

REPRESENTATIONS TO THE DRAFT BRACKNELL FOREST LOCAL PLAN REVIEW FURTHER CONSULTATION DECEMBER 2019

On behalf of Bewley Homes

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Bracknell Forest Local Plan
Review, Further Consultation
December 2019

06 December 2019

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Quality Management

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Contents

1	INTRODUCTION	1
2	BROOKFIELD STABLES, WARFIELD.....	2
3	SECTION 5 - SUSTAINABILITY PRINCIPLES.....	5
4	SECTION 6 - HOUSING	6
5	SECTION 9: CLIMATE CHANGE AND BUILT AND NATURAL ENVIRONMENT	14
	APPENDIX A.....	16

Appendices

Appendix A Brookfield Stables, Warfield - Landscape and Visual Appraisal, March 2018

1 INTRODUCTION

- 1.1 RPS Consulting Services Ltd (“RPS”) is instructed by Bewley Homes (“Bewley”) to represent their site interests in relation to the Bracknell Forest Local Plan (“BFLP”) review and to formally respond to the Revised Growth Strategy consultation which is taking place between Friday 25 October 2019 and Friday 06 December 2019.
- 1.2 Section 2 of this document provides a brief overview of the Bewley Homes site located in Warfield, known as Brookfield Stables (“the Site”). RPS consider that this omission Site is necessary to bolster the Council’s supply of housing land and make a positive contribution towards the needs of Warfield.
- 1.3 Section 3 of this document sets out Bewley’s response to the Council’s sustainable development principles.
- 1.4 Section 4 of this submission is concerned with the Councils approach to growth and housing delivery
- 1.5 Section 5 sets out Bewley’s response to policies concerned with climate change and the build environment.

2 BROOKFIELD STABLES, WARFIELD

- 2.1 Bewley propose a development of approximately 60 dwellings of mixed type and tenure alongside the proposed allocation at WNP2 Hayley Green within the Draft Warfield Neighbourhood Plan (“WNP”). Below is an inset of a Location Plan, indicating the extents of the boundary of the site, which and the relationship to the existing built form.

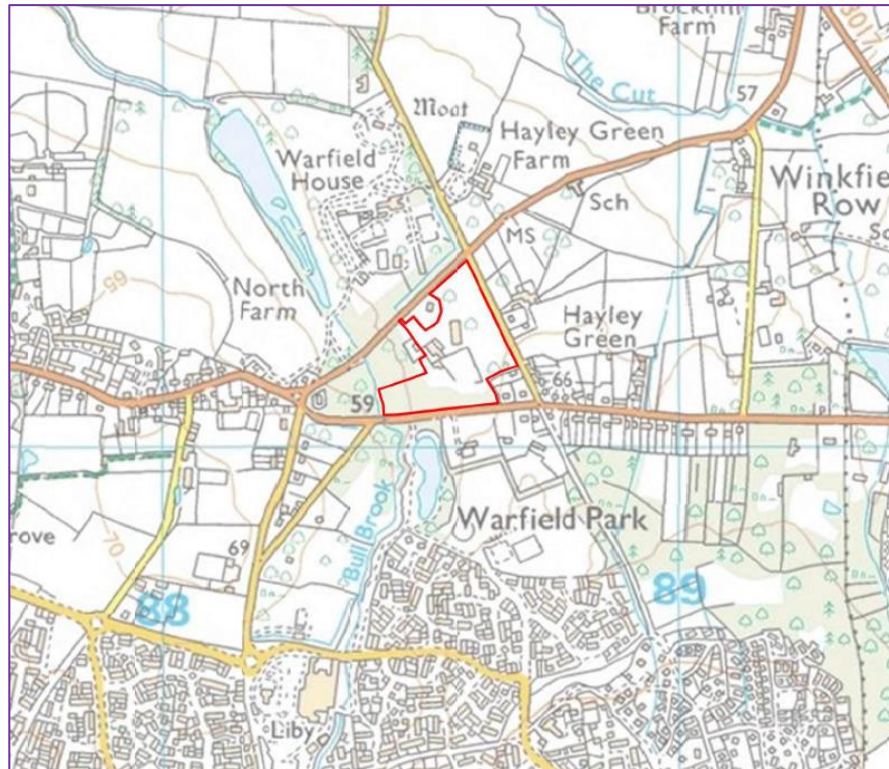


Figure 2.1 Brookfield Stables Location Plan

Site Context

- 2.2 Brookfield Farm is located at the north eastern edge of Bracknell, comfortably the largest settlement within the Borough, with an excellent level of facilities and services accordingly. The site is separated from existing housing within the urban edge of Bracknell, by a distance of less than 250m, made up of public open space, including footpaths and cycle way, linking the two. What is very clear is that the Site is adjacent to the settlement boundary for Bracknell and is considered a natural ex
- 2.3 The site lies directly to the west of the existing settlement of Hayley Green (absent from the Plan above), identified by the Draft Local Plan and emerging Neighbourhood Plan, as an appropriate location for 235 homes and a new primary school. The site itself covers an area of 4.1 hectares and hosts a commercial equestrian business. It is in part considered previously developed.
- 2.4 **Appendix A** provides a copy of the Landscape and Visual Appraisal that details the appearance and contribution to the existing landscape character.

- 2.5 The accompanying Landscape & Visual Appraisal describes in some detail the appearance of the site, and its contribution to the existing landscape character. This includes reference to one of the defining characteristics of the site being the mature treescape that defines the northern, eastern and western boundaries. This vegetation structure not only defines the adjoining street scenes, creating a sylvan character, but reduces the indivisibility between the internal components of the site and the road corridors and wider setting. The mature vegetation is characteristic of this localised setting which creates a compartmentalised character and reduces visibility across the landscape.
- 2.6 Proposed development of the site will give consideration to this landscape character. Whilst detailed plans are not yet prepared for the site, the proposal to introduce circa 60 dwellings over a site in excess of 4 hectares in area, indicates both the intention and ability to retain those elements of the site that contribute positively towards its appearance and impact upon the local landscape character at present.

Planning Considerations

Evidence Base – SHELAA

- 2.7 The October 2019 Strategic Housing and Employment Land Availability Assessment (“SHELAA”) includes the Site under the reference ‘WAR12’. The assessment takes the view that the 4.13ha site can achieve 82 dwellings based on the size area, which would take account of non-developable areas including open space, tree provision and areas of potential flooding.
- 2.8 the 2018 SHELAA concludes that there are no overriding constraints that might prevent the Site from being developed for residential uses, and the Site can be considered deliverable. RPS supports the Council’s assessment of deliverability.
- 2.9 It is also noted that the site is included within a wider parcel of land (titled ‘Cluster 7’), that includes the adjoining land at Hayley Green, proposed as an emerging allocation in the Warfield Neighbourhood Plan. The assessment of this wider parcel is replicated as part of the October 2019 Housing Background Paper, which allows for a more comprehensive review of the area for growth. As part of this assessment, it is noted that WAR12 receives more favourable scoring than the parcel to the east on a number of fronts:
- Landscape – given the flat and enclosed nature of WAR12 (the Site), a medium landscape sensitivity is recorded, which would reduce further if a proposal were to be scaled back to the equine business. In comparison, whilst the majority of the site to the west also records a ‘medium’ landscape sensitivity, the eastern edge has been found to have a medium-high score.
 - Flooding – A small area of WAR12 is recorded as Flood Zone 3 (0.5%) versus the remainder of the wider parcel (0.1%), however the significant difference relates to surface water flooding, which accounts for 21% of the eastern parcel, versus 11% for WAR12.
 - Ecology – It is noted that there are a number of boundary trees in WAR12 noted for potential for bat/bird roosts, however beyond this, the site is considered to have little biodiversity potential. The adjoining land to the east is noted to include UK Priority Habitats, including areas of moderate habitat constraint.

- 2.10 Although RPS does not seek to dislodge the adjoining allocation at Hayley Green, RPS consider that it is important to consider the underpinning evidence base behind the selection of sites. As illustrated by the Council's own evidence, the Site promoted by Bewley, performs strongly against the Council's SHELAA, and performs more strongly as a potential housing allocation on a number of fronts. RPS consider that there is sufficient evidence to support the inclusion of the Site as an allocation in the Plan and, as evidenced elsewhere in this submission, RPS considers that there is a compelling need to allocate more growth through the Plan.

Planning Benefits

- 2.11 Bewley Homes has a great deal of experience throughout Berkshire and surrounding areas and seek to bring a high standard of design and construction, in addition to providing much needed assurances of housing delivery.
- 2.12 Bewley Homes consider that the site can accommodate 60 dwellings at this site, providing 35% affordable on site, compliant with the proposed policy within the Draft Bracknell Local Plan (Policy LP8). The mix of house types and tenure of the housing is proposed to follow local evidence.
- 2.13 The development of the site would make an important contribution to the Bracknell housing supply, which would be developed in the early years of the Plan, and create a high-quality development that would provide a range of sizes and types of market and affordable homes.

