals for equestrian</p>

		<p>development, where it is appropriate designed and sited, and meets the required space standards. But such development should not be used as a 'back-door' to <del>permitting</del> residential development. The example above shows the speed at which this type of change is taking place in Cookham. The Local Plan does not address this challenge and is why the Neighbourhood Plan has sought to introduce this policy approach.</p> <p><b>WORKING PARTY MAY WISH TO ADD FURTHER TEXT</b></p> <p><b>"obtaining" to be used instead of "permitting".</b></p>
1 (a) and (b)	<p>Noted. However, the Council's Regulation 14 comment still stands. The Council still has concerns that this is not a planning consideration and that the Code of Practice for the welfare of Horses, Ponies, Donkeys is not relevant. The Council would suggest removal of this reference. Land required for grazing is adequately covered by BLP Policy QP5.</p> <p>The Council suggests using words like 'should' as an alternative to 'must' as this provides greater flexibility.</p>	<p>See explanation above. This justifies why the word 'must' as opposed to 'should' is needed in this instance. Putting to one side the issue of buildings being converted, the importance of animal welfare along dictates that these space standards must be met.</p>
5	<p>Noted. However, the Council's Regulation 14 comment still stands. The requirement for a business plan may be unreasonable/too onerous - for example, would one new stable in amongst others existing stable buildings require a business plan? Or why would a private stable require a business plan? It is worth noting that there are two types of equestrian - private and commercial. The Council is not sure who would assess any business plan submitted as part of a planning application. It is not clear how this policy requirement is reasonable, effective, or how a decision maker should react to development proposals (as per para 16 of the NPPF). The Council is also concerned that there is no substantive quantitative information to support an absolute requirement. The Council would recommend that this requirement is removed.</p>	<p><b>WORKING PARTY TO EXPLAIN RATIONALE FOR THE REQUIREMENT FOR A BUSINESS PLAN</b></p> <p><b>This policy DP6b expressly applies only to commercial development. It seems to the Parish Council the justification of commercial development, including as very special circumstances in Greenbelt, is a common place of planning assessments.</b></p>

7	Noted. However, the Council’s Regulation 14 comment still stands. As above, the Council still has concerns over this clause, its reasonableness and effectiveness. The Council questions how this policy be enforced if not complied with, and how ‘except in very special circumstances’ would be measured. The Council would recommend removing this clause.	<p><b>WORKING PARTY TO EXPLAIN RATIONALE FOR INCLUSION OF CLAUSE REQUIRING BUSILINGS THAT ARE NO LONGER NEEDED TO BE REMOVED</b></p> <p><b>The “except in very special circumstances” is frequently used in planning including in the NPPF, and the Parish Council sees no more difficulty in applying it to these circumstances than any other.</b></p>
<b>Natural Environment</b>		
5.6	Noted. The Council would recommend that the text here is clear on what is required by national legislation.	The Parish is happy to provide a link here to the collection of guidance on biodiversity net gain on the Government / Defra website: see: <a href="https://www.gov.uk/government/collections/biodiversity-net-gain">https://www.gov.uk/government/collections/biodiversity-net-gain</a>
Information Box 5	Noted. However the text was not actually amended, please amend as suggested. Recommend amending the opening line for accuracy. The BAP covers the period 2022-26. Bullet point 1 - recommend it be changed to, ‘Increasing the area of woodland, trees and hedgerows, via natural regeneration where possible and supplemented with direct seeding/planting with native species of local provenance.’ Also includes a lot of the BAPs objectives – not clear why, or why necessary?	<p>The first line of the Information Box already makes clear that the BAP covers the period 2022-26. The Parish is happy to amend the first bullet point as per the suggested wording from RBWM.</p> <p>Inclusion of the objectives here helps demonstrate the wide variety of ways in which biodiversity net gains can be provided and strengthens the view of the Parish that it is reasonable to expect net gains to be provided on site or, if off site, then within the Parish (this links to the comment and response below).</p>
<b>Policy C-EN1</b>		
2	Noted. However, the Council’s Regulation 14 comment still stands. The Council advise that this would not be practical as there is insufficient capacity to deliver enough locally - request removal	<p>The Parish disagrees. There is no evidence to suggest that biodiversity net gain cannot be accommodated in the Parish. Indeed, taking this stance simply risks biodiversity net gain being delivered elsewhere in the country, where it has no relevance to the development site, or where credits for offsite gains are not utilised.</p> <p>Biodiversity net gain can be accommodated in a variety of ways, both on and off-site within the Parish. Guidance published by the NHBC and RSPB (Biodiversity in new housing developments: creating wildlife-friendly communities), for example, illustrates a wide range of opportunities for delivering net gains, including but not limited to retaining and enhancing</p>

