

Bracknell Forest Council

**Consultation on Scope of Comprehensive Local
Plan - Summary of Responses**

February 2016

Introduction

- 1.1 The Council published its intention to prepare a Comprehensive Local Plan (CLP) in its Local Development Scheme 2015-2018 which came into effect on 30th June 2015. The CLP will set the vision, objectives and strategy for the distribution of development including housing, economic and retail development and new infrastructure for the Borough up to 2036.

Regulation 18 Consultation

- 1.2 Regulation 18 of the Town and Country Planning (Local Planning) Regulations 2012 requires the Council to notify various bodies and stakeholders that it is preparing a Local Plan and to invite comments about what that plan should contain. This is the start of the Local Plan preparation process.

- 1.3 The Council consulted on the scope of the CLP in accordance with Regulation 18 for six weeks between 21 October and 2 December 2015. Consultees on the planning policy consultation database were made aware of the consultation by email or letter. The consultation database includes the following:

- Statutory bodies and organisations
- Utility providers
- Service providers
- Planning agents
- Developers
- Land owners
- The general public
- Relevant local interest bodies and organisations
- Bracknell Forest Town and Parish Councils
- Local Councillors

- 1.4 The consultation was publicised on the Council's website and approximately 4,400 letters and emails were sent out informing stakeholders of the Council's intention to prepare a CLP and the policy topics to be covered. These are listed below (see Appendix 1 for full wording of the letter/e-mail):

- development within the Green Belt;
- development within the Countryside;
- design, including residential extensions and shop fronts;
- environmental issues such as flood risk and water quality;
- heritage assets;
- the natural environment and biodiversity including landscape, green infrastructure and the Thames Basin Heaths Special Protection Area;
- infrastructure needs including open space, sport and recreation and community facilities;
- town, district and local centres;
- development affecting employment sites;
- housing needs including those for:
 - Gypsies, Travellers and Travelling Showpeople
 - affordable housing;

- healthy and inclusive communities, and,
- climate change including the delivery of renewable energy and sustainable construction.

Comments Received

- 1.5 In total 24 consultees responded to the consultation (see Appendix 2). The main issues that were raised are summarised below.

General Comments

- 1.6 Some concern was raised that local people were not made aware of the consultation and that more detail was needed. On the whole, however, consultees supported the principle of a CLP.

Table 1: Summary of General Comments

Summary of main issues raised	Response
The majority of local residents were unaware of the document as it was not made available in the local library and was only available on the website.	No documents were produced. Information on the scope of the CLP was set out via letters, emails and put on the Council's website.
It would have helped if more guidance had been given and a glossary of terms included with all acronyms listed	A glossary of terms was not considered necessary as the only acronym used was defined. However, a glossary of terms will be included in future consultation documents.
No comment as the Council makes decisions regardless of the public's view.	Noted.
The headings given need expanding so that meaningful comments can be made.	Noted. The consultation was on the scope of the CLP. Further detail will be included at later stages in the plan making process.
The scope is adequate.	Noted.
Support the review of the Core Strategy and production of the CLP.	
The scope of the CLP is extensive and acceptable. Specifically supports policies relating to: site allocations for specific uses, design, including shop fronts; town, district and local centres; heritage assets; and development affecting employment sites.	
No objections to the policy topics.	
Accept that the CLP will not be concerned with Minerals and Waste.	

Comments on the Proposed Policy Topics

- 1.7 Comments were not received on all suggested CLP policy topics. The majority of responses were concerned with detailed matters that it is intended to cover under the proposed policy topics.. For example, '*the natural environment and biodiversity including landscape, green infrastructure and the Thames Basin Heaths Special Protection Area*' topic generated a number of detailed comments on policy content including suggested

policy wording. The *'housing needs'* policy topic also generated a number of comments on the type of housing which should be provided, for example, the encouragement of all types of low cost housing and the need for specialist accommodation.

- 1.8 Concerns were raised by a number of consultees that the topic of *'infrastructure needs, including open space, sport and recreation and community facilities'* policy topic might not cover road and transport infrastructure or healthcare. These matters will be covered by the CLP although it was not explicitly mentioned under the general policy topic heading. Detailed comments on the proposed policy topics are set out below.

