



Woolf Bond Planning

Chartered Town Planning Consultants

Our ref: TR/GR/7699

Email: [REDACTED]

15th April 2019

Development Plan Team,
Bracknell Forest Council,
Time Square,
Market Street,
Bracknell,
RG12 1JD

Dear Sir/Madam,

Warfield Neighbourhood Plan 2013-2026 – Consultation on Submission Draft Plan

Consultation response on behalf of Warfield Park

Background

We refer to the above consultation exercise and respond on behalf of Warfield Park.

As the Council and the Neighbourhood Plan steering group will be aware, Warfield Park is a long standing community of over 500 no. residential park homes located on the southeastern side of the Parish. It provides a form of accommodation in the Borough that is suitable for all, but in particular older persons. Park homes are much needed and greatly in demand with long waiting lists for both buying and renting. The Park includes its own recreational and amenity spaces, community centre, hairdresser, beautician and launderette. The park operator provides an on-site warden service and maintains the site.

The Park is accessible via Harvest Ride (on its western side), Westmoreland Drive (on its north-western side) and Long Hill Drive (on its eastern side). The Park's approximate location and area is illustrated on the satellite image below.



Figure 1 - Satellite Image showing Warfield Park

With the above context in mind, we refer to the draft Submission Plan and write to set out our comments upon certain of the policies and proposals contained within the document.

Assessment of the Neighbourhood Plan against the Basic Conditions

The Neighbourhood Plan must meet the "Basic Conditions". These are set out in Law [paragraph 8[2] of Schedule 4B of the Town and Country Planning Act 1990]. In order to meet the Basic Conditions, the Neighbourhood Plan must:

- Have regard to national policies advice contained in guidance issued by the Secretary of State;
- Contribute to the achievement of sustainable development;
- Be in general conformity with the strategic policies of the development plan for the area; and

- Be compatible with EU obligations.

In addition, the Planning Practice Guidance states:

‘It is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging local plan, including housing supply policies. This is because Section 38(5) of the Planning and Compulsory Purchase Act 2004 requires that the conflict must be resolved by the decision maker favouring the policy in the last document to become part of the development plan.’

(Paragraph: 009 Reference ID: 41-009-20160211).

It follows that an emerging Neighbourhood Plan must be consistent with the content of an emerging Local Plan and must not introduce unnecessary restrictive policies that could constrain the ability of a future Borough wide Local Plan to meet its objectives.

It is our position that Policy WNP7 (Local Gaps) is inconsistent with national planning policy, fails to contribute towards sustainable development and is not in accordance with the strategic policies of the existing development plan. This can be rectified through the deletion of Policy WNP7.

In the absence of such amendments, we consider that the Neighbourhood Plan does not meet the Basic Conditions and should not be submitted for examination in its present form.

Our concerns over the inconsistency of this policy of the emerging Neighbourhood Plan we outlined in our earlier representation submitted to the Steering Group in September 2017. Therefore, our concerns with these policies will be known to the Steering Group who have consequently had the opportunity to make the amendments previously advocated and restated again.

Existing Housing Land Supply Position in the Borough

Although the Council’s assessment of five-year land supply at 1st April 2018 (updated and republished February 2019) contends the authority can demonstrate a 6.04 years supply, this does not negate the likelihood that further land will need to be identified to ensure the Council can submit and subsequently adopt a new Local Plan consistent with the revised NPPF (February 2019). Paragraphs 22 and 73 of the NPPF require Bracknell Forest’s new Plan to accommodate at least 637.3 dwellings annually (April 2018 assessment of Standard Method relying upon the 2014 based household projections as required by the NPPF and PPG (updated February 2019)) for a 15 year period post adoption (expected January 2021 according to the Local Development Scheme (February 2019)), which is therefore until at least March 2036.

The need for additional housing allocations to address the Borough’s housing need is further acknowledged in the Draft Bracknell Forest Borough Local Plan (February 2018) which acknowledged a need to identify sites for at least 3,216 dwellings (albeit this was in the context of the assessed need and supply over the period 2016 to 2033 rather than until at least 2036 as required by the updated NPPF alongside an annual need for 670 dwellings instead of 637.3 dwellings outlined above). This is notwithstanding any concern regarding whether the Council’s assessment of supply within the February 2018 version of the emerging Local Plan adequately reflects the revised definition of a deliverable site and windfalls in the NPPF (February 2019).