3 SECTION 5 - SUSTAINABILITY PRINCIPLES

Policy LP2: Sustainable Locational Principles

- 3.1 As part of Policy LP2, the Council is looking to define a hierarchy of locations that can accommodate growth, however, despite the title of 'locational principles' the policy is only concerned with development within settlement boundaries.
- 3.2 This is not an uncommon approach, and whilst RPS notes that this can give the certainty that Development Management often seek, this approach can also present a rigidity in the planning process, that inhibits sustainable development from taking place. For example, if the Plan is adopted with settlement boundaries that follow the existing format, there would be little opportunity for additional development to a town or village, as this would be contrary to policy, even if it meets all the other provisions in the Plan.
- 3.3 The other issue that the Councils will want to be mindful of is the ability of the Plan to maintain a deliverable supply of housing, an issue that the Council has struggled with in recent years. There in, in RPS' view inherent risks to the Council's strategy if the supply of housing were to falter.
- 3.4 By allowing a positive approach to development on sites adjoining settlement boundaries, the Councils may be able to create greater flexibility through the Plan process and RPS would encourage to look more positively at Policy LP2, allowing a permissive approach a proposal demonstrates that it delivers sustainable development.

4 SECTION 6 - HOUSING

Policy LP3: Provision of Housing

Local Housing Need

- 4.1 RPS does not take issue with the use of the standard method to calculate Local Housing Need (“LHN”), however as a procedural point RPS suggest this should be rebased against a 2020 base date, which will allow for consistency when the Plan is submitted to the Secretary of State.
- 4.2 RPS does however take issue with the way in which the Plan has shortened the Plan period from 2013-2036 to 2019-2036. This measure has been justified in the plan by way of noting that the calculation of LHN operates based from 2019 onwards and as such the start date should also be changed. Whilst the standard method does advocate using household projections as part of the LHN as part of the calculations, this does not have a bearing on the start date for the Plan, and does not justify the change to the base-date of the Plan. If the data in the LHN is moved forward to 2020, would the Council again look to move the Plan forward? RPS considers that constantly moving the goal-posts is not in the interests of a positively prepared plan, as required by the NPPF.
- 4.3 What is more likely is that rebasing the plan is a very simple way of eliminating shortfalls to date. As evident in Figure 4.1 below, the Council has completed 1,879 dwellings since 2013. When compared against the LHN figure of 615 dwellings per annum (“dpa”), this represents a shortfall of 1,196 dwellings, conveniently swept under the carpet.

Year	C3 use (net)	C2 use (net)
No. of dwellings in 2011 (Census)	46,937	Unknown
Net completions 2011-2012	264	Unknown
Net completions 2012-2013	390	0
Net completions 2013-2014	314	0
Net completions 2014-2015	376	0
Net completions 2015-2016	336	-13
Net completions 2016-2017	437	0
Net completions 2017-2018	416	26

Figure 4.1: Bracknell Historic Completions 2013-2018 (Bracknell Housing AMR 2017/18, Table 3.1)

- 4.4 Whilst the Council might seek to argue that past delivery has been captured by the affordability uplifts in the way the LHN is calculated (PPG paragraph 2a-011-20190220), RPS does not consider that the adjustment will be likely to satisfy this shortfall. Unlike some authorities, which see ‘caps’ on affordability adjustments at 40% above household projections, the figure for Bracknell Forest is around 31%. Whilst this does not undermine the need to rebalance the affordability of house prices to earnings in the District, the 31% uplift is, in RPS’ view unlikely to address the specific shortfall of 1,196 dwellings that the Plan would have made provision for.

Housing Supply

- 4.5 Policy LP3 makes provision for 10,455 homes in the Borough for the period 2019/20 – 2035/36. As indicated above, RPS consider that this figure should cover the 20-year period from 2016-2036, which would derive a growth target of 12,300 dwellings.
- 4.6 Notwithstanding this, RPS has reservations with the housing supply, as outlined in Table 11, which only seeks to plan for growth of 1,877 dwellings. This, in RPS' view is insufficient and needs to be revisited.

Commitments

- 4.7 The Council has recorded a sizable number of permissions, recorded on large and medium sites, which total 4,849 dwellings, equating to 46% of the proposed target. If assumed that sites with legal agreements (822 dwellings) can also be given a reasonable degree of certainty, this increases the proportion of development with consent to 54%.
- 4.8 Although RPS does not intend to review these sites at present, the point to be made here builds on that above, which relates to the legitimacy of the Plan period. There is no objection to the inclusion of permissions within sources of supply, but the Council needs to recognise the period in which these were permitted – a large portion of which will no doubt have been approved prior to the base date of 2019.
- 4.9 The need for these permissions, and the policies they were approved against, were approved in the period up to 2019 and as such respond to a need from a different period of time. For the Council to both include these consents and reduce the start date of the Plan would be unsound, in proposing an unjustified strategy that is not positively prepared.
- 4.10 Whilst RPS would recommend that these sources remain in the supply, this should only be done where the start date is moved back to 2013.

Windfalls

- 4.11 As identified above, the Council is proposing that 54% of the forward growth has already been met through commitments, and as such, there is only a need to plan for 46%. Given the limited scope of the Plan, RPS is surprised that the Council is proposing 1,256 dwellings to be met as a windfall allowance of small and medium sites. As expressed in paragraph 15 of the NPPF, plan-making should be genuinely plan-led, and with this in mind, RPS is concerned that leaving 12% of growth to be met on undetermined locations goes against this expectation.
- 4.12 In respect of the evidence base, Section 3.4 of the Council's October 2019 Housing Background Paper ("2019 HBP") sets out the proposed approach for windfalls, based on delivery over the past 10 years. RPS is concerned with the statement in the 2019 HBF which notes the contribution that prior approvals have been making to the windfall supply (paragraph 3.4.4 refers). Although the Council has applied a 50% discount rate for such developments, RPS considers that even this is too optimistic for future forecasting which has not accounted for the potential capacity of such sites – RPS consider that most of this has now already been accounted for. Additionally, RPS note that

within the 10-year period assessed by the Council, in many of these years, the Council has been unable to demonstrate a 5-Year Housing Land Supply (“5YHLS”) which has enabled development beyond the Council’s allocations. This, in RPS’ view, affects the legitimacy of the Council’s trend-based approach to windfalls.

- 4.13 RPS does not consider that the proposed approach is justified, and gives no certainty that the approach will lead to sustainable outcomes for the District. RPS consider that a more positive approach would be to make residential allocations in more sustainable areas for growth, which will provide certainty of delivery, and allow for implications such as infrastructure needs to be better captured through the Plan.

Policy LP4: Sites Allocated for Residential/Mixed Use Development

- 4.14 RPS object to the way Policy LP4 is framed, including the specific identification of the Land at Hayley Green, Warfield, which anticipates delivering 235 dwellings within the plan period. RPS considers the Council’s approach to be flawed in identifying a site that is also currently identified in the submission version Draft Warfield Neighbourhood Plan (“WNP”), but which has not yet passed through the examination stage nor been subject to referendum. The site, as proposed in the WNP, is also the subject of a number of fundamental objections on which the Examiner has not yet reported on. Therefore, given the significant delays (and uncertainties) acknowledged by the Council in the examination of the WNP (the WNP was originally submitted nearly a year ago in January 2019) RPS objects to the reliance on this site through the Local Plan as part of the overall land supply identified for Bracknell Forest.
- 4.15 Paragraph 31 of the NPPF states that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence, and this should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned. This is particularly important when considering the approach to site selection (and rejection) of proposed allocations and reasonable alternatives.
- 4.16 In this regard, RPS considers that the process followed in promoting this site is not consistent with the SA or other aspects of the evidence base, in particular relating to the exclusion of Brookfield Farm, Bracknell Road (SHELAA Site WAR12) from the Plan allocations, and therefore is not soundly-based.
- 4.17 Land at Brookfields Farm (WAR12) was originally submitted in response to the ‘call for sites’ request in January 2016. The Bracknell Forest Strategic Housing and Economic Land Availability Assessment (SHELAA) Part 2, published in August 2017, found the site to be ‘*potentially developable*’ (though Bewley Homes maintains it’s view that the site is deliverable) *within the next 15-year period with an estimated capacity of 83 dwellings*’ (CLP.EV.10f, p126). The SHELAA 2017 also assessed the site as part of a larger parcel (or ‘cluster’) and also found the wider parcel (Cluster4) to be potentially developable (CLP.EV.10f, p243). This conclusion has remained broadly unchanged through subsequent SHELAA updates issued since then, with the latest assessment,

published in October 2019, finding that development on site WAR12 '*could take place within the next 6-10 years*' (LP.EV10n, p141).

4.18 However, despite the consistently positive assessment of the site through the emerging SHELAA evidence base, the site was excluded from the Draft Bracknell Local Plan (DBLP 2018), published in February 2018, as a potential site allocation for housing. The reason for the site's original omission is set out in the Draft Sustainability Appraisal (SA) 2018 issued alongside the DBLP 2018, which states:

" Falls within local gap identified in the Pre- Submission Warfield Neighbourhood Plan – allocation could prejudice approach to development in Hayley Green"¹

4.19 RPS considers that this reasoning is based on a 'policy' consideration and not derived from the actual appraisal of significant effects of the site (as a 'reasonable alternative') against the sustainability objectives that meets the legal requirements, as required by national policy (NPPF, para 31). Indeed, the SA draws no conclusions on the sustainability impacts from development on the site.

