

## WARFIELD NEIGHBOURHOOD PLAN

Warfield Parish Council's response to the Examiners initial questions (Procedural Letter dated 23 August 2021) are set out below. The Parish Council thank the Examiner for bringing these additional points to their attention and for the opportunity to provide clarification. The Examiner's questions are in **bold**, with Warfield Parish Council's (WPC) response following each question.

- 1. Paragraph 2.20 of the WNP refers to the 'countryside gap' and page 17 has a heading The Countryside Wedge. There are further references to the 'countryside wedge' at paragraph 5.2 and in policy WNP1. However, the function of this area is not defined in the Plan, nor is its extent shown on any map in the Plan. Please provide evidence justifying what appears to be a form of policy designation and provide a plan showing the countryside wedge.**

The reference to 'countryside gap' is in error and for consistency with page 17, the reference in paragraph 2.20 should be 'countryside wedge', the description and function of which is described in the 'Spatial Portrait' pages 17 and 18 (paragraphs 2.33 – 2.36).

The areas shown on the 'Spatial Portrait' are not intended to indicate any form of policy designation, rather to provide a simple illustrative diagram of the parish spatial context.

The 'countryside wedge' is the area in yellow to south of the Green Belt but appreciate this may not be immediately obvious. To rectify this, we suggest the following:























(i) paragraph 2.22 reverts largely to reflect the description in the Pre-Submission Version and the legend on Plan C to reflect the same, so enabling a clear cross reference to be made between the text and Plan C, thus:

2.22 In spatial terms, the parish is characterised by four broad areas (Plan C);

- a) the built-up area of Bracknell Town to the south
- b) the emerging new built-up area of the Warfield extension (SA9)
- c) the 'countryside wedge' containing the villages of West End, Newell Green, Warfield Street and Hayley Green; and,
- d) the Metropolitan Green Belt.

(ii) a new heading "The Emerging new built-up area of the Warfield extension (SA9)" is inserted between paragraphs 2.26 and 2.27 to reflect the revised paragraph 2.22 and the Plan C Legend

**2. Please provide a key and a source for Plan E on page 22.**

Policies	
	Bracknell Forest Borough Boundary
	Defined Settlements - CS2(2), CS2(3), CS19
	Land Outside Defined Settlements - CS9 - EN8,9,15, H5,6 M10, R7
	Town Centres - CS21
	Green Belt Villages - GB1,2,3,4
	Green Belt - CS9(ii) - EN8,15, GB1,2,4, H,5 M10, R7
	Major Developed Site within the Green Belt - CS19, CS20, GB5
	5km Special Protection Area line - CS14 (See SPA Context Plan)
	Site of Special Scientific Interest - EN3iii
	Area of Special Landscape Importance - EN10i
	Wildlife Heritage Site - EN4
	Historic Park or Garden - EN12
	Scheduled Ancient Monuments - EN6
	River Corridor - EN14
	Ramblers Route - R8(a)
	Area of Local Landscape Importance - EN10ii
	Conservation Areas A Warfield, B Winkfield, C Winkfield Row
	Warfield Park Mobile Home Site - EN11
	Special Area of Conservation - EN3ii
<b>Site Allocations Local Plan Proposals</b>	
	Sites Allocated for Mixed Use Development - SA9 - CS5
	Sites Allocated for Housing - SA1, SA2, SA3
<b>Bracknell Forest Borough Local Plan Proposals</b>	
	Highway works

Source: Bracknell Forest Policy Map July 2013 (Map 2 extract Warfield)

