



# **Bracknell Forest Borough Local Development Framework**

## **Core Strategy Examination**

**Topic Paper TP06**

**Somewhere to Live**

**April 2007**

## Somewhere to Live

### 1. Introduction

1.1 This Topic Paper is one of eight produced by Bracknell Forest Borough Council to assist the Public Examination into the LDF Core Strategy, which will commence on 25<sup>th</sup> June 2007.

1.2 This Somewhere to Live Topic Paper covers the following aspects of the Core Strategy:

*CS15 – Overall Housing Provision*  
*CS16 – Housing Needs of the Community*  
*CS17 – Affordable Housing*  
*CS18 – Gypsies and Travellers*

1.3 The Council is preparing the following for Examination:

- **The Council's Self Assessment Statement (OD004)**

This is available on the Council's website at [www.bracknell-forest.gov.uk/ldf](http://www.bracknell-forest.gov.uk/ldf)

- **Topic Papers**

These cover procedural and conformity matters, the main Core Strategy themes and the Thames Basin Heaths Special Protection Area. These will be available on the Council's website and in the Examination Library.

- **Written Statements responding to the Matters and Issues for Examination**

These will provide a detailed response to the separate Matters and Issues which will be identified by the Inspector as the basis for the debate at the Examination (and responding to specific points raised by representations to the submitted Core Strategy). These Statements will rely as far as possible on cross-referencing to the other documents listed above. These Statements will be available on the Council's website by the 24<sup>th</sup> May 2007.

- **Statements of Common Ground**

These will provide an agreed statement between the Council and specific representors on their representations. These Statements will be available on the website by the 24<sup>th</sup> May 2007.

1.4 Each Topic Paper is structured to provide:

- A broad summary of the submission representations and the changes sought;
- The broad basis of the Council's case in relation to the representations on this topic including the approach taken by the Borough Council, its conformity with national and regional guidance, and the evidence on which that approach is based.

- 1.5 Document references in ***bold italics*** relate to documents held within the Public Examination Core Document Library. In general, evidence is based on the following sources:
- Specific studies prepared to address issues to be covered in the LDF;
  - Comments received from consultation responses;
  - Information and guidance provided by the Sustainability Appraisal; and,
  - Existing national, regional and local policies and strategies such as national planning policy statements or the Sustainable Community Plan.
- 1.6 Procedural and Conformity Matters relating to the Core Strategy are dealt with in a separate Topic Paper '**Topic Paper 1 – Procedural and Conformity Matters**' (***TP01***).
- 1.7 At Submission, the Council prepared three Background documents which are particularly relevant to these policies. These are:
- **Major Locations for Growth Background Paper (*BP007*)**;
  - **Housing Supply Background Paper (*BP005*)**;
  - **Affordable Housing Background Paper (*BP006*)**.
- 1.8 This Topic Paper will cross refer to these documents which are available in the Core Strategy Examinations library and on the Council's website, rather than repeat information already set out elsewhere.

## **2. Background**

- 2.1 Somewhere to Live Policies set out the strategy and principles for the provision of new homes in the Borough. Policies in this Theme:
- identify the scale of new housing;
  - set the framework for phased delivery of new housing;
  - set the strategic approach for meeting the identified housing needs of the community;
  - recognise the priority to be given to affordable housing; and,
  - set the framework for providing for the needs of Gypsies and Travellers.
- 2.2 These policies flow from the **Bracknell Forest Borough Sustainable Community Plan (*LD009*)**, October 2005 and the Core Strategy Vision and Spatial Objectives. The links between the Somewhere to Live Submission policies and the Sustainable Community Plan priorities is set out in a separate paper (***OD012***). These policies particularly relate to Priority 4 – Providing Decent and Affordable Housing. The links between the Core Strategy vision and policies in this Topic Paper are defined in Appendix 1.
- 2.3 **PPS12 (Local Development Frameworks) (*ND015*)** confirms that a Core Strategy should set out strategic policies to deliver the vision. The Council believes that these policies will form a set of focused, spatial policies from which more detailed policies will flow in other Local Development Documents.
- 2.4 These Policies contribute specifically to meeting the following Core Strategy Objectives, although they may also influence other objectives through their implementation:

CS15 – Objectives A, B  
CS16 – Objective B  
CS17 – Objective B  
CS18 – Objective B

- 2.5 Locational aspects of delivering new housing are dealt with under the Sustainable Growth theme and the broad basis of the Council's case is set out in Topic Paper 2 'Sustainable Growth'.

