

# Statement of Consultation

### Amen Corner Supplementary Planning Document

### **ANNEX 3**

## Statement of Consultation Regulation 18(4)(b) Amen Corner Supplementary Planning Document Consultation Draft (November 2009)

### 1. Background

Bracknell Forest Council produced a draft Supplementary Planning Document (SPD) called the Amen Corner Supplementary Planning Document (SPD) Consultation Draft (December 2009). It was published for public consultation between 30 November 2009 and 14 January 2010. Regulation 18(4)(b) of the Town and County Planning (Local Development) (England) Regulations 2004 requires that prior to adoption of the a statement be published summarising who has been consulted during the preparation of an SPD, how consultation has taken place, and how any issues raised have been addressed.

### 2. Consultation

In the preparation of the Amen Corner SPD Bracknell Forest Council has comprehensively consulted with a range of key and statutory organisations to help assess the scope of the SPD, the consultation included:

- Land owners.
- Prospective Developers.
- Statutory bodies and organisations.
- The general public.
- Others with an interest in the site.

There have been a number of consultations on the Amen Corner Area Action Plan which have been carried forward into the preparation of the Amen Corner SPD. The Amen Corner SPD, has therefore been informed by the following consultations:

- 1. Area Action Plan Newsletter (July 2007);
- 2. Area Action Plan Issues and Options (December 2007);
- 3. Area Action Preferred Options (June 2008):
- 4. Area Action Plan Draft Submission Report (February 2009); and,
- 5. The Consultation Draft SPD (December 2009).

Details of all previous consultation on the Area Action Plan and to the Amen Corner SPD Consultation Draft are available online at <a href="https://www.bracknell-forest.gov.uk/aclibrary">www.bracknell-forest.gov.uk/aclibrary</a> under specific ACL reference, with each detailed in:

- Doc Ref ACL16 Amen Corner Area Action Plan Report of consultation at Regulation 25 (May 2008) which details response to stages 1 and 2 above.
- Doc Ref ACL27 –Amen Corner Area Action Plan Regulation 30 1 d Statement of Consultation (January 2009) which details responses to stage 3 above.
- Doc Ref ACL53 Amen Corner SPD Consultation Draft Regulation 17 (1)(b) Statement of Consultation (November 2009) which details responses to stage 4 above.

In accordance with regulation 18(4) (b) of the Town and Country Planning (Local Development) (England) Regulations 2004 in respect to the Amen Corner SPD Consultation Draft (stage 5 above):

- Details of who has been consulted on the SPD Consultation Draft and how they were consulted can be viewed in the ACSPD Consultation Proforma (Doc Ref ACL56).
- Details of the responses made to the consultation and how they have been taken account of in the Adopted SPD are detail in Appendix 1 of this statement.

### **Amen Corner**

### Supplementary Planning Document Consultation Draft (December 2009) Consultation representations and responses

Amen Corner SPD Consultation Draft (November 2009) was the subject of a public consultation in December and January 2009/2010. This paper details feedback from the consultation process and highlights amendments that have been made to the document in light of comments received.

Amen Corner Supplementary Planning Document Consultation Draft (November 2009)

Organisation or	Comment Summary	Response or amendments incorporated in SPD
Name		
1. Surrey County Council	We had no concerns when consulted over the previous versions for the Amen Corner area. Similarly, in respect of the draft SPD now to hand, due to the location of the Amen Corner site in relation to Surrey, we have no concerns.	Comment: No concerns raised SPD Response: No amendments necessary
2. The Coal Authority	Having reviewed your document, I confirm that we have no specific comments to make on this document at this stage.	Comment: No concerns raised SPD Response: No amendments necessary
3. Wokingham Borough Council	Paragraph 8.4 (4). Should refer to development principle AC5 and not AC4;	Comment: Comment partly agreed as Point 4 should cross reference with both Development Principles AC4 and AC5 to make the SPD correct.  SPD Response: Amend Point 4 of Paragraph 8.4 to read as: "The enhancement of the public rights of way alongside the strip of land described in Point 3 above

Organisation or Name	Comment Summary	Response or amendments incorporated in SPD
		which is located in Bracknell Forest Borough and in the Amen Corner site (to be delivered through Development Principles AC4 and AC5 above in this SPD Consultation Draft)."
	Paragraph 10.3. Second sentence should refer to "Supplementary Planning Document" and not "Area Action Plan".	Comment: It is agreed that the term Area Action Plan should be amended to bring the SPD up-to-date.  SPD Response: Amend 2 <sup>nd</sup> sentence to paragraph 10.3 to read as "It is the Council's preference to provide a solution prior to the adoption of the Area Action Plan Supplementary Planning Document."
	Paragraph 13.1. Penultimate sentence should refer to "Development Principles AC3 and AC8" and not "Policies AC3 and AC8".	Comment: It is agreed and this should be amended to bring the SPD up-to-date.  SPD Response: Amend the penultimate sentence in Paragraph 13.1 to read as: "Until North View and South View are redeveloped the area should be enhanced so that the quality of life for the existing residents is improved in line with Policies  Development Principles AC3 and AC8."
	Paragraph 13.2. Second sentence should refer to "Supplementary Planning Document" and not "Area Action Plan".	Comment: It is agreed that the term Area Action Plan should be amended to bring the SPD up-to-date.  SPD Response: Amend the second sentence in paragraph 13.2 to read as: "However, at this time it is not certain if or when this land will come forward for redevelopment and therefore there is a need for flexibility in the Area Action Plan Supplementary Planning Document."
	Paragraph 14.7, eighth bullet - The Regional Planning Guidance for the South East (RPG9) has been replaced by the South East Plan. Make a similar correction to the next bullet.	Comment: It is agreed and this should be amended to bring the SPD up-to-date.  SPD Response: Amend the 8 <sup>th</sup> and 9 <sup>th</sup> bullet points to read as:  • Employment is consistent with the economic

Organisation or Name	Comment Summary	Response or amendments incorporated in SPD
,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		<ul> <li>approach in Regional Planning Guidance for the South East (RPG9) the South East Plan.</li> <li>Employment complements the suite of employment related policies including those at a sub-regional level in the emerging South East Plan.</li> </ul>
	Paragraph 16.4. Last sentence should refer to Development Principle AC13 and not AC12.	Comment: It is agreed and this should be amended to bring the SPD up-to-date.  SPD Response: Amend the last sentence of paragraph 16.4 to read as: "These have informed Development Principle AC12 AC13 below."
	There is no appendix 2 included in the document.	Comment: This is an appendix 2 in the appendices document.  SPD Response: No amendments necessary.
	Paragraph 5.15 (1)(B) indicates that a new primary school could be delivered in the vicinity of the site. To minimise risk that people may travel to Wokingham Borough's primary schools, the maximum distance of an alternative site should be specified. This distance should not exceed the maximum appropriate for primary school aged children to walk to from the site.  Paragraph 14.4. The Council would support high quality employment at Amen Corner to ensure that the mix of uses proposed is appropriate to a	Comment: The new primary school will need to serve the development and therefore the intention is that it is within walking distance. Therefore for clarification purposes, a sentence will be added to ensure this intention is stated in the SPD.  SPD Response: Add a new sentence to paragraph 5.5 Option B which reads as: "This distance should not exceed the maximum appropriate for primary school aged children to walk to and from the site."  Comment: Supporting comment SPD Response: No amendments necessary
	site bordering residential uses.  Paragraph 14.9. The Council considers that additional employment on the Hewlett Packard Recreation Ground where its impacts upon the transport network (including Wokingham	Comment: Supporting comment SPD Response: No amendments necessary

Organisation or	Comment Summary	Response or amendments incorporated in SPD
Name		
	Borough) have been appropriately addressed.	
	This could include further highway	
	improvements on an enhanced travel plan.	
	Concept masterplan. This should be amended to	<b>Comment:</b> The Concept Plan demonstrates that the
	indicate that the areas for residential	development can be achieved and does not prescribe
	development do not coincide with the borough	the extent of the layout of development as prescribed
	boundary thereby indicating areas to maintain	by the development principles AC4 and 5. However it
	settlement separation within Bracknell Forest	is agreed that clarification could be added to the Plan.
	Borough as required by their Core Strategy	SPD Response: Amend the Concept Plan to show
	(policies CS4 and CS9).	the residential elements will not coincide with the
	,	Borough Boundary.
	Comments on the appendix 1	Comment: Agreed and additional text should be
	Green Infrastructure (Development Principle	added for clarification purposes.
	AC4). Additional line should be inserted to	SPD Response: Amend Appendix 1 to read as: "It
	commit developer to submit a planning	should be noted that in respect to the Wokingham
	application to Wokingham Borough Council to	Countryside Strip a planning application shall be
	deliver Passive open space on the Wokingham	submitted to Wokingham Borough Council to deliver
	Countryside strip (in line with paragraph 7.7 of	Passive open space (in line with paragraph 7.7 of the
	the draft SPD). This should be timed so that it	SPD)."
	can be delivered in tandem with proposals	
	covered by the SPD. However, the inclusion of	
	this statement within the SPD should not fetter	
	any decision that Wokingham Borough Council	
	may take upon such an application. The Council	
	supports the statements in Development	
	Principle AC2 (1) and (4) regarding the need to	
	timely deliver adequate primary and secondary	
	school capacity within Bracknell Forest to	
	support the development.	
	Additionally, the Council supports the following:	Comment: Supporting comments.
	1) Development Principle AC5, together with	SPD Response: No amendments necessary

Organisation or	Comment Summary	Response or amendments incorporated in SPD
Name		
	other statements in the draft Supplementary Planning Document highlighting the importance of maintaining and enhancing the strategic gap between Bracknell/Binfield and Wokingham thereby ensuring there separate identities.	
	2) The expectations of Bracknell Forest Borough Council that appropriate primary and secondary education provision will be delivered within Bracknell Forest Borough in accordance with Development Principle AC2 (1) and (4);	
	3) The contributions towards the delivery of transport improvements in Wokingham Borough necessitated by the development. These are likely to include to public transport together with works to Coppid Beech roundabout (Development Principles AC12 and AC13(4) respectively).	
4. English Heritage	I write to inform you that English Heritage has no comments to make on the consultation drafts.	Comment: No concerns raised SPD Response: No amendments necessary
5. Natural England	7. Green Infrastructure and Landscape Character Natural England are pleased to see this chapter within the document. There is a need to consider how these developments could contribute to enhancing existing open spaces in terms of quality, accessibility and biodiversity value, contribute to ongoing management, and also how such spaces may be better linked to provide corridors for the	Comment: This comment is supporting. The Council will endeavour to meet other standards of provision, including the ANGST standards. Provision of natural greenspaces in urban areas is provided through the Council's standards for Open Space of Public Value which will be a requirement of this development.  SPD Response: No amendments necessary.

Organisation or Name	Comment Summary	Response or amendments incorporated in SPD
Name	movement of people and wildlife.	
	We would also like to draw your attention to ANGST Standards set out in English Nature Research Report No. 153: 'Accessible natural greenspace in towns and cities: A review of appropriate size and distance criteria, Guidance for the preparation of strategies for local sustainability' (1995), which define accessibility standards for access to seminatural wildlife rich spaces in towns and cities. It is important that similar standards are applied in Bracknell.	
	Other forms of green infrastructure such as green roofs could also be considered. Natural England believes that the provision of green infrastructure should be an integral part of the creation of sustainable communities throughout England. Networks of multi-functional greenspace providing a wide range of environmental and quality of life benefits should be identified in regional and local plans and designed into all major new development and regeneration schemes from their outset. Green roofs offer a number of environmental benefits including improving air quality and reducing the risk of flooding by absorbing the worst of the weather. In ecological terms, a green roof is one that supports a community of plants and their associated wildlife. Under most circumstances roofs will colonise naturally, of course, and it is not unusual to see lichens and mosses taking a foothold on many	Comment: This comment is supporting and the intention of Development Principle AC4 is to achieve exactly the aim of Natural England in this respect. Paragraphs 7.26 and 9.7 specify that the urban contribution to biodiversity will be made through a range of measures such as green roofs. SPD Response: No amendments necessary.