The Council has completed its Green Belt review as a part of its comprehensive local plan evidence base. The Green Belt review concluded that the existing Green Belt in the Borough performs and fulfils its purpose and that no areas have been identified which merit removal from the Green Belt. It is therefore unlikely that the comprehensive local plan will release housing land in the existing Green Belt.

This will result in an increased pressure to deliver housing elsewhere beyond the Green Belt across the Borough. It is therefore essential that the Warfield NP does not prejudice the delivery of such housing or introduce unnecessary restrictive policies that could frustrate the above requirements.

Policy WNP7: Local Gaps

In summary, we make the following points relating to Policy WNP7 (Local Gaps):

1. The proposal to introduce a local gap policy fails to have regard to national planning policy and guidance (a basic condition).
2. The proposal to introduce a local gap policy is not in general conformity with the strategic policies contained within the existing Bracknell Forest Borough Council development plan.
3. The suggested local gap and its appropriateness has been rejected by a previous development plan Examination in Public Inspector in 2008.
4. The Steering Group have not provided any evidence with respect of the imposition of any of the Local Gaps with respect why the designation is required, nor the extent proposed on Policies Map Inset 1 of the Draft Neighbourhood Plan;
5. Without prejudice to the above points, if a local gap policy were to be imposed it should logically exclude the land adjoining Warfield Park.

The proposal to introduce a local gap policy fails to have regard to national planning policy and guidance (a basic condition)

The most recent national guidance on the matter of local and strategic gaps comprised Planning Policy Statement 7 (Sustainable Development in Rural Areas) that was published in 2004 and provided a clear presumption against the use of rigid local designations as follows:

‘The Government recognises and accepts that there are areas of landscape outside nationally designated areas that are particularly highly valued locally. The Government believes that carefully drafted, criteria-based policies in LDDs, utilising tools such as landscape character assessment, should provide sufficient protection for these areas, without the need for rigid local designations that may unduly restrict acceptable, sustainable development and the economic activity that underpins the vitality of rural areas’ (para 24).

The reason behind the change in national policy emphasis was to ensure that LPA’s manage development needs in a proactive way rather than relying upon restrictive controls which may prevent sustainable development.

Furthermore, although since revoked, the South East Plan (paragraph 21.9) emphasised the following with respect of the need to justify gaps within Berkshire (including Bracknell Forest):

‘21.9 A range of other factors (listed below in alphabetical order) will also influence the distribution of development within the sub-region over the Plan period. While national policy and the general policies in this Plan provide the policy framework, there are some local implementation considerations to be taken into account:

Gaps – the policy is contained in PPS7: *Sustainable Development in Rural Areas*. In implementing it, those Berkshire authorities operating gap policies will need to review them carefully to ensure that they have a continuing justification that accords with the purposes and requirements set out in PPS7, do not unnecessarily duplicate other protection policies such as Green Belt and have regard to the other policies of this Plan’.

Therefore, although the Local Landscape Appraisal accompanying the Neighbourhood Plan (January 2017) refers to the content of the Bracknell Forest Landscape Evidence base (September 2015), which quotes the Draft South East Plan and Structure Plan, both of these are inconsistent with the Government’s position as outlined in the subsequently revoked South East Plan above.

Furthermore, the Neighbourhood Plan’s Local Landscape Study appears to rely upon the Entec Study of 2006 to support the extent of the boundaries of local gaps proposed. However, the relevance of this study to the definition of any gaps must be appraised taking account of the conclusions of the Inspector who examined Bracknell Forest’s Core Strategy who concluded (paragraphs 117 to 119, 126, 127 and 135-137) on gaps generally and the one related to the Warfield Neighbourhood Plan’s area:

117. In order to plan for sustainable growth whilst preventing the coalescence of settlements, and in the light of the areas which are under pressure for development, the Council commissioned a study (Entec Study ETS007) to inform the CS. A landscape character assessment was undertaken and each of the landscape character areas identified was assessed to determine the landscape capacity of each area to accept development. Primary criteria were identified for gaps/green wedges which provide a basis for confirming the *principle* of which areas should be identified for gaps/green wedges. Secondary criteria were identified as a basis for *defining the areas more precisely* and providing justification for their designations. As a consequence, the Council identified the 7 gaps which are shown on the Key Diagram and submission CS Proposals Map, 4 of which are *Strategic Gaps* and 3 of which are *Local Gaps*.