Table 2: Summary of Comments on the Proposed Policy Topics

Summary of main issues raised	Response
Proposed policy topic: development within the Green Belt	
Green Belt is adequately covered by the National Planning Policy Framework (NPPF) and there is no need for policies other than those concerned with defining the Green Belt.	It is considered appropriate to include local policies on the interpretation of national Green Belt policy at a local level.
Protection of the Green Belt needs to be taken into account when making decisions on developments.	The CLP will include policies on protecting the Green Belt.
Proposed policy topic: development within the countryside	
A proactive approach to sustainable development and meeting housing need must be taken whilst protecting the countryside.	The CLP as a whole will balance meeting housing need and protecting the countryside.
Proposed policy topic: design, including residential extensions and shop fronts	
Queries whether the definition of Bracknell Forest is granular enough to recognise the uniqueness of different parts of the Borough, for example Crowthorne and Priestwood.	Evidence on character will be used to inform the development of appropriate policies.
All new housing on A and B roads should be set back from the road by an agreed limit (more than 5m). This will also allow adequate off-road parking.	These are matters of detail that might be more appropriately addressed in a Design SPD, for example, building lines, materials..
Design needs to take account of the effect of the impact of the elements as the deterioration can set in quickly and be unsightly.	
Proposed policy topic: heritage assets	
Supports policies relating to heritage assets providing they are consistent with the National Planning Policy Framework (NPPF).	Noted.
Pleased to see protection of heritage assets included in the Local Plan.	
Policies should be clear and where adverse impacts are predicted, development should only be considered where avoidance/mitigation/compensation measures can be delivered.	
There's no cohesive policy on heritage assets.	
Expects to see detailed development	
This level of detail will be dealt with under this topic heading at a later stage in the CLP process. The approach taken	

Summary of main issues raised	Response
management policies which should include criteria for assessing the potential impact of development proposals on the significance on designated and non-designated heritage assets and set out what is required of applicants.	will need to be consistent with national policy.
Proposed policy topic: the natural environment and biodiversity including landscape, green infrastructure and the Thames Basin Heaths Special Protection Area	
Natural environment should include Local Wildlife Sites.	Evidence has recently been gathered on Landscape Character Assessment. This together with other evidence on current designations and strategies will feed into the development of policies on these matters under this topic heading at a later stage in the CLP process. The approach taken will need to be consistent with national policy.
Policies should be clear that where adverse impacts are predicted, then development will only be considered where avoidance/mitigation/compensation measures can be delivered.	
Any policy relating to biodiversity should seek to achieve a net gain through protection and enhancement measures in and around developments and maintaining ecological connectivity and must reinforce the mitigation hierarchy.	
Local Biodiversity Opportunity Areas (BOAs) should be identified and mapped and opportunities for enhancement of biodiversity should be identified. [Suggested policy wording]	
Internationally, nationally and locally designated sites should be appropriately referenced and protected in line with their designated status. [Policy wording suggested]	
Development proposals should be informed by appropriate information relating to potentially impacted biodiversity. [Suggested policy wording]	
Wish to see details of local landscape character areas mapped. The Plan should include assessments of visual effects on the surrounding area and landscape together with any physical effects of the development, on changes in topography.	
Local authorities have a vital role in ensuring the conservation of Ancient Woodland, in particular through the planning system.	
Protect existing trees and secondly encourage future planting programmes.	
The Plan should reflect the England Biodiversity Strategy and take account of climate change, and how ecological networks will be maintained.	
Need to address the value of maintaining the distinctiveness of our communities within the overall plan. For example the separation	