4.20 The acknowledgement of the emerging 'Local Gap' policy in this area, being progressed through the Warfield Neighbourhood Plan, was also referenced in the Council's Housing Background Paper February 2018 as part of the reasons for excluding the wider Cluster within which WAR12 was situated (Cluster 4) (LP.EV.2e, p346). In coming to this conclusion, no reference was made to WAR12 and so it is unclear how the site assessment informed the exclusion of WAR12 at the Draft Plan stage.

4.21 In addition, RPS questions the legitimacy of applying an emerging policy (Policy WNP7) that had no weight in the development plan process at the time (nor at present). Furthermore, even if the emerging policy did have sufficient weight to be applicable to the assessment of higher order site allocations being considered through the Local Plan, the policy that seeks to preserve such gaps, of itself, does not preclude development as a matter of principle. Rather, the emerging policy '*...seeks to prevent development that will undermine the visual integrity of the gap to the point where the settlements coalesce...*'². RPS considers that too much weight is being given to this single consideration as a principal reason for excluding WAR12, rather than taking into account the full range of factors that inform the assessment of the site, which clearly suggest that the site is 'developable' based on other aspects of the evidence base referred to above.

4.22 On this basis, RPS considers that the exclusion of WAR12 at the draft Local Plan stage was not adequately justified and so was not soundly-based.

¹ Draft Sustainability Appraisal (SA) (incorporating Strategic Environmental Assessment) of the Draft Bracknell Forest Local Plan, Table 17, p109

² Warfield Neighbourhood Plan Submission Version (October 2018), para 5.41

- 4.23 As part of this latest consultation, the Council has updated the SHELAA, Housing Background Paper and SA. However, it is evident that the assessment of individual sites has not been undertaken on a consistent basis across the different evidence documents, nor have any firm conclusions been drawn on the appropriateness of the individual sites, including WAR12. In terms of updated SA for the Draft Local Plan (October 2019) the appraisal has re-considered each site. However, once again the SA fails to draw any firm conclusions on the overall sustainability of development on the sites, including WAR12, instead simply presenting the appraisal against each SA objective (as set out in Table 8 to 11 of the updated SA).
- 4.24 Appendix 4 of the updated SA is claimed to address more detailed considerations that have informed the updated appraisal however, in respect of WAR12, this has only considered the wider Cluster (now Cluster 7) and presents no information on the detailed consideration of each site. Consequently, it is not clear what analysis been done at the site-level to inform the summary appraisals set out in Table 8 to 11 for each site. Furthermore, the SA does not set out anywhere which sites have been selected and rejected, and why. On this basis, the updated SA lacks sufficient detail in order to test the findings on each site and so is not considered to be justified and, thus, is not soundly-based.
- 4.25 Similarly, the updated 2019 Housing Background Paper also dated October 2019 (“2019 HBP”), fails to present a consistent analysis of all sites in order to justify the proposed site allocations now preferred. Instead, the paper only assesses the wider Cluster (Cluster 7) to which WAR12 is assigned. It does, however, make intermittent references to the two sites that are excluded; WAR12 and (to a much lesser degree) WAR14, and does not make any specific reference to any of the sites that are taken forward. On a very basis level, RPS consider that the Sustainability Appraisal and Housing Background Paper have merely sought to highlight potential negatives with certain specific sites as a basis for their exclusion from the Plan in order to explain the reasons for why certain sites have been selected and why others have been rejected.
- 4.26 Consequently, RPS considers that the evidence does not adequately deal with the reasoning behind the selection and rejection of each site and, thus, the proposed site allocations are not sufficiently justified and, for the reasons set out above, the Plan is not soundly-based.
- 4.27 It is also noted, that although the Land at Hayley Green is in single ownership, the SHELAA prepared in October 2019 states that there is no developer/house builder currently involved. To the contrary, the Brookfields Farm site (WAR12) is under the control of Bewley Homes who has had an interest in the site for a number of years and is now fully engaged in pursuing development of the site.
- 4.28 The Site is proposed for allocation as a Strategic Gap (under Policy LP18), this will be addressed further in these representations. Brookfield Farm, alongside the Land at Hayley Green, was considered within the Landscape Sensitivity Appraisal. Brookfield Farm was considered as ‘*medium*’, similar to Hayley Green, however half of the Hayley Green site to the east is considered at ‘*medium-high*’. This begs the question as to why Brookfield Farm, a site that has less of an

impact on the landscape sensitivity of the area, has not been considered suitable for development ahead of Land at Hayley Green?

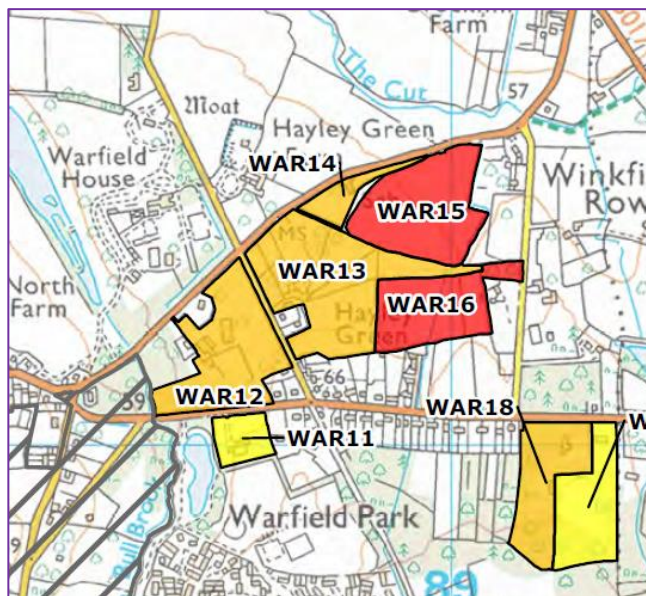


Figure 4.1: Landscape Sensitivity Map

4.29 Based on the foregoing analysis, RPS has serious concerns with the robustness and credibility of the Council’s approach to the selection (and rejection) of potential sites, in particular with reference to Brookfield Farm, Bracknell (WAR12). RPS suggests the Council should revisit it’s approach in order to properly explain for all interested parties how it has decided on the preferred strategy for the site allocations set out in the Plan.

Policy LP7: Land at Jealotts Hill, Warfield

4.30 Land at Jealotts Hill is one of the more significant additions to the Council’s Revised Growth Strategy. This is a significant site of c240ha, included by the Council on grounds that Jealotts Hill of national/global importance in terms of agricultural technology.

4.31 As part of this proposal, the Council wish to see the delivery of 4,000 new homes, of which 1,200 would be delivered in the Plan period (up to 2036) and 132,800 sqm of employment floorspace, including a Science and Innovation Park.

4.32 RPS has a number of concerns with this proposal, which is considered not only to be contrary to national policy as a significant intrusion into the Green Belt, but also in respects of the role to housing delivery within the Plan period. These factors are explored below, though in summary, RPS consider that the housing portion of the proposal of Jealotts Hill could be better met elsewhere, and a strategy for growth in alternative locations should be considered as a reasonable alternative.

Principle of Development

4.33 The Council is keen to note the inclusion of Jealotts Hill is of paramount importance to the Plan, as a site of global importance to agri-technology and science and innovation. For this reason, the

Council consider that the Exceptional Circumstances (“ECs”) of NPPF paragraph 136 have been met.

- 4.34 Paragraph 136 requires that Green Belt boundaries should only be altered where ECs are **fully evidenced and justified** (RPS emphasis). In terms of the Council’s evidence base here, there is a distinct lack of evidence to justify the development in the Green Belt, which is reflected in the cursory treatment of the matter as part of the consultation Plan, and the Council’s 2019 HBP.
- 4.35 The Council has provided no assessment of whether such a proposal can be met elsewhere, outside the Green Belt, or whether there are other, more suitable locations that would better meet the needs of this opportunity site. The Council will be mindful of Policy 137 of the NPP3, which now requires that *“the policy-making authority should be able to demonstrate that it has **examined fully all other reasonable options for meeting its identified need for development**”* (RPS emphasis in bold).
- 4.36 The concern that RPS has, is that the Council has failed to demonstrate that all other reasonable options beyond the Green Belt have been considered. Although the Council express a clear intention to see the development of the site to support the growth aspirations of Syngenta, no consideration has been given to whether the residential component of growth could be better met elsewhere, including on sites outside of the Green belt.
- 4.37 This is an issue which is not only absent from the Green Belt tests to support the Plan, but also in the assessment of reasonable alternatives as part of the Sustainability Appraisal.
- 4.38 The Council will be aware that Bewley are promoting land at Brookfield Stables for around 60 dwellings through the Plan. It is expected that there will be a number of other omission sites also being promoted outside of the Green Belt, which could collectively contribute towards residential growth in the District as a reasonable alternative to the Council’s plans at Jealotts Hill. This has however failed to be considered by the Council. There can be no assurances that the Council has explored all other reasonable options and as such fails the tests of NPPF3 paragraph 137.

