

**Bracknell Forest Borough Local Development Framework**  
**Sustainable Resource Management**  
**Supplementary Planning Document**

**Statement of Representations**  
**October 2008**

Under the Town and Country Planning (Local Development Framework) (England) Regulations 2004 (as amended) a local planning authority shall not adopt a Supplementary Planning Document (SPD) until:

- Representations made in respect of the draft SPD have been considered (Regulation 18(4)(a)); and,
- A statement is prepared setting out a summary of the main issues raised in these representations and how these issues are addressed in the SPD to be adopted (Regulation 18(4)(b)).

**Summary of consultation**

Consultation on the draft Sustainable Resource Management SPD took place between 30 November 2007 and 11 January 2008. Details of the consultation were sent to 173 key stakeholders including: Parish Councils, other local authorities, developers, housing associations, local environmental groups and government agencies. A full list of those contacted can be found in Annex 1. In addition, all consultees were invited to a workshop to provide a better understanding of the SPD's content and to raise any questions or comments informally, prior to making a formal submission. Unfortunately, due to lack of interest, these workshops were cancelled.

The draft document was also made available on the Council's website and the consultation was publicised in the Bracknell News on Thursday 6 December 2007 and the Council's newspaper, Town and Country, in the December 2007 edition.

Consultation on the draft Sustainability Appraisal was carried out alongside the SPD. The full document was emailed to statutory consultees and a non-technical summary was sent to all key stakeholders.

**Consultation responses**

Sixteen consultation responses were received in connection with the SPD. These were subsequently collated and, where appropriate, changes were made to the SPD.

Table 1 summarises the main issues raised during the consultation (in the second column) and how these issues were addressed in the final SPD (in the third column).

**Adoption**

The Borough Council presented the final version of the Sustainable Resource Management SPD, along with the representation responses, to Executive on 21 October 2008. The SPD was therefore formally adopted by the Council on this date.

**Table 1: Summary of responses to Sustainable Resource Management SPD**

Respondent	Main comments	Council's response
Environment Agency	<ul style="list-style-type: none"> <li>• Section 2.4 should make it clear that this section refers to surface water flooding</li> <li>• Make reference to PPS25.</li> <li>• Any watercourse (including ditches) should not be utilised as part of SUDS system.</li> <li>• Infiltration is a type of source control.</li> <li>• Allowance should be made for climate change.</li>   <li>• Reference to Surface Water FRA should be included and wording proposed relating to flood risk attenuation.</li> <li>• Infiltration should be the preferred option.</li> <li>• SUDS are only an effective way to deal with pollution of watercourses and groundwater if infiltration is not through contaminated soil.</li> <li>• Reference should be made to the detrimental effect of piling.</li> <li>• Buffer strips can also create wildlife corridors.</li> </ul>	<ul style="list-style-type: none"> <li>• Additional text is included on this point.</li>   <li>• PPS25 is referenced.</li> <li>• Reference to ditches removed.</li>   <li>• The heading of 'infiltration' has been amended.</li> <li>• Climate change allowance has been included as a requirement.</li> <li>• Surface Water FRA is referred to as a requirement and the requirements for river flooding are separate to this.</li> <li>• Text is included to clarify this.</li> <li>• Additional text is included on this point.</li>   <li>• Additional text is included on this point.</li>   <li>• Additional text is included to cover this point.</li> </ul>
Morrison Supermarkets Plc (response from Peacock & Smith Limited)	<ul style="list-style-type: none"> <li>• In setting levels and thresholds the SPD should <u>encourage</u> renewable energy <u>subject to the viability of the scheme</u>.</li> <li>• Object to the inclusion of water efficiency (section 2.3) because of duplication with Building Regulations.</li> <li>• Requirement to meet BREEAM standards should be subject to tests of viability and suitability.</li> </ul>	<ul style="list-style-type: none"> <li>• The SPD now makes reference to flexibility and viability.</li>   <li>• The supporting text of Core Strategy policy CS10 states that the Council will expect developers to have regard to best practice standards over and above Building Regulations, for example the Code for Sustainable Homes. As the Code includes water efficiency, the SPD also makes reference to this topic.</li> </ul>