Summary of main issues raised	Response
between Bracknell / Crowthorne / Wokingham should be objectively defined and valued.	
All policies relating to Thames Basin Heaths must be in compliance with the 'Thames Basin Heaths Special Protection Area Delivery Framework' published by the Thames Basin Heaths Joint Strategic Partnership Board.	Noted
Need to include use of brownfield land.	Use of brownfield sites will be considered in the spatial strategy which will guide the location of new development and in development management policies..
Proposed policy topic: infrastructure needs including open space, sport and recreation and community facilities	
Health care	
Health/social care provision should be included under infrastructure needs.	The Council will consult with NHS England and the Bracknell and Ascot Clinical Commissioning Group about future local health services required to meet the level of growth proposed. However, new development can only be expected to mitigate its own impact.
Queries which heading healthcare facilities would be considered under. Need to relate it to growth of population - development of doctors surgeries per x thousands of people.	
There is no specific mention of health/GP provision.	
Step down units for post operative recovery should be referred to	
Health provision has become too fragmented and less than ideal particularly for the aged.	
Education	
There should be policies relating to schools.	Schools will be considered under infrastructure.
There is no specific mention of education.	
School provision needs to be realistic and planned for the next 20 years and beyond.	Pupil forecasts will be produced for the level of growth proposed to try and ensure that sufficient school places are provided and that sufficient time is allowed for financial planning and any necessary construction works.
Water and sewerage	
A specific policy on water and sewerage infrastructure is required.	Water and sewerage infrastructure will be covered by infrastructure. Evidence on existing capacity and future needs will be gathered from Thames Water (wastewater and sewage) and the water supply companies (e.g. South East Water).
Need a policy to support the future development and expansion of water and waste water treatment works.	
The sewage works at the junction of Bracknell Road B3022/Cricketers Lane is not fit for purpose.	
Roads and transport	
Queries whether road infrastructure would be considered under this topic relative to population growth in areas such as Sandhurst.	Road infrastructure, public transport and other modes of travel will be considered under the infrastructure policy topic heading. Requirements for any additional transport infrastructure will be determined at a later stage in the CLP
No mention of roads and road improvement.	

Summary of main issues raised	Response
Northern distributor road – need to consider an outer ring road circling Bracknell.	process once the level of growth and location of growth becomes clearer. An Infrastructure Delivery Plan (IDP) will be developed in parallel to the CLP. Site specific infrastructure schedules are likely to be developed.
Need to look at options for supporting public transport as well as the provision of infrastructure to balance traffic flow, accessibility and safety.	
Need to refer to traffic calming covering alternative solutions.	
There is no specific mention of road network, local access, and cycle and pedestrian movements. If these are to be included in the infrastructure policy then they should be specified as they are more significant than open space, sport and recreation and community facilities.	
Strategic transport is not referred to in the scope of the Local Plan which simply refers to "infrastructure needs including open space, sport and recreation and community facilities". Strategic transport is a key issue, particularly with regard to the A321 and A322 corridors.	
There should be policies relating to traffic/transport provision (highways, cycle ways, foot paths) taking into account developments in neighbouring areas, particularly around the A329M junction and the Bracknell/Crowthorne/Wokingham triangle.	The Council will exchange data with adjoining Authorities and discuss implications of levels of growth on the local and strategic road network. Cross boundary issues will also be discussed under Duty to Co-operate.
A new major link road between the M3, M4 and M40 with a direct connection to the M25 from the east. The A329M going west needs a link to the M40 going west.	Highways England is responsible for managing the safe and efficient operation of the Strategic Road Network. The Council will consult with Highways England on its plans for growth when more detail is available.
When considering proposals for growth, any impacts on the M4 will need to be identified and mitigated as far as reasonably possible	
Telecommunications	
Provision for the community and businesses to be able to access the latest telecommunications technology is required.	This will be addressed under infrastructure and the Council will liaise with BT Openreach.
Open space and recreation	
Ensure that there is sufficient and adequate green space for all developments.	Evidence is being collected on the will feed into the development of policy on the amount of open space to be required in connection with new development.
Proposals need to incorporate measures to help encourage people to access the countryside. Links to other green networks and, where appropriate, urban fringe areas should also be explored.	Links from proposed sites to open space and the existing footpath network will be considered at a later stage, together with a policy on green infrastructure.
The Local Plan should consider potential impacts on access land, public open land and rights of way in the vicinity of the	