118. However, there are errors in the Entec Study and therefore its credibility is in doubt (EQ6). I shall therefore consider the merits of each of the gaps in turn.

Local Gaps

119. The proposed Local Gaps have been so named since none of them meets the emerging SEP Strategic Gap criteria because the population of one of the settlements involved is less than 10,000.

Gap 4 (Bracknell-North Ascot)

126. Bracknell and Ascot have very distinct and separate identities. However, the localised patterns of development are less coherent than in other parts of Bracknell's urban fringe due to the number of small clusters of development within this gap e.g. Chavey Down and Winkfield. The 2 wards which make up Ascot have a combined population of 11,604 but they comprise a number of dispersed settlement areas. The area closest to Bracknell and most subject to the threat of coalescence is North Ascot which has a population of 7,500.
127. But, it seems to me that North Ascot is separated from Bracknell by the Green Belt, albeit by a relatively narrow strip of Green Belt. Therefore, there can be no real threat of coalescence. Indeed, the Council has not sought to extend the Green Belt in this location. The proposed Gap 4 would therefore more serve to separate Bracknell from the settlements of Chavey Down, Winkfield Row and Hayley Green. As such, I do not feel there is sufficient support for Gap 4 to be defined as a local gap. It should therefore be removed from the Key Diagram change IR7 (Tests 4,6,7). There is acknowledgement elsewhere that Warfield Park Homes is a potentially appropriate use under CS9 subject to a suitable scheme coming forward.
135. I acknowledge that there is a history of gaps in Berkshire and I agree that there is a need to protect the setting and identity of settlements and avoid their coalescence. However, the CS should be broad brush and give direction. Although I have found support for the broad location of some of the gaps shown on the Key Diagram, it seems to me that the detailed boundaries should be the subject of a future DPD when they can be subject to public consultation. There is no evidence to suggest that the Entec Study was subject to public consultation, therefore I do not see that it should be taken as a given that the boundaries described/suggested in the Entec Study for the gaps should be put forward for adoption on the submission Proposals Map without further public consultation. As such, the Gaps should be removed from the submission CS Proposals Map. I also note that the submission SEP at paras 1.35 and 1.38 says that where a gap crosses local authority boundaries, the local authorities should prepare a joint LDD for the gap. I understand that subject to outcome of SEP process the Council will, along with other local authorities, consider the most appropriate way to jointly deal with more detailed work on issues such as gaps (EQ6).
136. In conclusion, all gaps should be struck from the SCSPM. However, there is support for keeping some of the gaps on the Key Diagram for detailed consideration through a lower tier DPD if the regional approach in the adopted RSS gives justification for them. In summary, there is some support for a Local Gap between Bracknell-Binfield (Gap 1) but not for a Local Gap between Bracknell-North Ascot (Gap 4). As such, Gap 4 should be struck from the Key Diagram. There is support for a continuous Strategic Gap to be shown on the Key Diagram straddling the boundary with Wokingham BC and BFBC alongside the west of Binfield, Amen Corner and Bracknell (Gaps 2 and 3). There is support for a Strategic Gap between Crowthorne-Bracknell (Gap 5) but not

extending east of Broadmoor; and as currently shown on the Key Diagram between Sandhurst-Crowthorne (Gap 6). And, there is support for a Strategic Gap between Sandhurst-Yateley which should be shown straddling the boundary with Hart DC (change IR4). Furthermore, the list of Gaps in paragraph 119 should be amended accordingly change IR9.

137. **Such Gaps would be justified in accordance with the provisions of the emerging RSS (SEP Policy CC10b and paragraph 1.38); Berkshire Structure Plan 2001-2016 (Policy DP7); BFB Local Plan (Policy EN8 wherein the word “function” subsumes “gap policy” from previous local plans); consultation feedback from the Core Strategy Issues and Options Stage (in the Statement of Compliance (LD004), The Report of Consultation at Regulation 25; and the Sustainability Appraisal. (Our emphasis).**

As paragraphs 25-29 of the Core Strategy Report indicates, Bracknell Forest’s Core Strategy was prepared prior to the Government’s approval of the South East Plan and consequently would not have considered the guidance in paragraph 21.9 referred to above. This inconsistency is highlighted in the reference in paragraph 137 of the Core Strategy Inspector’s Report detailed above.

Bringing the position up-to-date, the NPPF and PPG are silent on the use of policy concerning locally designated gaps but clearly provide for a presumption in favour of sustainable development.

