



Bracknell Forest Borough Local Development Framework

Core Strategy Examination

Topic Paper TP7

Somewhere to Work and Shop

April 2007

Topic Paper TP07

Title: Somewhere to Work and Shop

1. Introduction

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

1.2 This Topic Paper covers the following policies of the Core Strategy:

Employment (Work) Policies:

CS19 Location of Employment Development;

CS20 New Development in Employment Areas; and

Retail (Shop) Policies:

CS21 Retail Development in Town Centres; and

CS22 Out of Town Centre Retail Development.

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

- **The Topic Papers**

These cover procedural and conformity matters, the main Core Strategy themes and the Thames Basin Heath 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 24th 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 24th 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 This Topic Paper will cross refer to that background paper rather than repeat the information set out in that document.

2. Background

- 2.1 Employment and shopping have always been important issues in relation to the growth of the Borough.

Work

- 2.2 In the southern part of the Borough, the older settlements of Sandhurst and Crowthorne grew up around, and to service, such significant enclosed establishments as the Sandhurst Military Academy and College, Broadmoor Hospital and Wellington College. Prior to the designation of Bracknell as a New Town, important sites such as the former Transport and Road Research Laboratory (now Crowthorne Business Estate) and the former ICI agricultural field trials and research centre at Jealotts Hill (now Syngenta) helped to broaden the then employment base.
- 2.3 Bracknell was designated as a New Town with the intention that it would result in a self contained and balanced community (more detail is provided in the **Bracknell and its New Town Heritage (BP004)** background paper). Much of its growth depended on the decentralisation of companies from west London and the commensurate decanting of the staff they employed. Bracknell New Town was developed on a "neighbourhood" pattern with some provision for small business units in neighbourhood centres and defined employment areas purposely separated from residential areas. Employment which was originally based on industrial and manufacturing processes now focuses mainly on the office based financial and IT sectors.
- 2.4 For the future, the Core Strategy seeks to balance the provision of employment in the Borough with the population resulting from the housing allocation to 2026. To this end, the Employment Potential Study (***ETS003***) undertaken for the Council indicates that, with the more efficient use of existing employment sites, and a restriction on change to other uses (for example, housing) there is a 12 – 16 year supply of office floorspace (paragraph 3.5.10) and a 4-5 year supply for industrial purposes.

Shop

- 2.5 With regard to retailing, as most of the older settlements grew in size the necessary shopping provision was provided in town centre or local parades. The population of Bracknell New Town was expanded in size in three phases. With hindsight (**Bracknell and its New Town Heritage (BP004)**), it is obvious that Bracknell town centre, constrained by a ring road, was not sufficiently large to support the third phase of population growth (60,000 in Bracknell) let alone the present day Borough population (109,000 in the Borough).
- 2.6 The fact that “80 pence in every £1” was being spent outside of the Borough on retail goods was an indication that the regeneration of Bracknell town centre was a necessity rather than an ambition (in the original Community Strategy). The Council resolved to grant planning permission for the redevelopment and regeneration of Bracknell town centre in February 2006 (re-affirmed in July 2006). This £750 million mixed use scheme, approved in December 2006, is central to the Council’s plans for the future growth of the Borough.
- 2.7 The Submission Core Strategy has been prepared in the light of the development of a comprehensive Masterplan (**ITS003**) for Bracknell town centre and the earlier **Bracknell Town Centre Retail Impact Analysis (ITS004) and Retail Capacity Study and Appendices (ITS005)** (2002) examined at Local Inquiry at the behest of the Secretary of State used to inform the planning permission for the redevelopment and regeneration of Bracknell town centre (December 2006).
- 2.8 For the future, the Core Strategy seeks to support the regeneration proposals for Bracknell town centre, promote retail development in existing centres and parades, and support units which perform an important community role. The Council considers that nothing has occurred locally, since the preparation of the Masterplan (**ITS003**) and the impact and capacity studies to impact on the preparation of the Core Strategy.