Delivery

- 4.39 Policy LP7 indicates that around 1,200 dwellings can be expected from this Site and the Housing Trajectory for the Plan (Appendix 2) indicates that this is likely to occur from 2027/28 with initial delivery of 50 dwellings, to run at 150 dwellings per annum thereafter.
- 4.40 In respect of lead-in times, the Council has allowed for 7 years before completions can be expected in 2027/28. Whilst this may be seen as a significant period, RPS considers that there is an element of naivety on the Council’s part, given the significance of the proposal and the necessary infrastructure, this date is too ambitious.

- 4.41 By way of comparison, RPS is aware of a national analysis prepared by Lichfields, which considers lead-in times on around 200 housing schemes of varying sizes across the country³. Aligning with this assessment, Jealotts Hill would fall into the '2,000+' category, despite being twice the size of this cohort. For a site this size, the Lichfields study found that the average time taken to see a first completion on site would be 8.7 years following submission of application. At present, no application has been lodged on this site and, given the complexity of such an application involving the need to release the site from the Green Belt, none is expected until after the approval of the Local Plan. On the basis that the Council considers that the Plan will be adopted in early 2021 (page 11 of the February 2019 Local Development Scheme) an application is unlikely to be determined until summer/autumn 2021 at the very earliest. Combining this information together, as a suitable proxy for lead-in times, it is considered that delivery from 2030 is more realistic, subject to consent of the scheme. This would have the effect of pushing delivery of the scheme back three years, removing c400 dwellings from the supply.
- 4.42 In respect of delivery rates, Appendix 2 of the Plan indicates that at peak, around 150 dwellings could be expected from the site. As indicated in the Council's 2019 HBP, CEG and Taylor Wimpey are currently promoting the scheme as a joint venture, and if it is assumed that the two companies would control delivery of the site, this would see in the region of 75dpa per outlet. In RPS' view this remains an optimistic estimation. The 2018 Lichfields study has also undertaken a review of build rates. Whilst this does not equate delivery to the number of flags on a particular site, for a scheme of 2,000 or more, the study finds that an average of 139dpa can be expected of a site this size, which places the Council's estimates on the higher side of delivery.
- 4.43 RPS consider that the Council's estimates of delivery for this site to be overly-optimistic and, at the very least, the site should be moved back 3 years to allow for sufficient lead-in time to allow for the planning process and to better understand the infrastructure requirements for the site.

³ 'Driving housing delivery from large sites: What factors affect the build out rates of large scale housing sites? Lichfields, October 2019

5 SECTION 9: CLIMATE CHANGE AND BUILT AND NATURAL ENVIRONMENT

Policy LP18: Separation of Settlements

- 5.1 Bracknell describes the separation of settlements as land which physically and visually separates open areas of land which are typically undeveloped areas and being close to/adjoining defined settlements. With the function of preventing coalescence of distinct and separate settlements, the Council indicate that Policy LP22 is not a blanket policy for protection, but instead proposals will need to demonstrate that landscape functions related to the separation of settlements has not been compromised.
- 5.2 As identified as part of Draft Policies Map 2, the majority of Policy LP18 operates to the south of the B3034, occupying land between settlements. The exception to this is the parcel of land controlled by Bewley Homes at Brookfield Stables, which sees LP18 jut out beyond the B3034.
- 5.3 RPS does not consider that the inclusion of this land within the LP18 gap is justified or effective and should be amended to remove the site from the proposals map. This is all the more evident when considering the context for development to the north of the B3034, which includes 'Land at Hayley Green' as an emerging proposal under Policy LP4.
- 5.4 This policy mirrors the approach of the emerging Warfield Neighbourhood Plan ("WNP") which identifies the Site as a local gap as part of emerging Policy WNP7. Although RPS note that the Neighbourhood Plan is currently at Examination, crucially, the WNP does not benefit from the same strategic context as the BFLP, which requires that growth aspirations for the Plan area are considered. As explored elsewhere in these representations, RPS considers that a greater provision of housing growth needs to be made through the Plan, which will require adjustment to the boundaries as currently drafted, including the extents of LP18.

Supporting Evidence Base

- 5.5 It is noted in the Council's reasoned justification to LP18 that this is not a landscape policy, but one designed to ensure the distinct character of settlements. This being said, what remains clear that LP18 is devoid of a relevant and up to date evidence base, as required by NPPF3 paragraph 31. As part of the key evidence to the Policy, the Council refers to the document titled 'Landscape Character Assessment Landscape Recommendations' (LUC, September 2015) and this document itself relies on an older Assessment of Gaps/Green Wedges evidence base document prepared by Entec in 2006. What is clear is that this evidence was drafted at a time of different growth expectations in the District, the latter report landing prior even to the original 2012 NPPF.
- 5.6 RPS disputes the credibility of this blanket approach, which does not meet the purposes of NPPF3 paragraph 31, in ensuring that all policies are underpinned by a relevant and up-to-date evidence base. In this regard, RPS considers the policy deeply flawed and unsound.

The Council indicate that the operation of LP18 is linked to Development Management Policy LP35 'Landscape Character and Separation of Settlements (was referred to as LP12). In terms of guidance, Policy LP35 notes that: "*Within strategic gaps development will only be supported where it can be demonstrated that it would not adversely affect the gap's function and not unacceptably reduce the physical and visual separation of settlements either within or adjoining the borough*".

5.7 Notwithstanding RPS' view that Bewley's Site should be removed from Policy LP18, Bewley have already given consideration to how the Site could be delivered, which is sympathetic to the above principles. As indicated in Figure 5.1, the potential developable area of the Site has been identified, which would broadly correspond to the land take of the existing equine business, along with curtilage land. Alongside the developable land, the area that can be set aside for landscape buffering has also been identified, which builds upon the already strong boundary planting.

5.8 It is expected that the Site can be developed both in isolation and/or alongside the Council's proposed allocation at Hayley Green. Importantly, through the consideration of landscape principles from the outset, RPS consider that the Site could be delivered in accordance with LP18 as currently drafted.



Figure 5.1: Brookfield Stables – Constraints and Opportunities Plan

APPENDIX A

BROOKFIELD FARM,
WARFIELD

Landscape and Visual Appraisal

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CONTENTS

1	INTRODUCTION	1
2	BASELINE ASSESSMENT	2
3	POTENTIAL LANDSCAPE AND VISUAL EFFECTS	9
4	SUMMARY AND CONCLUSIONS	16

PLANS

PLAN ASP1	SITE LOCATION PLAN
PLAN ASP2	SITE AND SETTING
PLAN ASP3	OPPORTUNITIES AND CONSTRAINTS PLAN

APPENDICES

APPENDIX 1	PHOTOGRAPHIC RECORD
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1. INTRODUCTION

- 1.1. Aspect Landscape Planning is instructed by Bewley Homes to review the potential landscape and visual matters relating to the allocation of land at Brookfield Farm, Warfield for the provision of residential development. The site is illustrated on Plan ASP1.
- 1.2. The purpose of this appraisal is to accompany the representations to the Draft Bracknell Forest Borough Local Plan consultation providing a review of the existing landscape character and visibility of the site and its ability to accommodate development. This appraisal covers landscape and visual matters and should be read alongside the other submissions that accompany this representation.
- 1.3. This appraisal will take the following format:
 - Review of baseline conditions;
 - Identification of potential landscape and visual effects, with suggested approach to mitigation; and
 - Conclusions will be drawn
- 1.4. This appraisal does not represent a detailed Landscape and Visual Impact Assessment (LVIA) but has been prepared in line with guidance set out within GLVIA3, the industry best practice guidance. It is considered that if the site is allocated a detailed LVIA would be prepared as part of any planning application for development on this site.

2. BASELINE ASSESSMENT

- 2.1. The site currently comprises an established stables development that is located on the B3022 (Bracknell Road), just to the west of Hayley Green. The site lies within the wider setting of Bracknell which lies approximately 270m to the south. The site's location is shown on Plan ASP1.
- 2.2. The site is bound on three sides by road corridors, with Bracknell Road to the north, Hayley Green to the east and Forest Road to the south. The western boundary is defined by a garden boundary with Rose House which lies immediately to the west. This is a large detached residential property with gardens extending to the south and west. A parcel of land separates this property from the junction with Warfield Street to the west. Several detached properties are located in the south eastern corner of the parcel, adjacent to Hayley Green and Forest Road. These properties are excluded from the site.
- 2.3. The site is separated from the wider urban area of Bracknell by North Lodge Farm, the residential cul-de-sac The Limes and Westmorland Park to the south. Beyond the public open space, the suburban, residential areas that define the northern edge of the settlement extend to the east, south and west. To the north of the Bracknell Road streetscene lies Warfield House, which is set back from the road corridor within mature landscaped grounds. Evergreen planting within the gardens of this property characterise the northern side of the road and reinforce the local compartmentalised character and contains views of the property from the south. To the east, beyond the Hayley Green road corridor lies an area of open grazing land, with a number of semi-detached properties and collection of stables located towards the junction with Forest Road. These properties form the western edge of the hamlet known as Hayley Green. The site is separated from the settlement of Warfield Street to the west by the Bull Brook watercourse, a parcel of overgrown land and the Bracknell Road streetscene.
- 2.4. As noted above, the site currently comprises an established stables development and comprises, a number of stables, barns and outbuildings, hardstanding yards, horse walker, gallops and manege. The farmhouse associated with Brookfield Farm is excluded from the site. The existing components of the site are illustrated on Plan ASP2. Several of the barns are large agricultural sheds used as indoor arenas and storage. The majority of the built form is located within the north western part of the

site, with the horse walkers located to the east. Some attempts have been made to integrate the horse walkers into the local landscape with evergreen planting surrounding these features. However, the circular managed evergreen hedgerows do not reflect the wider rural character, instead evoking more of a domestic scale, garden character. Access to the stables is from Bracknell Road in the north western corner of the site.