**3. To be consistent throughout the Plan, please indicate which of the Plan’s objectives policy WNP1 will deliver.**

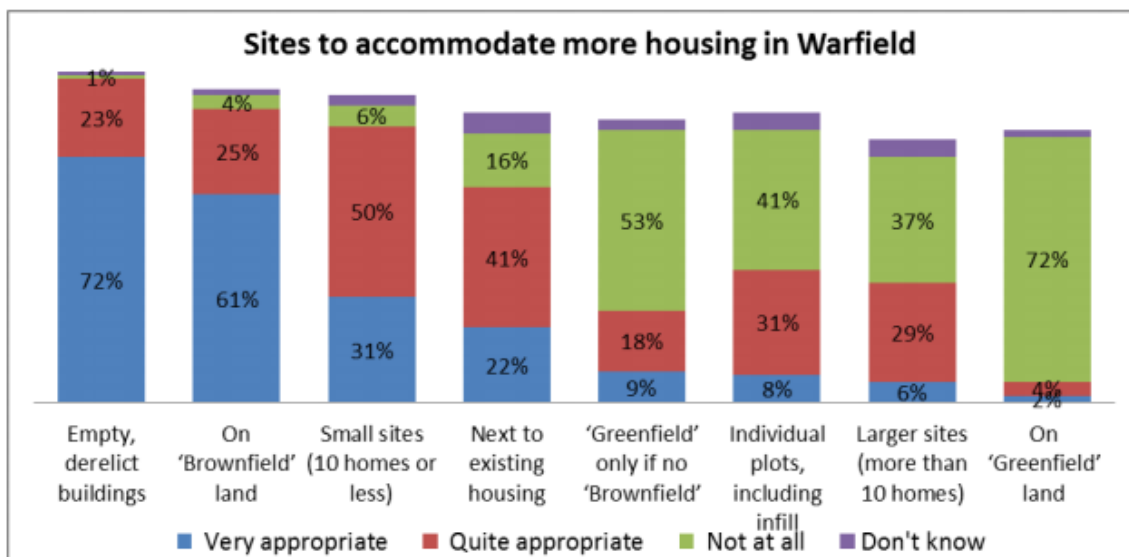
Policy WNP1 is an overarching spatial policy for the Parish for the purpose of delivering the “Vision of Warfield (paragraph 5.9). In this respect, the purpose of the policy is to contribute to the delivery of all the plan objectives to varying degrees. The Parish Council suggest the following list of objectives is inserted after paragraph 5.14

Delivers Plan Objective: A, B, C, D, E, F, G

**4. Please provide justification for the statements in paragraph 5.12 in respect of the 2016 Strategic Housing and Economic Land Availability Assessment (SHELAA) report and the community’s objection to building in the countryside and cul-de-sac developments on the edge of settlements.**

The community’s objection to building in the countryside was expressed in the ‘Summary Report on the 2015 Neighbourhood Plan Survey for the Warfield Parish Council’. The report is available in the supporting documents on the Parish Council Neighbourhood Plan webpage at: [http://warfieldparishcouncil.gov.uk/Neighbourhood\\_Plan\\_40552.aspx](http://warfieldparishcouncil.gov.uk/Neighbourhood_Plan_40552.aspx)

*“There is a high level of resistance to building on ‘Greenfield’ land, even if there is no ‘Brownfield’ available” (page 4 and graph on page 12 reproduced below)*



The reference to cul-de-sac developments on the edge of settlements relates typically to the significant community objections to planning applications on land to the north of Hershel Grange and New Hurst Gardens, Warfield Street.

- 5. Policy CS2 of the Bracknell Forest Core Strategy sets out locational principles for development and the Key Diagram identifies the existing settlements within which priority is given to locating development. These include Hayley Green, Newell Green and Warfield Street in the Warfield parish. Policy WNP1 is titled 'A Spatial Plan for the Parish' and as an overarching policy states that the Neighbourhood Plan 'defines the Settlement Boundaries of Newell Green, Warfield Street and Hayley Green, these areas are shown on the Policies Map'. Policy WNP1 is indicated on Inset Map 1 by a black dashed line and black dashed lines appear to contain policy areas WNP2, WNP3 and WNP4. However, none of those policies refer to settlement boundaries, WNP2 being the Hayley Green allocation whilst policies WNP3 and WNP4 deal with good design in the Newell Green and Warfield Street Character Areas. Nor is the Core Strategy policy area SA9 included within the settlement boundary on the Inset Map 1. The small scale of Inset Map 1 is such that it lacks definition and it is not easy to relate the designations to features on the ground such as roads. Please clarify whether the Settlement Boundaries and the Character Areas are meant to be the same and provide a map to a larger scale showing clearly the settlement boundaries shown on the Core Strategy Key Diagram for policy CS2 and the WNP2, WNP3, WNP4 and WNP5 designation areas.**