Policy Approach Background

Work

- 2.9 In order to protect the existing employment areas and to support the potential for future employment growth (cf Reg 26 Policy Approach), the Core Strategy seeks to protect the existing, urban and rural, identified employment areas from other forms of development, other than ancillary services, and to direct new employment development to these existing and relatively accessible locations subject to an assessment of impacts.
- 2.10 Appropriately located small businesses (less than 500 square metres) will be particularly supported, not only by protection in situ but also by allowing them to be located outside employment areas within existing settlements subject to their being no unacceptable impacts.

Shop

- 2.11 Similarly, retail development will be directed to existing, relatively accessible, identified town centres) before other edge-of-centre then out-of-centre sites are considered in order to support, enhance and protect the quality and range of units and services provided (cf Reg 26 Policy Approach). Policies CS21

and CS22 incorporate the wide definition of town centre in PPS6 (**ND009**) which ranges from city and town, through district to local centre. Such definition would include Bracknell town centre and Crowthorne village centre. Small retail units which perform a community function are also supported.

Spatial Approach

- 2.12 The above approach to the sequential location of employment and retail development, and for the protection of facilities, is considered to be appropriate to Bracknell Forest Borough and to accord with, Core Strategy Policies CS2 (Locational Principles), CS3 (Bracknell Town Centre), CS9 (Development on Land Outside Settlements), CS15 (Overall Housing Provision) and CS23 (Transport).

Other Borough Council Strategies

- 2.13 The Core Strategy approach to employment and retail development is also considered to reflect the **Sustainable Community Plan (LD009)** (especially Priorities 2, 5 and 6 and will inform the generation of an Economic Partnership) and the Core Strategy Vision to 2026 and the Spatial Objectives (particularly A, C, D, G, H and J).

3. Summary of Key Issues Raised at Submission

- 3.1 A more detailed response to the issues raised by Submission representations on Theme 5 (Somewhere to Work and Shop) of the Core Strategy will be dealt with in a separate Written Statement which will focus on the specific questions posed by the Inspector for discussion at the Examination into the soundness of the Core Strategy.
- 3.2 Whilst not an exhaustive list, a summary of the issues raised at Submission to each policy, and a general response, is set out below.

Somewhere to Work

- 3.3 In respect of Policy CS19 and its supporting text (paragraphs 191- 201 and 206) and Policy CS20, the main issues raised following the Submission consultation relate to:
- whether either policy is consistent with national policy; or whether there are soundly based local circumstances to go beyond national policy guidance;
 - what quantity of employment land will be provided and whether there is a current/likely local and wider employment/housing mismatch;
 - whether Policy CS19 is sufficiently flexible to allow expansion of existing businesses (particularly a major developed site in the Green Belt);
 - whether the detail in Policy CS20 is appropriate to a Core Strategy; and
 - whether CS20 is founded on a robust and credible evidence base.
- 3.4 The Council considers that Examination of these main issues will indicate that none of these matters are sufficiently significant as to adversely affect the fundamental soundness of the Core Strategy.

- 3.5 Other representations concern:
- the likely transport implications of out of town employment sites and the need for travel plans requiring targets, monitoring and funding streams;
 - the split between defined employment areas and major employment areas is confusing and inconsistent;
 - there should be a requirement to build in ratios for small and large businesses to diversify employment;
 - whether the definition of employment proposals in Policy CS20 should reflect that in paragraph 201;
 - the Core Strategy does not address some key recommendations of the Employment Potential Study (**ETS003**);
 - various sites should be considered as major employment sites or for other uses or mixed use development (as omission sites).

- 3.6 None of these other issues are considered to be fundamental to the soundness of the Core Strategy.

Somewhere to Shop

- 3.6 In respect of Policy CS21 and its supporting text (paragraphs 214 – 222) and Policy CS22 and its supporting text (paragraphs 228 – 232), the main issues raised following the Submission consultation relate to whether:

- the policies are consistent with national policy (particularly PPS6 in respect of “need”) or whether there are soundly based local circumstances to go beyond national policy guidance (particularly in respect of supporting small retail units);
- the policies repeat rather than implement national policy;
- there is a proper retail evidence base to underpin the Local Development Framework;
- the retail policies are the most appropriate having regard to transport implications;
- the smaller centres should be listed (for example, Crowthorne is described as a town rather than village).

