

**BRACKNELL FOREST BOROUGH
PUBLIC EXAMINATION OF THE CORE STRATEGY**

Statement by WARFIELD PARISH COUNCIL 0028

Warfield is a semi-rural Parish made up of 13 settlements. The northern part of the Parish is within the Green Belt. Warfield was originally a Saxon settlement and is recorded in the Domesday Book. The Parish Church of St Michael the Archangel dates from C13th. There are 25 listed buildings within the Parish.

Warfield Parish Council welcomes the opportunity to participate in the hearings as a means of including the voice of local residents

SUSTAINABLE GROWTH (CS1 – CS5) - THEME 1

Key Issues: Will CS1 achieve the overall objective of ensuring development is sustainable, with an appropriate set of criteria to be applied to all development proposals?

Has the Sustainability Appraisal provided a strategic input into the preparation of the Core Strategy and fully addressed the key sustainability issues and challenges in the Borough?	
Is Policy CS1 & its supporting text consistent with PPS12?	
Does CS 1 repeat rather than implement national policy for sustainable growth?	
Is it locally distinctive? If not, why not?	
Does CS1 go beyond aspirations of PPS1?	
Is CS1 sufficiently flexible in terms of healthcare provision? Does para 51 require amendment?	
Should there be a reference to the possibility of a new hospital site?	
Should CS1 include more detailed information on densities?	
How will CS1 increase access to education for all ages and to healthcare facilities	
Should CS1 recognise green infrastructure and its wider benefits to health and education?	
Should CS1 include a reference to PDL?	
CS1 vii aims to protect and enhance quality of water and land but how are these matters to be addressed?	

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<p>Is CS5 proposal to build on greenfield land in conflict with CS1?</p>	<p><u>Unsound Test 7.</u> The land north of Whitegrove and Quelm Park is an undeveloped Greenfield site within which lies an area of local landscape importance, open space of public value, SSSI, designated wildlife heritage site and sports fields. Major development with supporting infrastructure (CS5), would not enhance the character and quality of the landscape, contradicting CS1, this in turn makes development on Cabbage Hill unsustainable. In order to make CS1 sound, major urban development of the scale proposed, should be accommodated on Brownfield sites to the east of Bracknell where the existing infrastructure could cope with increased traffic and travel and where there is an existing railway station (Martins Heron) within easy reach of any new development. We suggest Policy CS 1 (i) should be worded as follows <i>makes efficient use of <u>previously developed land, buildings and infrastructure.</u></i></p>
<p>CS1 viii – is proposal to build on Cabbage Hill unsustainable?</p>	<p>See above.</p>
<p>Is CS1 sufficiently flexible for existing employment sites to cater for future needs?</p>	
<p>Does CS properly address sustainable transport issues, safety and reduction in crime?</p>	
<p>Para 46 biodiversity – does the strategy/policy for biodiversity represent the most appropriate in all the circumstances and does it reflect PPS9?</p>	

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CS4 & CS5 and Paras 69-72

<p>Has the strategy of meeting the long term growth requirements by means of 2 proposed urban extensions (CS4 & CS5) been subjected to sustainability appraisal?</p>	
<p>Is it consistent with national planning policy and RSS?</p>	
<p>Has it had regard to the Sustainable Community Plan?</p>	
<p>Is it soundly based, coherent and consistent within and between DPDs and by neighbouring authorities? Is it in conflict with CS2?</p>	
<p>Does this strategy represent the most appropriate in all the circumstances and is it founded on a robust and credible evidence base?</p>	<p><u>Unsound Test 7.</u> In reaching our earlier submissions we considered that any major development on the scale suggested in CS5 would not be sustainable for the following reasons: Much of the land lies within flood plain, river corridor and within 5 kms of TBHSPA. Cabbage Hill is an area of local landscape importance, Larks Hill an established area of public open space and Priory Field an area of sports pitches. Together with SSSI and wildlife heritage sites the remaining area of land available for development on the scale proposed becomes insufficient. CS1 encourages sustainability for all development. The Borough Council has stated that 2200 dwellings are required to build a sustainable development. The area of land specified in CS5 is we believe insufficient to accommodate the proposed scale of development and therefore makes this policy unsustainable. If additional land were added to the proposed growth area, the gaps identified in the Borough's reports would be lost. This would lead to loss of character and identity of land in the south of the parish, contrary to CS1. The strategy could be made sound by deleting CS5 and allowing development of Brownfield sites to the east and south of Bracknell. These sites are more sustainable as they already have good transport links to Bracknell TC and the railway station at Martins Heron.</p>