The Parish Council thank the Examiner for making these observations in the interests of clarity. We confirm the boundaries for the settlements and the boundaries for the character areas are contiguous.

The larger scale policy maps requested have been attached to this response.

**6. Please provide a redraft of the second part of policy WNP2 and part vi. to clarify when it is expected that the detailed masterplan should be prepared and submitted for approval if it is to be included in the planning application.**

The Parish Council's response (E20b page 8) contained the following redraft of WNP part (vi) in response to the earlier redraft proposed by Bracknell Forest Council (BFC). The policy sets out that the preparation of a masterplan and design code is expected to be approved by the WPC and the LPA **prior to** the submission of any planning application. The revised policy clause, below, is considered by the Parish Council to be consistent with the PPG Design: Process and Tools and specifically with PPG Paragraph: 004 Reference ID: 26-004-20191001

*(vi) A single comprehensive masterplan and design code is prepared informed by the concept layout illustrated in Inset Map 2 and design principles in paragraph 5.20 of this Plan. The masterplan and design code will be submitted for approval by Warfield Parish Council and Bracknell Forest Council prior to any planning applications being submitted for the site.*

**7. Should the scope of policy WNP2 xii. be expanded to require account to be taken of all issues identified in the Planning Practice Guidance on Flood Risk and Coastal Change, including flood risk elsewhere?**

PPG Paragraph: 061 Reference ID: 7-061-20140306 provides guidance on flood risk for neighbourhood planning. To ensure the clause (xii) is consistent with bullet point 3 of the guidance the Parish Council propose the following modification in response to the Examiners question:

(xii) A flood risk assessment and sustainable drainage strategy to demonstrate how the scheme will not increase surface water flood risk on site and on any adjoining land as well as run-off from the completed development, **ensuring the scheme will remain safe over its lifetime taking account of climate change impacts;**

**8. Please advise WPC's view on BFC's suggested changes to policy WNP2 regarding the masterplan.**

WPC has little to add to its rebuttal of BFC's concerns regarding Inset Map 2. The Parish Council's views have been expressed throughout the plan making stages, in the Basic Conditions Statement (paragraph 5.4 – 5.6), and throughout the examination. Most recently, this issue was again dealt with in detail in E20b (Question 9 response) following BFC's further comments on Inset Map 2 in E17 in which they suggested that to remedy their concerns, Inset Map 2 should be removed.

WPC will continue to vigorously defend the Concept Plan. In WPC's judgment, Inset Map 2 provides a technically robust landscape led framework for a sensitive and appropriate design response to the site, offering clear community benefits over the all too often incremental developer led approach to planning applications. In fact, WPC would go as far to say, the Concept Plan is a model of how to go about achieving high quality well-designed places which, as we are reminded by NPPF paragraphs 126 and 127, are fundamental to what the planning and development process should be about - now also expressed throughout the National Model Design Code.

In addition, the Concept Plan is consistent with many of the development principles outlined in the Pre-Submission Local Plan 'Green Infrastructure' Policy (LP16). This states "where new or improved green infrastructure is proposed, the maximum benefit should be achieved by designing it to serve a variety of functions."

There is always more than one design approach that will deliver successful development.

But

what is important about the approach set out in the concept plan in Inset Map 2 is that it has been arrived at through consultation with the community and represents how their settlement should grow, as well as being a framework for delivering a high-quality scheme with a sense of place, which is the core purpose of neighbourhood planning.