- 3.8 The Council also considers that Examination of these main issues will indicate that none of these matters are sufficiently significant as to adversely affect the fundamental soundness of the Core Strategy.

- 3.9 Other representations concern whether:

- the policies detract from the regeneration objectives of Bracknell town centre;
- the policies allow impacts on centres that are not town centres or those outside the Borough boundary;
- new development should not detract from the regeneration objectives for Bracknell town centre; and
- the policy allows impacts on centres that are not town centres or those outside the borough boundary;
- various changes to the wording of criteria.

- 3.10 Again, none of these other issues are considered to be fundamental to the soundness of the Core Strategy.

4. Context

4.1 The employment and retail policies have been influenced by a number of National planning policy statements and guidance notes. It is not proposed to reference the relevant provisions in detail. However, the following paragraphs identify the key elements of national and regional policy considered relevant to these Core Strategy policies.

National

4.2 **PPS1 (ND007)** includes, inter alia, the Aims (paragraph 4) of:

- Effective protection of the environment; and
- The maintenance of high and stable levels of economic growth and employment;

and the Key Principles (paragraphs 17 – 20 and 23) of:

- Protection and Enhancement of the Environment; and
- Sustainable Economic Development.

4.3 The policies themselves are considered to support sustainable economic growth and the locational elements they contain are considered to protect and enhance the wider environment by restricting conflicts with other uses (for example, residential development) and locations (for example, land outside settlements).

4.4 **PPG2 (ND003)** makes provision for minor development proposals at identified Major Development Sites in the Green Belt. Core Strategy Policies CS9 (Development on Land Outside Settlements) and Policy CS19 support these provisions (see also paragraph 5.13 below regarding employment sites outside of settlements beyond the Green Belt).

4.5 **PPG4 (ND021)** indicates (paragraph 6) that Development Plans should aim to ensure that, in allocating land for industry and commerce, there is sufficient land available which is readily capable of development and well served by infrastructure.

4.6 **PPG4** also indicates that locational factors (paragraphs 9 – 12) are an important consideration in the preparation of Development Plans, including:

- the locational needs of businesses;
- wider objectives in the public interest;
- encourage locations which minimise the length and number of trips;
- encourage locations served by more energy efficient means of transport;
- discourage development that would unacceptably add to congestion; and
- locate development requiring access to local roads away from trunk roads.

4.7 Again, the locational elements of the policies which promote development in existing, identified centres and employment areas support this guidance.

- 4.8 **PPS6 (ND010)** contains (paragraph 1.3) the Government's Key Objective for town centres, which is to promote their vitality and viability by:
- planning for growth and development of existing centres; and
 - promoting and enhancing existing centres.
- 4.9 Other Key Objectives (paragraphs 1.4 and 1.5) include:
- improving accessibility, ensuring new development is well served by a choice of means of transport;
 - promoting economic growth of local economies; and
 - deliver sustainable patterns of development.
- 4.10 Paragraph 1.8 details the main town centre uses to which the guidance applies; these include retail and office uses. Paragraphs 2.58 and 3.28, respectively, seek to protect existing facilities which provide for day-to-day needs and promote social inclusion.
- 4.11 Paragraph 2.15 of **PPS6 (ND009)** indicates that the Core Strategy should set out a spatial vision, the role different centres have in contributing to the vision and a strategy for the network and hierarchy of centres. Table 1 to Annex A of PPS6 details the definitions of the types of town centre.
- 4.12 Policies CS19 – CS22 and their supportive text apply these national key objectives and guidance to the local level.
- 4.13 Paragraphs 2.16 to 2.18 contain provisions relating to need, capacity, location, allocation and review most of which are considered to be more appropriate to the Development Management - Housing and Commercial Policies and Sites - Development Plan Document detailed at Profile 103 of the current Local Development Scheme (**LD008**). Although in respect of need, the Council takes the view that there is a need in the Core Strategy to protect the ability of the "larger" (Sandhurst and Crowthorne) and "smaller" (for example, Binfield and Bracknell neighbourhood centres) centres to serve their immediate communities from an over-concentration of growth in Bracknell town centre (first bullet point para 2.9 PPS6).
- 4.14 **PPS7 (ND019)** details (paragraphs i-iv) the Government's Objectives for rural areas, including:
- raising the quality of life and the environment in the rural areas; and
 - promoting more sustainable patterns of development.
- 4.15 By promoting employment and retail development in existing centres and employment areas, Policies CS19 – CS22 promote continued protection of the open, undeveloped countryside, discourage the development of "greenfield sites" and maximise the potential benefits of the countryside in accordance with these objectives. These policies also allow for the continued use of identified major employment sites outside of settlements and not covered by Green Belt notation.
- 4.16 Alongside the general policies relating protection of the environment to sustainable development, Chapter 3 (Vision and Key Development Principles) promotes town centres as the focus for development and economy in the use of land, as do Policies CS19 to CS22.