Organisation or Name	Comment Summary	Response or amendments incorporated in SPD
	of many of these species means that they rarely get the opportunity to become well-established before the man-made material of the roof requires replacing. Low maintenance roof top gardens can make a significant contribution to the survival of Britain's native plants.	
	Street trees can form an attractive and functional element of urban streets, helping to define their character. Planting should be of native species with a continuous canopy if possible. This will maximise the habitat potential for birds and insects. Street trees should be planted as semi mature standards at around 10 years old, as at this age they are less easily vandalised. Natural England note that they are discussed in paragraph 9.7 from the Biodiversity section of the document.  We draw your attention to the South East Green Infrastructure Framework which was finalised at the beginning of July 2009. This will offer you regional advice and guidance on the matter  We also draw your attention to the document below regarding climate change. Green Infrastructure can have a positive impact on many aspects of climate change, and Natural England recommend you consider this document with regard this particular section of the SPD.	Comment: This comment is supporting and the intention of Development Principle AC4 is to achieve exactly the aim of Natural England in this respect. Paragraphs 7.26 and 9.7 specify that the urban contribution to biodiversity will be made through a range of measures such as native tree planting SPD Response: No amendments necessary.
	10. Thames Basin Heaths Special Protection Area	Comment: This is a supporting comment. SPD Response: No amendments necessary.
	Natural England are pleased to see the progress being made in terms of mitigating for likely significant	

Organisation or	Comment Summary	Response or amendments incorporated in SPD
Name	effects upon the integrity of the SPA generated by this proposal. We are happy for this document to continue to remain flexible in terms of what approach is taken. We do wish to remain fully engaged with this proposal and are happy to offer advice and visit the mitigation sites when necessary.	
	10.8 – Natural England are pleased to see the inclusion of the emerging Strategic Access Management and Monitoring measures mitigation technique. We understand this will hopefully go live around April 2010.	Comment: This is a supporting comment. SPD Response: No amendments necessary.
	Appendix 2 – Appropriate Assessment  Natural England acknowledge for this document that the Habitats Regulations Assessment has not currently been updated. Once a mitigation proposal has been decided upon, this will need to be updated to reflect this. Again Natural England are happy to remain fully engaged in this process.	Comment: A revised Appropriate Assessment is included in the Final Sustainability Appraisal Report which gives more details on the solution. Further work on development the SANG will also be required such as a management Plan etc.  SPD Response: Add a new text at the end of paragraph 10.3 which reads as:"The Final Sustainability Appraisal Report provides a revised Appropriate Assessment for Development Principle AC7 and it is recognised that further Appropriate Assessment is necessary to provided more detail to the SANG solution advocated in Development Principle AC7 to inform for example, the production of a Management Plan. This work will be continued to support the production of an Amen Corner Avoidance and Mitigation Strategy."
6. Ascot and	Section 14 Employment Provision - The committee is	Comment: Development Principle AC11 does not
Bracknell District CPRE	concerned that no reference is made specifically to the need to provide small units especially small	preclude the provision of smaller employment provision revised Appropriate Assessment is included
OI IVE	Title field to provide small diffes especially small	Provision revised Appropriate Assessment is included

Organisation or	Comment Summary	Response or amendments incorporated in SPD
Name		
	workshop units. There is reference to small	in the Final Sustainability Appraisal Report which
	commercial units in the Local Centre but this may not	gives more details on the solution. Further work on
	be the appropriate location for units of the workshop	development the SANG will also be required such as
	type. This committee would like to see this	a management plan etc.
	recognised in Development Principle AC11 -	SPD Response: Add a new text at the end of
	Employment Provision.	paragraph 10.3 which reads as
7. Resident (Linda	Consultation Draft document	<b>Comment:</b> Comment agreed the text relating to a
Cooper- Dellow,	3.3 – the possibility of using the land at Farley Wood	railway halt is a typo and paragraph 3.3 is corrected
Beehive Road,	for the provision of a railway halt	accordingly.
Binfield)	- this land is too far from the railway to be practical	SPD Response: Amend the second paragraph of
	for this use.	Paragraph 3.3 to read as:
		Farley Wood Recreation Land
	- this land is too close to existing residential	The 3.63 hectares of land at Farley Wood (as
	development for change of use to a railway halt.	shown in light blue on Map 2). This land will be
		investigated through the Site Allocations
	- the existing Farley Wood site and the land around	Development plan Document and/or Local
	it is required for the use of the community. Other	Transport Plan 3 for the provision of a railway
	parts of the plan inicate the need to grow these	halt. Should a robust business case be
	facilities. The use of some land for a railway halt will	demonstrated in favour of a railway halt then the
	take away valuable space for growth of community	land could be redeveloped for additional
	facilities.	employment and a railway halt. Contributions
		from the development will enhance the
	- the land for HP recreation is much more suitable	recreational facilities and community centre
	as railway station as it is next to the railway and	which currently exist for the benefit of the new
	further from residential development.	and existing community (see Development
		Principles AC2 and AC4). There is also an
	- I therefore object to the proposed use of the Farley	option to share the pitch for use by the new
	Wood land for a railway halt	Primary School to be provided (see
		Development Principle AC2)
	Map 2 and Concept Masterplan	Comment: The bus gates are not part of this

Organisation or	Comment Summary	Response or amendments incorporated in SPD
Name	<ul> <li>it is not clear if the bus gates on Beehive Road/Cain Road junction will remain.</li> <li>there is no consideration given in the plan for the protection of the privacy and road use of the existing old residences on Beehive Road. My house is over 200 years old and cannot deal with heavy traffic use on Beehive Road - it literally shakes the foundations.</li> <li>please provide clarity on the retention of bus gates</li> </ul>	development and will remain. The transport solution for the site takes account of their retention. Beehive Road will not be opened up for general vehicle use as part of the Amen Corner development SPD Response: Add a new sentence at the end of paragraph 15.4 to read as: "The existing bus gate between Cain Road and Beehive Road will not be removed as a result of this development."
	on Beehive Road.  - please provide clarity on protection and consideration to existing residential development.  Bus route 190  - the bus route has previously been rerouted away from London road down John Nike Way. There is indication that it will be rerouted again.	Comment: The development will contribute towards delivering bus services which could include the 190 service. The bus operator normally decides on the appropriate route for a particular bus service (taking account of factors such as journey time and
	- it is important that the bus route not only serves the new Amen Corner community but also services the existing residential communities of Beehive Road and London Road.	commercial viability). The Council can have some influence on routing if it provides commercial subsidy or support. This is a matter for the detailed planning of bus routes in the vicinity of the area at the planning application stage of the process.  SPD Response: No changes necessary.
8. Binfield Badger Group	"A badger survey which should be undertaken over winter when signs of any activity are most obvious"  This is incorrect as badger activity is lower in the winter as their sources of food (earthworms, grubs, cereals etc) are less available. We understand why	Comment: This is agreed and the appropriate text should be amended to correct the SPD.  SPD Response: Amend the 2 <sup>nd</sup> bullet in paragraph 9.5 to read as:   "A badger survey which should be undertaken over winter when signs of activity are most

Organisation or	Comment Summary	Response or amendments incorporated in SPD
Name		
	you have been provided with this statement as it is easier to find setts in undergrowth when the nettles and brambles have died back.	obvious by a qualified consultant, this should be undertaken at the earliest planning stage to mitigate impact by redesign and prior to any groundwork starting to confirm no new
	However we would suggest that in future publications you state:	wildlife activity has occurred ".
	"A badger survey by a qualified consultant, which should be undertaken at the earliest planning stage to mitigate impact by redesign. Also prior to any groundwork starting to confirm no new wildlife activity has occurred"	
	Obviously we are very keen to be able to continue to support the Council with this major development as we know of a number of significant badger activities very close to the plan area.	
9. GOSE	GOSE does not have any fundamental objections to the SPD. However there are two minor issues that need addressing:  Para 2.4 The use of the word 'adopted' doe the South East Plan mentioned in the second and third	Comment: This is agreed and the appropriate text should be amended to correct the SPD.  SPD Response: Amend the last sentence in paragraph 2.4 to read as: "The adopted published South East Plan (May 2009) contains the Borough's housing allocation for the period 2006 to 2026."
	sentences should be replaced by 'published'. It would also be helpful to include the date of publication – May 2009.	riousing anocation for the period 2000 to 2026.

Organisation or Name	Comment Summary	Response or amendments incorporated in SPD
	Para 2.6 PPG4 was superseded by Planning Policy Statement 4: Planning for Sustainable Economic Growth on 29 December 2009. The section should be updated to reflect the latest national policy.	Comment: This is agreed and the appropriate text should be amended to update the SPD.  SPD Response: Amend the third bullet point of paragraph 2.6 to read as:  • PPG4 Commercial and Industrial  Development: encourages new development in locations which minimise the length and number of trips, especially by motor vehicles; encourage new development in locations that can be served by more energy efficient modes of transport; discourages new development where it would be likely to add unacceptably to congestion; and, locate development requiring access mainly to local roads away from trunk roads, to avoid unnecessary congestion on roads designed for longer distance movement. PPS4 Planning for Sustainable Economic Growth (2010) sets out a positive approach for planning economic growth with the Government's objectives:  - A good range of sites identified for economic development and mixeduse development;  - A good supply of land and buildings which offers a range of opportunities for creating new jobs in large and small businesses as well as start-up firms and which is responsive to changing needs and demands;

Organisation or	Comment Summary	Response or amendments incorporated in SPD
Name		<ul> <li>High quality development and inclusive design for all forms of economic development;</li> <li>Avoiding adverse impacts on the environment, but where these are unavoidable, providing mitigation; and</li> <li>Shaping travel demand by promoting sustainable travel choices wherever possible.</li> <li>A sequential test, which requires shops to be developed on the most central sites first, retained alongside a new impact test. Schemes that could harm town centres will be assessed against factors including impact on the high street, consumer choice and consumer spending.</li> </ul>
10. Warfield Parish Council	All references to ACL18  Summary:  ACL18 is unsound. It merely refers to a 2003 study of potential for a railway station associated with the Jennet's Park development. However, according to ACL18, the 2003 study itself did not provide any costing of a railway station and ACL18 does not address this deficiency. The 2003 study does not take into account the development now proposed at Amen Corner, or that intended for Warfield.  Recommended Changes:  Work in partnership with Network Rail and South	Comment: The purpose of the SPD is not as an allocation document (which is the function of a DPD). There is uncertainty over a railway station at present because of a number of factors including the lack of a business case (including the impact of deflection from Bracknell Railway Station) and that an additional station on a railway line which already takes over an hour to get to London. Network rail are in favour of the principle of a station and the SPD reflects this by allowing for a potential station to be provided. It would therefore be entirely wrong to place an emphasis on the development at Amen Corner to provide a station. However, the Council is producing two other

Organisation or	Comment Summary	Response or amendments incorporated in SPD
Name		
	West Trains to provide specifications for a new railway station comparable to Martins Heron station, to be used as an addendum to ACL18. Recognise that railway infrastructure is strategic and an essential component of sustainable transport, on the same basis as highways infrastructure, not as a standalone business case.  For illustrative purposes, the similar new Mitcham Eastfields modular station cost £6M which includes lift access to both platforms.	strategies in which the potential railway station could be further explored: The Site Allocations DPD and Local Transport Plan 3. The Council has consulted with both Network Rail and South West Trains yet both have remained fairly silent over the issue. The Council will continue to engage with these organisations further.  SPD Response: No amendments necessary.
	Paragraphs 3.3, 4.3, 5.4, 5.15, 14.6, 14.9, 15.1, 15.2, 15.4, 15.6, 15.8  Summary: It is welcome to see that potential for a railway station at Amen Corner has been added to the SPD, since this was omitted in the AAP. However, the proposal is passive and fails to secure funding for this essential infrastructure.  Martins Heron station was provided in 1988 through partnership between Berkshire County Council and British Rail. Three decades later, the requirement for sustainable transport is paramount, yet the SPD fails in this respect.  Railway station car parking is already oversubscribed at Bracknell, Martins Heron, Ascot and Wokingham stations, causing potential rail users to be displaced to road use. This situation will be further exacerbated by the BFC housing development plans to 2026. Furthermore, the immediate proximity of Amen Corner Business Park to the proposed station location can provide a	Comment: The provision of a railway station is still aspirational rather than a robust, feasible and viable project. Therefore, it is not agreed that the proposed changes are included in the SPS. However the proposed text and comments will be taken forward for consideration under both the Local Transport Plan 3 and the Site Allocations DPD. It is agreed that s106 or CIL could be sources of funding.  SPD Response: No amendments necessary.