### **3. Summary of Key Issues raised at Submission**

- 3.1 One of the purposes of this paper is to identify, in summary form, the representations received on this topic and the main changes sought by the submission representations. More detailed responses to representations will be dealt with through separate Written Statements which will be prepared to respond to the Matters and Issues for Examination identified by the Inspector. These Written Statements will be published by the 24<sup>th</sup> May 2007.
- 3.2 Whilst not an exhaustive list, a summary of the main issues raised at Submission is set out below against each Policy, including a summary of the main changes sought.

#### **Policy CS15 – Overall Housing Provision**

##### **Key Issues raised and changes sought:**

- Representations seek flexibility in order to deal with possible increases in allocations from the South East Plan including greater flexibility on the timings of delivery of major locations for growth, and for the ability to bring forward other sites;
- Representations objecting to the housing numbers as being unsustainable and questioning whether there is sufficient infrastructure to accommodate the housing allocation;
- Objections regarding conflicts with national guidance, particularly PPS3, and reliance on windfall, and also PPS12 and the balance between policy and reasoned justification;
- Representations were made seeking the allocation of specific sites;
- Representations seeking an assignment model to identify transport mitigation issues; and,
- Representations were made regarding inconsistencies between the timescales mentioned in Policies CS15 and CS5.

#### **Policy CS16 – Housing Needs of the Community**

##### **Key Issues raised and changes sought:**

- Representations that the policy repeats national policy;
- Additional references are sought including: housing needs of older people; better use of the housing stock; reference to Travelling Showpeople; and Village Design Statements;
- Objections seeking reference to affordable housing to include park homes and provision of dwellings for special/mobility needs;
- Objection to the fact that the Policy has not had regard to other policies and plans as the Housing Market Assessment is not yet completed; and,
- Representations seeking wording to clarify that 'Suitable Development Sites' are to be defined in a Site Allocations Document.

## **Policy CS17 – Affordable Housing**

### **Key Issues raised and changes sought**

- Representations that the Policy repeats national policy;
- Representations that the Policy is contrary to PPS3 and changes sought regarding definitions including reference to low cost housing and the role of park homes;
- Representations seeking additional references/clarity re economic viability;
- Representations seeking the inclusion of a target figure for affordable housing; and,
- Representations seeking clarity as to how and when thresholds will be prepared.

## **Policy CS18 – Gypsies and Travellers**

### **Key Issues raised and changes sought:**

- An additional reference should be added to issues wider than biodiversity in criterion (iii);
- The policy conflicts with national guidance (Circular 1/2006) in that a criterion based policy is seen as an alternative to a Site Allocation DPD; and,
- A specific Gypsy and Traveller DPD should be referenced should the needs assessment identify such needs.

## **4. Context**

- 4.1 Sections 4 and 5 of this Topic Paper set out the broad basis of the Council's case in respect of the representations on this Theme. They identify the context against which the policies have been prepared and the issues and evidence which have informed the final policies. It is not the intention to provide a detailed justification of each policy; however, the following paragraphs identify the key elements of this guidance which were used to inform the development of, or are considered relevant to support, the Core Strategy Policies covered in this Topic Paper.
- 4.2 It should be noted that the Core Strategy was prepared in the context of changing guidance on housing policy. In terms of national policy it has been prepared in the context of **PPG3 'Housing' (ND004)**. However, Draft PPS3 'Housing' was published during preparation of the Core Strategy and the final version of **PPS3 'Housing' (ND008)** (which replaced PPG3) was published at the same time as Submission of the Core Strategy. The Council believes that the Core Strategy is consistent with the key messages in PPS3 and has prepared a scoping report which demonstrates how further work will be undertaken to ensure compliance in future DPDs (**OD011**). The Council has recently revised its **Local Development Scheme (April 2007 – March 2010) (LD008)** to start early work (May 2007) on a Development Management: Housing and Commercial Policies and Sites DPD which will ensure priority is given to those elements of PPS3 not picked up in the Core Strategy (e.g. detailed small sites allocations).
- 4.3 The current Regional Spatial Strategy (RSS) is the **Regional Planning Guidance Note 9 (RD002)**, which will be replaced by the South East Plan when adopted. The South East England Regional Assembly has confirmed that the Core Strategy is in general conformity with the adopted and emerging

