



# Bracknell Forest Local Plan 2020 - 2037

## **Sustainability Appraisal Post Adoption Statement**

March 2024

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# 1. Introduction

1.1 This report is the Sustainability Appraisal (SA) Post Adoption Statement for the Bracknell Forest Local Plan (BFLP) 2020-2037. The SA incorporates Strategic Environmental Assessment (SEA) and has been prepared under Regulation 16 of The Environmental Assessment of Plans and Programmes Regulations (SI 1633) 2004. All references to 'SA' in this report should be taken to mean 'SA incorporating SEA'.

1.2 Regulation 16 of The Environmental Assessment of Plans and Programmes Regulations (SI 1633) 2004 sets out the post-adoption procedures<sup>1</sup>. As soon as reasonably practicable after the adoption of a plan for which an environmental assessment has been conducted, the Local Planning Authority (LPA) must make a copy of both the plan and SA report publicly available. This must be accompanied by a statement which explains the following points:

- How the local plan integrated environmental and sustainability considerations.
- How the environmental report has been considered.
- How opinions expressed by the public and consultation bodies, during consultation periods have been considered.
- The reasons for choosing to adopt the plan, considering reasonable alternatives.
- The measures that are to be taken to monitor the significant environmental and sustainability effects caused by the implementation of the plan.

1.3 Additionally, Regulation 26 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)<sup>2</sup> sets out a requirement for the SA report to be made available as soon as reasonably practicable after the LPA adopts a local plan.

1.4 The Bracknell Forest Local Plan was adopted by the Council on 19th March 2024. It is a key document in the Development Plan for Bracknell Forest and (along with other plans) will be used to assess planning applications relating to land in the Borough.

1.5 The SA process examines how each of the policies in a Local Plan can contribute to the achievement of sustainable development, by assessing the extent to which, when judged against reasonable alternatives, a Local Plan will help achieve relevant environmental, economic and social objectives. The process is integral to plan making activities.

1.6 The following suite of documents comprise the final SA Report on the Bracknell Forest Local Plan:

- **Sustainability Appraisal (Incorporating Strategic Environmental Assessment) of the Pre-Submission Bracknell Forest Local Plan (March 2021).**

This report examines how each of the policies in the Plan contribute to the achievement of sustainable development by assessing the extent to which the Plan, when judged against other reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. It is also a means of identifying and mitigating any potential adverse effects that the Plan might otherwise have.

<https://consult.bracknell-forest.gov.uk/resources/portal/supportingfiles/716530>

- **Non-Technical Summary**

This provides an overview of the main report referred to above.

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<sup>1</sup> <https://www.legislation.gov.uk/ukxi/2004/1633/regulation/16>

<sup>2</sup> <https://www.legislation.gov.uk/ukxi/2012/767/regulation/26>

<https://consult.bracknell-forest.gov.uk/resources/portal/supportingfiles/716531>

- **Addendum to Sustainability (SA) of the Pre-Submission Local Plan (October 2023)**

This document focuses on the Main Modifications that were proposed to the submitted plan. They were compiled following the Inspectors' Post Hearings letter that the Council received in January 2023.

<https://consult.bracknell-forest.gov.uk/file/6244566> <https://consult.bracknell-forest.gov.uk/file/6244566>

## 2. Development of the Local Plan

2.1 The Bracknell Forest Local Plan is the principal planning policy document for the Borough and will guide development in the Borough up to 2037. The Plan will enable the Borough to grow in a sustainable manner, to meet the future social, economic and environmental needs of its residents. To do this, priority has been given to making the best use of land within our existing built-up areas and ensuring that development is located in sustainable locations.

2.2 The Plan includes policies to mitigate and adapt to climate change by encouraging lower carbon developments, promoting sustainable travel and requiring tree planting, landscaping, sustainable drainage, and extensive areas of open space as part of new developments.

2.3 Preparation of the Bracknell Forest Local Plan commenced in 2016. Since then, the Plan has undergone six formal periods of public consultation. This has included consulting on technical reports forming part of the evidence base. The events can be summarised as follows:

- **Issues and Options (June – July 2016)**
  - The Council called for views on a possible ‘Vision’ for the Borough and a set of associated objectives that the policies could be based on. The main issues for the Borough were identified and stakeholders were invited to make comments on suggested policy approaches<sup>3</sup>. The consultation did not include specific sites.
- **Draft Bracknell Forest Local Plan (February – March 2018)**
  - This consultation provided stakeholders with the opportunity to make comments on the wording of possible policies and site allocations to be included in the Bracknell Forest Local Plan<sup>4</sup>.
- **New Sites (2019)**
  - A number of new sites were put forward for consideration for future development during the consultation outlined above. This consultation focused on explaining how these sites were assessed and invited comments on two of the additional sites which were considered to have the greatest potential for allocation<sup>5</sup>.
- **Revised Growth Strategy (October – December 2019)**
  - The need for this consultation was driven by the extension of the plan period to 2036, an updated housing requirement; the decision to include an additional strategic allocation at Jealott's Hill, and the need to distinguish between strategic and non-strategic policies<sup>6</sup>. The consultation document was primarily concerned with strategic policies. Stakeholders were invited to submit their comments.
- **Pre-Submission Bracknell Forest Local Plan (March – May 2021)**
  - This stage was the final opportunity for people to make comments on the legal compliance and soundness of the Local Plan before it was submitted to the Government for independent examination<sup>7</sup>.

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<sup>3</sup> <https://consult.bracknell-forest.gov.uk/file/3993041>

<sup>4</sup> <https://consult.bracknell-forest.gov.uk/file/4868307>

<sup>5</sup> <https://consult.bracknell-forest.gov.uk/file/5051275>

<sup>6</sup> <https://consult.bracknell-forest.gov.uk/file/5940007>

<sup>7</sup> <https://consult.bracknell-forest.gov.uk/resources/portal/supportingfiles/714771>

- **Proposed Main Modifications to the Bracknell Forest Local Plan (Pre-Submission version) (October – December 2023)**
  - Stakeholders were given the opportunity to make comments on the legal compliance and soundness of the Proposed Main Modifications and linked changes to the Policies Map. The document was based on the Inspectors' Post Hearings letter and subsequent endorsement by the Inspectors<sup>8</sup>.

2.4 Periods of public consultation were undertaken to ensure that stakeholders had the opportunity to present their views throughout the plan making process. The issues raised and responses prepared were documented throughout the development of the Local Plan and are available to view on the Council's website. The Council's Regulation 22 Consultation Statement (December 2021) summarises the consultation undertaken<sup>9</sup>.

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<sup>8</sup> <https://consult.bracknell-forest.gov.uk/kse/event/37701>

<sup>9</sup> [LP-CORE-007 BFLP Regulation 22 consultation statement \(5\).pdf](#)

### 3. How the Local Plan integrated environmental and sustainability considerations

- 3.1 The SA has been undertaken in accordance with The Environmental Assessment of Plans and Programmes Regulations (SI 1633) 2004 which transpose into national law the requirements of the EU Strategic Environmental Assessment Directive, and Government guidance on the preparation of SAs. As required by The Environmental Assessment of Plans and Programmes Regulations (SI 1633) 2004, the SA has been an iterative and influential process, and has informed decision making at every stage of the Local Plan. The process has made recommendations on how to improve the sustainability of the BFLP, enabling the wording of policies and supporting text to be amended to improve its overall sustainability.
- 3.2 The SA methodology has followed the key stages in the Planning Practice Guidance (PPG)<sup>10</sup>. The first stage of the process was the SA/SEA Scoping Report (2015) which set out the SA Framework. The Scoping Report included a review of the policy context on which the Local Plan was based. This involved reviewing plans and strategies at local, national and international levels that might influence the Local Plan. The social, environmental and economic baselines were established to set out the existing sustainability of the Borough. This formed a baseline against which the potential effects of the Local Plan could be measured.
- 3.3 The SA was then undertaken at each stage of Local Plan preparation process (see Figure 1). The likely significant effects of the implementation of the Local Plan on the sustainability objectives for the Borough were considered. Each element of the Local Plan was assessed against the SA Objectives. The outcomes were recorded with commentary describing any significant effects identified, the mitigation needed for any significant negative effects, and suggested ways of enhancing potential beneficial effects.
- 3.4 In line with the requirements of The Environmental Assessment of Plans and Programmes Regulations (SI 1633) 2004, the appraisal considered effects including short, medium and long term, permanent and temporary, positive and negative, secondary, cumulative and synergistic, wherever possible and relevant. Any gaps or difficulties were also reported. The findings and recommendations of the SA informed the plan making process and were integrated into each stage of the Local Plan.
- 3.5 The Proposed Main Modifications required to make the Local Plan sound were also screened to determine if they were significant. The Proposed Main Modifications screened in as requiring further appraisal were subject to SA, reported and published for consultation.
- 3.6 The SA reports have all been made available on the Council's website at each stage of the plan making process. The appraisals have been proportionate and appropriate to the particular stage of plan-making. As such, environmental and sustainability considerations have been integrated and the SA Reports have been taken into account and influenced the plan-making process.