The proposed use of a gap designation is not supported by national policy guidance, is entirely unnecessary and threatens the delivery of sustainable development principles. Sufficient protection of the landscape can instead be contained in criterion based policies regarding the need to take landscape character into account when determining planning applications (consistent with paragraph 171 of the NPPF). Such an approach would be more flexible in order to enable an application to be determined on the basis of site specific circumstances. In effect, if coalescence or landscape impact is a fundamental issue the decision maker retains the ability to refuse for these reasons irrespective of whether a gap policy exists. Such an approach is a far more effective approach and consistent with national policy.

The proposal to introduce a local gap policy is not in general conformity with the strategic policies contained within the existing development plan

Paragraphs 5.39 to 5.43 of the NP state:

- 5.39. **The Local Gaps defined in this policy seek to prevent the coalescence of the settlements of Newell Green, Warfield Street and Hayley Green, and to contribute to the maintenance of the separation with Winkfield Row in the adjacent Parish of Winkfield. No more land than is necessary to prevent coalescence and retain separate identities of the three settlements has been included in the policy.**
- 5.40. **The three settlements lie within the ‘countryside wedge’ between Bracknell and the Metropolitan Green Belt where development pressures in the Parish are at their greatest. The settlements are separated by relatively narrow and diminishing areas of countryside as Bracknell continues to grow northwards and**

encroach further into the countryside. Although the land lies outside the settlement boundaries defined in policy WNP1, that policy acknowledges that some types of development that are suited to the countryside may be appropriate.

- 5.41. The policy defines the areas of land on the edge of the settlements that plays an especially important role in preventing development that will undermine the visual integrity of the gap to the point where the three settlements coalesce. The Warfield NP Local Landscape Appraisal (January 2017) confirms that development in areas that form the separation between these settlements would significantly erode settlement distinctiveness, identity and sense of separation.
- 5.42. The principle of protecting gaps is well established in the Borough. BFBLP 'saved' Policy EN10 identified areas of special landscape importance (which forms part of the Hayley Green Local Gap) and Core Strategy Policy CS9 (i) seeks to "protect the defined gaps within or adjoining the Borough from development that would harm the physical and visual separation of settlements..." and confirms this policy will be implemented through subsequent policies and guidance. Policy CS9 was adopted in 2008 and pressure for development in the gaps continue. The purpose of this policy is therefore to translate this policy into the Warfield context by defining the boundaries of the gap.
- 5.43. Areas of land protected by Local Gap designations can also provide a valuable source of green infrastructure which may offer important recreational, health and landscape benefits to the local community as well as nature conservation value. The Entec Landscape Study (2006) and the Landscape Character Assessment and Recommendations Sept 2015 (LCA) similarly acknowledged the importance of the landscape in defining the character of the area and the part gaps play in preserving the physical and visual separation of settlements; the latter recommending gap boundaries should be defined on maps.

The justification for the local gap policy appears in part to be based upon policies EN10 and CS9, however as explained below, neither provides a justification for any local gaps within the Neighbourhood Plan's area. Policy EN10 of the Local Plan designates areas of special landscape importance and is not relevant to whether a gap policy should be made, particularly as the authority has more up to date evidence on landscape quality and potential impacts through its Landscape Character Assessment (September 2015).

The Bracknell Forest Core Strategy (2008) Policy CS9 'Development on Land Outside Settlements' identified the following strategic and local gaps between:

- Strategic Gaps:
Bracknell and Wokingham;
Crowthorne and Bracknell;
Sandhurst and Crowthorne;
Sandhurst and Yateley.

- Local Gap:
Bracknell and Binfield.

Contrary to the NP statement at paragraph 5.42 the principle of protecting gaps through the use of gap designations is not established in this location. No gap designations exist in the existing local plan that cover any of the land contained within Warfield Parish, or as follows, the land proposed to be covered by NP Policy WNP7.