Respondent	Main comments	Council's response
<p>Legal and General (response from Terence O'Rourke)</p>	<ul style="list-style-type: none"> <li>• The SPD will need updating following publication of the PPS on climate change.</li> <li>• Further evidence is needed on the feasibility of technologies within a Bracknell Forest context.</li> <li>• Links between EIA and Sustainability Statement should be clarified.</li>   <li>• Glossary would be helpful.</li> <li>• SPD should make clear under which circumstances planning conditions or obligations can be used instead of applicants submitting detailed information prior to application approval.</li> <li>• Page 8 – reference should be made to the PPS1 Supplement on Climate Change.</li> <li>• Page 9 – missing text at bottom of page.</li> <li>• Page 17 – inclusion of energy efficient appliances is not subject to control through the planning system.</li> <li>• Page 24 – include cross reference to the Core Strategy. Provide further information on potential and feasibility in context of BF.</li> <li>• Pages 50-54 – specific and standalone assessments of new development in terms of light, noise, air and land pollution should not be required where this forms part of EIA. Planning conditions may also be able to control this without need for detailed information provided by the applicants.</li> <li>• Page 56 – measuring success. Clarification of the lifetime of the document and review timescales would be welcomed.</li> </ul>	<ul style="list-style-type: none"> <li>• The SPD now takes account of the PPS on Planning and Climate Change.</li> <li>• Additional information has been provided on renewable technologies.</li> <li>• Section 2.1 now explains links between Environmental Statements and Sustainability Statements.</li> <li>• Glossary has been included.</li> <li>• The use of planning conditions has been clarified.</li>   <li>• The specific technical points have all been included within the SPD.</li> </ul>

Respondent	Main comments	Council's response
Home Builder's Federation (HBF)	The matter of viability should be tested through a DPD policy, in particular in relation to compliance with Code Level 3. Compliance with the Code for Sustainable Homes should therefore be deleted from the SPD.	<ul style="list-style-type: none"> <li>• DPD policy (Core Strategy policy CS10) makes reference to meeting best practice standards, with subsequent guidance in further LDDs. It is therefore considered appropriate to include the Council's definition of best practice within SPD, which can be updated more frequently than a DPD.</li> <li>• The SPD now makes reference to flexibility and viability.</li> </ul>
Community & Environmental Development, BFBC	A major omission is flood resistance and resilience of buildings to deal with future climate risks. Groundwater, surface water runoff are risks as well as river flooding.	<ul style="list-style-type: none"> <li>• Text is added to ensure the Sustainability Statement considers adaptation to the impacts on microclimate arising from climate change.</li> <li>• Flood risk assessments are required to make an allowance for climate change</li> </ul>
SEEDA	The aims of the SPD are well aligned to the Regional Economic Strategy. The use of SEEDA's Sustainability Checklist is welcomed.	<ul style="list-style-type: none"> <li>• No changes proposed.</li> </ul>

Respondent	Main comments	Council's response
Thames Water plc	<ul style="list-style-type: none"> <li>• Support the SPD and believes it will contribute to ensuring development takes place in a sustainable way.</li> <li>• Support the objective to reduce per capita water consumption in section 2.3 but have concerns that assumptions may be over optimistic. A mandatory Code for Sustainable Homes and revisions to the Building Regulations would be needed.</li> <li>• Section 2.4 on flooding makes no mention of sewer flooding. The timing taken to deliver sewerage infrastructure should be considered and development should not be allowed to proceed ahead of adequate sewerage infrastructure.</li> <li>• Maintenance of SUDS is important.</li> <li>• Section 3.3 should refer to pollution caused by sewer flooding.</li> </ul>	<ul style="list-style-type: none"> <li>• Reference to sewer flooding and associated pollution is now included.</li> </ul>