Regional

Regional Planning Guidance Note 9 (RD002)

- 4.17 In paragraph 3.5 details the main principles that should govern the continuing development of the Region, including:
- Urban areas should become the main focus for development;
 - The pattern of development should be less dispersed;
 - Continued protection and enhancement of the Region's biodiversity; and
 - Access to jobs, etc should be less dependent on longer distance movement with reduced reliance on the car.
- 4.18 Similarly, the emerging **South East Plan (RD001)** promotes an urban focus to development, generally, and continuing economic growth in the Western Corridor and Blackwater Valley (where Bracknell Forest is situated), particularly, subject to environmental considerations. Policies CS19 to CS22 accord with these principles.
- 4.19 The Regional Planning Committee has informed the Council that it considers the Core Strategy to be in general conformity with both the adopted and emerging Regional Spatial Strategy and the South East England Development Agency has raised no objections to these employment and retail provisions of the Core Strategy.
- 4.20 The Berkshire Structure Plan 2001-2016 (**BSP (CW001)**) provides local strategic guidance until replaced by the RSS.
- 4.21 The **BSP (CW001)** allocates the centre of Bracknell for major office development and existing employment areas in settlements as the location for employment development (Policy E1). Major employment development will be expected to mitigate against its housing, visual and travel impacts (E2). Policies E3 and E4 seek to ensure an appropriate diversity of enterprises and amount of employment land. Policies CS19 and CS20 are considered to reflect these **BSP (CW001)** provisions.
- 4.22 Similarly, **BSP (CW001)** Policy S1 directs major retail development to the centre of Bracknell and supports retail development which strengthens the role and function of smaller centres. Policy S2 concerns those exceptional cases where major retail development cannot be accommodated in town centres. Again, Policies CS21 and CS22 are considered to reflect these **BSP (CW001)** provisions.

5. Council Approach

- 5.1 In addition to the national, regional and local strategic planning provisions, the development of the Core Strategy approach towards employment and retail development has also been informed by:
- Consultation during the preparation process;
 - Other plans and strategies;
 - The Sustainability Appraisal of the emerging strategy; and
 - Background Studies.

Issues and Options Consultation (Regulation 25) stage

Work

5.2 At the Issues and Options stage, the Council sought views on the Core Strategy and Site Allocations DPDs which had been prepared in conjunction. Therefore, the employment matters examined (see questions 27 – 33 of **Your Views**, July 2005 (**OD009**)) included strategic and locational aspects, as follows:

- Whether limited, or higher, levels of growth should be promoted;
- Whether smart growth should be promoted to reduce the need for additional employment floorspace;
- Whether employment generating development should be accommodated on new sites, or existing sites; and
- Whether under used employment areas should be used for other purposes, including housing.

5.3 In respect of the level of growth, the resultant Report of Consultation at Regulation 25 stage (**LD011**), indicated slightly more support (45% of responses) for limited growth (with 32% objecting and 23% offering no opinion) than higher levels (38%, 35%, 27%).

5.4 There was overwhelming support for:

- “Smart” growth limiting the need for large amounts of new employment floorspace (supported by 82% of respondents);
- for the promotion of employment development on existing employment areas (88%); and for
- the use of under-used employment areas to be used for other uses including housing (80%).

5.5 These responses can be seen as offering support for continued employment generating development within existing employment areas (contrast with the 60% site area criterion in Policy E2 of the BFBLP(**LD003**)) in preference to new, rather than existing, sites beyond identified settlement boundaries.