Therefore, paragraph 5.42 of the NP entails the unsubstantiated imposition of an additional local gap which is not supported in any way by the current development plan. The referenced development plan policies upon which the NP uses as justification for the inclusion of the proposed EN7 gap policy are set out in full below:

‘Core Strategy Policy CS9 – Development on Land Outside Settlements

124 The Council will protect land outside settlements for its own sake, particularly from development that would adversely affect the character, appearance or function of the land; and

- i. protect the defined gaps within or adjoining the Borough from development that would harm the physical and visual separation of settlements either within or adjoining the Borough; or**
- ii. maintain the Green Belt boundary within Bracknell Forest and protect the Green Belt from inappropriate development’.**

‘Local Plan POLICY EN10 - Areas of landscape importance

2.77 PLANNING PERMISSION WILL NOT BE GRANTED FOR DEVELOPMENT WHICH WOULD HARM THE OPEN, RURAL OR UNDEVELOPED CHARACTER, THE SPECIAL LANDSCAPE QUALITIES OR THE FUNCTION, OF THE FOLLOWING AREAS:

(i) DEFINED AREAS OF SPECIAL LANDSCAPE IMPORTANCE:

(a) THE BLACKWATER VALLEY

(b) WINDSOR GREAT PARK

(ii) DEFINED AREAS OF LOCAL LANDSCAPE IMPORTANCE:

(a) CABBAGE HILL

(b) LAND SOUTH OF FOREST ROAD, WEST OF CHAVEY DOWN ROAD AND SOUTH WEST OF WARFIELD PARK’.

It is evident that Local Plan Policy EN10 is not a gap policy. It is a landscape policy and cannot act as justification for the proposed gap policy. The Core Strategy Key Diagram did identify some local and strategic gaps but none of these cover any part of Warfield Parish and the reasons for this were clearly evidenced in the Core Strategy Inspector’s Report. It follows that Policy WNP7 is not in conformity with the adopted development plan and therefore fails this basic conditions.

Accordingly, in terms of the basic conditions, the Neighbourhood Plan should not identify new local gaps.

In addition, the proposal to introduce a local gap would generate an additional restrictive policy at a time when the forthcoming Borough-wide local plan is to identify substantial housing allocations to meet acknowledged pressing housing needs. The local gap proposal is therefore also contrary to the PPG that requires such conflicts between an emerging neighbourhood plan and local plan to be minimised.

Furthermore, by frustrating the ability of the Borough to deliver housing (a key economic and social requirement) at necessary levels it also fails to contribute to the achievement of sustainable development as required by the NPPF. For all these reasons the proposal to introduce a local gap policy cannot meet the basic conditions. If such a policy were ever to be developed it would have to be a matter for the new comprehensive Borough-wide local plan, not an NP covering a modest proportion of the Borough.

The suggested local gap and its appropriateness has been rejected by a previous Inspector

Notwithstanding the above points, whereby the proposed local gap policy is inconsistent with the existing development plan, is prejudicial to the objectives of the emerging Local Plan and fails to contribute towards sustainable development, a proposed local gap in this area was considered previously by the Core Strategy Inspector (adopted in 2008).

The NP evidence base refers to potential gap designations identified originally in a report prepared by Entec in 2006 named – ‘Landscape Analysis of Sites and Allocations and an Assessment of Gaps/Green Wedges’. It is apparent from Figure 10 of the ‘Local Landscape Appraisal Illustrative Material’ document that the proposed local gap boundary is a hybrid combination of the land identified as ‘Gap 4’ by Entec in 2006 alongside the Bull Brook Green Wedge.

The Entec report was referred to by the Borough in proposing a gap ‘no. 4’ between Bracknell and North Ascot in the submission version of the Core Strategy. In considering whether such a gap should be identified, the Core Strategy Examination in Public Inspector stated:

‘Gap 4 (Bracknell-North Ascot)

Bracknell and Ascot have very distinct and separate identities. However, the localised patterns of development are less coherent than in other parts of Bracknell’s urban fringe due to the number of small clusters of development within this gap e.g. Chavey Down and Winkfield. The 2 wards which make up Ascot have a combined population of 11,604 but they comprise a number of dispersed settlement areas. The area closest to Bracknell and most subject to the threat of coalescence is North Ascot which has a population of 7,500.

But, it seems to me that North Ascot is separated from Bracknell by the Green Belt, albeit by a relatively narrow strip of Green Belt. Therefore, there can be no real threat of coalescence. Indeed, the Council has not sought to extend the Green Belt in this location. The proposed Gap 4 would therefore more serve to separate Bracknell from the settlements of Chavey Down, Winkfield Row and Hayley Green. As such, I do not feel there is sufficient support for Gap 4 to be defined as a local gap. It should therefore be removed from the Key Diagram change IR7 (Tests 4,6,7). There is acknowledgement elsewhere that Warfield Park Homes is a

potentially appropriate use under CS9 subject to a suitable scheme coming forward' (paragraphs 126 & 127).

