

Charles Planning Associates Limited
Chartered Town Planners

**Bracknell Forest Borough Local Development Framework
Examination of the Core Strategy Development Plan Document**

HEARING STATEMENT

***THEME 4 – SOMEWHERE TO LIVE
Policy CS15 and Paragraphs 156 – 169***

Charles Planning Associates Limited
on behalf of
Croudace Strategic Limited

May 2007

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THEME 1 – SUSTAINABLE GROWTH
Policy CS2 and Paragraphs 55 – 59

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Town and Country Planning Acts

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**THEME 1: SUSTAINABLE GROWTH
POLICY CS2 AND PARAGRAPHS 55 – 59**

**Hearing Statement
on behalf of
Croudace Strategic Limited**

MAY 2007

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POLICY CS2 AND PARAGRAPHS 55 – 59**

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1.0

INSTRUCTIONS AND INTRODUCTION

- 1.1 Charles Planning Associates Limited (CPA), Chartered Town Planners, is Instructed by Croudace Strategic Limited to act on its behalf in relation to the Examination of the Bracknell Forest Borough Core Strategy Development Plan Document.
- 1.2 This Hearing Statement refers to Theme 1: Sustainable Growth, Policy CS2 and paragraphs 55 – 59, and responds to the Key Issues raised by the Inspector as included in the Draft Schedule of Matters and Issues for Examination at Hearings.
- 1.3 This Statement is submitted further to the Hearing Session that CPA shall be attending on behalf of Croudace Strategic Limited in relation to Policy CS2 and Paragraphs 55 – 59, which is scheduled to be heard on Tuesday 26 June 2007.
- 1.4 This Statement should be read in conjunction with the representations submitted to the Submission Draft Core Strategy in December 2006, and collectively they are intended to assist the Inspector in undertaking an Examination of this element of the Core Strategy DPD.
- 1.5 If you have any queries regarding the content of this submission, please do not hesitate to contact:

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2.0

POLICY CS2 AND PARAGRAPHS 55 – 59

- 2.1 The following responds to some of the questions raised by the Inspector in the Draft Schedule of Matters and Issues, based upon the principal issue:

Are the locational principles in CS2 soundly based, recognising the sustainability, role, status, constraints and potential opportunities of each settlement and reflecting the underlying spatial strategy and national and regional guidance?

- 2.2 Draft Policy CS2 of the Submission Draft Core Strategy provides the locational principles for development, based upon a sequential approach as advocated in PPG3, and is the key guiding policy for directing growth within the Borough up to 2026. In this respect, it is imperative that the Policy is able to respond to current Government Guidance to ensure that development is delivered in a sustainable manner.
- 2.3 PPS3 (November 2006) (ND008) sets out the need to identify suitable locations for housing development to ensure that ‘everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live’ (paragraph 9).
- 2.4 PPS3’s predecessor set out the need to identify locations for growth based upon a search sequence starting with the re-use of Brownfield sites, then urban extensions and then development around nodes in good public transport corridors.
- 2.5 This search sequence has been largely diluted by PPS3 which now emphasises the need for Local Planning Authorities to identify sites which are available, suitable and achievable in suitable locations which offer ‘a range of community facilities and with good access to jobs, key services and infrastructure’ (paragraphs 36 and 54). PPS3 continues to prioritise the development of previously-developed sites but not necessarily ahead of other more deliverable sites in sustainable locations.
- 2.6 Policy CS2 is based upon the search sequence set out in PPG3 and as such it is not considered that it is truly reflective of current national guidance as set out in PPS3.
- 2.7 Whilst the Council should maintain the need to prioritise the use of previously-developed land, it is considered of equal importance to acknowledge the need for sustainable urban extensions on Greenfield sites to provide housing, and that their release should not necessarily be dictated by the development of previously-developed sites first. This approach would ensure a deliverable and flexible housing land supply that would be in accordance with PPS3.