Shop

5.6 With regard to retailing (questions 34 – 36 of **Your Views**, July 2005 (**OD009**)), opinions were sought on the continued promotion of mixed uses in Bracknell town centre (93% support); for Bracknell town centre to be the focus for new employment, retail and housing development (78%) and for the regeneration of smaller community and neighbourhood centres (82%).

5.7 These later responses were seen as supporting Bracknell town centre as the prime focus for major development in the Borough, with smaller scale development in the local centres to provide local services.

Pre-Submission Public Participation Options (Regulation 26) stage

5.8 The Issues and Options consultation responses aided the preparation of Preferred Options documents concerned with policy approach formulation and site allocations which were still being prepared in parallel.

Core Strategy

Work

- 5.9 With regard to the formulation of employment policy, the approach suggested was to guide the location of new development, including new development areas, and the type of development that would be acceptable in particular areas. As a result, employment policy was expected to:
- direct development to town centres and major urban employment areas in the first instance;
 - support, enhance and protect existing employment areas;
 - protect small business units and non-office employment floorspace to maintain diversity; and
 - protect employment sites for employment uses, but to set out the circumstances where the loss of employment sites might be acceptable (but not considered necessary as a result of the **Employment Potential Study (ETS003)**).
- 5.10 Individual objections were received on the grounds of:
- the need to support employment development in sustainable developments;
 - Amen Corner being allocated as an employment site;
 - employment development being allowed away from designated areas in conflict with BSP (**CW001**) Policy E1; and
 - the need to define employment uses.
- 5.11 In summary, the Council's response was that the **Employment Potential Study (ETS003)** suggested that existing employment areas within the Borough could accommodate employment generating development, including expansion in situ, sufficient for the next 15 years by more efficient use of land and buildings so long as there is no redevelopment for residential purposes (otherwise additional employment generating sites would have to be found outside of existing settlements). Directing employment generating development to existing employment areas would result in the more efficient use of land, build upon existing travel patterns and reflect the historical separation of accessible employment areas from adjoining residential areas providing a solution appropriate for Bracknell Forest Borough (**Bracknell and its New Town Heritage (BP004)**). Amen Corner will be the subject of an Area Action Plan.

Shop

- 5.12 With regard to retail policy formulation (WS1), the approach suggested was:
- to support retail development, appropriate in scale and function to its location, which met a proven need; and
 - seek a sequential test to identify sites; and
 - had no unacceptable adverse impacts on surrounding towns.
- 5.13 Individual objections were received on the grounds that:
- provision should be made for low cost shop premises;
 - the policy would impact on retail centres that are not town centres or are outside the Borough;
 - there was no evidence that this is the most appropriate strategy;
 - the policy should not be overly restrictive in terms of scale and function;

- the policy should cross refer to retail needs assessment and reflect PPS6 (**ND009**) regarding sequential test; and
- small, individual shops should not influence determination of a planning application for additional retail facilities.

5.14 In summary, the Council's response was that the regeneration scheme for Bracknell town centre remains the Council's prime development catalyst for growth in the Borough as a whole. The impact of retail development on all centres, including those outside the Borough and not just Bracknell town, will be taken into account. The retail provisions of the Submission Core Strategy will be based on a network of town centres in the Borough which have different and complementary roles, an assessment of need and a separate out of town centre policy. Whilst it was not expected that the protection of small local shops would be retained in the policy approach, on reflection it was.

Site Allocations

Bracknell town centre

5.15 With regard to site allocations, which at that time was still being considered alongside the Core Strategy, Bracknell town centre (SA9) was promoted as the major development area for mixed uses (in accordance with the Bracknell Town Centre Masterplan (**ITS003**) – September 2002).

5.16 There were individual objections on the basis that Bracknell town centre had been developed enough and that more flexibility was needed to allow proposals to evolve over the plan period. In summary, the Council's response was that the regeneration of Bracknell town centre is a main objective of the Community Strategy and the LDF supported by a Masterplan and an outline planning application (since approved). Appropriate flexibility was expected to result from the flexibility inherent in planning legislation and the monitoring which will be undertaken.