		<p>grasslands and woodland, introducing biodiverse verges into the street environment, making use of nectar rich shrubs that support pollinators and adapting use of existing structures and materials for wildlife enhancement. Indeed, RBWM has very recently consulted on the Berkshire Local Nature Recovery Strategy, 'Making Space for Nature'. This includes a series of priorities, measures and mapping. The mapping identifies extensive areas of opportunity for biodiversity with the Parish. In short, the Parish does not agree that this Part of the policy should be removed, though is <del>happy</del> to consider redrafting this along the lines of a 'cascade' policy (see responses to representation from Stantec above).</p> <p><b>Take out the word "happy" and replace with "prepared".</b></p>
<b>Policy C-EN2 (at Regulation 14 stage this policy was split into 2 policies – C-EN2a and C-EN2b)</b>		
1	Noted. However the text was not actually amended, please amend as suggested. Suggest NP includes retention of natural soils, so recommend it be changed to 'Applicants are required, as far as physically possible, to retain and include existing trees and hedgerows in their layouts, along with safeguarding as much natural soil (soft ground) as possible. Where landscaping...'	The Parish is happy to include the additional wording in Part 1 of the Policy as suggested.
4	Noted. The Council considers this to be an improvement, but would suggest that the words, 'show how they have responded to...' are also be removed.	The Parish understand this to be a comment on Part 5 of the policy. Based on this, the Parish is happy to remove the words as suggested by RBWM.
Conservation Area map 1995.	Noted. We note that the map on the Council's website is also out of date. This map has now been updated and can be downloaded from the <a href="#">Council's website</a> . The Council would suggest that updated maps are included in the Plan.	This refers to the Appendix of the Neighbourhood Plan rather than Policy C-EN2. However, the Parish is happy to include updated maps of the Conservation area in the Neighbourhood Plan.
<b>Policy C-EN2b (This Policy has now been amalgamated with C-EN2a to become C-EN2)</b>		

1	Noted. However, the Council is still unsure of the intention with this part of the Policy (now C-EN2(4)). The Council would again suggest this clause is removed or re-written for clarity.	<p>WORKING PARTY TO PROVIDE A RESPONSE AS WORDING IN THE POLICY IN RESPECT OF EXISTING HOMES AND THEIR CURTILAGE WAS INSERTED UPON REQUEST OF THE WORKING PARTY. PARTS (A) AND (B) OF THIS PART OF THE POLICY ARE SIMILAR TO THE TEXT IN THE ASCOT NEIGHBOURHOOD PLAN AND COULD BE RETAINED, BUT IT IS THE OPENING SENTENCE OF PART 4 THAT IS BEING QUESTIONED HERE.</p> <p>Green corridors</p> <p>CNPWP would like to stick with the existing policy wording and are comfortable with Jon's response in Q5.</p>
Figure 3	Noted. The map is now much clearer, but the Council still has concerns that this map and para 5.10 alone are not sufficiently robust to support Policy EN2 and the Green Corridors identified.	<p>Within the Parish there are extensive areas of important habitats. These are set out in Table 1, mapped and tabulated in Appendix 4. The green corridors that have been identified seek to connect these and follow existing habitats, green and blue infrastructure. This is aligned with the NPPF. Para 192(a) of the NPPF (2024) states that plans should identify, map and safeguard components of local wildlife-rich habitats... wildlife corridors and stepping stones that connect them...'. The Neighbourhood Plan is consistent with the NPPF and contributes towards delivery of Nature Recovery Networks.</p> <p>Provision of green corridors are supported in the RBWM Open Space Study which forms part of the evidence base to the adopted Local Plan. This notes that these can take the form of wildlife corridors, being linear strips of open space that combine habitats and species. The linking of habitats along existing green and blue infrastructure does just this. Furthermore, the approach taken in the Neighbourhood Plan supports Policy NR2 (Parts 5d and 5e) of the Borough Local Plan which states that development proposals should recognize the importance of green corridors and avoid fragmentation of existing habitats. The Local Plan however does not define what or where green corridors are in the Borough. The Neighbourhood Plan thus develops this further by identifying important corridors in Cookham Parish. The Green Corridors in the Neighbourhood Plan have been identified in partnership with Wild</p>