RSS (letter dated 22 December 2007). The approach taken by the Council, and encouraged by the regional Government Office is to progress based on the most up to date guidance available, but to build in flexibility as supported by both PPS12 and PPS3.

### **National**

- 4.4 **PPS12** advises that the Core Strategy should seek to implement the spatial policies of the Regional Spatial Strategy and 'incorporate its housing requirement' (paragraph 2.10). Similarly, Planning Policy Guidance Note 3 (Housing) advises that Regional Planning Guidance will set the overall level of provision to be made in each region, and a distribution to each planning authority.
- 4.5 **PPS3** requires local authorities to identify broad locations and specific sites to enable continuous delivery of housing for at least 15 years from the date of adoption, taking account of the level of housing provision as set out in the Regional Spatial Strategy (or relevant emerging Regional Spatial Strategy). Policy CS15 sets the framework for this by including the housing allocation to be met up to 2026.
- 4.6 **PPG3** indicates that local planning authorities should ensure provision of a 'wider housing opportunity and choice, and a better mix in the size, type and location of housing than is currently available, and seek to create mixed communities'. Plans should be formulated to secure an appropriate mix of dwelling size, type and affordability and encourage the provision of housing to meet the needs of specific groups.
- 4.7 **PPS3** seeks to ensure that local planning authorities deliver a mix of household types across the plan area to meet the needs of all members of the community, and set out policies which address the needs and demands of specific groups. PPS3 also advises on the approach towards providing affordable housing. These clear directions of approach need to be acknowledged and reflected in the Core Strategy, and are consistent with the Council's approach in CS16 and CS17.
- 4.8 In considering the needs of Gypsies and Travellers, the Council has had regard to advice in **Circular 1/06 'Planning for Gypsy and Traveller Sites'** which advises that Core Strategies should set out criteria for the location of gypsy and traveller sites to guide the allocation of sustainable sites in the relevant DPD. PPS3 also identifies that Local Planning Authorities should plan for a mix of housing having regard to the diverse requirements across the Borough, including the need to accommodate Gypsies and Travellers.

### **Regional**

- 4.9 Policies in this Theme have had full and proper regard to policies in existing and emerging Regional Policy.
- 4.10 Policies are consistent with Policies in **Regional Planning Guidance Note 9 (RD002)**, including: reflecting RPG9 Policy H2 regarding the housing allocation; provision of a range and mix of dwellings (RPG9 Policy H4 and Core Strategy Policy CS15) and the provision of affordable housing based on an assessment of local need (RPG9 Policy H4 and Core Strategy Policy CS17).

- 4.11 The Core Strategy Policies are also consistent with those in the emerging **South East Plan (SEP) (RD001)**.
- 4.12 The overall prescribed level of new dwellings to be built in the Borough in Core Strategy Policy CS15 is consistent with the scale of development set out in SEP Policies H1 and WCBV3. Core Strategy Policies CS16 and CS17 are consistent with SEP Policy H6 which states that Local Development Documents should require an appropriate range of mix, types, sizes and tenures.
- 4.13 SEP Policy H5 provides a regional affordable housing target and guidance for which LDD's should follow when producing local policies. Core Strategy Policy CS17 further defines affordable housing in Bracknell Forest Borough and sets the context on which it will be secured.