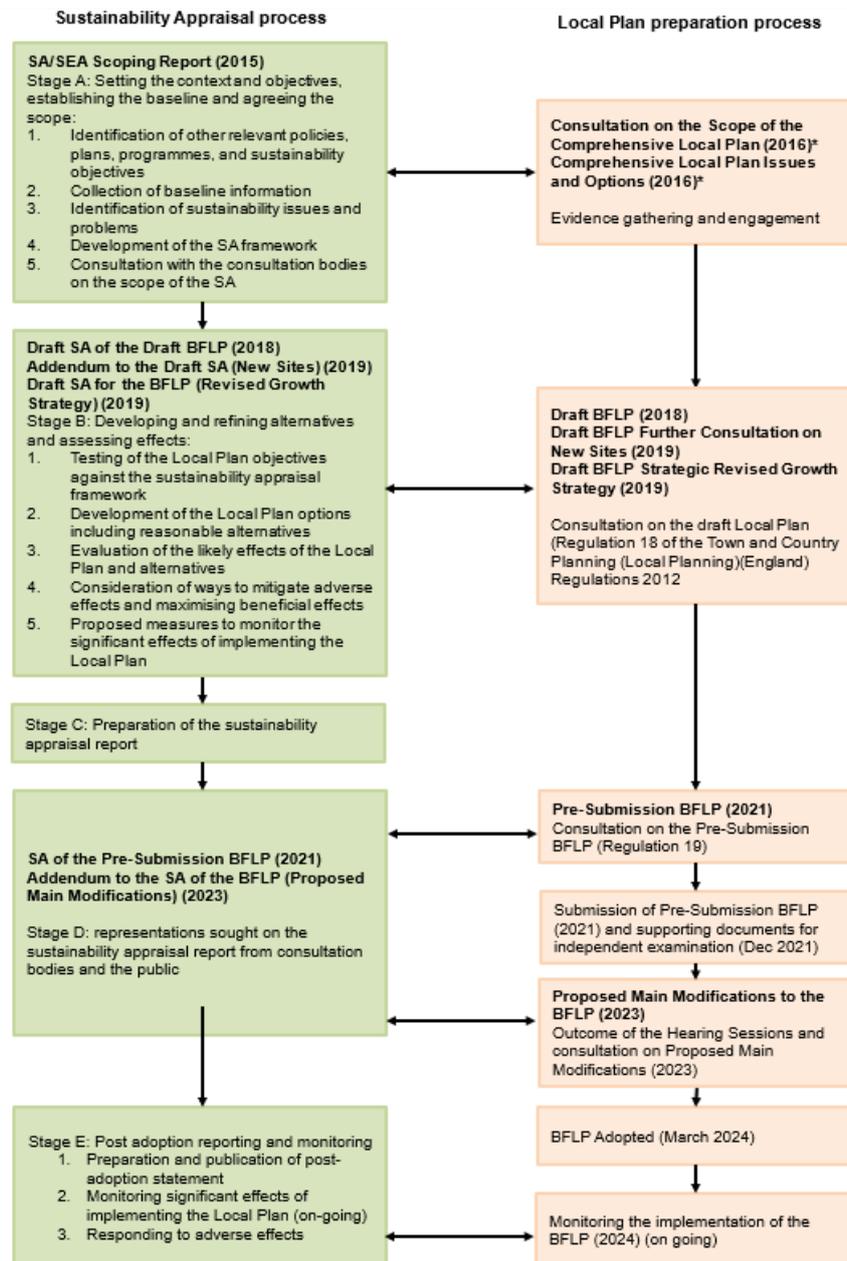
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<sup>10</sup> Flow chart: sustainability appraisal process

[https://assets.publishing.service.gov.uk/media/5a7557f240f0b6360e4735dd/sea1\\_013.pdf](https://assets.publishing.service.gov.uk/media/5a7557f240f0b6360e4735dd/sea1_013.pdf)

3.7 Paragraph 23 of the Inspectors' Report on the Examination of the Bracknell Forest Local Plan<sup>11</sup> states *“The SA has been methodically undertaken and consulted on at each stage of the Plan process. Issues of coverage and consistency have been addressed during the preparation and comprehensive updates to the SA report. In terms of the timing of the outputs, SA is an iterative process that has informed the contents of the Plan.”*

Figure 1: Key stages of the Local Plan and their relationship with the SA



\*The title of the Local Plan was amended after the initial stages

<sup>11</sup> <https://www.bracknell-forest.gov.uk/sites/default/files/2024-03/inspectors-report-bracknell-forest-local-plan.pdf>

## 4. How the opinions expressed during the consultation periods have been taken into account

4.1 The SA/SEA Scoping Report (2015)<sup>12</sup> was published for consultation with the following statutory bodies:

- Natural England,
- Environment Agency, and
- Historic England.