		<p>Cookham: the local wildlife society championing local environmental issues, biodiversity and wildlife protection.</p> <p><b>COULD THE WORKING PARTY (WILD COOKHAM) ADD FURTHER INFO HERE WHICH FURTHER EXPLAINS HOW THE CORRIDORS WERE IDENTIFIED AND WHICH SUPPORTS THEIR RETENTION IN THE PLAN.</b></p> <p>The Parish notes that the ‘made’ Ascot, Sunninghill and Sunningdale Neighbourhood Plan (also within RBWM) also includes a policy and mapping on Green Corridors. These follow features such as existing watercourses and railway corridors, and link Local Wildlife Sites, biodiversity opportunity areas, open water and ancient woodland. This was found to meet the Basic Conditions. The approach in the Cookham Neighbourhood Plan is consistent with this.</p>
<b>Policy C-EN3a</b>		
1	Noted. The Council would question the need for this text given the existing requirements of local and national policy and guidance on flood risk assessments.	<p>The Parish acknowledges the comments made by RBWM and is happy to be steered by the Examiner as to the most appropriate course of action.</p> <p><b>The Parish Council believes it provides useful context and support for this policy, so would prefer to keep it.</b></p>
2	Noted. However, the Council still has concerns that this would undermine a strategic Policy in the BLP (NR1). Guaranteeing safe access and egress would be inconsistent with national policy and unworkable. The Council would again suggest that this clause is removed or reworded in line with the BLP and NPPF.	<p>The need to provide and maintain safe access and egress is essential in Cookham given the impact of flooding on the population and which has, and on several occasions recently, ‘cut’ many residents off from the wider area, with The Causeway being the only means of access available. This is particularly important for emergency services in times of flooding. Whilst it is accepted that development cannot be expected to retain and maintain the Causeway, it must, as appropriate to the extent of the site, allow access to and from this. The Parish accepts that Policy NR1 (Part 6e) makes reference to safe access and egress being demonstrated ‘where appropriate’. However, the Parish considers that the impact of flooding on communities in the Parish is more severe than other parts of the Borough and, given the very real risk of isolation in times of flooding, that the requirement for safe access and egress must be demonstrated.</p>

		<p>This does not seek to undermine the Policy in the Local Plan but expands this as appropriate to make it relevant to the specific circumstances in Cookham.</p> <p>In the event that Part 1 of the Policy is removed (see above), the policy could potentially be reframed around safe access and egress to ensure that the Cookham Causeway Plan remains operable. Potential wording for this could be along the lines of:</p> <p><i><del>'As appropriate to location, development proposals must retain access to The Causeway, including routes within the Parish that lead to The Causeway, so that it remains open and operational during periods of heavy flooding. All new developments will be expected to provide safe egress and access in case of fluvial and/or surface and ground water flooding and rising river levels, and having made allowance for the effects of climate change'.</del></i> <b>Remove the striked out above.</b></p> <p>The Parish is <del>happy to be steered by the Examiner and or</del> <b>prepared to discuss further if that would be of assistance.</b></p> <p><b>CNPWP would like to insert a new sentence between existing 1<sup>st</sup> and 2<sup>nd</sup> paragraph of response, "the Parish Council appreciates <u>guaranteed</u> may be too strong. And it would be prepared to substitute with the word <u>ensures</u>".</b></p>
<b>Policy C-LI1</b>		
2	Noted. However, the Council's Regulation 14 comment still stands. BLP Policy TR5 is not strategic, so doesn't necessarily need to be complied with, however, it is worth noting that this clause of C-LI1 conflicts with TR5(3) and potentially national guidance - permitted development? Recommend rewording the policy.	The Parish suggests that this part of the Policy is reworded slightly along the lines of <i>'insofar as planning permission is required, residential uses should be located on the upper floors of a mixed-use scheme.....'</i> or other form of wording that the Examiner considers appropriate. Notwithstanding permitted development rights, it is important to promote an appropriate mix of uses to help support and sustain local centres, and where residential use at ground floor can fracture and