The Parish Council would also wish to draw to the Examiners attention procedural letter E7, and the previous Examiners' pertinent references to NPPF 2012 paragraph 183 (now paragraph 29) and Planning Practice Guidance. The parish council believes in the principle of neighbourhood planning being community led, rather than planning authority led.

**9. Please amend Inset Map 2 to delete the reference to Designated Local Green Space (LGS) in accord with paragraph 5.18.**

An amended version is in the Appendix.

**10. Please provide a full reference to the document referred to in paragraph 5.21 which is not listed in Appendix A. Are the references in 5.21 and 5.22 to that document?**

The full reference is: Berkshire (including South Bucks) Strategic Housing Market Assessment: Berkshire Authorities and Thames Valley Berkshire Local Enterprise Partnership Final Report: GL Hearn, February 2016.

The references to SHMA in 5.21 and 5.22 are to this document and WPC agree this should be added to the schedule of evidence in Appendix A. WPC also notes that subsequent evidence (Bracknell Forest Housing Needs Assessment Final Report: Icen Projects Ltd, March 2021) published by BFC since the WNP was submitted, continues to recommend a housing mix which focuses on 1, 2 and 3 bed homes across all forms of tenure.

**11. Please clarify whether the references in policies WNP3, WNP4 and WNP5 to 'the Character Area Study', should in fact be to the WNP settlement assessments which can be found on the WPC's Neighbourhood Plan web page.**

WPC confirm the WNP settlement assessments are the 'Character Area Studies' referred to in 5.25 and in WNP3, WNP4 and WNP5. To provide clarity and consistency with BFC's naming convention used in the Character Area Assessments SPD, WPC suggest the WNP website is amended to refer to WNP 'Character Area Studies' and the entry in the 'Schedule of Evidence' (Appendix A) is amended as follows: WNP ~~Settlement~~ Character Area Studies.

**12. Is policy WNP3i. consistent with the objectives of policy SA9 for a new neighbourhood centre and enhancement of existing areas of open space at Newell Green?**

Yes, the new Neighbourhood Centre is adjacent to, but outside of, the character area boundary.

**13. Given the advice in the Habitats Regulation Assessment (HRA) that a Suitable Alternative Natural Green Space (SANG) should be at least 10ha in size<sup>1</sup> to comfortably accommodate a 2.5km circular walk, is it necessary to refer in policy WNP6 to measures including ‘the provision of a bespoke SANG’, when it is unlikely, outside of the Land at Warfield where SANGs are being provided as part of the comprehensive development, that development proposals coming through the WNP will be of the scale to require such a provision?**

As Policy WNP6 applies to the whole of Warfield Parish, WPC consider it appropriate to retain this requirement whether or not the development proposals come forward directly through the WNP.

**14. Through policy WNP8, the Plan proposes the establishment of a Green Infrastructure Network in the parish. However, the Plan lacks clarity as to what the policy is seeking to achieve and what the Green Infrastructure Policies Map shows. Please explain how ‘the completion of the comprehensive network’ is proposed to be achieved and what new features are proposed to be created by way of this policy.**

WPC would refer the Examiner to the Pre-Submission Policies Map dated June 2017 (page 50)<sup>2</sup>. This provided a comprehensive map of the Green Infrastructure Network (GIN), its key features, principally publicly accessible green space at Frost Folly (now SANG) and Hayley Green, the green space community assets in WNP10, and the interconnecting walking, cycling and bridle routes to connect these features and to align with BFC’s strategic GI proposals in Policy SA9; the ‘Cut Countryside Corridor’ and the ‘Bull Brook River Park’. The policies map was replaced following comments received at Regulation 14 stage. Given the Examiners observations, WPC suggest the GIN map from the Pre-Submission plan is reintroduced to improve clarity on the relationship of various GI features and BFC’s strategic proposals.