Organisation or Name	Comment Summary	Response or amendments incorporated in SPD
	sustainable alternative for inbound commuters from outside Bracknell Forest, as well as viable rail access to the leisure facilities at the site that attract visitors from far afield. The private road "John Nike Way" is already a cause of significant congestion at peak hours that in turn causes congestion at Coppid Beech Roundabout. This situation will worsen with the development proposed in this SPD which will increasingly constrain access to/from the Northern Distributor Road (Harvest Ride / Temple Way) from the west.  In view of these existing constraints it is ludicrous to suggest that a business case is required for the railway station any more than it is required for a road improvement scheme, such as the recent traffic signals installed at John Nike Way/London Road junction.  There is thus a clear call to action for Bracknell Forest Council to engage actively with Network Rail and South West Trains to deliver this key transport infrastructure as an integral part of this development, by securing funding through Community Infrastructure Levy or failing that by Section 106 agreements.  This SPD represents the final stage of development at Amen Corner. Failure to secure a new station now would probably result in the permanent loss of the opportunity. Network Rail relies heavily on local authority partners to deliver local infrastructure.  Recommended Changes:	

Organisation or	Comment Summary	Response or amendments incorporated in SPD
Name		
	3.3 Change The Hewlett Packard Recreation	
	Areadue course to	
	The Hewlett Packard Recreation Area	
	This comprises 2.39 hectares shown in green in	
	map 2 that is used as a private sports ground	
	containing a football pitch, pavilion and	
	balancing pond. This land is designated for the	
	provision of a new railway station, associated car	
	park and secondary transport hub with additional	
	employment space. A consideration will be the	
	re-provision of the recreational facility off-site,	
	retention of the balancing pond and some of the	
	space currently designated as Open Space of	
	Public Value.	
	4.3 Change Planning applicationsservice	
	<del>provider</del> to	
	The Council will work actively with Network Rail	
	and South West Trains to deliver a new railway	
	station and ancillary car parking at Amen Corner	
	to provide sustainable transport to the SPD area,	
	Amen Corner Business Park, Jennet's Park and	
	wider area of Binfield and Warfield.	
	Renumber <b>5.4</b> and subsequent sections, inserting	
	new section	
	5.4 The development will include the on-site	
	provision of a railway station and ancillary car	
	parking on the land owned by Hewlett Packard	
	shown in green in map 2. This will be delivered in	
	partnership with Network Rail and South West	
	Trains and secured by Community Infrastructure	
	Levy or by section 106 agreements and potential	
	contribution from any successor to the Network	

Organisation or	Comment Summary	Response or amendments incorporated in SPD
Name		
	Rail Discretionary Fund.	
	5.15 Renumber <b>1</b> and subsequent paragraphs,	
	inserting new paragraph	
	1. A new railway station will be constructed on	
	land owned by Hewlett Packard, secured by	
	Community Infrastructure Levy or other	
	planning obligations, in partnership with Network	
	Rail and the train operator.	
	14.6 Change There may also become forward to	
	There will also be additional office space	
	together with a railway station and ancillary car	
	park sited on land owned by Hewlett Packard.	
	14.9 Change Additional employmentCS8 to	
	Additional employment space on the Hewlett	
	Packard Recreation Ground subject to the	
	provision of alternative recreational facilities in	
	accordance with Core Strategy Policy CS8.	
	15.1 Change improvements to bus to	
	improvements to train and bus	
	15.2 Insert Network Rail, before the Highways	
	Agency.	
	15.4 Change Public Transport Hub – Buses to	
	Public Transport Hub – Trains and Buses	
	Insert Key to this is the provision of a new railway	
	station on the London Waterloo to Reading line	
	before The Amen Corner Transport Assessment	
	Delete The later addition of a railway	
	stationparagraph 3.3	
	15.6 Change may cover railway services to will	
	include railway services	
	Delete (including the uses of railways should a	

Organisation or Name	Comment Summary	Response or amendments incorporated in SPD
	station be provided) 15.8 Change 1. Buses to 1. Trains and buses After public transport hub insert centred on a new railway station	
	Paragraphs 5.16, 7.32, 14.11, 15.1, 15.12, 16.10 <u>Summary:</u>	Comment: The Council is uncertain at present regarding to the implementation of CIL. The Council does have to have its CIL arrangements in place for 2014 at the latest. However this may be late for the
	The Community Infrastructure Levy (CIL) comes into full effect on 6 <sup>th</sup> April 2010. It has been possible for local authorities to determine CIL since 6 <sup>th</sup> April 2009. CIL is intended to overcome the frequent shortfalls and/or misallocation of Section 106 funds that have often made S106 ineffective for delivering infrastructure for larger scale development projects. Whereas S106 is expected to remain in use for small scale developments, strategic developments such as Amen Corner are expected to have infrastructure financed through CIL.  The SPD mentions CIL in passing via a foot note however it should be cited as the primary delivery vehicle for infrastructure.	2014 at the latest. However this may be late for the implementation of development at Amen Corner associated with this SPD. The second bullet point is paragraphs 5.16, 7.32, 9.11, 10.11, 11.9, 12.12, 14.11 and 15.12. which read as "Conditions, Section 106 Agreement or other agreements unless other legal measures to secure contributions or works are put in place" allows the flexibility to use CIL if appropriate arrangements are put in place. SPD Response: No amendments necessary.
	Recommended changes: 5.16 Insert Community Infrastructure Levy, before Conditions and delete foot note. 7.32 Insert Community Infrastructure Levy, before Conditions	
	<ul><li>14.11 Insert Community Infrastructure Levy,</li><li>before Conditions</li><li>15.1 change will be agreed to will be funded</li></ul>	

Organisation or Name	Comment Summary	Response or amendments incorporated in SPD
	through the Community Infrastructure Levy or else agreed	
	15.12 Insert Community Infrastructure Levy, before Conditions	
	16.10 Insert Community Infrastructure Levy,	
	before Conditions	
	Paragragh 4.2	Comment: It is agreed that this is an error and
	Summary:	changes should be made for clarification.
	Existing residential developments are to the north	SPD Response: Amend the first sentence of
	and south, existing commercial developments are to the east	paragraph 4.2 to read as: "Whilst the level of development is not necessarily sufficient to create a
	the cast	fully self-contained community in its own right,
	Recommended changes:	opportunities must be taken to ensure the new
	Change east to north and south	development integrates well with the existing
		development including the residential development to
		the east-north (off Beehive Road and Turnpike
		Road) and south (Jennett's Park). "
	Paragraphs 10.3	Comment: It is agreed that the term Area Action Plan
	Summary:	should be updated. A revised Appropriate
	Errata	Assessment is included in the Final Sustainability
	Recommended changes:	Appraisal Report. <b>SPD Response:</b> Amend 2 <sup>nd</sup> sentence to paragraph
	Change Area Action Plan to Supplementary	10.3 to read as "It is the Council's preference to
	Planning Document	provide a solution prior to the adoption of the Area
		Action Plan Supplementary Planning Document."
	Paragraphs 13.2	Comment: It is agreed that the term Area Action Plan
	Summary:	should be amended to bring the SPD up-to-date.
	Errata	SPD Response: Amend the second sentence in
		paragraph 13.2 to read as: "However, at this time it is
	Recommended changes:	not certain if or when this land will come forward for

Organisation or Name	Comment Summary	Response or amendments incorporated in SPD
	Change Area Action Plan to Supplementary Planning Document	redevelopment and therefore there is a need for flexibility in the Area Action Plan Supplementary Planning Document."
11. Environment Agency	Paragraph 4.5 We support the inclusion of a guiding principle for development of green infrastructure in this section. However, we note that there is no guiding principle in this section on sustainability and would recommend that an additional guiding principle is added to this section on sustainable development as this relates to mitigating climate change, water resource availability, SUDS, waste management etc.	Comment: It is agreed that sustainability is important, however, the Council has already published the Sustainable Resource Management Supplementary Planning Document of which planning applications at Amen Corner will be expected to take account.  SPD Response: No changes necessary.
	Development Principle AC2 We support the inclusion of parts 3 and 5 in this development principle as they promote the sustainable management of water at the site.  Paragraph 6.11 We note from this that 'the development will need to demonstrate that it has been designed and laid out to adapt to the predicted effects of climate change'. However, the examples cited in paragraph 6.11 all relate to energy usage only; they do not consider the impacts of and adaptation requirements for climate change on water usage, flood risk etc. We recommend that paragraph 6.11 is expanded to incorporate other ways of adapting to climate change.	Comment: Supporting comments. SPD Response: No changes necessary.  Comment: Comment agreed Supporting comments. SPD Response: Add a new bullet point at the end of paragraph 6.11 which reads as:  "New development will have to consider key impacts of climate change such as flooding, structural damage and subsidence, biodiversity losses, intense rainfall and drought leading to soil damage, erosion and damage to road/rail infrastructure. The development may have to include adaptation measures such as installing external shading above south-facing facades or setting aside land for water attenuation systems to cope
	Section 7 and Development Principle AC4	with intense rainfall."  Comment: Supporting comments.

Organisation or Name	Comment Summary	Response or amendments incorporated in SPD
Wallie	We support the inclusion of section 7 and development principle AC4 on Green Infrastructure and Landscape Character from both a biodiversity and flood risk perspective.	SPD Response: No changes necessary.
	We are pleased that you have included the use of SUDS as part of this section on green infrastructure and have stated that the system must 'provide a net ecological benefit' as this recognises the multifunctionality of SUDS schemes.	
	There is not a significant risk of flooding at Amen Corner as it is within flood zone 1 and is largely greenfield. However, the redevelopment could result in a significant increase in flood risk from pluvial sources if not managed appropriately. The requirement in AC4 for a sustainable urban drainage scheme (SUDS) will help to prevent any increase in surface water runoff as a result of the proposed development.	
	Section 9 Biodiversity and Development Principle AC6 From both a biodiversity and flood risk perspective we support the inclusion of paragraph 9.7 which recommends the inclusion of green roofs. We support this as they not only control surface water run off at source but can replace losses of habitat and can also be used to provided ecological enhancements at a site in accordance with PPS9.	Comment: Supporting comments. SPD Response: No changes necessary.
	They can also help to limit the impact of climate change by conserving energy as they make buildings	

Organisation or Name	Comment Summary	Response or amendments incorporated in SPD
Numb	more thermally efficient. Green roofs can also prolong the life of a roof, manage the extremes of temperature and humidity, moderate surface water run-off, provide greenspace for people and wildlife and help to reduce air pollution and noise.	
	Paragraph 11.1  Due to the previous potentially contaminating uses on the site we are pleased to see the inclusion of this paragraph and development principle AC8 as these accord with the requirements of PPS23.	Comment: Supporting comments. SPD Response: No changes necessary.
12. RSPB	Amen Corner is situated within 3km of Broadmoor to Bagshot Woods and Heaths SSSI, which forms part of the Thames Basin Heaths SPA. Without appropriate mitigation, additional residential development in this location is therefore likely to have a significant effect on the SPA both on its own and in combination with other housing applications in the area.	Comment: Supportive comments SPD Response: The SPD provides for SPA mitigation in Development Principle AC7
	In this respect, we greatly welcome the commitment to avoid and mitigate impacts on the SPA through a bespoke combination of on and off-site SANGS, access management and monitoring measures. We also welcome the proposal sets out in paragraph 10.2 of the SPD to improve footpath connections to the proposed on-site SANGS and to introduce parking facilities in association with that SANGS. These measures should help to improve the attractiveness of the SANGS and therefore its effectiveness as an alterative to the SPA for recreational users.	