- 2.8 PPS3 clearly stipulates that Local Planning Authorities should maintain a rolling five year land supply of deliverable sites and that these should not include existing commitments and windfall sites, unless the Local Planning Authority can robustly demonstrate that it is not possible to identify specific sites.
- 2.9 It is considered necessary for the Core Strategy DPD to clearly set out the Borough's up-to-date housing land supply, including anticipated sources of supply, to meet the rolling five year land supply as required by PPS3. This matter is of strategic importance and should, therefore, be included within the Core Strategy DPD. It is therefore not considered appropriate for this to be considered in the Development Management DPD as indicated in the Council's Document 'National Planning Policy Assessment' (April 2007) (OD011).
- 2.10 Whilst it is acknowledged that Policy CS15 and its supporting text sets out the housing requirement and anticipated sources of housing land, Croudace does not consider this Policy and its supporting text to be sound and has submitted a separate Hearing Statement in relation to Policy CS15 in advance of attending the hearing session scheduled for 13 July 2007.
- 2.11 However, Policy CS2 is inextricably linked to Policy CS15 as it provides the locational principles for identifying sites to facilitate the allocation of specific sites in the Site Allocations DPD to meet the housing requirement set out in Policy CS15. In this regard, and having regard to the recommended amendments to Policy CS15 and the supporting text, Policy CS2 should avoid restrictive wording that could inhibit the allocation of sites to respond to any changes in the housing requirement, shortfalls from the anticipated delivery included in the housing trajectory and changes in market demand.
- 2.12 The supporting text to Policy CS15 identifies that the housing requirement will be met by existing sites with planning permission, windfall sites and two large scale urban extensions to Bracknell Town Centre. Croudace considers that this housing land supply, for the reasons set out in the Statement dealing with the matter, is not in accordance with PPS3 and will not provide sufficient flexibility.
- 2.13 Croudace does not object to the identification of large scale urban extensions, however, it does consider that the Council should acknowledge the lengthy delays involved with the development of such large sites, as has been experienced within the Borough. The Core Strategy must therefore include sufficient flexibility to enable the identification of sites that are deliverable in order to meet the five year land supply.
- 2.14 In this regard, it is considered small scale extensions to existing settlements would provide a more deliverable and dependable source of supply, which the Council can rely upon to meet the housing requirement and respond to any changes in local circumstances. Whilst the Policy as currently worded provides for extensions to defined settlements, it does not provide sufficient flexibility for such sites to be developed ahead of less deliverable previously-developed sites.

- 2.15 In the interests of facilitating a rolling five year land supply, Policy CS2 should include a clear commitment for small scale urban extensions in sustainable locations.
- 2.16 In terms of the broad locations of these small scale extensions, Croudace considers that the defined settlements identified on the Core Strategy Key Diagram represent suitable and sustainable locations as they already provide the services and facilities to support development. Additional development at these locations would provide an opportunity for improvements to the existing infrastructure and would assist in ensuring their long-term sustainability.
- 2.17 However, it should also be recognised that some of the defined settlements are severely constrained. For example, Crowthorne and Sandhurst are in very close proximity to the Thames Basin Heaths Special Protection Area, with some areas within 400m, where development is considered (by Natural England) likely to affect the integrity of the SPA.
- 2.18 Such constraints should be taken into account when determining the quantum of development in order to ensure a realistic and deliverable supply of housing land.
- 2.19 It is therefore considered that Policy CS2 should promote extensions to the defined settlements in no particular hierarchical order but stipulate that proposed locations should accord with other policies within the Core Strategy, and especially Policy CS14.
- 2.20 This approach would provide greater flexibility to ensure delivery and would avoid the hierarchical approach, which can unnecessarily impede development to the detriment of meeting the housing requirement. It would also promote a more balanced distribution of growth and would avoid overheating the housing market in certain locations.
- 2.21 As a consequence of the above, it is not considered appropriate for the Core Strategy to identify specific sites for small scale urban extensions or identify specific locations such as Bracknell Town Centre as is currently included within Policy CS2. PPS12 states that the Core Strategy is a strategic document which should identify broad locations for growth with the identification of specific sites reserved for the Site Allocations DPD.
- 2.22 The acknowledgement in Policy CS2 that extensions to existing defined settlements are required to meet the housing land supply is sufficient for the purposes of the Core Strategy. The development of urban extensions will inevitably lead to the possible extension of settlement boundaries in the future, however, this is a matter for the more specific Site Allocations DPD and does not fall within the remit of the Core Strategy DPD.
- 2.23 In summary, it is considered that Policy CS2, in its current format fails soundness test 4.