It follows that the benefit of providing a local gap in this area has been thoroughly reviewed and considered at a Borough wide level previously and rejected. Further and as mentioned earlier, the Borough have undertaken a Green Belt review and are proposing no releases. The Core Strategy EiP Inspector concluded:

'In conclusion, all gaps should be struck from the SCSPM. However, there is support for keeping some of the gaps on the Key Diagram for detailed consideration through a lower tier DPD if the regional approach in the adopted RSS gives justification for them. In summary, there is some support for a Local Gap between Bracknell-Binfield (Gap 1) but not for a Local Gap between Bracknell-North Ascot (Gap 4). As such, Gap 4 should be struck from the Key Diagram' (paragraph 136).

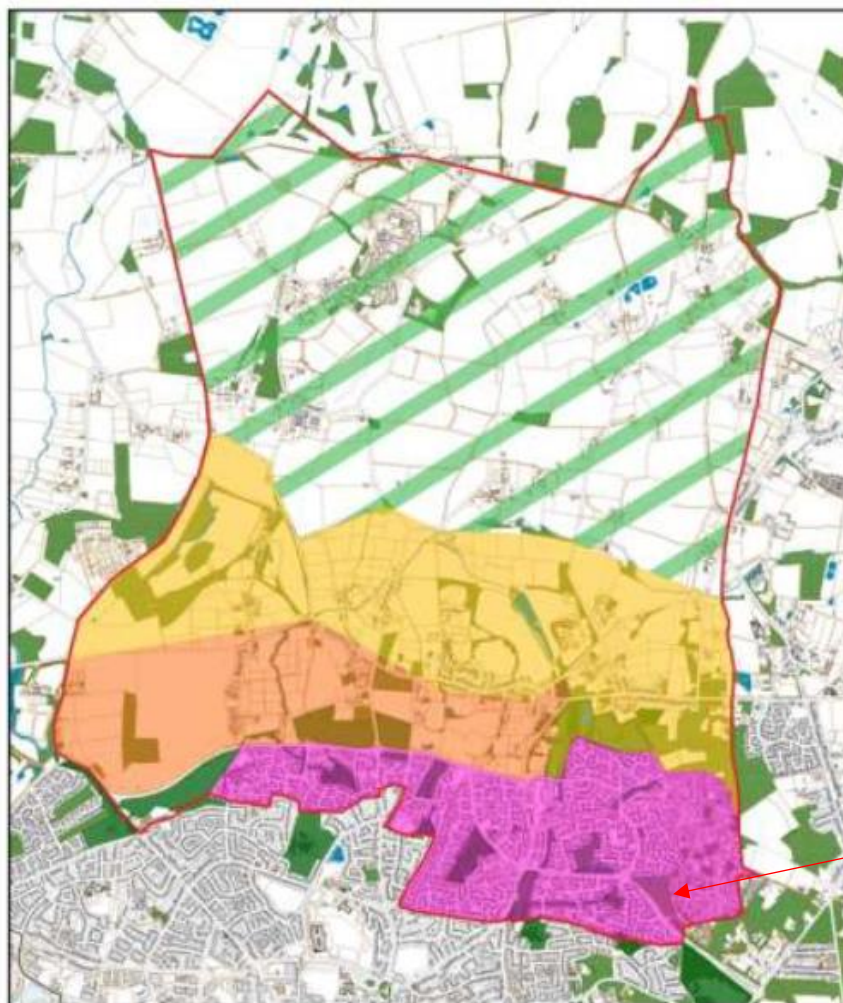
It follows that not only would the provision of a new local gap be contrary to the existing development plan but would specifically conflict with the clear conclusions of the EiP Inspector who examined such development plan documents. The Core Strategy Inspector's conclusion was of course taken at a time when housing needs were not as pressing as they now are in the Borough and without the clear resounding rejection of gaps within Berkshire as confirmed in the subsequently approved (since revoked) South East Plan. The above evidence further confirms that the proposed local gap is fundamentally unsound but also reasserts the necessity for any such proposal to be considered at a strategic Borough wide level (if it is to be at all).

The Steering Group have not provided any evidence with respect of the imposition of any of the Local Gaps with respect why the designation is required, nor the extent proposed on Policies Map Inset 1 of the Draft Neighbourhood Plan and Without prejudice to the above points, if a local gap policy were to be imposed it should logically exclude the land adjoining Warfield Park.