Organisation or Name	Comment Summary	Response or amendments incorporated in SPD
	We understand that the Council has purchased land known as Bigwood, which may be provided as offsite SANGS. As no details have been provided on the location or size of the area, it is not currently possible to comment on its adequacy or appropriateness. Nevertheless we acknowledge that work is ongoing to investigate the options for off-site SANGS and we recognise that Development Principle AC7 incorporates a degree of flexibility to ensure that any future developers could bring forward an alterative site for off-site SANGS.	Comment: A revised Appropriate Assessment is included in the Final Sustainability Appraisal Report which gives more details on the solution. Further work on development the SANG will also be required such as a management Plan etc.  SPD Response: Add a new text at the end of paragraph 10.3 which reads as :"The Final Sustainability Appraisal Report provides a revised Appropriate Assessment for Development Principle AC7 and it is recognised that further Appropriate Assessment is necessary to provided more detail to the SANG solution advocated in Development Principle AC7 to inform for example, the production of a Management Plan. This work will be continued to support the production of an Amen Corner Avoidance and Mitigation Strategy."
	We greatly welcome the statement at paragraph 10.3 of the SPD that "it is the Council's preference to provide a solution prior to the adoption of the Area Action Plan. This approach is considered to represent best practice and provide certainty that an adverse impact will be avoided, in accordance with the Habitats Regulations" and we would support the Council in its efforts to achieve this objective. Paragraph 10.3 should, however, be updated to replace the term Area Action Plan with Supplementary Planning Document, to reflect the current approach of the Council.	Comment: Supportive comments and it is agreed that the term Area Action Plan should be updated. A revised Appropriate Assessment is included in the Final Sustainability Appraisal Report.  SPD Response: Amend 2 <sup>nd</sup> sentence to paragraph 10.3 to read as "It is the Council's preference to provide a solution prior to the adoption of the Area Action Plan Supplementary Planning Document."
	We recognise that the Appropriate Assessment that accompanies the Consultation Draft SPD and is	Comment: A revised Appropriate Assessment is included in the Final Sustainability Appraisal Report

Organisation or	Comment Summary	Response or amendments incorporated in SPD
Name		
	provided at Appendix 2 of the Draft Sustainability Appraisal, was undertaken for the submission version of the Amen Corner AAP. We understand that a revised Appropriate Assessment will be undertaken in respect of the SPD and we recommend that this be undertaken as early as possible.	which gives more details on the solution. Further work on development the SANG will also be required such as a management Plan etc.  SPD Response: Add a new text at the end of paragraph 10.3 which reads as: "The Final Sustainability Appraisal Report provides a revised Appropriate Assessment for Development Principle AC7 and it is recognised that further Appropriate Assessment is necessary to provided more detail to the SANG solution advocated in Development Principle AC7 to inform for example, the production of a Management plan. This work will be continued to support the production of an Amen Corner Avoidance and Mitigation Strategy."
13. The Theatres	No comments to make	Comments: No comments
Trust		SPD Response: No amendments necessary
14. Thames Water	In commenting on previous versions of the Amen Corner Area Action Plan TWUL identified concerns as to the capacity of the existing sewerage network to support additional demand arising from future development at Amen Corner. It was therefore considered that any future version of the Area Action Plan should make it clear that the capacity of the sewerage network to provide for wastewater demand should not be adversely affected by development at Amen Corner. The same considerations are appropriate to the SPD Document.  TWUL therefore welcomes the inclusion of section 5 Infrastructure, Services and Facilities within the SPD. In particular the requirement for "all new	Comment: Supporting comments. SPD Response: No changes necessary.

Organisation or Name	Comment Summary	Response or amendments incorporated in SPD
	development to provide suitable infrastructure and services to support it and mitigate any impacts that it may create" (Paragraph 5.1) is supported.	
	Development Principle AC2 - Community Facilities and Other Services and Infrastructure. It is likely that strategic sewer reinforcement work will be required to accommodate development at Amen Corner. TWUL therefore supports the requirement for all necessary utilities (including surface water and foul sewer management) to be secured by private agreement between the developer and the provider. The requirement for a Surface Water Drainage Strategy for the site is also supported.	Comment: Supporting comments. SPD Response: No changes necessary.
	TWUL considers that the wording of bullet point 5 could be strengthened by making it clear that that planning permission will only be granted where there will be adequate provision for and / or improvement of necessary infrastructure.	Comment: The purpose of the document is guidance rather than prescriptive policies in a DPD and therefore the suggested change is disagreed.  SPD Response: No changes necessary.
	There should also be a requirement for phasing of development, where appropriate to ensure that the required infrastructure is provided ahead of development.	Comment: The provision of infrastructure will be subject of agreements/conditions associated with planning applications affecting the site. At this stage the timing of provision will be considered in detail in line with current policies and guidance (such as that set out in the Limiting the Impact of Development SPD).  SPD Response: No changes necessary.
	Thames Water supports the use of sustainable urban drainage systems in appropriate circumstances. However it should be stated within bullet point 5 or the supporting text to Development Principle AC2 that sustainable drainage systems are not	Comment: It is agreed that a caveat relating to drainage in the event SUDs cannot be flly provided is included.  SPD Response: Amend the first bullet point of paragraph 5.12 to read as:

Organisation or	Comment Summary	Response or amendments incorporated in SPD
Name	appropriate for use in all areas, for example areas with high ground water levels or clay soils which do not allow free drainage. A well maintained and managed sustainable drainage system is also required to prevent it becoming ineffective, potentially increasing overland flows and consequently having an impact on the sewerage network.	" water management including surface water and sewer management (all sustainable drainage systems should be well maintained and managed to ensure they do not impact for example, on the sewerage system)."
	In respect of any future development at Amen Corner it is anticipated that sufficient capacity to provide for additional wastewater demand will available at existing Sewage Treatment Works (STWs), however sewerage network upgrades are likely to be required and may need developer funding. Water and sewerage undertakers have limited powers under the Water Industry Act to prevent connection to distribution networks ahead of infrastructure upgrades and therefore rely heavily on the planning system to ensure infrastructure is provided ahead of development either through phasing or the use of planning conditions.	Thames Water this comment relates to planning applications affecting the site.
	TWUL would expect to be consulted on most major planning applications.  Paragraph 84 of PPS12, states that lifedequacy of infrastructure can be a aterial consideration in deciding whether permission should be granted."  Paragraph 22 of PPS23, 2004, states at Appendix A that the ollowing should be considered in the preparation of development plans and can be material in the consideration of individual planning	

Organisation or	Comment Summary	Response or amendments incorporated in SPD
Name	applications:	
	The provision of sewerage and sewage treatment	
	and the availability of the eisting sewerage	
	infrastructure.	
	<ul> <li>The need to make suitable provision for the drainage of surface water.</li> </ul>	
	Compliance with water quality objectives.	
	TWILL published and circulated in Cummer 2007 to	
	TWUL published and circulated in Summer 2007 to all LPAs in our area a "Guide fr LPAs on Planning"	
	Application & Development Plan Consultation with	
	Thames Water Utilities as Statutory Water and	
	Sewerage Undertaker". This wll be of assistance to	
	you when determining which planning applications to	
	consult TWUL on and in the preparation of LDF	
	documents.	
	The earlier TWUL is able to be involved in the	
	planning application process the greater the	
	opportunity we have to make known our concerns regarding the ability of the local infrastructure to	
	support development, and to ensure any proposed	
	development has no detrimental impact on our	
	assets or the service w provide to existing	
	customers. Furthermore, early consultation allows	
	TWUL to work with developers and other agencies to	
	enable the issues caused by a development to be	
	mitigated, or a compromise to be reached.	
	Additional Comments.	Comment: It is agreed that that the current surface
	There is a surface water pond that is under TWUL	water pond should not be placed at risk. However it
	ownership in the south east corner of the Amen Corner Area. TWUL would seek assurance that any	should be noted that Hewlett Packard maintain that they own this pond.
	subsequent development will not be placed at risk of	SPD Response: No changes necessary

Organisation or	Comment Summary	Response or amendments incorporated in SPD
Name		
	flooding should this pond be unable to cope with	
	extreme weather.	
15. Binfield Village	My first reading of the Consultation Draft was that	Comment: Supporting comments.
Protection Society	every issue had been addressed and covered with appropriate development principles. It is not as "sparse," thankfully, as the BFC LDF Core Strategy because the Introduction and the History of the site are more detailed than in previous Amen Corner documents and the "development principles" are	SPD Response: No changes necessary.
	broader and more detailed as a result of the numerous and important comments and objections raised during the various consultations held since the first Newsletter in Jul-Aug 2007.	
	Some issues appear easy to rectify such as the timing of the Badger survey.	<ul> <li>Comment: This is agreed and the appropriate text should be amended to correct the SPD.</li> <li>SPD Response: Amend the 2<sup>nd</sup> bullet in paragraph 9.5 to read as:</li> <li>"A badger survey which should be undertaken over winter when signs of activity are most obvious by a qualified consultant, which should be undertaken at the earliest planning stage to mitigate impact by redesign. Also prior to any groundwork starting to confirm no new wildlife activity has occurred".</li> </ul>
	Some development principles appear to allow for alternatives (In my mind the school situation) which must be a good thing in the present financial climate. I think the planners efforts at protecting the gap between settlements against central government decrees and neighbouring borough's LDF is	Comment: Supporting comments. SPD Response: No changes necessary.

		<del>,</del>
	admirable.	
	I welcome the Design Principles (DV Principle AC3)	Comment: Supporting comments.
	and all the "green" principles - AC4, AC5, AC6 and	SPD Response: No changes necessary.
	of course AC7, which may have some returns for the	
	community in SANGS. It seems to me that the last	
	five development principles should have a notable	
	effect on Development Principle AC9 Housing	
	Provision.	
	After years of thinking and talking, discussion and	Comment: Comments noted. It is confirmed that the
	argument, disappointment and acceptance it would	opportunity to comment on planning applications
	seem to me that Development Principle AC10 –	remain.
	North View and South View is the ultimate in	SPD Response: No changes necessary.
	pragmatism. I hope that the opportunity to comment	or b response. No onanges necessary.
	or object at the planning application stage still	
	remains in planning legislation and has not been	
	removed in recent changes because the interest and	
	concern of the Society in these little houses remains.	
	It is still hoped by bvps members and non-members	Comment: Comments noted. The intention of the
	alike that the Development Principle AC11 will	SPD is to allow the provision of small business units
	provide for small, contemporary business units which	at Amen Corner.
	has been a requirement in the Borough for many,	SPD Response: No changes necessary.
	many years.	To Response. No changes necessary.
16 Highways	Development Principle AC1 – Vision (The Delivery of	Comments It is agreed that at ourrent that the
16. Highways	Comprehensive Development)	
Agency	It would seem that the start date for the delivery of	delivery programme for the site is optimistic and
	the Amen Corner Development is stated to be 2010.	therefore the programme for delivery should be put back for a year.
	As this document is only in draft form, it would be	SPD Response: Appendix 2 is revised to delay the
	questionable whether this is achievable considering	development phasing by a year. Consequential
	the time involved in finalising the document and the	
	time required for the site to gain full planning	are also made.
	permission. This could have implications on the	
	certainty of the development and therefore could	
	compromise the deliverability of the site itself.	

Further clarification on the start date is required.

Furthermore, it is unclear within the SPD whether the delivery of the entire development will be reliant on a single planning application, or if the site will consist of a number of planning applications. Further detail should be provided in order to ensure that the delivery of the site is fully understood; this should be outlined within the Development Principle AC1.