## **5. Council Approach**

- 5.1 Policies in this Theme are fundamental to delivering Core Strategy Objective B – *To aid delivery of housing in the Borough, which meets the needs of all sectors of the community, including the provision of affordable housing*, although they also contribute to delivery of other objectives as set out on page 9 of the Core Strategy.
- 5.2 As set out earlier, the Core Strategy policies have had to be prepared within the context of the emerging South East Plan.
- 5.3 Policy CS15 of the Core Strategy is therefore based on the housing allocation in the submission RSS. If the RSS is finally adopted with different housing figures for the Borough, then it is likely that the Core Strategy will need to be reviewed to ensure conformity with the adopted RSS. This is set out clearly in paragraph 166 of the Core Strategy which identifies that the delivery of the current allocation has been: the subject of consultation; tested through the sustainability appraisal; the basis for the preparation of a bespoke **Thames Basin Heaths Special Protection Area Avoidance and Mitigation Strategy (ITS002)**.
- 5.4 Whilst the Council does not support a higher allocation, the Council has demonstrated that there is some flexibility in the early part of the plan period to allow for an increase in provision while any review to accommodate a higher allocation in the longer term takes place.
- 5.5 Policies CS16 and CS17 establish the strategic approach to meeting the future housing needs for all sectors of the community. The local circumstances outlining the need to identify affordable housing as a priority in the Borough, and therefore the inclusion of a specific policy steer in the Core Strategy is set out in the Affordable Housing Background Paper (**BP006**) published at Submission.
- 5.6 The Council has taken the view that the detailed approach to, and implementation of, housing mix and tenure, and to affordable housing targets and thresholds will be implemented through the Development Management: Housing and Commercial Policies and Sites DPD following completion of a robust evidence base. In addition to the need to complete evidence to

support these policies, the Submission Core Strategy was prepared in a climate of changing regional and national guidance on housing. The Council considers the more strategic approach taken in the Core Strategy is responsive to the changing housing policies at national and regional level, allowing the detail to be determined in a more settled policy context in future DPDs.

5.7 The Council is currently working on two specific pieces of background evidence that will help to inform this detail and develop future policies specifically in the Development Management DPD. These are:

- The preparation of a Housing Market Assessment with the other Berkshire Unitary Authorities; and,
- A Gypsy and Traveller Accommodation Assessment Study for the ACTVaR region.

#### ***Issues and Options***

5.8 At the Issues and Options stage (**OD008, OD009**), views were sought on different approaches or options to the scale and type of new housing development. In particular, views were sought on the level of housing identified for the Borough in the **Berkshire Structure Plan 2001 - 2016, (CW001)**, the need to promote a range of housing types and styles and the need to provide housing for all sectors of the community.

5.9 At this stage, the issues and options were informed by a number of background studies and preparatory work. Specifically in relation to this Theme, these included:

- A Borough-wide consultation in the summer of 2003 on key planning issues as a start to the review of the existing Local Plan; and,
- Preparation of a **Fact Pack (BP003)** identifying key statistical evidence about the Borough.

5.10 The Issues and Options consultation gave support to:

- providing housing only at the rate agreed in the **Berkshire Structure Plan 2001 – 2016 (CW001)**;
- promoting a mix of types, sizes and styles of new houses to meet local needs; and,
- the inclusion of a policy on providing housing to meet all income levels.

5.11 The **Initial Sustainability Appraisal (BP009)** tested in very broad terms, continued development at the rate identified in the Berkshire Structure Plan (532 dwellings per annum) and a 'higher' but unstated level. The option of no further development was not tested as being unrealistic. In addition, the appraisal considered the impact of promoting a mix of dwelling types and tenures.

5.12 At this stage the Initial Sustainability Appraisal concluded that:

- A higher level of development would have greater negative environmental impacts although some of these could be mitigated against to some extent;
- There are considerable social and economic benefits to the growth of planned Communities; and,

- Providing a mix of types and styles of housing is more likely to ensure housing needs, and potentially local labour requirements are met.

### ***Preferred Options***

5.13 Consultation responses and local priorities led to the preparation of a draft Vision and Spatial Objectives as part of the **Preferred Options Document (BP010)**. This vision recognised that growth will take place and that a mix of housing types and tenures should be provided to meet the needs of the local community.