Advice was sought on the appropriateness of the sustainability objectives, the key sustainability issues and the baseline data. A total of 18 SA Objectives, with relevant indicators were developed during the scoping stage and refined through the consultation. The consultation ensured that the SA framework was comprehensive and robust enough to support the Local Plan through each consultation stage. Responses to consultation comments on SA scoping are in Appendix D of SA/SEA Scoping Report (2015).

4.2 The following Draft SA reports supported key Regulation 18 consultation stages:

- Draft SA of the Draft BFLP (2018)<sup>13</sup>
- Addendum to the Draft SA (New Sites) (2018)<sup>14</sup>
- Draft SA of the Draft BFLP (Revised Growth Strategy) (2019)<sup>15</sup>

4.3 Summaries of the comments received during these three consultations and how they have been taken into account are set out in Appendix 1 of the SA of the Pre-Submission BFLP (2021)<sup>16</sup>. Comments received have informed the appraisal process and development of the Local Plan.

4.4 In addition, the Summary of Responses (Main Issues) to the Draft BFLP (2018)<sup>17</sup>, summarises the consultation comments on the Draft SA of the Draft BFLP (2018) and the Summary of Responses (Main Issues) to Further Consultation on New Sites Draft BFLP (2018)<sup>18</sup> summarises the consultation comments on the Addendum to the Draft SA (New Sites) (2018). The Summary of Responses to the Consultation on the Revised Growth Strategy (2020) summarised the consultation comments on the Draft SA of the Draft BFLP (Revised Growth Strategy) (2019)<sup>19</sup>.

4.5 Furthermore, the Strategic Housing and Economic Land Availability Assessment Part 1 Methodology (2017)<sup>20</sup> involved a high-level assessment of sites against sustainability objectives drawn from SA/SEA Scoping Report.

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<sup>12</sup> <https://consult.bracknell-forest.gov.uk/file/3976791> and <https://consult.bracknell-forest.gov.uk/file/3976790>

<sup>13</sup> <https://consult.bracknell-forest.gov.uk/file/4880468>

<sup>14</sup> <https://consult.bracknell-forest.gov.uk/file/5051263>

<sup>15</sup> <https://consult.bracknell-forest.gov.uk/file/5512144>

<sup>16</sup> <https://consult.bracknell-forest.gov.uk/resources/portal/supportingfiles/716530> and <https://consult.bracknell-forest.gov.uk/resources/portal/supportingfiles/716531>

<sup>17</sup> <https://consult.bracknell-forest.gov.uk/file/5940020>

<sup>18</sup> <https://consult.bracknell-forest.gov.uk/file/5940020>

<sup>19</sup> <https://consult.bracknell-forest.gov.uk/file/5940018>

<sup>20</sup> <https://consult.bracknell-forest.gov.uk/file/4648574>

## 5. Reasons for choosing the Local Plan as adopted, in light of other reasonable alternatives

5.1 Regulation 12(2) of The Environmental Assessment of Plans and Programmes Regulations (SI 1633) 2004 requires the assessment of the likely significant effects of Plan implementation and 'reasonable alternatives', taking into consideration the SA objectives and geographical scope of the Plan. The reasons for selecting alternatives should be outlined in the report.

5.2 At each stage of plan-making, the SA was used to assess the likely effects of the plan when judged against any reasonable alternatives to the spatial strategies and policies. The SA considered, assessed and recorded these reasonable alternatives as the plan evolved, including the preferred approach and the wider social and economic effects. The SA was an iterative process. Chapter 5 of the SA sets out the development options, including consideration of the following alternative options:

- a. No plan.
- b. Housing need and provision – including consideration of the level of housing need; level of housing provision relative to the housing need (including not meeting needs/ exceeding housing need); how to meet the housing need at the strategic level; ability to implement strategic options; and, the selection of the preferred approach to meet needs.
- c. Where the houses should go – making effective use of land, looking at options within the settlement, the countryside or the Green Belt (noting the availability of land heavily influences these options).
- d. Level of affordable homes.
- e. Amount of housing for older people and people with disabilities – including the level of need and meeting the need.
- f. Location of new gypsy and traveller sites – the level of need and meeting the need.
- g. Level of economic development and where it should be located.
- h. Four broad options for Jealott's Hill, Warfield (N.B. This site was removed through Main Modifications to the Local Plan; however, the SA process did consider detailed alternative options which informed the proposal submitted for examination).