### **Evidence Base**

In response to the Amen Corner Area Action Plan – Draft Submissions Document, the HA concluded that the Amen Corner Transport Model Assessment was fit for purpose for assessing impacts on the SRN. However, it would seem that the document has now been revised to account for a revalidation of the base model, and also to consider comments raised by Bracknell Forest Borough Council. Upon review of the Revised Transport Model Assessment, it is apparent that these revisions have resulted in the evidence base varying from that previously agreed. The HA therefore request verification of these changes as this could have serious implication on the SRN, particularly at Junction 10 of the M4.

### <u>Sustainable Growth and Infrastructure Services and</u> Facilities

It is noted that the SPD refers to an integrated transport strategy which the HA supports. The strategy will need to be provided before the HA can make further comment. PPG13<sup>1</sup> refers specifically to public transport and also to mixed-use and B1 development which should be considered when

**Comment:** The SPD provide clarity in paragraphs 4.5 and 4.6 that comprehensive development is sought on the site and that individual applications would only be acceptable where it can be demonstrated that the implementation of a comprehensive scheme will not be prejudice by individual application approvals. **SPD Response:** No amendments necessary.

**Comment:** As the Highways Agency is aware, Transport Modelling is based upon assumptions and up-to-date information. In respect to the issue of verification this matter will be dealt with by separate correspondence with the HA.

SPD Response: No amendments necessary.

**Comment:** This comment is noted and the Council will continue to work with the HA regarding the potential impact of development on the SRN and on the Integrated Transport Assessment.

SPD Response: No amendments necessary.

\_

<sup>&</sup>lt;sup>1</sup> PPG13 Planning Policy Guidance 13:Transport

producing the integrated transport strategy. The HA will be looking for the integrated transport strategy to be phased in line with the development. The HA has no objection in principle to the development of the infrastructure, services and facilities proposed within the SPD, providing that a suitable level of mitigation is implemented to minimise the impact on the SRN. This should be in line with PPG13.<sup>2</sup>

A robust infrastructure delivery plan will be required which should indicate the phased approach to development and infrastructure. This document will ensure that the impact of the development on the SRN is controlled and would be 'deliverable'. This is in line with PPS12 paragraph 4.44 which states that "Core strategies must be effective: this means they must be deliverable". As such, this SPD is one of the means of that delivery.

### Public Transport and Accessibility

The HA supports that the parking provision will be in line or below the Council's maximum parking standards. This will assist in mitigating the impact of trips on the SRN. However, it may be necessary for the Council to adopt lower standards of parking if traffic levels require further mitigation. Parking provision could prove to be a vital mitigation measure for the development as outlined in PPG13<sup>3</sup>, and as such, the HA would request a wording

Comment: The restriction of car parking provision could have some impact on reducing car borne trips, however we are in an area of high car ownership and restricting private space for parking will only lead to parking on adopted/distributor roads around the site and this will impact on the look of the development. Careful consideration should be given to design of this site and how parking relates to each parcel. Just reducing car parking provision will not in itself secure a reduction of car trips on the SR. The inclusion of

<sup>&</sup>lt;sup>2</sup> PPG13 paragraph 20, "Local Authorities should .... actively manage the pattern of urban growth and the location of major travel generating development to make the fullest use of public transport. This may require the phasing of sites being released for development, in order to coordinate growth with public transport improvements"

<sup>&</sup>lt;sup>3</sup> PPG13 paragraph 49, "reducing the amount of parking in new development (and in the expansion and change of use in existing development) is essential, as part of a package of planning and transport measures, to promote sustainable travel choices"

change which will ensure that traffic on	
reduced through parking restrictions:	potential for a new rail halt are going to more
	positively reduce car use as they will provide reliable
"The site should not however be do	,
parking provision, but designed by	
reasonable and pragmatic approach	
consistent to the Council's Parking	
SPD and has regard to the traffic	•
development on the Strategic Road Ne	
<u>Travel Plan</u>	Comment: Supporting comment
It is noted that Travel Plans will be required	
development, with specific action	
monitoring relating to employment d	·
residential development and primary sch	ool. The HA
welcomes this approach.	
In order to ensure sustainability b	
maximised, it may be appropriate for th	
develop an area wide Travel Plan fo	
Amen Corner SPD area. All Travel Plans	, , , , , , , , , , , , , , , , , , ,
into account the guidance set out in Df1	
'The Essential Guide to Travel Plannii	•
Choices' and 'Making residential Travel	•
This approach would be consistent with	
02/2007 <sup>4</sup> and PPG13. This in turn sho	·
ensure that the level of development	·
deliverable and in line with the requ	irements of
PPS12.	
Site Access and other Highway works	Comment: The Council is in dialogue with the
Subsequent to our review of the Ar	
Transport Assessment prepared to	support the regarding the impacts on the SRN. This supports, as

<sup>4</sup> Guidance on Transport Assessments, paragraph 4.82 – "The use of area and site specific travel plans is an important mechanism in the underlying aim to manage vehicle trips at the source. Whenever a site specific TP is proposed, the developer should ascertain the existence of an area-wide TP. Where one exists, the site-specific TP should integrate with the area-wide TP."

Preferred Options AAP document, it became apparent that Amen Corner will have a detrimental impact on the SRN, specifically the M4 Junction 10, but also on the M3 Junction 3. As highlighted within our previous response to the AAP dated 23 March 2009, the following recommendation was made:

"Based on forecast traffic changes at Junction 10, M4 a number of slip roads will need to be improved to preserve safe flow conditions in the future. The impact of Amen Corner at M4 Junction 10 is a component part of general traffic growth across the assessment area. As such it is reasonable to expect a contribution towards improvements measures, such as those already described."

Within Guidance Principle AC13, the HA would request that 'point 7 – general improvements to the wider network which may include improvements to the Strategic Road Network necessary to accommodate development traffic' be amended to read:

"general improvements to the wider network and improvements to the Strategic Road Network, in particular the M4 Junction 10 and the M3 Junction 3 necessary to accommodate development traffic".

The HA are undertaking a study which is looking to assess the viability of a scheme at M4 Junction 10 to

demonstrated by point 7 of paragraph 16.9, the principle of development mitigating their impact on the SRN. The Council is on-going dialogue with the Highways Agency and Wokingham Borough Council on this matter. However, it is clear at present that no proper account has been taken of the impact on Junction 10 of the M4 by traffic from other authority areas (other than Reading, Bracknell Forest and Wokingham). Furthermore, there is no mechanism for securing contributions so the SPD cannot be more specific in this nature. Finally, and of concern is that the HA seemed to have changed their position again and are now demanding contributions to the M3 as well despite not earlier seeking such contributions regarding Amen Corner or not seeking the contributions from a larger development closer to the M3 at a Public Inquiry.

SPD Response: No amendments necessary.

<sup>&</sup>lt;sup>5</sup> Circular 02/2007, paragraph 8 – "the presumption should be to give preference, where possible, to solutions other than the provision of new road Capacity"

accommodate the proposed increases in traffic from the surrounding area. This includes traffic associated with Bracknell Forest, Reading and Wokingham councils. The study seeks to determine an appropriate scheme in order to protect the safe and efficient operation of the SRN. It is also essential that stringent demand management measures are implemented to minimise the traffic impact as outlined within Circular 02/07<sup>5</sup>. The HA will be looking for such measures to reduce the impact at Junction 10. However, it is apparent that a scheme may still be required to mitigate traffic impacts at Junction 10; some of this traffic may be attributed to the proposed development at Amen Corner. However, the deliverability of this scheme remains undetermined and therefore there is the potential that the scheme will not be affordable.

#### **Mitigation**

The SPD does not appear to provide in any detail evidence of potential mitigation measures on the M3 The proposed development at Amen and M4. Corner, in conjunction with other forthcoming developments within the area could adversely affect the capacity and safe and efficient running of the SRN. As such, the HA would seek appropriate mitigation measures. The Amen Corner Transport Model Assessment also gives a good indication of what demand management measures will be required to enable the development to come forward. Any reduction in traffic generation could help to relieve vehicular flows on the SRN, specifically at Junction 10 of the M4. Therefore, greater consideration should be given to these measures

Comment: The Council is in dialogue with the Highways Agency and Wokingham Borough Council regarding the impacts on the SRN. The supports as demonstrated by point 7 of paragraph 16.9 the principle of development mitigating their impact on the SRN. The Council is on-going dialogue with the Highways Agency and Wokingham Borough Council on this matter. However, it is clear at present that no proper account has been taken of the impact on Junction 10 of the M4 by traffic from other authority areas (other than Reading, Bracknell Forest and Wokingham). Furthermore, there is no mechanism for securing contributions so the SPD cannot be more specific in this nature. Finally, and of concern is that the HA seemed to have changed their position again and are now demanding contributions to the M3 as

		,
	within the SPD.	well despite not earlier seeking such contributions or
		not seeking the contributions from a larger
		development closer to the M3 at a Public Inquiry.
		SPD Response: No amendments necessary/
	Implementation and Phasing Plan	Comment: Page 10 of Appendix 1 already provides
		text regarding this issue where it says that "Funding
	As you are aware, the HA do not plan to improve the	for improvements to the Strategic Road Network
	M4 Junction 10 as outlined within the HA's forward	could be acquired through s106." However further
	programme of work. As a result, it is anticipated that	text should be added to included other partners such
	any scheme will be funded through developer	as Reading and others
	contributions by way of a Section 106 agreement. It	SPD Response: Update the text to read as:
	is also important that this is reflected within the SPD.	"Developer(s)/BFC/Highways Agency/Wokingham
	The following additional wording is requested to be	Borough/Reading Borough/Others
	added alongside guidance principle AC13:	Funding for improvements to the Strategic Road
	"It is supported that founding for improvements to	Network could be acquired through S106."
	"It is expected that funding for improvements to	
	the Strategic Road Network would be acquired	
	through S106".	
	As you are aware, the Amen Corner site was	Comment: The Council is fully aware of the HA
	previously brought forward as a DPD document.	position regarding development and the SRN. The
	Development at Amen Corner raises the possibility	Council is in ongoing dialogue with the HA and
	of additional pressure on key junctions on the SRN,	Wokingham Borough regarding this issue.
	including M4 J10 and M3 J3. As such, and given the	SPD Response: No amendments necessary.
	document's status as a SPD, the HA would hope that	
	serious consideration is given to the advice in this	
	letter. Given the capacity issues on the SRN, should	
	the points raised in this letter not be addressed, the	
	HA may have to consider its position at the planning	
	application stage.	
17. Sport England	The Amen Core development area (as indicated in	Comment: Supporting comments.
	yellow as shown on Map 1) does not include any	SPD Response: No changes necessary.
	current or former use as playing field, such that the	
	proposals do not propose any loss of playing field	
	1 F. F. F. F. S. S. G. F. F. G. F. G. F. F. G. F. F. G. F. F. G. F. G. F. F. G. F. G. F. F. G. F. G. F. G. F. G. F. F. G. F. F. G. F. G. F. G. F. F. G. F. G. F. F. G. F. G. F. G. F. G. F. G. F. F. G. F. F. G. F	

land. Therefore, Sport England raises no objection to the allocation of the Amen Corner as a development site and the principle of mixed used development.

### Para 3.3 Farley Wood Recreation Land - Comment

This paragraph provides that this site will be investigated for the provision of a railway halt. In this regard, we take this opportunity to remind the Council that Sport England would resist the loss of any playing fled land unless it complies with PPG17 and as such accords with Sport England's policy. Sport England policy is to oppose development on playing fields in all but exceptional circumstances.