		undermine the success and vibrancy of the centre.
<b>Policy C-AM2</b>		
General	<p>Noted. However, the Council’s Regulation 14 comment still stands. Appendix 8 of the BLP states specific parking standards ‘based on RBWM Parking Standards 2004’. However, the use of those standards seems to be selective in using standards for areas of poor accessibility (commercial, retail, educational, health, leisure) and standards for areas of good accessibility (residential). It is unclear whether the standards are minimum, maximum or optimum standards. The Council is still concerned at the lack of justification for the selection of the standards included in the Neighbourhood Plan. The Council would recommend removing Parking Standards from the Neighbourhood Plan, or if they are to remain, they need to be appropriately justified.</p>	<p>Policy IF2 (Part 3g) of the Borough Local Plan clearly states that development should provide parking in line with the Parking SPD or as set in made Neighbourhood Plans. This gives scope for Neighbourhood Plans to include parking standards. Those in the appendix of the Cookham Neighbourhood Plan are taken directly from the Parking Standards SPD. They are included in the Neighbourhood Plan to provide clarity on the standards that should be applied in Cookham.</p> <p>The SPD establishes different parking standards related to levels of accessibility. It clearly defines Cookham as an area of poor accessibility. The Parking Standards in Appendix 8 of the Neighbourhood Plan are those applying to poor accessibility areas as presented in the SPD. They are extracted directly from the Parking Standards SPD. The only difference is that the Neighbourhood Plan has presented the standards in terms of the new Use Classes Order, thus bringing the standards up-to-date.</p> <p><del>The standards in the Appendix are maximum standards, as clarified in the SPD. The Parish is happy to add the word ‘maximum’ to the appropriate column of the table in Appendix 8.</del> <b>Remove this paragraph and replace with: “Because of lack of public car parks, poor public transport links and very limited availability of on street parking, these are intended to be minimum standards”.</b></p> <p>In short, the Local Plan allows Neighbourhood Plans to include parking standards and supports provision in line with the Parking Standards SPD. The Cookham Neighbourhood Plan does exactly this – indeed, it simply clarifies which of the adopted standards apply in Cookham. As such, the</p>

		<p>Parish sees no reason why this section of the Neighbourhood Plan should be amended (particularly as the text in the Plan acknowledges that these may be superseded at a later date if and when RBWM introduces new standards)</p> <p><b>CNPWP would like a sentence inserting; “The Parish Council has not been “selective” in its use of standards”.</b></p>
2	<p>Noted. However, the Council is unsure why parking spaces should ‘normally’ be set back from the main building line, or whether this is a reasonable, or achievable requirement. The Council cannot see how a policy which effectively implies that it is unacceptable to have a parking space between a house and the road can be adopted.</p>	<p>The policy does not preclude car parking from being located in front of the house. However, in line with good design, it encourages parking to be set back behind the building line and which is reflected in the Borough Local Plan which states, at Policy QPS (part1i), for example, that development should be designed to minimise the visual impact of traffic and parking. Equally, the Cookham Design Guidance and Codes document states in the section on residential street design: ‘Locate parking to the side of the property to mitigate the impact of cars on the streetscape’.</p> <p>The above <b>reflects</b> <del>is reflected</del> of RBWM’s own guidance. The Cookham Village Design Guidance, which was adopted as SPD by RBWM, states in Guidance note GU.16 that ‘car parking should be arranged discreetly, avoiding visually dominant hard-standings at the front of houses...’. Furthermore, the RBWM Borough-wide Design Guide expresses a preference for on-plot parking and clearly states, at paragraph 6.35, that ‘the Council’s preference is for parking to be to the side or rear where adverse impacts on the street scene and amenities can be more effectively managed’. This is also stated in Principle 6.8 of the Design Guide. This approach is thus already accepted and indeed promoted by RBWM. The Parish’s view is thus that the Policy does not need to be amended.</p> <p><b>CNPWP would like paragraph 2, first sentence to be re-arranged to</b></p>