5.14 Responses from Issues and Options, the development of a Spatial Vision for the Borough and other sources of background information including national and regional guidance referred to earlier and the Sustainability Appraisal led to a Preferred Options consultation seeking views on a number of policy approaches. These related to;

- The scale of new housing;
- The location of new housing;
- Meeting the housing needs of the Borough; and,
- Meeting the needs of Gypsies and Travellers.

5.15 Alternative options were assessed and identified through the Sustainability Appraisal.

5.16 The preferred approach identified at this stage was to:

- reflect the housing requirement in the emerging RSS and identify mechanisms for delivery and phasing (SL1);
- set out the approach to the location of new housing development giving priority to previously developed land and buildings, and the approach to infilling and conversion and setting out the considerations if land were needed outside settlements (SL2);
- set out a strategic policy seeking to meet the needs of the Borough's population (SL3); and,
- set out an approach for a criteria based policy to meet the specific needs of Gypsies and Travellers (SL4).

### ***Background Studies***

5.17 To help support and develop the Submission Policies further background studies were completed as set out in Appendix 4 of the Core Strategy. Of particular relevance to policies in this Topic Paper are:

- An updated **Urban Potential Study** (Baker Associates, June 2006) (**ETS006**) which looked to 2026 which informed potential delivery of the housing allocation as set out in the Housing Supply Background Paper;
- A **Housing Supply Background Paper (BP005)** which provided broad background information to the delivery of the housing allocation including a housing trajectory;
- An **Affordable Housing Background Paper (BP006)** which sets out the policy context and local information to support Policy CS17; and,
- A **Major Locations for Growth Background Paper (BP007)** which supports the capacity of the proposed urban extensions (Policies CS4 and CS5) for housing.

### ***Submission***

- 5.18 A summary of the issues raised at Preferred Options consultation and the Council's response can be found in the **Statement of Compliance (LD004)**. Wide ranging comments were received both in support and objecting to different elements of the strategy and the policies within this Theme.
- 5.19 These responses, national and regional guidance, the findings from the **Final Sustainability Appraisal Report (BP001)** and the background work referred to above informed the Submission Policies which include:
- Through Policy CS15, the Borough's housing allocation as set out in emerging Regional Guidance. This policy identifies broad phasing and indicates in paragraphs 168 and 169 that the method of implementation will be through measures including the specific identification of sites in a Site Allocations Document. The Housing Supply Background Paper and supporting text to CS15 identifies in broad terms how the allocation is likely to be met;
  - Through Policy CS16, a commitment to ensure that new housing development meets the needs of all sectors of the community, including some specifically identified needs groups;
  - Through Policy CS17, identification of the strategic need to provide for affordable housing in the Borough reflecting priorities in the Sustainable Community Plan and other local strategies. Supporting text (paragraphs 180 – 183) identifies where further detail relating to the provision of affordable housing, including thresholds will be developed, and the factors that the Council will take into consideration in developing such policies; and,
  - In Policy CS18, the criteria against which the Council will identify or consider sites for gypsies and travellers through the site allocations process and having regard to local evidence and national guidance.

### ***Implementation and Monitoring***

- 5.20 A key element of the new planning system is to ensure that policies are implemented and monitored. As set out earlier, the Core Strategy sets out key strategic policies that will guide development in the Borough but which in many instances will be detailed in further Local Development Documents (LDD). The key LDD which will include detailed policies in this Theme is the Development Management DPD referred to earlier in this Paper. Work will commence on this DPD in May 2007. This DPD will identify sites to meet the Borough's housing allocation, policies regarding the delivery of new housing for example on density, policies setting out the specific requirements to meet and plan for the provision of affordable housing and to ensure that an appropriate mix of sizes, types and tenures is delivered to meet the needs of the local community.
- 5.21 The approach to monitoring is set out in Appendix 5 of the Core Strategy and specific targets and indicators are linked to a number of policies and objectives. At this strategic level, the Council has, wherever possible, used the National Core Indicators which establish an overall monitoring framework.