Since the WNP was prepared, green infrastructure, access to nature and local nature recovery has risen up the planning agenda, and Nature Recovery is now a key component of the Environment Bill. A representative of the Parish Council and Warfield Environment Group is a member of the Bracknell Forest Nature Partnership which is tasked with implementing the Biodiversity Action Plan, and the Berkshire Local Nature Partnership is now tasked with preparing the Local Nature Recovery Strategy. Completion of the network will be achieved through WPC working with these partnerships, the implementation proposals described in WNP paragraph 6.6 and 6.8. and any major development proposals that may come forward in the Parish in the future.

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<sup>1</sup> Paragraph 5.13 WNP HRA, February 2021.

<sup>2</sup> [http://warfieldparishcouncil.gov.uk/UserFiles/Files/Neighbourhood%20Plan/Warfield-Pre-Submission\\_Publish.pdf](http://warfieldparishcouncil.gov.uk/UserFiles/Files/Neighbourhood%20Plan/Warfield-Pre-Submission_Publish.pdf)

**15. Please give examples of what is intended to be covered by the phrase ‘other amenity requirements’ in policy WNP8.**

This could, for example, include allotments and community orchards.

**16. Policy WNP9 lists three LGS which are shown on the Green Infrastructure Policies Map but at such a small scale, it would be very difficult for any interested person to understand their full extent. Please provide maps of the LGS at an appropriate scale.**

See Appendix, for larger scale Local Green Space policy map. Should the WNP be successfully made, it is envisaged that all the policy map layers will be added by BFC to the online Development Plan policies map.

**17. Please refer me to where I can find the detailed assessment against the criteria at paragraph 77 of the NPPF (2012) of the 3 LGS in policy WNP9. Please confirm the involvement of the respective landowners in discussion prior to their designation.**

A copy of the detailed assessment is attached. Unfortunately, due to the passage of time, WPC are unable to find correspondence with the landowners.

**18. Please refer me to where I can find a plan showing the locations of the community facilities and assets listed in policy WNP10, or provide such a plan.**

WPC do not currently have the resources to produce such a plan, nor does it have access to GIS, but is committed to produce a plan with the help of BFC and to add these layers to the development plan policy map following the examination.

If it will assist the examiner, WPC have noted that in other neighbourhood plans it has been suggested that postcodes are an acceptable means of defining the location of a community asset – particularly where there are many listed – to reflect the expectation that the evidence supporting a neighbourhood plan remains proportionate to the task.

**19. What is WPC’s view on representations that WNP10 should also include Cabbage Hill Park, Frost Folly Park (not just the car park), Quelm allotments and Hayley Green Wood?**

WPC would have no issue with these areas being added to WNP10.

Cabbage Hill and Frost Folly Park are both areas of SANG that have been delivered and adopted by Bracknell Forest Council since the plan was developed. Both these areas are protected by legal agreements and should therefore not be at any risk of loss to the community.

The Quelm Allotments are owned by the Parish Council. This land is protected in law that make disposal or alternative use only achievable with consent of a secretary of state.

Hayley Green Wood lies next to Westmorland Park. It was incorporated into the park in 2002.

There would be no issue with combining these areas, which are illustrated on green spaces map produced for WPC by BFC.

**20. Where is the Forest Park Character Area referred to in paragraph 5.72?**

This area is named in error. It should read Hayley Green, Newell Green and Warfield Street and these character areas are covered elsewhere in the plan.

**21. Please advise WPC's view on the additional evidence provided by BFC in its response of 26/4/21 regarding drainage at Hayley Green.**

WPC's response regarding these drainage issues is included in E20b (final paragraph page 6 and page 7). The note provides details from the surface water drainage technical note prepared by the land promoters of the Hayley Green allocation for their pre-application meeting in January 2019.

**22. Has the proposed updated wording of paragraphs 1.9 -1.12 been agreed with BFC?**

WPC have received no comments from BFC on paragraph 1.9 – 1.12