- 2.5. One of the defining characteristics of the site is the mature treescape that defines the northern eastern and western boundaries. This vegetation structure not only defines the adjoining streetscenes, creating a sylvan character, but reduces the intervisibility between the internal components of the site and the road corridors and wider setting. The mature vegetation is characteristic of this localised setting which creates a compartmentalised character and reduces visibility across the landscape.
- 2.6. The site is located within a very gently undulating landscape which, when combined with the mature vegetation structure that characterises the localised landscape setting, ensures that an enclosed, more intimate landscape is achieved, with very few middle or longer distance views.
- 2.7. The site is not publicly accessible and there are no footpaths along Bracknell Road and Hayley Green to the north and east respectively. A footpath runs along the northern side of Forest Road adjacent to the southern boundary of the site, linking the hamlet of Hayley Green to Warfield Street to the west. Pedestrian and cycle access is also available into Westmorland Park to the south west of the site, on the opposite side of Forest Road.

Landscape Related Policy

- 2.8. The site is not subject to any qualitative landscape designations at a national or local level. Within the Bracknell Forest Borough Local Plan, the site is shown to be located outside of the settlement boundary, within Countryside (which is not a qualitative landscape designation) but is not located within any of the Strategic or Local Gaps as identified within the Core Strategy. Nor is the site subject to any heritage or ecological designations within the adopted or emerging policy framework.

- 2.9. It is noted that the site appears to be indicated as a Local Gap within the draft Warfield Neighbourhood Plan (policy 4). This is not a specific landscape designation relating to quality and is not reflected in the adopted Core Strategy or emerging Local Plan. The gap seeks to maintain the separation between Hayley Green and Warfield Street.

Landscape Character

- 2.10. At a regional level, the Natural England Character Map of England illustrates that the site is located within the Thames Valley NCA. The regional assessment identifies that this area is characterised by a number of features, including:

- **“Flat and low-lying land, rising to low, river-terraced hills, which include the prominent local outcrop of chalk on which Windsor Castle sits.**
- **The numerous hydrological features provide unity to an area which otherwise lacks homogeneity; these features include the River Thames and its tributaries, streams, lakes, canals and open waterbodies (the result of restored gravel workings).**
- **Farming is limited. Where it survives, grazed pasture is the major land use within a generally open, flat and featureless landscape. The field pattern is medium-scale and irregular, with smaller fields to the west. Localised areas of species-rich hay meadows provide a splash of colour in summer.**
- **Although densely populated and developed, pockets of woodland, open grassland, parkland, wetlands and intimate meadows provide escape and tranquillity, and include a variety of habitats supporting important populations of many species, notably stag beetle, shoveler, gadwall and other invertebrates and wildfowl.**
- **To the south, the open Thames flood plain dominates, with its associated flat grazing land, becoming characterised by a number of formal historic landscapes on higher ground. Between Hampton and Kew, the River Thames forms the focus of a series of designed landscapes.**
- **The area has an urban character, and there are very few villages of more traditional character, although almost half of the area is greenbelt land and development has been restricted in areas like Crown Estate land and Eton College grounds.**

- **The river is closely associated with numerous historic places and cultural events, such as the signing of Magna Carta at Runnymede. Tourists from all over the world are drawn to the rich heritage of the area, flocking to attractions like Hampton Court Palace and Windsor Castle.**
- **The area is important for recreation, both for residents and visitors. Historic parkland and commons provide access to green space, the Thames Path National Trail runs the length of the NCA, and a variety of activities are enjoyed on the river and other waterbodies.”**

2.11. At a more local level, the Bracknell Forest Borough Landscape Character Assessment (September 2015) identifies that the site is located within the south eastern corner of the Binfield and Warfield Clay Farmland Landscape Character Area (LCA C1). The assessment identifies that this area is characterised by a number of features, including:

- **“Underlying clay geology, cut by water courses including the Cut River creating a gently undulating landform with mid-distant views across grass and arable fields to low ridgelines and wooded horizons.**
- **A farmed, working landscape of medium to large sized fields of mixed arable and pasture, and smaller fields around the edges of villages.**
- **Small deciduous woodlands and well-managed hedgerows provide rhythm and emphasis to views across the landscape.**
- **Quiet and rural character with limited scattered settlement well integrated into the landscape.**
- **Historic manor houses sited within remnant parkland landscapes, often hidden from view behind high fences or coniferous boundaries.**
- **Rural lanes bordered by hedgerows, grass verges and ditches.”**

2.12. As part of the evidence base for the emerging Local Plan, it is noted that the site was assessed as part of the Landscape Sensitivity Appraisal of Potential Housing and Employment Sites in Bracknell Forest Borough (February 2018), prepared by LUC on behalf of the Borough Council. The site is identified as WAR12 and is identified as having a Medium sensitivity to residential development. The overall assessment of the site concludes that:

“The site is flat and enclosed by trees which reduce visual sensitivity. The character of the site is influenced by the existing built development

associated with its use as an equestrian centre. However, the presence of valued landscape features such as mature trees across the site and the potentially poor relationship with the existing settlement form increases sensitivity giving it a medium sensitivity overall. If development were confined to the existing footprint sensitivity would be reduced.

The vegetation around the boundaries of the site is particularly sensitive while previously developed areas have lower sensitivity.”

2.13. In addition, the Sensitivity Appraisal includes some guidance which it recommends any development on this site should incorporate. This guidance includes:

- **“Locate development within existing developed areas and retain wooded buffers to screen development from the wider countryside;**
- **Ensure the area retains its role as an apparent ‘wooded gap’ between Warfield Street and Hayley Green when travelling along Forest Road;**
- **Ensure development does not result in the loss or fragmentation of protected trees or tree clusters, in particular standard oaks which are distinctive landscape features and reinstate appropriate woodland management;**
- **Provide further woodland and tree planting that is characteristic of the clay farmland landscape as part of an integrated green infrastructure network connected to the surrounding landscape, to protect visual amenity and to help integrate new development into its landscape setting;**
- **Reinstate native hedgerows in place of existing post and rail fencing where there are opportunities to do so;**
- **Ensure new development responds to the character of the site, taking into consideration its setting in the wider landscape through use of architectural design and materials. Refer to Design SPD (2017) and the Northern Villages study area of the Character Area Assessment SPD (2010);**
- **Conserve the leafy rural character of the lanes bordering the site, particularly along the eastern boundary by retaining grass verges and vegetation and enhance their leafy character with additional hedgerow and tree planting;**
- **Protect the naturalistic character along the Bull Brook watercourse;**

- **Retain and strengthen the green infrastructure links between the site and the surrounding landscape, particularly the wooded corridor along the Bull Brook watercourse;**
- **Promote further opportunities to increase access and enjoyment of the landscape in association with any new development, by promoting recreational links between the site and the surrounding countryside;**
- **Light pollution from new development should be minimised to maintain rural character and dark skies.”**

2.14. Aspect has undertaken an assessment of the local character and site in relation to the criteria set out within Box 5.1 of GLVIA3. The site currently comprises a private stables development which incorporates a number of buildings and equine related facilities internally. The key landscape features associated with the site are the mature trees which define the northern, eastern and southern boundaries. These reinforce the local compartmentalised character and are therefore representative of the local landscape. However, the internal features of the site do not contribute to local landscape. The development has altered the landscape quality of the site, removing it from agricultural use and reducing the perceived openness and tranquillity associated with the site.

2.15. The site is not visually prominent as a result of the boundary planting, but where glimpsed views into the site exist, the existing built form associated with the stables reduces the visual qualities. The site is not publicly accessible and therefore does not have a recreation value. The site is not subject to any heritage designations and therefore does not have any historic conservation value. The undeveloped parts of the site comprise semi-improved grassland used for the grazing of horses and is of limited ecological value. The key features, in this respect are the boundary trees and hedgerows which offer some ecological value. It is considered that, with reference to Box 5.1 of GLVIA3 the site itself is of medium / low landscape value.