2.24 Therefore, further to previous representations submitted, and having regard to the issues raised by the Inspector, it is considered that the Policy should be re-worded as follows.

‘The Council will identify land for development in accordance with the following options:

- *Previously-developed land and buildings within existing settlements*
- *Other land within existing settlements where this does not conflict with other policies*
- *Large-Scale and Small-Scale extensions to defined settlements where this does not conflict with other policies*

Development will be permitted within defined settlements and on allocated sites identified in the Site Allocations DPD.’

2.25 It is considered that this revised policy wording would overcome the Policy’s failure to meet soundness test 4.

2.26 In addition, it is also considered that the supporting text to this Policy should set out the need to prioritise the development of previously-developed land to be in accordance with PPS3. It is considered more suitable for this reference to be included within the supporting text to the Policy than within the Policy itself in the interests of maintaining sufficient flexibility to enable the identification of suitable sites to demonstrate a deliverable housing land supply and respond to any changes in the housing requirement or market demand.

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POLICY CS15 AND PARAGRAPHS 156 – 169**

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2.0

POLICY CS15 AND PARAGRAPHS 156 – 169

2.1 Croudace, in principle, supports the proposed overall housing provision as set out in Policy CS15 as it represents the most up-to-date position in terms of the emerging Regional Spatial Strategy and acknowledges the current housing shortfall. However, it is considered that the Policy does not provide sufficient flexibility to respond to changes in local circumstances and, coupled with the supporting text, Croudace does not consider that the Council can demonstrate a housing land supply that accords with the current national guidance set out in PPS3.

2.2 The remainder of this Statement sets out Croudace's consideration of the issues raised under this Matter.

Accordance with the RSS and flexibility

2.3 At the time of the Core Strategy's Submission, the most up-to-date housing requirement for the Borough included the existing housing shortfall up to 2006 and the housing requirement set out in the Submission Draft South East Plan. In this regard, it is considered that the Policy does reflect the housing requirement of the RSS as known at the time of submission.

2.4 However, it is considered that the wording of the Policy fails to recognise that the RSS housing requirement is yet to be formally approved and is, therefore, subject to change. It is well documented that many respondents to the South East Plan, including Croudace, do not consider that the overall regional growth level proposed is sufficient to meet projected household numbers and an increase in the overall housing requirement for the Region up to 2026 has been requested.

2.5 It will not be known whether the Borough's housing requirement will be increased until such time that the South East Plan Panel Report has been received and the Secretary of State's Proposed Changes are made available. In this regard therefore, there remains a degree of uncertainty regarding the Borough's housing requirement, and as such the overall housing requirement for the Borough as currently set out in Policy CS15 should be considered with a degree of caution.

2.6 It is therefore suggested that the Policy should cross refer to the relevant policy (Policy H1) of the South East Plan to ensure conformity with the approved RSS. This would guarantee that the Borough's housing requirement as set out in the approved South East Plan is taken into account rather than relying upon draft figures. The wording of the Core Strategy should avoid the need for an early review as such a process is likely to lead to further delays in the delivery of development which would exacerbate the existing housing shortfall in the Borough.

- 2.7 This suggested change should also be reflected in the supporting text, and other policies of the Core Strategy, especially within Policy CS2, to ensure that suitable sites can be identified within the Site Allocations DPD to respond to any changes in the housing requirement and demonstrate a five year land supply in accordance with PPS3. Specifically, the acknowledgement of the contribution from small scale urban extension sites to defined settlements.
- 2.8 Croudace has submitted further representations in relation to Policy CS2, which seeks greater flexibility for identifying suitable locations for growth, and would therefore accord with the suggested approach for Policy CS15 set out in this Statement.