Respondent	Main comments	Council's response
<p>Bracknell Regeneration Limited Partnership (BRP) response from Drivers Jonas</p>	<ul style="list-style-type: none"> <li>• The document solely focuses on environmental sustainability and should cover social and economic aspects.</li> <li>• Site selection and location should be part of the SPD to address more sustainable town centre locations.</li> <li>• The document is not sufficiently flexible to respond to changes in technology.</li> <li>• Section 2.1 – energy efficiency should not be limited to building design but also consider the operational performance. The document could include an ‘energy plan’ to influence occupiers choice.</li> <li>• Section 2.2 – target for renewable provision should be more flexible and assessed on a scheme by scheme basis taking into account constraints. On site generation is unlikely to be achievable in some developments so there should be the option to provide a combination of solutions including on-site and off-site solutions.</li> <li>• Decentralised renewable generation should not be included before it is proven to be technically feasible.</li> <li>• Section 3.1 – there should be flexibility in the choice of building materials as it is not always appropriate to use local materials.</li> </ul>	<ul style="list-style-type: none"> <li>• The SRM document relates to resource use so social and economic issues are outside the scope of this guidance.</li> <li>• Policy on site selection is covered in other documents, for example Policy CS2 in the Core strategy DPD, so is not reiterated in this SPD.</li> <li>• The document will be regularly reviewed to ensure it provides up-to-date guidance and a section on flexibility has been included.</li> <li>• Text has been added which makes reference to operational performance.</li> <li>• The 20% renewable energy target is set within an adopted DPD but there is a caveat that if this cannot be achieved for technical or viability reasons the percentage can be reduced.</li> <li>• Reference has been removed.</li> <li>• The wording of this requirement has been modified to be more flexible.</li> </ul>

Respondent	Main comments	Council's response
Millgate Homes	<ul style="list-style-type: none"> <li>• Requirements should be numbered to aid referencing.</li> <li>• Section 1.1 – more flexible approach should be promoted taking into account site characteristics, location, viability, material availability, technologies and size of development.</li> <li>• Page 7 – reference to increased returns on developments should be deleted from the text.</li> <li>• Page 24 – there should be indications of viability thresholds accepted by the Council as developers have different definitions.</li> <li>• Page 35 – include definition of ‘large development’. There should be an indication of what takes precedence, provision of parking or landscaping. Also, other means of shading are available.</li> <li>• Page 42 – requiring Green Guide rating B is higher than required under the Code for Sustainable Homes, which may lead to specific sourcing issues and conflict with other requirements.</li> <li>• Page 45 – requiring the use of local materials is too onerous and should be an aim, not a requirement.</li> <li>• Page 54 – no definition of a major new development or if contaminated land assessment needs to be submitted with a planning application or post application as a discharge of planning condition. Pollution prevention requirement should be reworded for clarity.</li> <li>• Page 55 – no definition of larger development.</li> <li>• Measuring success – it will be difficult for smaller developments to meet Level 3 of the CSH. BRE and Code Assessors should be consulted to ensure SPD is achievable.</li> </ul>	<ul style="list-style-type: none"> <li>• Within the summary table the information required is numbered.</li> <li>• The level of information provided should be proportionate to the scale of the proposed development.</li> <li>• This text has been deleted.</li>   <li>• This has not been included – it is up to the applicant to demonstrate potential impact upon viability and is not for the Council to prescribe what this may be.</li> <li>• The definition of ‘major development’ is clarified in the glossary.</li>   <li>• The most recent Green Guide to Specification (2008) uses an A, B, C rating system. This is clarified in the SPD’s text.</li>   <li>• Materials with a better environmental rating are strongly encouraged and the Sustainability Statement must now show the proportion of local materials included, however a target is not placed on this.</li>   <li>• This has been clarified in the final SPD.</li>   <li>• There is flexibility in the requirement to meet Code Level 3, as indicated in section 2.4 of the final SPD.</li> </ul>