2.16. The proximity of the site to the existing urban area, with pedestrian and cycle access into Bracknell from the south represents an accessible and sustainable location. The key landscape features associated with the site are the boundary trees which reduce intervisibility between the site and localised setting, reinforce the local compartmentalised character and are of some ecological value. There are very few internal features of landscape note and as such it is considered that the landscape of the site has some capacity to accommodate sensitively designed residential

development. The susceptibility of the site to residential development is considered to be low. Given the assessment of value above, it is considered that the site is of medium / low sensitivity.

Visual Environment

- 2.17. As noted above, the compartmentalised character of the site and localised landscape setting contains middle and longer distance views towards the site. Publicly accessible views of the site are limited to the road corridors to the north, east and west. The lack of pavements along Bracknell Road and Hayley Green mean that the primary receptors of these views will be motorists. These are considered transient receptors, who are passing through the landscape at speed. The sensitivity of views from the north and east is therefore reduced.
- 2.18. A pavement runs along the northern side of Forest Road, parallel to the southern site boundary, providing pedestrian access between Hayley Green, Westmorland Park and Warfield Street to the west. Primary receptors will continue to be motorists, however, it is acknowledged that pedestrians will also appreciate views immediately from the south. Several photographs have been taken illustrating the site within its immediate context and these are included within Appendix 1. For reference these views have been taken with a wide-angled lens, rather than at 50mm as you would find within an LVIA, to show the localised setting of the site and the maturity of the associated treescape.

3. POTENTIAL LANDSCAPE AND VISUAL EFFECTS

- 3.1. The Landscape and Visual Appraisal does not include a detailed assessment of effects, but seeks to assess the principle of introducing residential development into the site within the context of the receiving landscape and visual environment as identified within the baseline assessment.
- 3.2. This section will provide an overview of the possible effects in terms of landscape character and visibility if the site were to be developed in an unsympathetic, non-landscape led way. The assessment then includes a series of recommendations for development to avoid or mitigate for the potential identified harm.

Potential Landscape Effects

- 3.3. The development of this site could give rise to potential significant landscape effects including:
- Over development of the site
 - Reduction in perceived openness
 - Loss of key landscape features
 - Increased intervisibility of built form
 - Loss of habitats
 - Reduction in perceived tranquillity
- 3.4. To avoid these potential adverse effects, it is recommended that development is limited to the existing developed parts of the site, with generous landscape and open space buffers provided to the eastern and southern parts of the site. Development already characterises part of the site and it is considered that a sympathetically designed development of circa 60 units could be accommodated within the site without compromising the wider landscape setting. Maintaining broad buffers to the eastern and southern boundaries will also ensure that the perceived openness of the site is not compromised. It is recommended that access is taken from Bracknell Road to the north, using the existing site access. This will limit impacts upon the boundary planting while using an established site access within the Bracknell Road streetscene.

- 3.5. Any development within the site should seek to protect the mature treescape associated with the northern, eastern and southern boundaries. The mature treescape to these boundaries forms the key landscape feature associated with the site. Based on the suggestion above that development should be located within the north eastern parts of the site, the protection of the boundary planting is achievable, with opportunities for public open space wrapping around the eastern and southern edges of the development and forming a buffer to the retained treescape. In addition, this vegetation can be reinforced through new native planting that will reinforce the tree stock and ensure the long term maintenance of the compartmentalised character of the site. The use of locally prevalent species will not only ensure that the vegetated boundaries are enhanced, but will also represent a positive contribution to local biodiversity.
- 3.6. The site already has a high degree of visual enclosure as a result of the boundary planting and, as set out above, any development proposals should retain and reinforce this planting. This will ensure that built form within the site, as part of any new development, will be afforded a significant degree of containment from Day One. The reinforcement of these boundaries with additional planting will also enhance the degree of enclosure. New development should be set back from the eastern and southern boundaries to ensure that built form is not readily perceived from the adjoining streetscenes. Glimpsed views of the existing built form are available from Bracknell Road, immediately to the north. The existing built form is of limited architectural merit and there is an opportunity to introduce a high quality scheme that has been influenced by the local vernacular and is located within a landscaped setting.
- 3.7. The creation of landscape buffers and public open spaces around the eastern and southern boundaries present an opportunity for the creation of new habitats. At present, the undeveloped parts of the site are predominantly semi-improved grassland used for grazing horses. The creation of new open space as part of the development of this site presents opportunities for the establishment of areas of native wildflower grassland, shrub planting and woodland. The open spaces will also extend the green corridor north from Westmorland Park.
- 3.8. In terms of the perceived tranquillity of the site, this is reduced as a result of the existing development associated with the site and the road corridors that lie to the north, east and south. Ensuring an appropriate offset from the eastern and southern

boundaries, together with the reinforcement of the boundary planting will ensure that the perceived tranquillity of the site is not compromised.

- 3.9. The development of the site also presents an opportunity to enhance public access to the countryside, with potential footpath links through the proposed public open space to the pedestrian / cycleway that links Westmorland Park to Forest Road.
- 3.10. The key opportunities and constraints associated with the site are illustrated on Plan ASP3. These opportunities and constraints will inform any future development to ensure that a sympathetic, landscape-led scheme is achieved.
- 3.11. It is considered that the approach set out above is in line with the guidance set out within the Landscape Sensitivity Appraisal within the Local Plan Evidence Base to ensure that development does not give rise to significant adverse effects.
- 3.12. The borough-wide assessment identifies a number of characteristics associated with the localised landscape setting of the site. As set out above, it is considered that the incorporation of a sensitive, landscape-led approach to the development will minimise the potential landscape effects of the proposals upon the receiving landscape. Table 1, below, sets out the potential effects upon the identified characteristics of a sympathetic, considered residential development upon the LCA.

Key Characteristics of Binfield and Warfield Clay Farmland LCA	Potential effects arising from development of the Brookfield Farm site
Underlying clay geology, cut by water courses including the Cut River creating a gently undulating landform with mid-distant views across grass and arable fields to low ridgelines and wooded horizons	None – The site does not present any significant level changes that would require regrading to accommodate residential development that would affect the overall appreciation of the local topography. The vegetated boundaries of the site contain middle distance views over the wider farmland and, as such, proposed development within the site will not affect this characteristic.

<p>A farmed, working landscape of medium to large sized fields of mixed arable and pasture, and smaller fields around the edges of villages.</p>	<p>Low – The site comprises an established equine development and, as such, residential development will represent a change of use, however, it is proposed that development is located within the already developed parts of the site, with the paddocks to the south being retained as POS. The proposed development of this site will not lead to significant loss of agricultural land.</p>
<p>Small deciduous woodlands and well-managed hedgerows provide rhythm and emphasis to views across the landscape.</p>	<p>None – There are no woodlands associated with the site and the native hedgerows are confined to the boundaries. As outlined above, the proposed development will retain these features as part of any layout.</p>
<p>Quiet and rural character with limited scattered settlement well integrated into the landscape.</p>	<p>Low – The perceived tranquillity of the site is reduced by the presence of the road corridors on three sides and the built form of Hayley Green to the east and south east. Furthermore, built form is already characterised by the site, and any proposals will locate development within the more developed parts of the site and retain the boundary vegetation that assists in integrating the existing development in this landscape setting.</p>
<p>Historic manor houses sited within remnant parkland landscapes, often hidden from view behind high fences or coniferous boundaries.</p>	<p>None – No such features are associated with the site and any development within the site will not affect the appearance or setting of Warfield House to the north.</p>
<p>Rural lanes bordered by hedgerows, grass verges and ditches.</p>	<p>None – Proposed development within the site will be set back from the road corridors that define the northern, eastern and southern boundaries ensuring that the</p>

- - -	hedgerow and trees that define the streetscenes are retained and unaffected by the proposals.
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3.13. In conclusion, it is considered that, subject to the incorporation of the guidelines set out above, residential development can be integrated within the site without significant adverse effects upon the localised or wider landscape receptor.

Potential Visual Effects

3.14. In terms of potential visual effects, these will be localised as a result of the compartmentalised nature of the site's setting. Unsympathetic development could give rise to adverse visual effects, creating a hard built edge and extending the perceived presence of development into the countryside.

3.15. Views of the site are highly localised, and the retention and reinforcement of the boundary planting will ensure that a soft edge to any development is achieved, filtering any views of the proposed development from the wider public realm. Buildings already characterise parts of the site, so their replacement with a sympathetically designed residential scale development will not significantly affect the qualities or amenities of the local visual environment. The retention of the mature boundary tree planting will create a high quality, established landscape setting for the proposed development. The careful development of the site will not harm views across, or peoples' appreciation of, the wider countryside setting. The adoption of a positive, outward looking layout will also assist the integration of the proposals, ensuring that the proposed dwellings do not turn their backs on the wider setting or present hard rear garden boundaries onto the surrounding open space. This approach also ensures that the properties overlook the proposed open spaces, creating a quality outlook for residents and passive surveillance for the open spaces.

3.16. It is considered that, subject to the incorporation of the recommendations set out above, namely locating development within the already developed part of the site, creating public open space and landscape buffers to the eastern and southern boundaries and protecting and reinforcing the landscaped boundaries, residential development can be integrated within this site without significant, long term harm.