Consistent with our comments set out in the 'Introduction' section of this letter, Policy 1 (A Spatial Plan for the Parish) of the NP indicates that:

The Parish will continue to be defined by the urban area in the south of the Parish, the 'countryside wedge', and the Metropolitan Green Belt in the north where development is by definition inappropriate.

The extent of the urban area to the south is shown illustratively on Plan C 'Parish Spatial Context' of the Submitted NP. This indicates that Warfield Park is part of the wider existing built-up area in the south and therefore is excluded from a Local Gap policy.



Parish Spatial Context
(illustrative purposes only)

- Existing built up area in the south
- Emerging new built up area (Warfield extension SA9)
- Defined settlements and countryside including West End, Warfield street, Newell Green, Hayley Green
- Metropolitan Green Belt

Warfield Park

Plan C – Parish Spatial Context

The above statements identify Warfield Park as part of the existing urban area. This is quite correct and is supported by the established nature of the park home site that benefits from a long standing permanent community of over 500 no. park homes and comprises approximately 10% (approximately 900 no. residents) of the overall population residing in the Warfield NP area.

Paragraph 5.39 of the NP refers to the intention of the local gap policy to “**prevent coalescence of the settlements of Newell Green, Warfield Street and Hayley Green, and to contribute to the maintenance of the separation with Winkfield Row in the adjacent Parish of Winkfield**”. This paragraph concludes by indicating “**No more land than is necessary to prevent coalescence and retain separate identities of the three settlements has been included in the policy.**”

Although a Local Landscape Appraisal has been prepared for the draft Neighbourhood Plan (January 2017), this document entails a review of earlier evidence and research of landscape designations and gaps within Bracknell Forest. There is no new evidence within this document detailing why local gaps are specifically required in the areas defined. Therefore, although paragraph 5.39 of the Draft Submission Neighbourhood Plan contends that “**No more land that is necessary to prevent coalescence and retain separate identities of these three settlements has been included in the policy**”, there is no clear evidence within the Landscape Appraisal of why the areas chosen represents the minimum necessary to prevent coalescence and retain the separate identities of these settlements. This therefore further supports our contention that the policy is not justified.

As indicated above, it is considered that the Local Gaps are reliant upon the flawed Entec report (hybrid combination of the Green Wedge and Gap 4) to define the boundary. The robustness of this Entec assessment was criticised by the Core Strategy Inspector and therefore should not be relied upon for the NP. In the absence of detailed specific evidence from the NP group, the extent of the local gap should exclude the land in the vicinity of Warfield Park, especially as since it lies within Bracknell urban area, it is not one of the settlements to which the NP is seeking to prevent coalescence. This is a further justification for why any local gap (if eventually accepted) should not include land along the edge of the Bracknell urban area since there is no evidence that this land should be retained open to ensure the separation of the three settlements lying north of the town.

Summary

In summary, the proposed local gap policy is **not consistent with national policy**, is **not in conformity with the existing development plan** and **does not contribute towards sustainable development**. It therefore fails the basic condition tests.

**Proposed Change:
Policy WNP7 (Local Gaps) to be deleted.**

Other comments

We note that the extent of Warfield Parish is shown with a stippled notation on the Policies Map, Inset Map 1 and the Green Infrastructure Map. An illustration of the stippling is shown below.



Stippling notation to be removed

The legends/keys associated with each of these maps does not indicate what the stippling notation represents.

However, as there is no explanation of why the stippling is included on the maps, to avoid any ambiguity for future users of the Neighbourhood Plan, this notation should be omitted from each of these three maps.

Summary.

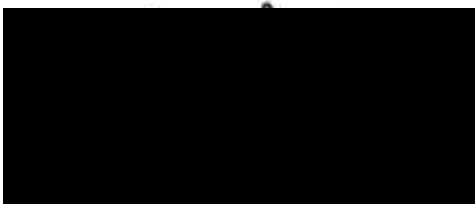
In summary, the stippled notation should be removed from the Policies Map, Inset Map 1 and the Green Infrastructure Map.

Summary

We trust the above comments are of assistance and we await confirmation of receipt of our representations in due course. We would be grateful if we could be kept informed of the plan's progress through the examination process.

Please do not hesitate to contact the writer should you wish to discuss any matter(s) arising.

Yours faithfully





Enc.