These exceptional circumstances are where, in the judgment of Sport England:

- E1 A carefully quantified and documented assessment of current and future needs has demonstrated to the satisfaction of Sport England that there is an excess of playing field provision in the catchment, and the site has no special significance to the interests of sport.
- E2 The proposed development is ancillary to the principal use of the site as a playing field or playing fields, and does not affect the quantity or quality of pitches or adversely affect their use.
- E3 The proposed development affects only land incapable of forming, or forming part of, a playing pitch, and does not result in the loss of, or inability to make use of any playing pitch (including the maintenance of adequate safety margins), a reduction in the size of the playing area of any playing pitch or the loss of any other

**Comment:** Comment agreed the text relating to a railway halt is a typo and paragraph 3.3 is corrected accordingly.

**SPD Response:** Amend the second paragraph of Paragraph 3.3 to read as:

### • Farley Wood Recreation Land

The 3.63 hectares of land at Farley Wood (as shown in light blue on Map 2). This land will be investigated through the Site Allocations Development plan Document and/or Local Transport Plan 3 for the provision of a railway halt. Should a robust business case be demonstrated in favour of a railway halt then the land could be redeveloped for additional employment and a railway halt. Investment from the development will enhance the recreational facilities and community centre which currently exist for the benefit of the new and community Development existina (see Principles AC2 and AC4). There is also an option to share the pitch for use by the new Primary School to be provided (see **Development Principle AC2)** 

sporting/ancillary facility on the site. E4 - The playing field or playing fields which would be lost as a result of the proposed development would be replaced by a playing field or playing fields of an equivalent or better quality and of equivalent or greater quantity, in a suitable location and subject to equivalent or better management arrangements, prior to the commencement of the development. E5 - The proposed development is for an indoor or outdoor sports facility, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss of the	
playing field or playing fields.	
Para 3.3 The Hewlett Packard Recreation Area –	Comment: Supporting comments.
Comment	SPD Response: No changes necessary.
This section of the document provides that the	
Hewlett Packard Recreation Area may be	
appropriate for the provision of a railway station in	
the future with associated employment space.	
However, the text also makes clear the need for the	
recreational facility to be re-proved. The approach to	
re-proved any lost provision accords with Core	
Strategy Policy CS8 and also Sport England Policy which derives from PPG17.	
Para 4.4 - Support	Comment: Supporting comments.
Sport England supports the provision of a new	SPD Response: No changes necessary.
Commercial and Leisure Zone that will compliment	or b Response. No changes hecessary.
and enhance the existing sports and leisure facilities	
at the John Nike Leisure sport complex.	
Para 4.5 - Support	Comment: Supporting comments.
Sport England supports the SPD vision for	SPD Response: No changes necessary.
development, which aims to achieve the integration	
of leisure facilities and the provision of infrastructure,	
1 ,	

	services and facilities.	
	Development Principle AC1 - Support	Comment: Supporting comments.
	Sport England supports Development Principle AC1	SPD Response: No changes necessary.
	and the inclusion of community and recreational	. ,
	facilities and open as part of any development.	
	Para 5.6 - Support	Comment: Supporting comments.
	Sport England supports the proposed enhancement	SPD Response: No changes necessary.
	the Farley Wood Recreation Facility as detailed in	
	Para 5.6 of the draft document. In particular, Sport	
	England supports the proposed provision of	
	additional changing facilities and the enhancement of	
	the existing sports pitches	
	Development Principle AC2 & Apra 5.15 - Support	Comment: Supporting comments.
	Sport England supports the upfront commitment,	SPD Response: No changes necessary.
	expressed by the Council within Development	
	Principle AC2, to secure the improvements to the	
	Farley Wood Recreation Facility via planning obligation. Sport England also supports the	
	preparation Farley Wood Enhancement Scheme	
	which will set out the nature of the improvements	
	required.	
	Para 7.4 – Support	Comment: Supporting comments.
	Sport England supports the Councils commitment to	SPD Response: No changes necessary.
	provide 3.35 hectares of active open space as part of	or 2 macket the sharings he seeds.
	the Amen Corner development.	
	Development Principle AC11 & Para 14.9 Support	Comment: Supporting comments.
	Sport England supports the Council's approach that	SPD Response: No changes necessary.
	additional employment space on the Hewlett	
	Packard Recreation Ground will be only be	
	acceptable subject to the provision of alternative	
	recreational facilities in accordance with Core	
	Strategy Policy CS8.	
18. Binfield Parish	Clause 7.25 on page 23 of the Consultation Draft	<b>Comment</b> : It is agreed that the SPD could be more

Council	document states, ".There may be opportunities to provide communal allotments for the benefit of new residents." Can we suggest that the sentence reads, "The layout of the site will also provide communal allotments for the benefit of new residents."	positive about the provision of communal allotments and the wording should be amended.  SPD Response: Amend the last sentence of paragraph 7.25 to read as: "There may be opportunities to The layout of the site will also provide communal allotments for the benefit of new residents."	
	Under Development Principle AC4 - Green Infrastructure and Landscape Character, Clause 7.3 states, "The development will provide. which includes" and is followed by a list including "7. Provision of gardens, communal allotments and amenity soft landscaping." Presumably this principle may not include all of the items in the list of eight points.	Comment: The intention of the SPD is to express the requirements of the development which includes all the elements in Development Principle AC4.  SPD Response: No changes necessary.	
19. South East England Partnership Board	No comment to make	Comment: No concerns raised SPD Response: No amendments necessary	
20. Royal Borough of Windsor and Maidenhead	I can confirm that we do not have any comments to make regarding this document at this time.	Comment: No concerns raised SPD Response: No amendments necessary	

21. Tony Collins	Introduction and Context Para 1.4	<b>Comment:</b> The SPD does clarify the area to which the
(Hewlett Packard		SPD applies. However for clarity further annotations to
LTD)	Proposed Change:	Map 1 and 2 will be provided.
-	It is necessary for the Amen Corner Area covered	SPD Response: Amendments are made to Map 1 and
	by the SPD to be clearly defined on a plan.	2
	Reason: Include new plan to define area and include HP's recreation land within the designated area. This should accord with Policy CS4 of the adopted Core Strategy.	

National and regional Policy Para 2.6

#### Proposed Change:

The recently published PPS4 Planning for Sustainable Economic Growth needs to be incorporated into the SPD. In particular Policy EC2.

#### Reason:

This supports the allocation of HP's recreation land for office use together with a balancing pond and railway station. **Comment:** It is agreed that the policy context needs to be amended to update it in respect to the publication of PPS4.

**SPD Response:** Amend the third bullet point of paragraph 2.6 to read as:

- PPG4 Commercial and Industrial Development: encourages new development in locations which minimise the length and number of trips, especially by motor vehicles; encourage new development in locations that can be served by more energy efficient modes of transport; discourages new development where it would be likely to add unacceptably to congestion: and, locate development requiring access mainly to local roads away from trunk roads, to avoid unnecessary congestion on roads designed for longer distance movement. PPS4 **Planning for Sustainable Economic Growth** (2010) sets out a positive approach for planning economic growth with the Government's objectives:
  - A good range of sites identified for economic development and mixed-use development;
  - A good supply of land and buildings which offers a range of opportunities for creating new jobs in large and small businesses as well as start-up firms and which is responsive to changing needs and demands;
  - <u>High quality development and</u> <u>inclusive design for all forms of</u> <u>economic development;</u>
  - Avoiding adverse impacts on the

Area for SPD Map 2	environment, but where these are unavoidable, providing mitigation; and  - Shaping travel demand by promoting sustainable travel choices wherever possible.  - A sequential test, which requires shops to be developed on the most central sites first, retained alongside a new impact test. Schemes that could harm town centres will be assessed against factors including impact on the high street, consumer choice and consumer spending."  Comment: The references to the colours on Map 2 are
Decreased Observes	all included in Paragraph 3.3 of the document. However
Proposed Change:	labels will be added to Map 2 for clarification.
The map does not include any reference to the	SPD Response: Amendments are made to Map 2.
coloured areas.	
Reason:	
Clarify map notation by reference to a key.	
The Development Area Para 3.2	Comment: This is not agreed as there is no certainty
	over the provision of a railway station and therefore the
Proposed Change:	remaining element of development associated with the
The yellow area should include HP's recreation	SPD should be considered on its own merits. Because
land	of the uncertainty over the delivery of a railway station
	the status of the Hewlett Packard Land it should be
Reason:	treated separately as it is in paragraphs 3.3, 4.3 and
Change Map 2 to reflect the development potential	14.6
of HP's land.	SPD Response: No changes necessary.
The Development Area Para 3.3	Comment: The SPD cannot allocate specific uses. A
'	DPD is the only tool for this process. The Council is

Proposed Change:

HP's land is part of a single planning unit for Class B business purposes. The land has been used for recreation purposes (football pitch) which is disused and for a balancing pond for HP's main office development.

The Council has indicated that the football pitch is suitable for office development (10,000 sq m) together with a railway halt.

The balancing pond would be retained for HP's future development.

Network Rail and South West Trains do not consider any business case prior to the issue of a planning permission or land use allocation in principle.

The SPD area needs to be positively planned for recreation facilities without need for like-for-like replacement facilities. The land comprises a disused football pitch for HP's employees.

The land needs to be allocated now. If land is to be developed later rather than sooner this should be phased now.

#### Reason:

The land is part of a Class B1 permission and is used for ancillary purposes to the main office use. The Council has accepted the principle under the AAP process.

now producing the Site Allocations DPD, the relevant comments on made on the Draft SPD such as this will be considered through the SADPD. On confirmation from HP these comments will be considered as a response to the forthcoming SADPD Participation on Issues consultation. The Golf Driving Range has a temporary planning permission and does not benefit from an established recreational use as the does the Hewlett Packard Recreation Area.

SPD Response: Add an additional wording to the 4<sup>th</sup> bullet point in paragraph 3.3 to read as: This comprises 2.39 hectares and is a privately owned sports ground containing a football pitch, a pavilion and a balancing pond. This land (shown in green on Map 2) is designated as Open Space of Public Value (OSPV) on the Bracknell Forest Borough Proposals Map. This land forms part of a single planning unit for Class B business purposes. The land has been used for recreation purposes (football pitch and pavilion) which is disused and for a balancing pond serving the main Hewlett Packard office development. Hewlett Packard have indicated that this land could accommodate up to 10,000 sqm. of new employment space whilst retaining the drainage function of the balancing pond. In the circumstance that this development goes ahead the recreational land would be developed. may be appropriate for the provision of a harlway station in the future with associated employment space. In order for a railway station to be delivered on this land is will be necessary for evidence and a business case to be provided. A further consideration will be the re-provision of the recreational facility and guaranteeing the drainage function of the balancing pond will be

There is no intention of removing the balancing	appropriate to serve the existing and new
pond.	development. The development proposed in this Draft
As a defeated by Nationals Day	SPD will not prejudice an appropriate scheme coming
As advised by Network Rail.	forward in due course. The formal allocation of land
The public solf devicing reason improved totals, nowth of	for employment and a railway station will be
The public golf driving range immediately north of HP's land has not been required to be re-provided	Considered through the Site Allocations
and the Council's approach is inconsistent in this	<u>Development Plan Document (see www.bracknellforest.gov.uk/sadpd).</u>
matter.	iorest.gov.uk/saupu <u>i.</u>
matter.	
Clarity is required in the SPD as to the release of	
land over the plan period.	
Development principle AC1 Para 4.7	Comment: This is not agreed as there is no certainty
, ,	over the provision of a railway station and therefore the
Proposed change:	remaining element of development associated with the
The list should include the provision of a railway	SPD should be considered on its own merits. Because
halt.	of the uncertainty over the delivery of a railway station
	the status of the Hewlett Packard Land it should be
The employment floorspace should be increased to	treated separately as it is in paragraphs 3.3, 4.3 and
45,000sq m to accommodate the office	14.6
development of HP's recreation land if not already	SPD Response: No changes necessary.
included in the 35,000 sq m allocation.	
Reason:	
In order to ensure the SPD area is developed with	
sustainable transport modes.	
To enable the proper planning for the SPD area.	
Development Principle AC2 Para 5.15	Comment: This is not agreed as there is no certainty
Dovolopinient i ililoipie AOZ Fala 3.13	over the provision of a railway station and therefore the
Proposed change:	remaining element of development associated with the
The list should include the provision of a railway	SPD should be considered on its own merits. Because
halt to be funded through section 106 planning	of the uncertainty over the delivery of a railway station
obligations as the station will support the whole of	the status of the Hewlett Packard Land it should be
and the state of t	and distributed on the first terminal and the first terminal bottom before the first terminal and the first termin

Amen Corner.  Reason: In order to ensure the SPD area is developed with sustainable transport modes.	treated separately as it is in paragraphs 3.3, 4.3 and 14.6 SPD Response: No changes necessary.
Proposed changes: The requirement for an approved masterplan and design code prior to the issue of a planning permission is contrary to Government guidance and statute. This will act as a moratorium on development and could preclude individual land owners progressing planning applications on their respective land parcels even though the proposed uses would be in compliance with the SPD. Other matters of design can be controlled by planning condition.  Reason:	Comment: This is agreed and amendments should be made to the text to ensure the SPD is consistent to allow individual applications that demonstrate a comprehensive delivery of the site.  SPD Response: Amend paragraph 6.13 to read as: "A detailed Masterplan and Design Code for the development are required to be submitted and approved prior to any detailed planning submissions being considered and permissions granted. either as part of a full application or prior to the submission of Reserved Matters."
To ensure that Amen Corner can be developed without unnecessary requirements of the LPA.  Passive Open Space Para 7.7  Proposed change: Plan 2 should be Map 2.	Comment: This is agreed and the appropriate text should be amended to correct the SPD.  SPD Response: Amend the second sentence in paragraph 7.7 to read as: "Such provision could include
Pian z snould be iviap z.	land in Wokingham Borough as identified (on Plan Map 2 shown in orange)."