Potential Effects Upon Landscape Related Policy

- 3.17. The site is not subject to any qualitative landscape designations at a national or local level and, as set out above, is not considered to represent a “valued” landscape with reference to para 109 of the NPPF.
- 3.18. It is considered that a sympathetic, landscape-led development can be achieved within this site that respects the localised landscape setting and will not give rise to significant landscape or visual harm.
- 3.19. As noted within Section 2, the site appears to be identified as a Local Gap within the Draft Warfield Neighbourhood Plan. This non-statutory designation is not supported within the adopted or emerging Local Plans. The Neighbourhood Plan identifies that this local gap should be established to prevent the coalescence of Warfield Street and Hayley Green. The Neighbourhood Plan includes a masterplan illustrating potential development of up to 235 dwellings to the north of Hayley Green, south of Bracknell Road and east of Hayley Green, with reference to Policy WNP2. The NP Local Gap has been drawn to separate Hayley Green, and the proposed extension, from Warfield Street and the proposed allocation SA9.
- 3.20. The policy wording that accompanies Policy 4 states that **“Development proposals within the Local Gaps will be supported provided that they will not lead to physical or visual coalescence, damage the integrity and distinctive identity of the adjoining settlements (Newell Green, Warfield Street and Hayley Green) or compromise the integrity of the gap.”**
- 3.21. As is illustrated on Plan ASP3, areas of public open space are located along the eastern and southern parts of the site, wrapping around the development from Bracknell Road, along Hayley Green and along the southern boundary adjacent to Forest Green. These areas will ensure that the physical coalescence of these settlements is avoided. The combination of these development offsets, between the proposed development and Hayley Green to the east, together with the retained and reinforced boundary planting will ensure that a perceived break in development is achieved along Forest Road and Bracknell Road, and that development is set well back from the Hayley Green streetscene. The presence of the Bull Brook corridor, and associated floodplain, and Rose House also ensure separation between Warfield Street and the site. It is considered that the proposed landscape-led

approach to development within the Brookfield Farm site will ensure that the visual coalescence of the settlements is also avoided, and the identity and integrity of the existing settlements is protected.

- 3.22. It is also noted that a careful and considered approach to the design of the layout and built form will ensure that the proposals comply with the design related policies within the Borough and Neighbourhood planning documents.

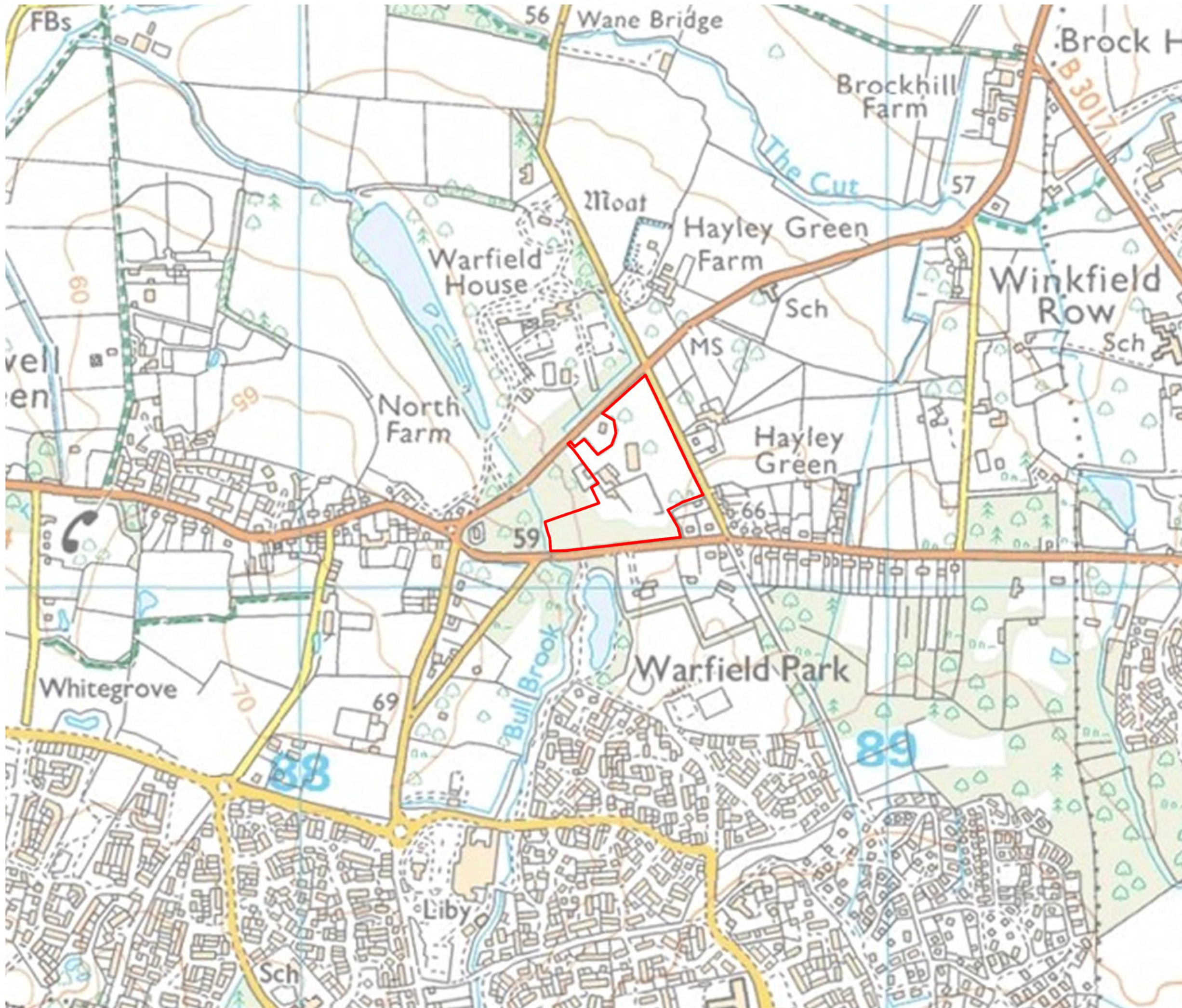
4. SUMMARY AND CONCLUSIONS

- 4.1. Aspect Landscape Planning is instructed by Bewley Homes to review the potential landscape and visual matters relating to the allocation of land at Brookfield Farm, Warfield for the provision of residential development.
- 4.2. The site currently comprises an established stables development located between the Bracknell Road, Hayley Green and Forest Road streetcenes. The site includes areas of development including a number of stables, barns and outbuildings, hardstanding yards, horse walker, gallops and manages. Several paddocks which are subdivided by post and rail fencing and electric tape are located within the southern part of the site.
- 4.3. The site is not subject to any qualitative landscape designations at a national or local level and, as set out above, is not considered to represent a “valued” landscape with reference to para 109 of the NPPF.
- 4.4. It is considered that if development adopts a sensitive, landscape-led approach it can be integrated without significant harm to the receiving landscape receptor or visual environment. Any development within the site should incorporate the following elements:
- Locate development away from the eastern and southern boundaries, utilising the already developed parts of the site. These buffers can be used for the creation of public open space;
 - Retain and reinforce the existing boundary planting to the northern, eastern and southern boundaries;
 - Create a new footpath link through the proposed POS to Westmorland Park to the south east;
 - Incorporate a comprehensive scheme of landscaping utilising locally native species;
 - Incorporate a simple palette of materials and architectural detailing that reflect the local vernacular.
- 4.5. It is noted that the site appears to be identified as a Local Gap within the Draft Warfield Neighbourhood Plan. This non-statutory designation is not supported within the adopted or emerging Local Plans. The Neighbourhood Plan identifies that this

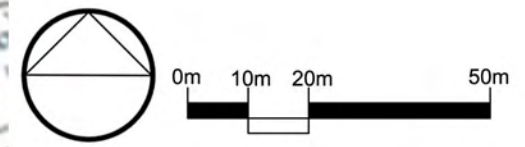
local gap should be established to prevent the coalescence of Warfield Street and Hayley Green.

- 4.6. As set out above, the incorporation of a landscape-led layout, which incorporates the guidelines outlined above will ensure that the physical coalescence of these settlements is avoided. The combination of development offsets to the east and south, together with the retained and reinforced boundary planting will ensure that a perceived break in development is achieved along Forest Road and Bracknell Road, and that development is set well back from the Hayley Green streetscene. The presence of the Bull Brook corridor, and associated floodplain, and Rose House also ensure separation between Warfield Street and the site. It is considered that the proposed landscape-led approach to development within the Brookfield Farm site will ensure that the visual coalescence of the settlements is also avoided, and the identity and integrity of the existing settlements is protected.
- 4.7. It is concluded that the Brookfield Farm site has the capacity to accommodate a sensitively designed residential development which will not give rise to significant landscape or visual effects and is in line with adopted planning policy. It is considered that, from a landscape perspective, the allocation of the site for residential development within the emerging Local Plan can be supported.