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Are there clear mechanisms for implementation and monitoring?	
Are CS4 & CS5 sufficiently flexible to deal with changing circumstances?	
Should the Rough, North Ascot be included as an allocated site for mixed use including residential?	
(i) Paras 69-72 CS should identify broad locations for future development. Detailed proposals will be set out in site Allocations DPD and Area Action Plans. So what is status, role and function of Proposals Map & should it be part of CS?	
(ii) Not clear on Key Diagram p10 or Proposals Map	
(iii) Is it appropriate to show boundaries for CS4 or CS5 in CS? Are they sufficiently fixed at this stage?	
(iv) Should CS4 & CS5 require masterplans to fully address landscape character implications of proposals?	
(v) Should the no. of proposed houses be stated in CS4 & CS5?	
(vi) Should these sites be in Site Allocations DPD or Area Action Plans & therefore be deleted from CS?	
(vii) Does CS4 conflict with CS1 in terms of gaps between Bracknell & Wokingham (Riggs Copse)?	
(viii) Is there a more appropriate mix of uses for these sites than that shown on illustrative drawing in Major Location for Growth Background paper?	
(ix) Should Parish of Binfield be omitted for clarity?	
(x) Is CS4 site a sustainable option when considered against alternatives?	

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ENVIRONMENT (CS9-CS14) - Theme 3

Key Issues:CS9

Does Policy CS9 properly reflect national guidance in PPG2, PPG3, PPS3, PPS7, PPS12; the need to plan for mobile homes; and CO5/05?	
Is para 107 consistent with PPS7 para 5 in terms of expansion of existing businesses in locations outside settlements? What about areas on urban fringe? – are they sustainable in terms of CS1, CS2 (4)?	
Is Policy CS9 coherent and consistent with the spatial strategy and other policies in the Core Strategy (CS1, CS2 (4) CS9)?	<p><u>Unsound Test 7</u> By proposing to protect land outside settlements the CS contradicts CS1 when applied to CS5. The land north of Whitegrove and Quelm Park is currently undeveloped. Part of this land is designated of local landscape importance, open space of public value, SSSI and designated wildlife heritage site and would patently not be protected within the scope of this policy. By not protecting this land, the visual separation of settlements would be harmed, again contrary to Policy CS1. The proposal CS5 ignores PPS3 which seeks to encourage development on Brownfield land before Greenfield sites. There are a number of significant Brownfield sites to the east and south of Bracknell, that if PPS3 were to be followed, should be developed sequentially and therefore before green field sites in the north of Bracknell, which should have a lower priority for development. These areas can be protected by complying with CS9. We would support the wording in submission 00001 (1351/3 (para 2.9, 2.10, i, ii, iii). The strategy can be made sound by encouraging major sustainable development on Brownfield sites to the east and south of Bracknell.</p>
Is Policy CS9 founded upon a robust and credible evidence base in terms of the protection of land outside settlements?	
Is there a robust justification for the local	

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gap designation (para 119); has it had regard to national guidance (PPS7); is it consistent and coherent with neighbouring authority plans (Wokingham DC) and other relevant plans, policies and strategies (SE Plan)?	
Should the GB boundaries have been reviewed (in line with national & regional guidance) in order to provide affordable housing & to support overall housing provision (CS15)?	
Should there be a greater degree of importance placed on the proactive management of GB land for the purpose of landscape enhancement and formal recreation?	
Has the designation of the local gap between Bracknell & Binfield had proper regard to strategies relating to adjoining areas and how cross boundary issues area to be addressed?	
Does CS9 give sufficient recognition to development necessary for needs of farming, forestry & other related activities that can be allowed outside major developed areas within the policy context?	
Does CS9 represent the most appropriate option in all circumstances?	
Is CS9 sufficiently flexible to deal with changing circumstances?	
Para 115 is there a local justification for gaps not consistent with national planning policy?	
Have the gaps in para 119 been identified by a robust and credible evidence base?	

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Key issues CS14 and paras 143-151

Is CS14 and its supporting text consistent with SPA Technical Background document?	
Has CS14 had sufficient regard to other relevant plans, policies and strategies (PPS9, SE Plan Habitats Regulations)?	
Should additional text be added to clarify the policy having regard to the outcome of the SE Plan?	
Have CS14 and paras 144 & 145 been based on a robust and credible evidence base? Is para 144 consistent with figure 1 of Circular 06/2005?	
Are there clear mechanisms for implementation and monitoring of CS14?	<p><u>Unsound Test 7</u> We submit that there is insufficient land on the scale required within easy reach of new development in Whitegrove/Quelm Park to fulfil the SPA mitigation. If the land for mitigation and avoidance is amassed piecemeal the strategy will contradict the requirement that mitigation land should be available in sufficiently large areas to attract residents away from the SPA. Therefore the policy fails to have a clear mechanism for implementation. We recommend that the policy makes clear that any land used for mitigation may only be used once. We suggest the following additional text for para 154 <i>monitoring should be controlled or audited by an independent body on a regular basis.</i></p>
Is CS14 sufficiently flexible to deal with changing circumstances?	
Does CS14 and para 149 represent the most appropriate strategy in all the circumstances?	