HP's land should be removed from the current Open Space of Public Value (OSPV).

Reason:

Correct error in text.

To ensure proper designation of land in SPD.

Business Zone Para 14.4

Proposed changes:

HP's potential to deliver 10,000 sq m should be included. HP's site is adjacent to HP's main office development and provides ancillary support at present.

Reason:

The circumstances pertaining to the public golf driving range are the same as that for HP's private recreation land. Both parcels are suitable for office development and should be allocated accordingly

Commercial and Leisure Zone Para 14.6 Proposed change:

It is not clear why HP is mentioned under this head rather than the Business Zone. The land contains a disused football pitch and balancing pond. The latter is to be retained whilst the football pitch is planned to be redeveloped for offices adjacent to the station halt.

Reason:

HP's land needs to be allocated and confirmed under paragraph 14.4 with the correct information.

**Comment:** The SPD cannot allocate specific uses. A DPD is the only tool for this process. The Council is now producing the Site Allocations DPD, the relevant comments on made on the Draft SPD such as this will be considered through the SADPD. On confirmation from HP these comments will be considered as a response to the forthcoming SADPD Participation on Issues consultation.

SPD Response: no changes necessary.

Comment:. This is disagreed because the Golf Driving range is subject of a temporary permission and not an Open Space of Public Value designation unlike the HP Recreational Land. For this reason they are treated differently. The Site Allocations DPD provides the opportunity to remove the OSPV designation otherwise it is for HP do demonstrate how alternative provision could be made in line with Policy CS8 of the Core Strategy DPD. The employment space associated with the HP recreational land is tied to the provision of a railway station and should not be provided for regardless of a railway station.

SPD Response: No amendments necessary.

Comment: It is agreed that this paragraph should be moved under the Business Zone paragraph (14.4). Further, the SPD cannot allocate specific uses. A DPD is the only tool for this process. The Council is now producing the Site Allocations DPD, the relevant comments on made on the Draft SPD such as this will be considered through the SADPD. On confirmation from HP these comments will be considered as a response to the forthcoming SADPD Participation on Issues consultation.

**SPD Response**: swap paragraph 14.5 and 14.6 around.

Development Principle AC11 Para 14.8 Proposed change:

The employment floorspace should be increased to 45,000sq m to accommodate the office development of HP's recreation land if not already included in the 35,000 sq m allocation.

Reason:

To enable the proper planning for the SPD area.

Development Principle AC11 Para 14.9

Proposed change:

HP's land should be allocated in the SPD for employment use. Any recreation facilities should form part of the planned facilities for the whole of the SPD area. Remove reference to Policy CS8 Reason:

To enable the proper planning for the SPD area.

Development Principle AC12 Para 15.8 Proposed change:

Include requirement for provision of a railway halt. Reason:

To enable the proper planning for the SPD area.

**Comment:** The SPD cannot allocate specific uses. A DPD is the only tool for this process. The Council is now producing the Site Allocations DPD, the relevant comments on made on the Draft SPD such as this will be considered through the SADPD. On confirmation from HP these comments will be considered as a response to the forthcoming SADPD Participation on Issues consultation.

SPD Response: no changes necessary.

**Comment:** The SPD cannot allocate specific uses. A DPD is the only tool for this process. The Council is now producing the Site Allocations DPD, the relevant comments on made on the Draft SPD such as this will be considered through the SADPD. On confirmation from HP these comments will be considered as a response to the forthcoming SADPD Participation on Issues consultation.

**SPD Response**: no changes necessary.

**Comment:** There is uncertainty over a railway station at present because of a number of factors including the lack of a business case (including the impact of deflection from Bracknell Railway Station) and that an additional station on a railway line which already takes over an hour to get to London. Network Rail are in favour of the principle of a station and the SPD reflects this by allowing for a potential station to be provided. It would therefore be entirely wrong to place an emphasis on the development at Amen Corner to provide a station. However, the Council is producing two other strategies in which the potential railway station could be further explored: The Site Allocations DPD and Local Transport Plan 3. The Council has consulted with both Network Rail and South West Trains yet both have remained fairly silent over the issue. The Council will

		continue to engage with these organisations further.  SPD Response: No amendments necessary.
	Concept masterplan Para 17.  Proposed: The plan should include HP's recreation land coloured yellow for business purposes.  The station location needs to be moved to the southern end of Beehive Lane.  Reason: To enable the proper planning for the SPD area.	Comment: This is not agreed as there is no certainty over the provision of a railway station and therefore the remaining element of development associated with the SPD should be considered separately. The Hewlett Packard Recreational Land has been coloured differently to reflect its context as set in paragraphs 3.3, 4.3 and 14.6. It is agreed that the potential location of the railway station should be moved to the southern end of Beehive Lane.  SPD Response: Amen the Concept Plan to show the potential railways Station in a different location.
	This is the optimum location for the station.	
22. Nike Group	Development Principle AC 5 - Landscape Sensitivity  Comment: No objection to the policy as worded, however other parts of Footpath 14, Binfield could well be superseded by the footpath/cycleway to be introduced in connection with the new link road.	Comment: This comment is noted and agreed with SPD Response: No amendments necessary.
	Provision  Comment: Item 2 of the principle refers to the character zones being fully detailed in an agreed masterplan. It is not considered realistic to try to fully detail the character zones at masterplan	Comment:. This is agreed and the text should be amended for clarification purposes.  SPD Response: Amend point 2 of paragraph 12.11 to read as: "the housing will be provided in distinct Character Zones which will be fully detailed specified in an agreed Masterplan;"

stage, at a time when the eventual developers will not be known, as they will input into the final detail. The wording should be amended so that the distinct character zones are <u>specified</u> in an agreed masterplan.

# Development Principle AC 10 – North View and South View

**Comments: 1.** The supporting text acknowledges that there is no certainty that this land will come forward for redevelopment. The principle should therefore be amended to read North View and South View will be developed as part of the early phases in the development <u>if</u> practicable.

It is not considered that this location is suitable for small business enterprises. If there is a requirement for small business enterprises at Amen Corner, The Nike Group consider a better location would be on Scott land adjacent to the railway. However this would reduce the amount of land available for housing and go against the consensus of opinion at the Employment Land Study Workshop, which concluded that Amen Corner was not the location for small business enterprises

# Paragraph 15.4

**Comment:** It is considered that a 10-minute service for the shuttle bus service is excessive.

**Comment:** The purpose of the SPD is ensure that an appropriate development goes ahead including the redevelopment of North and South View. There has been flexibility in this to provide development that would enable this to go ahead. It is apparent from consultation responses that North View and South View need to be redeveloped as part of the development. Clarification is needed to ensure that any employment at this location is compatible with the other business and residential uses to be located nearby.

SPD Response: Add a new 3<sup>rd</sup> sentence in paragraph 13.1 which reads as: "Any employment uses must be compatible with nearby other uses such as offices, school and residential areas. Industrial, noisy and polluting uses will not be acceptable."

**Comment:** It is considered that the text may be detailed at this stage however, the Transport Assessment work carried out so far has indicated the need for such a service. To allow more flexibility and detailed work additional text should be included. **SPD Response:** Add new text to the end of the 3<sup>rd</sup> sentence to paragraph 15.4 which reads as: "This is intended to provide a 10 minute service (15 minutes off-

		peak) although the actual extent of the service will
		be matter for further detail and negotiation."
	Guidance Principle AC 13 – Site Access and	<b>Comment:</b> It agreed and this text should be deleted to
	Other Highways works	reflect an update on the ground.
	<b>Comment:</b> 16.9 Item 5 is now unnecessary.	<b>SPD Response:</b> Delete point 5 of paragraph 16.9 and
	The junction of John Nike Way and London Road	renumber points 6 and 7 as " <u>5</u> and <u>6</u> "
	has already been improved. The junction of John	
	Nike Way with Cain Road is covered in 16.8 item 2.	
23. Thames Valley	You will be aware that the District fails within the	<b>Comment:</b> This is context to the comments TVP make
Police	operational area of Thames Valley Police Authority	on the Draft SPD.
	(TVP) who is responsible for delivering services to	SPD Response: No amendments necessary.
	address community safety, tackle the fear of crime	
	and seek to achieve a reduction in crime.	
	The delivery of growth and new development within	
	the District imposes additional pressure on TVP's	
	infrastructure base, which is critical to delivery of	
	effective policing and securing safe and	
	sustainable communities. The Police Service no	
	longer receives central grant funding for	
	infrastructure projects; while revenue funding is	
	provided by the Home Office and the Council Tax	
	precept, capital projects are financed through	
	borrowing. Borrowing to provide infrastructure has	
	an impact on delivery of safe and	
	sustainable communities because loans have to be	
	repaid from revenue budgets, the corollary of which	
	is a reduction in the money available to deliver	
	operational policing.	
	PPS1 makes clear that the promotion of	
	communities that are inclusive, healthy, safe and	
	crime-free is a key tenet of Government planning	
	policy, and is therefore a material consideration in	
	the determination of planning applications. As part	
	of achieving sustainable communities, PPS1	

requires Local Authorities to take account of the provision of essential infrastructure in bringing forward land for development (paragraph 2.7).

The Police are recognised nationally in PPS12 as key stakeholders in determining the type and quantum of social infrastructure needed to support sustainable development (paragraph 4.29). At a regional level, the South East Plan (May 2009) states via Policy CC7: Infrastructure and Implementation, that infrastructure will need to be expanded and improved to support development, where existing capacity is insufficient. The Policy advises that contributions from development towards infrastructure will be needed to ensure its delivery in a sustainable manner. A table within the supporting text defines infrastructure as including the emergency services, which encompasses the Police.

Consequently, there is clear acceptance within Government that the Police is a key stakeholder when it comes to determining what infrastructure is necessary in order to ensure development can be delivered in a sustainable way.