Work

5.17 The preferred approach to the location of new employment development (SA5) was very much based on the protection of identified employment areas for such uses; although further consideration was also given to the need to contract existing employment areas or the need to provide new employment areas.

5.18 There was one objection to Policy Approach SA5 on grounds that the policy should define existing employment areas which are suitable for housing or mixed-use development and that Crowthorne Business Estate should have been considered under the employment potential study as it may have been considered for mixed use development. In summary, the Council's response was that the **Employment Potential Study (ETS003)** suggested that more efficient use of existing employment sites (without change to other uses) would negate the need to identify additional land for employment uses in about the first 15 years of the 20 year term of the framework and that the Submission Core Strategy will direct employment generating development to employment areas as opposed to other forms of development. It was expected that the Submission Site Allocations document (not now progressed) would include provisions for the Crowthorne Business Estate similar to those in the existing BFBLP (**LD003**). Whilst it had been suggested that the future of this site might best be examined under an Area Action Plan,

speedier guidance on the future of this site is now considered appropriate under the Development Management - Housing and Commercial Policies and Sites - DPD.

Shop

- 5.19 The intention for retail development (SA8), outside of Bracknell town centre, was to support, enhance and protect the retail function of local shopping centres, consistent with their scale, and of small retail units, whether inside or outside centres.
- 5.20 There were no representations regarding Policy Approach SA8 or its supporting text.

Other Plans and Strategies

- 5.21 The most relevant strategy is the Sustainable Community Strategy. This originated as the Community Plan for Bracknell Forest (Shaping Tomorrow Together 2002). This document included a necessity, rather than an ambition, of making Bracknell town centre fit for the 21st Century and supporting the Bracknell Forest economy.
- 5.22 This document has been superseded by the Bracknell Forest Sustainable Community Plan - October 2005 (BFSCP) (**LD009**). Priority 5 of the BFSCP continues the former necessity of making Bracknell a town fit for the 21st Century. This is due to overwhelming public support for the regeneration of the town centre as a first choice destination that people are proud of, where more time and money will be spent and which offers a wide range of shops, leisure and housing.

Sustainability Appraisal

- 5.23 Each stage of the Core Strategy and Site Allocations preparation process has been accompanied by an emerging Sustainability Appraisal, including Strategic Environmental Assessment, which has informed, and been informed by policy formulation.
- 5.24 The sustainability appraisal of the Issues and Options stage was preceded by a Scoping Report (**BP015**) which identified, inter alia, the following main outcomes:
- minimise the need for travel;
 - prioritise development on brownfield land;
 - promote mixed use development; and
 - encourage a match of skills and employment to meet the needs of local people.
- 5.25 The Issues and Options stage in the preparation of the Core Strategy was accompanied by an Initial Sustainability Appraisal (**BP009**) which included the following Sustainability Objectives:
- to protect and enhance the Borough's countryside;
 - to ensure high and stable levels of employment; and
 - to sustain economic growth;

and included the following Core Strategy Spatial Objectives:

- to plan for a balance of housing and employment growth;
 - to deliver the regeneration of Bracknell town centre;
 - to promote a sequential approach to the location of new development; and
 - to maintain high and stable levels of economic growth.
- 5.26 In respect of the employment options, the Initial Sustainability Appraisal (**BP009**) promoted “smart” growth; intensifying the use of existing employment sites and utilising under-used sites for employment. The Initial Sustainability Appraisal supported redevelopment in Bracknell town centre and the smaller community and neighbourhood shopping centres in order to reduce travelling and support small businesses.
- 5.27 The Preferred Options stage was accompanied by a Draft Sustainability Appraisal Report (**BP011**). No changes were proposed to the relevant employment and retail policy approaches as a result of the Draft Sustainability Appraisal Report. However, the examination of the emerging provisions for Bracknell town centre indicated that there was a need to ensure that smaller businesses are promoted at a more local level in Policy WS1 (Retailing).
- 5.28 The development, and application of the **Sustainability Appraisal** were major processes in the consideration of sites suitable for development, particularly in respect of the appropriateness of sites for housing development.
- 5.29 The allocation of new sites, and the review of existing sites, for retail, employment or other purposes, would best be considered during the preparation of, and consultation on, the proposed Development Management (Policies and Sites) Development Plan Document.