		<p><b>read:</b></p> <p><b>“Car parking spaces required for new homes, conversions or extensions should be of a sufficient size to accommodate modern vehicles, normally be provided on-plot and preferably set back from the main building line fronting the street”.</b></p>
5	<p>Noted. However, the Council’s Regulation 14 comment still stands. If this clause relates to new development only, this should be stated clearly in the policy. Even then, the Council maintains that this would be overly prescriptive. The Council recommends the removal of the clause.</p>	<p>The Parish is happy to include reference to this clause applying to new development only. This is however already stated in Part 1 of the policy. It may read better if Parts 2 – 5 then become a sub-set of Part 1 (i.e.: they became Part 1a-d), with current Part 6 then being renumbered as Part 2.</p> <p>The Parish does not agree this part of the policy is overly prescriptive and, as above, that it reflects the existing suite of guidance and advice adopted by RBWM and prepared for the Cookham Design Guidance and Code. The Borough-wide Design Guide makes clear that parking should be provided on-plot but, where provided on-street (see Principle 6.10), must be well-designed, integrated within a public realm scheme and limit the number of parking bays to a row of three. The Neighbourhood Plan thus reflects guidance that RBWM already supports and promotes. The Parish’s view is thus that, other than the renumbering suggested above, the Policy does not need to be amended.</p>
<b>Appendix 9: Projects</b>		
Project 03	<p>Noted. However, the Council’s Regulation 14 comment still stands. The Council query whether this is a realistic expectation for smaller schemes in conservation areas / adjacent to the river. How will this be encouraged / ensure participation?</p>	<p>The need for Design Review would be determined by the case officer. There is no requirement for Design Review to take place. The Project uses the words ‘should’ and ‘encourage’, however, the Parish stresses that the delivery of high quality design is important given the setting and context of the Parish, and that the NPPF encourages use of tools such as Design Review to help achieve this. Inclusion of such an aspiration is common in Neighbourhood Plans elsewhere and the Parish sees no reason why it should be removed. The practicalities of the review process can be discussed further with the Borough. Indeed, the Parish</p>

		welcomes the opportunity to discuss this further. <b>CNPWP think we should also make clear this applies to major development in conservation areas / adjacent to the river.</b>
Project 08	Noted. However, the Council's Regulation 14 comment still stands. Not clear what it is intended with this, or what this would power?	It is not necessary for the details of all projects to be resolved at this stage. They appear in the Plan as an expression of the community's desire to see wider change in the Parish and to work in partnership with relevant partners to deliver these. It is not necessary to confirm what community-led energy schemes would power. Rather, it is important to acknowledge that better use is made of green energy supplies and that these can contribute to the energy needs of the Parish.

Comments from RBWM on the Design Guidance and Codes document are presented below, with an additional column added as per the previous section.

Section / Paragraph	Comment – Regulation 16	Response from Cookham Parish Council
General	References to NPPF 2023 should be updated to account for recent NPPF updates.	Noted and agreed
<b>HE.02</b>		
General	Noted. HE.02 (pg. 38), 2 <sup>nd</sup> paragraph – the use of the word 'efficient'. It can only be assumed that this is relation to energy efficiency. The Council would suggest that the word 'sustainable' may be better suited for this paragraph.	The use of 'efficient' in this paragraph refers to energy efficiency and sustainability. The Parish is happy for the wording in this paragraph to be updated accordingly.
<b>Chapter 5</b>		

General	Noted. SD.01 (pg. 44), line 3 – the word ‘old’ is missing. However, some interventions may not also be appropriate for traditionally constructed buildings and bespoke approaches may need to be considered for those building alongside listed buildings or those in Conservation Areas.	The word ‘old’ does not cover all buildings. The Parish acknowledge there is a missing word in this sentence but that it should be ‘existing’ rather than ‘old’.
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