The delivery of Community Safety is an obligation on the part of the Council under Section 17 of the Crime and Disorder Act 1998 (as amended), which extends to place shaping and spatial planning, and consequently the delivery of housing and employment development. It is therefore critical to ensure the appropriate Police infrastructure is provided in a timely fashion and in the right location to deliver community safety. This is particularly crucial at Amen Corner given the scale and

implications of the development of the site.	
Draft SPD	Comment: This is a supporting comment.
TVP supports the proposal to seek contributions	SPD Response: No amendments necessary.
towards social infrastructure from the development	
of Amen Corner in accordance with Policies CS1	
and CS6 of the Core Strategy DPD. TVP strongly	
supports recognition of the Police as third party	
infrastructure providers (paragraph 5.2 of the Amen	
Corner SPD) and one of the number of	
infrastructure services likely to be affected by the	
development proposed at Amen Corner.	
TVP also strongly supports the acknowledgement	Comment: This is a supporting comment.
developer contributions towards Police	SPD Response: No amendments necessary.
infrastructure would be necessary if the Police	
identifies a	
requirement which accords with the provisions of	
Circular 05/05.	
TVP objects to the omission of reference to the	Comment: This comment is not agreed as the SPD
specific contributions required by the Police to fund	provides guidance rather than prescribes the
additional capital infrastructure costs to mitigate the	infrastructure provision required. In respect to 3 <sup>rd</sup> party
impact of the development on the Police Service.	infrastructure provision it is uncertain over an effective
Included with this representation is an assessment	mechanism to secure provision in respect to Local
against Circular 05/2005 of the principle of claiming	Government law. e.g. for financial contributions in lieu
developer contributions towards Police	of provision. The SPD is not an allocations document
infrastructure.	and therefore will not exactly prescribe all the
	infrastructure provision as a DPD would. The Site
Development Principle AC1 of the Amen Corner	Allocations DPD will provision an Infrastructure Delivery
SPD sets the "Vision" for the development of the	Plan and 3 <sup>rd</sup> party infrastructure needs will be
site, including the anticipated number of dwellings	considered as part of this process. The Council does
and employment space to be provided.	have an SPD in place (Limiting the Impact of
Accordingly, the level and type of the infrastructure	Development) which makes provision for infrastructure
to be provided as part of the development should	requirements in association with planning applications.
also be outlined to clarify the scale and extent of	This tool will be used alongside the Amen Corner SPD

development.

Paragraph 5.1 of the SPD states that the SPD identifies in broad terms the required infrastructure. services and facilities to be provided at Amen Corner, including how this will be provided, where, when and by whom. The SPD as drafted specifies the infrastructure requirements arising from the development in the case of all other service providers. However, in the case of the Police (and Health and the Fire Service), the SPD places onus on TVP to justify the extent of the claim sought at the application stage and demonstrate compliance with Circular 05/05. This approach is disappointing given the extent of discussions held with Officers during the preparation of the Amen Corner Area Action Plan and the belief that Police requirements would be incorporated in the final document. Moreover, it fails to offer the clarity and certainty that the developers will be seeking at the preapplication stage on the level of contributions which would be sought from the development.

Policy CS6 of the Bracknell Forest Borough Council Core Strategy, Limiting the Impact of Development acknowledges that new development places additional pressures on existing infrastructure and local facilities. The Policy establishes that new development should address the resulting local impacts either through mitigation measures which

form part of the proposals or through contributions towards measures which will address the cumulative impacts. The Policy is supported by the SPD Limiting the Impact of Development which should an application e received prior to the consideration of the Site Allocations DPD. It is considered that the need for a new facility at Amen Corner cannot be met by the existing facility in Binfield (next to the Parish Office). The TVP should discuss separately wit the Council any opportunity to use the existing community centre at Farley Wood for such purposes.

**SPD Response**: No amendments necessary.

provides general guidance on developer contributions in the Borough. As this is non-specific guidance, detail is limited although participation in CCTV schemes is given as an example of the type of Police infrastructure that may be required through a planning obligation.

In response to the TVP representations submitted to the draft Amen Corner Area Action Plan in March 2009, Bracknell Forest Council stated that the Limiting the Impact of Development SPD could be relied on to seek contributions towards Police infrastructure, if justified, from the development. However, the Core Strategy and Limiting the Impact of Development SPD precede the 2008 version of PPS12, the adoption of the South East Plan and the amendments to the Town and Country Planning (Local Development) (England) Regulations of 2008. They therefore fail to include specific reference to the

Police as infrastructure providers. The inclusion of the suggested amendments to the Amen Corner SPD would serve to provide explicit requirements.

# **Suggested Amendments**

PPS12 encourages negotiation with infrastructure providers at the earliest possible stage in order to ensure its delivery and provide certainty to the developer and to ensure the timely delivery of infrastructure in the right location. The SPD should include details of the items of Police infrastructure required, the contribution triggers, the method of delivery, and the quantum and source of infrastructure funding for the Police.

This information in relation to Police infrastructure was submitted to the consultation on the Amen Corner Area Action Plan in March 2009. This is essential to ensure the delivery of community safety at Amen Corner and it is not satisfactory to leave the detail or principle of the provision of infrastructure to the application stage.

Further clarification should be provided in Development Principle AC2 regarding the Police infrastructure that would be required as part of the proposed development of Amen Corner. TVP has identified an on-site requirement for neighbourhood Police facility of maximum 60sqm gross internal area plus a dedicated car space and shared use of other parking spaces, sufficient to accommodate three staff with ancillary facilities eg toilets, kitchen etc. This would be sought at no cost to TVP. It would be possible for the facility to be collocated within the Community Centre, which would result in a reduced space requirement if elements such as a meeting room or ancillary facilities were shared.

The development at Amen Corner is also identified as one of the seven sites around the Borough at which an Automatic Number Plate Recognition camera is required.

Contributions should be sought from development towards provision of this facility.

In addition, financial contributions would be sought towards capacity building at Basic Command Unit and Force-level and the need for additional staff and accommodation to mitigate the impact of the development on policing in full.

These changes would provide certainty on the type of infrastructure required as part of the development at Amen Corner. Unless these changes are incorporated within the final SPD, TVP objects to the document.

# Developer Obligations towards Police Infrastructure

We set out below how the need for an appropriate Planning Obligation to include provision to mitigate the impact of the development on the Police Service meets the tests set out in Circular 05/2005.

#### Relevant to Planning

In the context of the prevailing planning policies outlined above and on the basis that an increase in population arising from the development proposals would impact on the ability of the police to deliver an effective and efficient service, the request for contributions towards police infrastructure provision to mitigate the impact of the proposed development is relevant to planning in the context of Circular 05/2005.

### Necessary to Make the Proposed Development Acceptable in Planning Terms

The delivery of safe, healthy and attractive places to live is fundamental to planning for sustainable development. Contributions to essential Police infrastructure are required to ensure that an adequate level of police service is available to achieve sustainable communities. Contributions

Comment: The problem at present is that there is no effective mechanism to secure financial contributions. The Council, under Local Government Law gas to maintain the discretion over cos106 contributions it receives. For example, the Council is currently exploring a mechanism for securing a strategic contribution in respect to the Thames Basin Heaths Special Protection Area which may include the need for a Joint Committee which only Council's can be part of. Therefore an SPD is an inappropriate tool for securing contributions for third party infrastructure requirements. The CIL may provide an opportunity and the Council will explore all relevant infrastructure needs as part of this process. The Site Allocations DPD is another mechanism that provides the opportunity for consideration.

**SPD Response:** No amendments necessary.

are necessary because there is no central Government

grant funding to cover the capital costs of staffing increasing and associated accommodation/vehicle costs in line with the additional impact on the police service arising from the development proposals. Consequently, TVP will be unable to maintain current levels of policing, with existing resources stretched to serve an enlarged resident and working population, resulting in heightened incidents of crime and disorder within the local area. Contributions are therefore necessary to bring the development in line with the objectives of sustainable development as articulated through local, regional and national planning policies set out above.

# Directly Related to the Proposed Development

There is a functional link between the new development and the contributions and/or onsite Police infrastructure being sought.

The scale of Police Force resources sought is commensurate with the scale of the population to be served, in order to maintain an adequate level of service and enable the police to deliver on its duty to address crime and disorder issues. There is evidence that an increase in population arising from new developments would result in an increase in the incidents of crime, which would apply greater pressure to the existing Police Service.

In addition, new development inevitably creates targets for crime which requires a Police presence to reduce the perception of crime and respond effectively to incidents of crime. The impact of increased incidents of crime and targets for crime arising from development must be addressed through Planning Obligations in order to fund the expansion of the police service to maintain a commensurate level of policing.

Put in simple terms, if there was no development there would be no need for additional Police resources and a resultant contribution. Where a development proposal gives rise to an increase in population it will be necessary to increase the number of Police Officers and support staff policing that population to ensure the level of service is maintained. Additional accommodation, vehicles and other ancillary facilities would be required to be delivered to meet the needs of the expanded staffing. As previously explained, there is no existing funding source to support this from central or local taxation.

It is therefore appropriate to seek contributions towards community safety from new housing and employment development because such development will have a direct impact on the capacity of the Police Force to provide an efficient and effective service in the area.

# Fairly and Reasonably Related in Scale and Kind to the Proposed Development

TVP has formulated a methodology for seeking contributions. It is constructed to ensure that payments are directly related in scale to impact arising from proposed development in terms of new resident/working population accommodated by the scheme. The formula-based approach anticipates

that there would not necessarily be a direct relationship between population growth and housing growth based on current household size. Accordingly it includes a discount factor to ensure that there is proportionality between new population and new dwellings. The contributions sought are therefore appropriate to the net impact of new development in terms of population growth.

#### Reasonable in All Other Respects

The financial contribution and/or on-site infrastructure provision sought is not to resolve existing deficiencies in police infrastructure provision, nor is it seeking to provide a higher level of service. The impact of the development on the capacity of the Police Force to provide an efficient and effective service in the context of the Government's agenda for the delivery of safe communities is a material planning consideration, and the contributions/infrastructure sought are proportionate to that impact. The requirement for a Planning Obligation to deliver a financial contribution to Police infrastructure and secure the provision of an on-site facility is therefore reasonable in all respects.

# 24. Crowthorne Parish Council

CPC has reviewed the Amen Corner SPD and supports the proposals contained therein.

Because of the closeness of the site to Wokingham BC "South Wokingham Development Area", CPC urges BFC to continue consultation with WBC to optimise transport inter-linkage, use of green infrastructure and rights-of-way, and development of SANG

**Comment:** Supporting comment

**SPD Response:** No amendments necessary

**Comment:** The Council will continue to discuss the delivery of Amen Corner and the Wokingham Strategic Development Locations with Wokingham BC.

SPD Response: No amendments necessary.

Copies of this booklet may be obtained in large print, Braille, on audio cassette or in other languages. To obtain a copy in an alternative format please telephone 01344 352000.

### Nepali

यस प्रचारको सक्षेपं वा सार निचोड चाहिं दिइने छ ठूलो अक्क्षरमा, ब्रेल वा क्यासेट सून्नको लागी । अरु भाषाको नक्कल पनि हासिल गर्न सिकने छ । कृपया सम्पर्क गनुहोला ०१३४४ ३५२००० ।

# **Tagalog**

Mga buod/ mga hango ng dokumentong ito ay makukuha sa malaking letra, limbag ng mga bulag o audio kasette. Mga kopya sa ibat-ibang wika ay inyo ring makakamtan. Makipag-alam sa 01344 352000

#### Urdu

اس دستاویز کے خلاصے یا مختصر متن جلی حروف، بریل لکھائی یا پھرآڈیو کیسٹ پرریکارڈ شدہ صورت میں فراہم کئے جا سکتے ہیں۔ دیگر زبانوں میں اس کی کاپی بھی حاصل کی جا سکتی ہے۔ اس کے لیے براہ مہربانی ٹیلیفون نمبر 352000 01344 کریں۔

### **Polish**

Streszczenia lub fragmenty tego dokumentu mogą być dostępne w wersji napisanej dużym drukiem, pismem Brajla lub na kasecie audio. Można również otrzymać kopie w innych językach. Proszę skontaktować się z numerem 01344 352000.

#### **Portuguese**

Podemos disponibilizar resumos ou extractos deste documento em impressão grande, em Braille ou em audiocassete. Podem também ser obtidas cópias em outros idiomas. Por favor ligue para o 01344 352000.

Spatial Policy
Environment, Culture and Communities
Bracknell Forest Council
Time Square
Market Street
Bracknell
RG12 1JD