Respondent	Main comments	Council's response
Croudace Strategic response from Charles Planning Associates	<ul style="list-style-type: none"> <li>• The SPD should be revised to take into account the requirements of PPS1 Supplement and this should be issued as a further consultation draft.</li> <li>• The SPD requires Code 3 of CSH, whereas government guidance states this level should be achieved by 2010. The requirements could be introduced in stages. It is premature to require developments to comply with the CSH.</li> <li>• Some information required by the SS will not be known at planning application stage and some will be better placed in Design &amp; Access Statements.</li> <li>• Appendix 1 should not be a defining checklist of information to be supplied.</li> <li>• Requirements for locally produced or recycled materials needs to be balanced against the requirement for aesthetically pleasing development or road safety. SPD must acknowledge this.</li> <li>• SPD should have greater flexibility regarding minimum targets and information provided to ensure viability.</li> </ul>	<ul style="list-style-type: none"> <li>• Account has now been taken of PPS1 Supplement.</li> <li>• The adopted Core Strategy requires a Sustainability Statement which demonstrates how current best practice in the sustainable use of natural resources has been incorporated into development proposals, over and above Building Regulations, for example the Code for Sustainable Homes. The SPD provides guidance on what is viewed as current best practice.</li> <li>• Links with Design and Access Statements are highlighted in the SPD.</li> <li>• Appendix 1 (Table 1 in the adopted SPD) has been changed into a 'summary of information' table.</li> <li>• Text has been added to recognise that the use of environmentally sensitive materials must also have regard to design and safety issues.</li> <li>• A section on flexibility has been added.</li> </ul>
Friends of the Earth (Mr Bill Dowling)	<ul style="list-style-type: none"> <li>• Current growth plans are not sustainable with the requirements in the SPD – a 10% reduction in energy is still an increase.</li> <li>• The document is not tough enough.</li> </ul>	<ul style="list-style-type: none"> <li>• The SPD supports targets within the Core Strategy DPD and is not able to set new targets.</li> </ul>

<b>Respondent</b>	<b>Main comments</b>	<b>Council's response</b>
Wokingham Borough Council	<ul style="list-style-type: none"> <li>• Section 1.4 – cross refer to Core Strategy policy</li> <li>• Section 2.2 – provide further information on how renewable % were derived. Define CS policy number.</li> <li>• Section 2.4 – refer to PPS25 Practice Guidance and Flood Direction 2007. Should mention FRA for sites over 1ha or within flood zones 2 or 3, requirements for Drainage Impact Assessments.</li> <li>• TV Energy have produced guidance for SPDs which could feed into the document.</li> </ul>	<ul style="list-style-type: none"> <li>• Cross-reference to Core Strategy has been included.</li> <li>• Additional text on flood risk included.</li> </ul>
Rambler's Association (SE Berks Group) – Mr Richard Mosses	Raised concern that the document would not inform planning decisions.	<ul style="list-style-type: none"> <li>• No changes proposed.</li> </ul>
Highways Agency	No comment	<ul style="list-style-type: none"> <li>• No changes proposed.</li> </ul>
Theatres Trust	No comment	<ul style="list-style-type: none"> <li>• No changes proposed.</li> </ul>
Warfield Parish Council	General agreement with the proposals.	<ul style="list-style-type: none"> <li>• No changes proposed.</li> </ul>

## Annex 1 – Consultees

12-14 Folgate Limited  
A2 Housing Group  
Ability Housing Association  
Airtrack  
Airways Housing Society Ltd  
Annington Homes  
Arcadia Ventures Ltd  
Babtie Environmental  
Bancroft Developments  
Barratt Homes Ltd  
Beacon Housing Association  
Beaulieu Homes Ltd  
Beazer Homes PLC  
Bellway Homes  
Berkeley Strategic  
Berks, Bucks and Oxon Wildlife Trust  
Berkshire Archaeology  
Berkshire Field Research Group  
Berkshire Homes  
Berkshire Local History Association  
Berkshire Shared Services Organisation  
Bewley Homes PLC  
Binfield Badger Group  
Binfield Parish Council  
Binfield Village Protection Society  
Blackwater and Hawley Town Council  
Bovis Homes South East  
Bracknell and District Friends Of The Earth  
Bracknell and District Urban Wildlife Group  
Bracknell and Wokingham College