Summary of main issues raised	Response
development.	
Need to consider the protection of the best and most versatile agricultural land. Soils should be considered under a more general heading of sustainable use of land and benefits to the ecosystem.	The site selection process that will take place at a later stage, will consider the grade of agricultural land.
Proposed policy topic: town, district and local centres	
The CLP should take into account the aspirations of the Town Centre regeneration.	The next stage of the regeneration of Bracknell Town Centre will be considered through policy formulation and site allocation.
Regeneration of High Streets should be addressed.	A Retail and Commercial Leisure Study has been commissioned which will begin to look at this issue. This evidence will be used in the formulation of any retail policies.
Proposed policy topic: development affecting employment sites	
Need to identify which sites should remain exclusively for employment uses and supporting activities (nurseries, gyms etc). Should use wider definition than B use classes to allow for future changes in nature of employment.	The evidence base includes an Economic Development Needs Assessment and a Retail and Commercial Leisure Study which will look at the overall need for floorspace for economic development according to the definition set out in the NPPF.
Proposed policy topic: housing needs	
Support the aims of Core Strategy Policy CS16: Housing Needs of the Community and note that this could reasonably be carried forward into the CLP. Policy CS17: Affordable Housing would however benefit from being updated to recognise the importance of Rent to Buy models such as Rentplus.	The Strategic Housing Market Assessment (SHMA) looks at the need for affordable housing in the Borough. A policy for affordable housing will be developed under this topic heading, bearing in mind the national definition of affordable housing.
Need to encourage all types of low cost housing not only those secured for Registered Social Landlords.	
Institutional build to rent/private rental sector housing schemes to include affordable rented.	
Need to cover accommodation for staff on equestrian and similar developments.	The matter of accommodation for such uses will be considered under development within the countryside.
Wide variety of type of accommodation for older population needed.	The Strategic Housing Market Assessment (SHMA) considers the needs of other groups, including older people. This forms the evidence on which future policies will be based.
Need to consider other specialist accommodation e.g. for ex servicemen and disabled.	
Need to consider sites that are available now.	The availability of sites will be assessed in the Strategic Housing and Economic Land Available Assessment which will form part of the evidence base of the CLP.
Any office that has not been occupied for	There are currently permitted

Summary of main issues raised	Response
three years should be made available as housing land.	development rights enabling empty or underused offices to be converted into residential use, subject to prior approval. Whether or not such action is taken is in the hands of the landowner.
Proposed policy topic: climate change including the delivery of renewable energy and sustainable construction	
Sustainable construction should only relate to those matters which are locally justified and not addressed in Building Regulations.	The CLP policy will be in accordance with Government policy following the housing standard review.

Other Comments

- 1.9 Other comments were received which were not directly related to the scope of the CLP but were concerned with broader issues including the process of producing the Plan.

Table 3: Other Comments

Summary of main issues raised	Response
Other comments	
New development needs to be co-ordinated with the infrastructure it requires and needs to take account of the capacity of existing infrastructure.	The infrastructure needed to support the level of growth needed will be addressed. An IDP will be produced in parallel with the CLP.
It is vital that the Local Plan demonstrates and assesses the deliverability of any required infrastructure to accommodate proposed growth.	
Bracknell Forest Council and Wokingham Borough Council policies need to be aligned with each other.	The Council will work with adjoining Councils on growth proposals including under the Duty to Co-operate requirements.
Need to include a section that looks at neighbouring councils and development activity within three miles of Bracknell Forest's borders.	
Need to have an up to date evidence base and demonstrate how the historic evidence base has informed and influenced the Plan's policies and site allocations.	A final methodology will be agreed for the Strategic Housing and Economic Land Availability Assessment. A methodology will also be drawn up for site selection. Heritage assets will be a consideration. All proposals will also be subject to Sustainability Appraisal (SA)/SEA.
Expects the consideration of the potential impact of development on the historic environment to influence the choice of sites.	
Promotes various sites for housing development.	The Council has carried out a call for sites and will be assessing them according to the final methodology agreed for the Strategic Housing and Economic Land Availability Assessment.
Queries whether there is a correlation between housing needs and economic development.	The SHMA has taken into account economic projections as well as demographic projections in arriving at an Objective Assessment of Need. Once the growth target has been agreed, the
Queries how much the existing connecting infrastructure (roads cycle-ways, public	

Summary of main issues raised	Response
transport, parking and broadband etc.) will influence the Strategic Housing Market Assessment.	infrastructure required to support that growth will be analysed. The capacity of existing infrastructure will be looked at as part of this exercise.