ASPECT PLANS



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Key:
 Application Site Boundary

REV	DATE	NOTE	DRAWN	CHK'D
REVISIONS				

aspect landscape planning

TITLE
 Brookfield Farm, Warfield
 Site Location Plan

CLIENT
 Bewley Homes

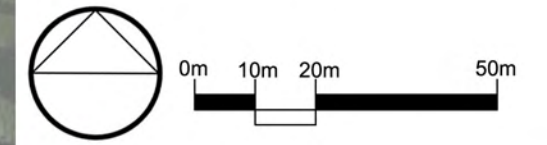
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DRAWING NUMBER		REVISION	
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Key:
 Application Site Boundary

REV	DATE	NOTE	DRAWN	CHK'D
REVISIONS				

aspect landscape planning

TITLE
**Brookfield Farm, Warfield
 Site & Setting Plan**

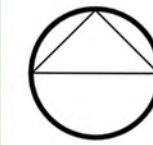
CLIENT
Bewley Homes

SCALE 1:1,250@A3	DATE MAR 2018	DRAWN SB	CHK'D AM
DRAWING NUMBER 6513/ ASP2		REVISION	



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Key:
 Application Site Boundary

Road corridor

Landscape bufer / P.O.S

Developable Area

Middle and longer distance views contained by intervening vegetation

Suggested buffer to protect existing treescape and maintain character of adjoining streetscene

Landscape bufer / P.O.S

Existing built frontage of Hayley Green

REV	DATE	NOTE	DRAWN	CHK'D
REVISIONS				

aspect landscape planning

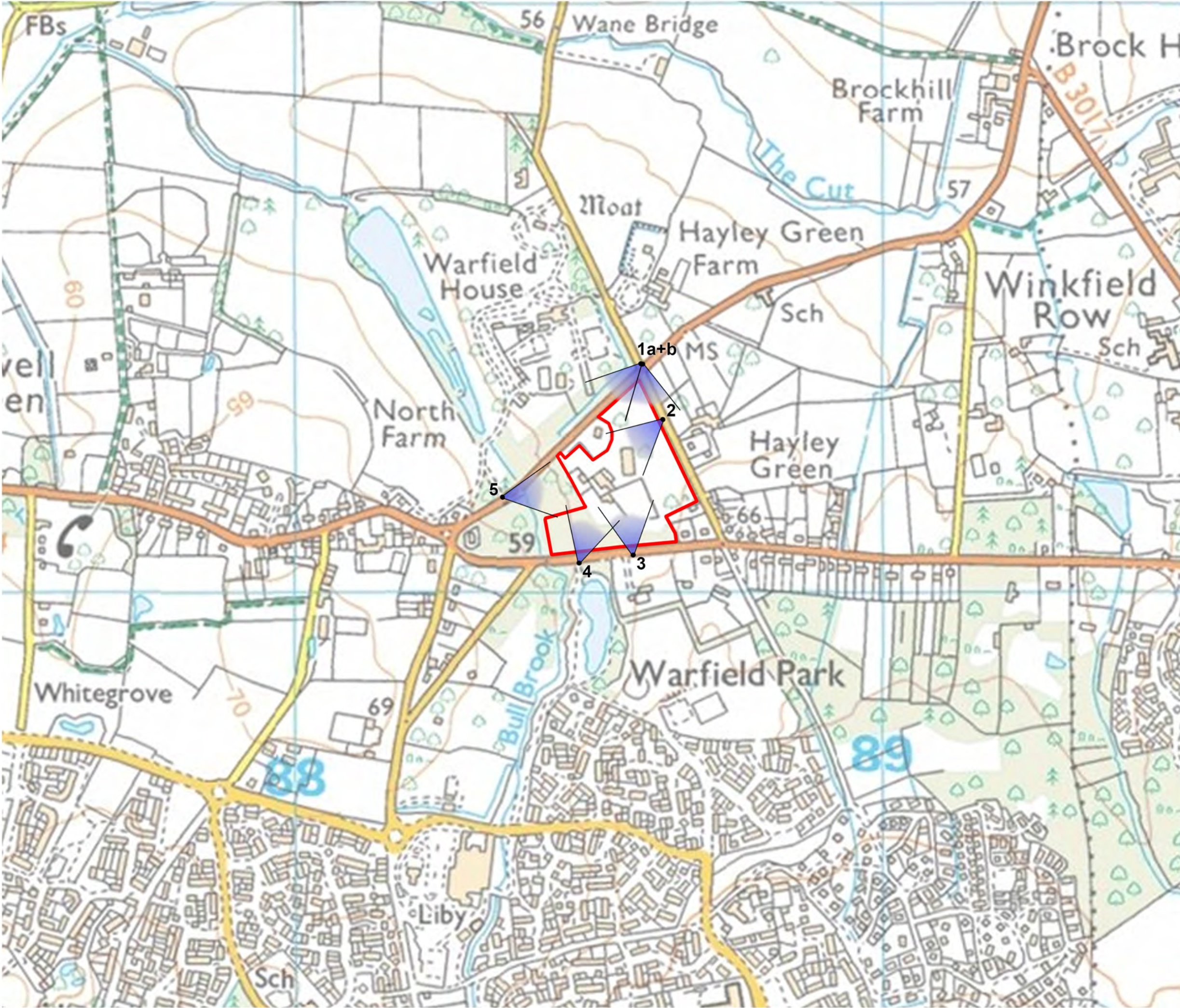
TITLE
 Brookfield Farm, Warfield
 Opportunity & Constraints Plan

CLIENT
 Bewley Homes

SCALE	DATE	DRAWN	CHK'D
Not to scale	MAR 2018	SB	AM
DRAWING NUMBER		REVISION	
6513/ ASP3			

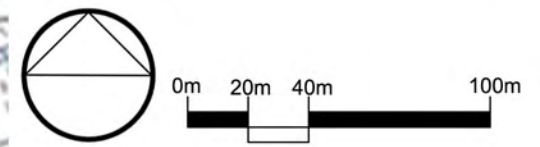
APPENDIX 1

PHOTOGRAPHIC RECORD



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- Key:
- Application Site Boundary
 - Viewpoint Location

REV	DATE	NOTE	DRAWN	CHK'D
REVISIONS				

aspect landscape planning

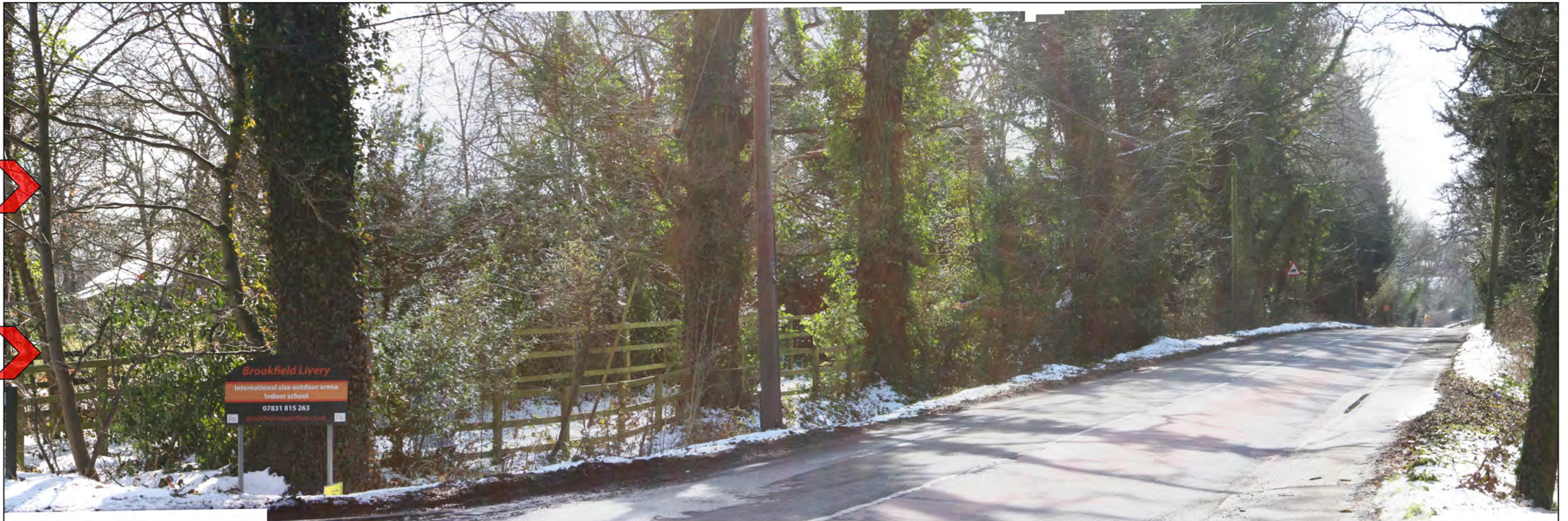
TITLE
 Brookfield Farm, Warfield
 Viewpoint Location Plan

CLIENT
 Bewley Homes

SCALE 1:2,500@A3	DATE MAR 2018	DRAWN SB	CHK'D AM
DRAWING NUMBER 6513/ VLP/01		REVISION	



Viewpoint 1a



Viewpoint 1b



Viewpoint 2



Viewpoint 3



Viewpoint 4



Viewpoint 5

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