Bracknell Forest Tenants and Leaseholders Panel  
Bracknell Forest Young People's Engagement  
Bracknell Forest Youth Forum  
Bracknell Regeneration Trust  
Bracknell Town Council  
Brandon Gate Homes Ltd  
Bray Parish Council  
British Gas  
British Wind Energy Association  
BTCV  
Burrell Developments Ltd  
Cala Homes  
Castlemore  
Charles Church Ltd  
Chiltern Hundreds Housing/Paradigm Housing Group  
Chobham Parish Council  
CPRE  
Crest Nicholson  
Croudace Strategic Ltd  
Crowthorne Parish Council  
David Wilson Homes  
Defence Estates  
Directorate Of Organisation and Management Development  
Ellmer Homes Limited  
Elsmore Construction  
Energis Street Works Office  
Englemere Homes  
English Heritage

English Partnerships  
Environment Agency  
Fairview New Homes  
Finchampstead Parish Council  
First Great Western Ltd  
Fordham Research  
Forestry Commission England  
George Wimpey PLC  
Government Office For The South East  
Greenham Common Trust  
Guinness Trust  
Hampshire County Council  
Hanover Housing Association  
Harbour Properties  
Harcourt Developments Ltd  
Harrison Homes  
Hart District Council  
Helical Bar PLC  
Heronsbrook Homes Ltd  
Hicks Developments Ltd  
Highways Agency  
Hodson Developments PLC  
Hogarth Developments Ltd  
Home Reading  
Housing 21  
Hurst Parish Council  
James Butcher Housing Association  
Joint Nature Conservation Committee  
Key Properties Ltd  
Kings Oak Thames Valley  
Kingston Infrastructure  
Laing Homes Thames Valley

Legal & General Assurance Society Ltd  
Levvel Consulting Ltd  
Linden Homes  
London & Quadrant Housing Trust  
Look Ahead Housing and Care Ltd  
Lovejoy Homes  
Luff Homes  
Martin Grant Homes Ltd  
McCarthy and Stone  
Michael Shanley Homes  
Millgate Homes  
Ministry Of Defence - South East  
Mobile Operators Association  
Morrisons  
Mulhern New Homes Ltd  
National Grid  
National Housing Federation  
Natural England  
Notting Hill Home Ownership Ltd  
Old Windsor Parish  
Oldfield King (Architects)  
Pact  
Parkside Housing Group  
Persimmon Homes  
Planning Issues  
Princegate Estates  
Queensmere Properties Limited  
Radian Group  
Rambler's Association (SE Berks Group)  
Redrow Homes (Southern) Limited  
Robert Aden Associates  
Rosemary Simmons Memorial HA Ltd

Royal Borough of Windsor and  
Maidenhead  
Royal Society for The Protection Of Birds  
RTPI  
Samuel Lewis Housing Trust  
Sandhurst Town Council  
Scottish and Southern Energy  
SE Network European Information Relays  
SEEDA  
Shottesbrooke Parish Council  
South East England Region Assembly  
South East Water  
Southern Housing Group  
Sovereign Housing Association  
Squires Bridge  
Strathmore Developments Ltd  
Sunningdale Parish Council  
Sunninghill and Ascot Parish Council  
Surrey County Council  
Surrey Heath Borough Council  
Surrey Heath Housing Association  
Taylor Woodrow Developments Ltd  
Tetlow King Planning  
Thames Train Ltd  
Thames Valley Housing Association  
Thames Water Property Services  
The Estate Office  
The Guinness Trust  
The Home Builders Federation  
The Housing Corporation  
The Joint Strategic Planning Unit  
The Planning Inspectorate  
The Theatres Trust

Thomas Lawrence Ltd and Taylor  
Woodrow Dpts LTD  
Three Valley Water Plc  
Toynbee Housing Association Ltd  
Trimount Properties  
UN Association  
Valuation Office (Reading)  
Waltham St Lawrence Parish Council  
Warfield Parish Council  
Westbury Homes (Holdings) Ltd  
White Waltham Parish Council  
William Sutton Trust  
Windlesham Parish Council  
Windsor Housing Ltd  
Winkfield Parish Council  
Wokingham Borough Council  
Wokingham Town Council  
Wokingham Without PC  
Woodlands Trust  
Yateley Town Council