Wording of Letter/Email Sent to Consultees

Comprehensive Local Plan: Consultation on Scope of Document

I am writing to you as an interested party on our consultation database about the Council's intention to prepare a new Local Plan for the Borough. The decision to proceed with a Comprehensive Local Plan (CLP) was taken by the Council during the Summer (see Bracknell Forest Local Development Scheme June 2015). At this early stage we are inviting comments on what the Plan should contain.

The consultation period runs from **21 October 2015 to 2 December 2015**.

The Comprehensive Local Plan will set the long term vision and development strategy for the Borough up to 2036. Once adopted, it will replace many of the saved policies in the Bracknell Forest Borough Local Plan (2002) and the Core Strategy (2008). It will therefore be wide ranging in terms of the issues that it will cover. In summary, the Plan will include the following:

A vision, objectives, and strategy for the level and distribution of development in the Borough up to 2036, including housing, economic and retail development and new infrastructure;

It will include policies relating to:

- development within the Green Belt;
- development within the Countryside;
- design, including residential extensions and shop fronts;
- environmental issues such as flood risk and water quality;
- heritage assets;
- the natural environment and biodiversity including landscape, green infrastructure and the Thames Basin Heaths Special Protection Area;
- infrastructure needs including open space, sport and recreation and community facilities;
- town, district and local centres;
- development affecting employment sites;
- housing needs including those for:
 - Gypsies, Travellers and Travelling Showpeople
 - affordable housing;
- healthy and inclusive communities, and,
- climate change including the delivery of renewable energy and sustainable construction.

The Comprehensive Local Plan will include site allocations for specific uses, including housing and employment uses, and will need to be based on a range of up to date evidence which is currently being prepared. Background work that has already been completed can be viewed on the Council's website at <http://www.bracknell-forest.gov.uk/evidencebaseforcomprehensivelocalplan>.

The only significant area of planning policy that will not be included in the Comprehensive Local Plan is that concerned with minerals and waste. The intention is to produce a joint Minerals and Waste Local Plan with a number of other Berkshire Authorities.

As part of the production of the evidence base, the Council will be undertaking targeted consultation. The Plan will also be informed by a Sustainability Appraisal. Consultation on

a 'Sustainability Appraisal Scoping' Report took place with key stakeholders in June/July 2015.

The outcome of the above work will lead to a consultation on an 'Issues and Options' document in Summer 2016.

We would be grateful for any comments that you would like to make on these, or other issues that you think should be covered in a Comprehensive Local Plan. Further detail on the timetable for the Comprehensive Local Plan and on current development plan documents can be found at <http://www.bracknell-forest.gov.uk/developmentplan>.

In order that we can keep our consultation database up to date, we would be grateful if you could confirm your contact details are correct by emailing them to the following address: development.plan@bracknell-forest.gov.uk. If you have received this notification via letter it would be helpful if you could provide us with an email address as we will then be able to notify you of consultations more easily. If you no longer wish to be contacted about future consultations, please let us know so that we can update our database accordingly.

If you require further information on the issues raised in this email, please do not hesitate to get in touch with a member of the Development Plan Team by calling 01344 352000 or emailing development.plan@bracknell-forest.gov.uk.

Appendix 2: Consultees who Responded to the Consultation

Consultee
Harrison Housing (Barton Wilmore)
Rothwell
Moynihan
McHale
Butcher
Historic England
Berkshire Archaeology
Warfield Parish Council
Berks, Bucks & Oxon Wildlife Trust (BBOWT)
Natural England
Crowthorne Village Action Group (CVAG)
Neil Richardson
Wilson Developments Ltd (Barton Wilmore)
Bracknell Regeneration Limited Partnership (Deloitte)
Crowthorne Parish Council
Charles Chesterton
Gladman Development Limited
Highways England
Joanne Male
Red Kite Development Agency
Surrey County Council
Rentplus (Tetlow King)
Thames Water (Savills)
Winkfield Parish Council