Background Documents

- 5.30 The employment policies have taken account of the **Employment Potential Study** (Final Report 2005) (**TES003**) which identified supply and demand trends and indicated a 12 – 16 year supply of office sites and 4-5 year supply for industrial purposes and of the **Employment Potential Study – Phase II** which considered potential redevelopment sites. The retail policies have been prepared in the light of the earlier **Bracknell Town Centre Retail Impact Analysis (ITS004) and Retail Capacity Study and Appendices (ITS005)** (2002).
- 5.31 The information, and any recommendations, contained in such documents need to be weighed against the results of all the investigations undertaken by the Council in support of the preparation of the Core Strategy and, although no longer being progressed, the Site Allocations DPDs.

Submission

- 5.32 The Submission Core Strategy was accompanied by a Final Sustainability Appraisal Report (**BP001**). This report noted that both the employment and retail policy approaches were each to be translated into two policies (requiring no mitigation) and that the provisions of Policy CS21 (Retail development in Town Centres) promoting lower tier centres in the Borough would overcome

the negative impacts of an over-dominant Bracknell town centre on smaller businesses.

- 5.33 The forgoing considerations led to a Submission Core Strategy which contains policies for employment development which seek to locate major employment development in defined employment areas (CS19). These comprise Bracknell town centre, the existing employment areas within settlements (cf **BFBLP (LD003)** Policy E2), the identified major employment sites outside of settlements and beyond the Green Belt (cf **BFBLP (LD003)** Policy E12) and in major developed sites within the Green Belt (cf **BFBLP (LD003)** Policy GB5). CS19 also seeks to safeguard small businesses.
- 5.34 Policy CS20 defines employment development appropriate to the defined employment areas, contains provisions for the consideration of non-employment development, requires mitigation for the impacts of employment development and supports appropriate ancillary services in employment areas.
- 5.35 Similarly, Policy CS21 directs retail development to Bracknell town centre, the larger settlement centres and smaller centres. It also requires the consideration of the overall need for retail growth in the Borough in support of the strengthening, and regeneration of, centres smaller (see paragraph 220 of the supportive text) than Bracknell town centre. The policy also promotes accessibility and the retention of individual retail units that perform a community function.

6 Implementation and Monitoring

- 6.1 A key element of the new planning system is to ensure that policies are implemented and monitored. The Core Strategy sets out key strategic policies that will guide development in the future but which in many instances will be detailed in further Local Development Documents. One of the key mechanisms for the implementation of policies in this Theme, in addition to determination through planning applications and appeals, will be through a Development Management – Housing and Commercial Policies and Sites – DPD (due to commence in May 2007) and Area Action Plans for the major locations for growth at Amen Corner, Binfield (under CS4 and already commenced and due for adoption in February 2010) and land north of Whitegrove and Quelm Park, Warfield (under CS5 and due to commence in October 2007).
- 6.2 The approach to monitoring policies 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.

7 Conclusion

- 7.1 The Council considers that the employment and retail policies, and their contribution to the overall Core Strategy, are **sound** as they:

- Have been prepared in accordance with the Procedural Tests (i, ii and iii) of Soundness (discussed in Topic Paper 1);
- Are consistent with national planning policy, is in general conformity with the Regional Spatial Strategy, and has regard to other plans, policies and strategies relating to the area or adjoining areas (Test iv);
- Relate appropriately to the Priorities in the Bracknell Forest Borough Sustainable Community Strategy (Test v);
- Are coherent and consistent with the Core Strategy, generally, and other policies in the Core Strategy, particularly, and those of neighbouring authorities, where cross-boundary issues are relevant (Test vi);
- Represent the most appropriate policies in all circumstances having considered relevant alternatives, and are founded on a robust and credible evidence base;
- Include clear monitoring and implementation mechanisms which have been identified with each policy and in the monitoring Appendix to the Core Strategy; and
- Include inherent flexibility within the overall strategy (Test ix).

7.2 Therefore, the Council feels this approach is sound and consistent with the emerging South East Plan (**RD001**), 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.