## **6. Conclusions**

6.1 The Council considers that these policies and their contribution to the overall Core Strategy are sound as they:

- Reflect the guidance on spatial planning set out in national planning policy and are in general conformity with existing and evolving planning guidance and the Regional Spatial Strategy (Test 4);
- Relate appropriately to the priorities in the Bracknell Forest Sustainable Community Strategy prepared by the Bracknell Forest Partnership (Test 5);
- Identify an approach which is consistent with the approaches and plans of adjoining authorities (Test 6);
- Are supported by appropriate evidence where necessary and have been objectively assessed through the Sustainability Appraisal and Strategic Environmental Assessment (Test 7);
- Include clear monitoring and implementation mechanisms which have been identified with each policy and in the monitoring Appendix to the Core Strategy (Test 8); and,
- Include inherent flexibility within the overall strategy (Test 9).

6.2 Therefore, the Council feels this approach is sound and consistent with the emerging South East Plan, the Core Strategy Vision and national planning policy guidance. As a result, the Council believes no fundamental changes are necessary to make the plan sound. Minor factual changes may be put to the Inspector for her consideration for purposes of clarity. Where relevant, these will be identified within the Written Statements and/or Statements of Common Ground.

## **Appendix 1: Links between the Core Strategy Spatial Vision and Core Strategy Policies**

*The Borough will continue to grow sustainably (CS1, CS10, CS11, CS12), in a planned manner, with new development being directed to sustainable locations (CS2) and having good access to a range of local facilities, services, housing and employment (CS2, CS23, CS24). New development will be located so as to maximise the opportunity to travel by all modes (CS1, CS23) and to improve relative accessibility for all. New development will be mindful of the character of the area in which it sits and will be designed and located such that it will enhance the quality of life in the Borough (CS7).*

*There will be a continuation of development both within settlements, where appropriate, and outside settlements through planned longer term expansion (CS2, CS3, CS4, CS5). Having had regard to the future development needs, environmental, physical and policy constraints and to an assessment of the level of development that may be accommodated within settlements, land to the west of Bracknell and to the north of Whitegrove and Quelm Park have been proposed for such expansions (CS4, CS5). New housing (CS15) will be targeted to meet the needs of local people and will include a mix of tenures, size and types of unit (CS16, CS17, CS18). New communities will be planned to provide the necessary physical infrastructure (e.g. roads, water) (CS24) as well as the social infrastructure (eg. schools, libraries, leisure facilities, health facilities) to support the community (CS6, CS8, CS13).*

*The Borough will continue to develop as an important business centre: 'smart' growth will be encouraged whereby businesses maximise the use of technology and human resources rather than additional land resources for sustained economic growth. New employment development will be focussed mainly within Bracknell town centre (CS19, CS20) and the existing employment areas. New housing growth areas will be developed as sustainable communities and may include a mix of uses including employment, leisure and community facilities (CS4, CS5, CS19).*

*Partnership working will ensure that Bracknell Town Centre is regenerated to provide a mix of homes, shops, jobs and other opportunities that will provide economic, social and environmental benefits to residents, businesses and visitors (CS3, CS19, CS21). The town centre will be easily reached by public transport and have a good standard of access by car. It will also be served by park and ride facilities, for example at Peacock Farm. The town centre will also include a health facility which serves new and existing residents in and around the town centre.*

*Accessibility to Bracknell will be increased with improved connections to Heathrow through the delivery of the Airtrack proposals (better use of rail connections using mostly existing infrastructure on the Reading to Waterloo line via Staines) along with improved links to London and other areas including the Blackwater Valley (CS23).*

*The smaller town, village and neighbourhood centres will be maintained and enhanced to provide a valuable role in providing local services and reducing the need for local people to travel for their day to day requirements (CS2, CS21, CS22). A 'design-led' approach to new development will provide a safe and attractive living environment (CS7).*

*The quality of the environment will continue to improve with the existing high levels of open space and 'greenery' within the settlements maintained and improved (CS7, CS8, CS9). The Green Belt boundary will remain unchanged and areas of important natural and historic interest will be protected, conserved and enhanced (CS1, CS9).*

*Special attention will be placed on the importance of the Thames Basin Heaths Special Protection Area (CS14) to ensure that its integrity is maintained whilst allowing sustainable development which meets the needs of the Borough to take place.*