Consistency with National Planning Policy

- 2.9 Whilst it is acknowledged that the Core Strategy was submitted prior to the publication of PPS3, it is necessary to consider whether the Core Strategy is in accordance with current national planning policy (Test 4), which now includes PPS3.
- 2.10 In this regard, whilst Croudace considers that Policy CS15 is in general conformity with PPS3, the supporting text at paragraphs 162 – 164 is not. This objection refers to the Council’s inclusion of commitments and windfall sites within the first ten years of the Core Strategy, without providing robust evidence that all committed sites are deliverable, and there are genuine local circumstances that prevent specific sites being identified (paragraphs 58 and 59 of PPS3). As such, it is not considered that the Core Strategy provides a flexible and responsive supply of land, which is in direct conflict with PPS3.
- 2.11 Whilst the Housing Supply Background Paper (BP005) provides a useful summary of the Borough’s housing land supply situation, it does not provide robust evidence to demonstrate that all the commitment sites identified at paragraph 162, (i) – (iii) will come forward within the ten year period of 2006 – 2017. The Council has suggested that some units on committed sites are being completed, however, there is a lack of evidence to demonstrate that all committed sites, which comprise some 4,150 dwellings, are all deliverable within the ten year period.
- 2.12 In relation to windfall sites, PPS3 clearly stipulates (paragraph 59) that such sites should not be included within the first ten years unless specific sites cannot be identified to deliver development. The Council has not provided evidence to suggest that genuine local circumstances are preventing the identification of specific sites. Indeed, it is apparent through the Site Allocations Representations Consultation stage of the Core Strategy Examination, that there are other sites available within the Borough that could form part of the housing land supply, although this source of supply is completely omitted by the Council for the first ten years up to 2017.

- 2.13 Furthermore, whilst the Council identifies that an element of Greenfield land development (150 dwellings at Amen Corner) could be brought forward within this ten year period, it is not considered that this provides sufficient flexibility should the anticipated delivery from committed and windfall sites fall short; notwithstanding our contention that windfalls should no longer be included. Croudace therefore contends that the approach set out in the Core Strategy would not result in a flexible and responsive supply of land and, consequently, it would not be possible to demonstrate a continuous five year supply of deliverable sites available for housing based upon the information available as required by PPS3.
- 2.14 On the basis of the above, the approach as currently set out in the Core Strategy for the first ten years fails to accord with PPS3 and, consequently, fails soundness test 4.
- 2.15 Nevertheless, it is considered that this failure could be overcome through the deletion of windfall sites within the first ten year housing provision and its replacement with suitable small scale urban extension sites to defined settlements to meet the housing requirement, the specific locations of which should be identified through the relevant Site Allocations DPD in accordance with other policies of the Core Strategy.
- 2.16 Whilst Croudace does not oppose the identification of large scale Greenfield sites to meet the housing requirement, it considers that small scale Greenfield sites benefit from shorter lead-in times and can therefore be delivered quickly. It is therefore considered that this source of housing supply would provide more dependable and deliverable sites to maintain a rolling five year land supply as well as providing greater flexibility to respond to any changes in the housing requirement or housing market.
- 2.17 The recommended revisions to Policy CS2 submitted to the Examination on behalf of Croudace Strategic Limited would accord with this approach and enable the identification of suitable sites.

Conclusions and Recommendations

- 2.18 In summary, it is considered that Policy CS15 as currently worded fails to meet soundness tests 4, 7 and 9. However, it is recommended that the following revised policy would overcome this failure:

‘Over the period 2006 to 2026 the Council will make provision for the phased delivery of 11,139 net dwellings in the following broad phases:

April 2006 to March 2012 – an average of net 572 dpa

April 2012 to March 2017 – an average of net 572 dpa

April 2017 to March 2022 – an average of 539 net dpa

April 2022 to March 2026 – an average of 539 net dpa

The overall housing provision shall be in accordance with policy H1 of the South East Plan and take account of the existing housing shortfall up to 2006 of 356 dwellings. In order to achieve delivery, available, suitable and achievable sites will be allocated in a Site Allocations Development Plan Document to meet this provision in accordance with policy CS2.’

- 2.19 This revised policy should be accompanied by revisions to the supporting text at paragraphs 162 and 164, to include the need for suitable small scale urban extensions sites to defined settlements to meet the housing requirement, specifically within the first ten years of the Core Strategy.