5.3 Within Chapters 6 and 7 of the SA, alternatives were considered for each of the strategic and development management policies on a policy-by-policy basis. Chapter 8 of the SA appraised the alternative site options.

5.4 The SA also provided conclusions and reasons on why the rejected options are not being taken forward.

5.5 In their final report to the Council<sup>21</sup>, the Inspectors noted in paragraph 23 that *“some representors have argued that not all reasonable alternatives have been subject to SA, particularly in relation to the alternative development options outside of the Green Belt.”* However, the Inspectors considered that *“the Council can exercise its discretion in deciding what the reasonable alternatives may be. We are satisfied that the Council has exercised this discretion in a reasonable way.”*

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<sup>21</sup> <https://www.bracknell-forest.gov.uk/sites/default/files/2024-03/inspectors-report-bracknell-forest-local-plan.pdf>

5.6 The final version of the Local Plan was chosen for adoption on the basis that its Vision seeks to enable future growth through sustainable practices. The plan balances the need for housing and available sites with future employment growth by utilising the opportunities provided by previously developed land to create mixed-use sites. The use of previously developed land as a priority will enable the Borough to meet its sustainability goals whilst meeting housing needs and employment needs as far as possible. The Local Plan does not include the release of land from the Green Belt since the allocation at Jealott's Hill was removed via a Main Modification to the Plan (MM12)<sup>22</sup>. The Local Plan includes a settlement hierarchy policy and a climate change policy. The SA Addendum (October 2023) considered the 'total plan effects and cumulative effects' in paragraphs 4.10 – 4.13 and Table 11, and whether these had changed as a consequence of the Proposed Main Modifications.

5.7 The Inspectors concluded in their final report (paragraph 23) that they found the SA *“proportionate, objective, underpinned by relevant and up to date evidence, and accords with the relevant legal requirements and national guidance.”*

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<sup>22</sup> <https://www.bracknell-forest.gov.uk/sites/default/files/2024-03/schedule-of-main-modifications-bracknell-forest-pre-submission-local-plan.pdf>

## 6. Measures to be taken to monitor the significant environmental and sustainability effects caused by the implementation of the Local Plan

- 6.1 Regulation 17(1) of The Environmental Assessment of Plans and Programmes Regulations (SI 1633) 2004 sets out the requirement that any significant environmental impacts caused by the implementation of the Plan should be continuously monitored with the purpose of identifying unforeseen adverse implications at the earliest possible stage, allowing the Council to intervene and take appropriate remedial action.
- 6.2 The PPG outlines<sup>23</sup> that the SA itself should only focus on what is needed to assess the likely significant effects of the Plan, focusing on the environmental, economic and social impacts that are likely to be significant. As such monitoring of the Local Plan will be focused on the significant sustainability impacts which will be done through the monitoring of Local Plan policies.
- 6.3 The PPG<sup>24</sup> states that details of the monitoring arrangements may be included in the Local Plan itself. The Monitoring Framework in Appendix 2 of the Bracknell Forest Local Plan to 2037 sets out the arrangements for how the policies will be monitored throughout the plan period. This will be incorporated into the Council's existing monitoring arrangements, including the various Annual Monitoring Reports (AMR)<sup>25</sup>. These reports evaluate whether the Council's targets are being achieved. As set out in the SA<sup>26</sup>, in addition to monitoring undertaken by the Council, further monitoring is undertaken by external organisations.
- 6.4 Through this monitoring process, the Council will be able to identify how effective the policies are, and any unforeseen adverse effects arising from implementation. This will be highlighted in the AMRs and, if relevant, recommendations will be made regarding the need for revisions to any policies in the Local Plan through the five-year review.

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<sup>23</sup> Strategic environmental assessment and sustainability appraisal Paragraph: 009 Reference ID: 11-009-20140306 <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

<sup>24</sup> Strategic environmental assessment and sustainability appraisal Paragraph: 025 Reference ID: 11-025-20140306:

<sup>25</sup> <https://www.bracknell-forest.gov.uk/planning-and-building-control/planning/planning-policy/monitoring/authority-monitoring-reports>

<sup>26</sup> SA of the Pre-Submission Local Plan (March 2021) - paragraph 11.2 <https://consult.bracknell-forest.gov.uk/resources/portal/supportingfiles/716530>

## 7. Availability of Adoption Documents

7.1 Copies of the adopted Bracknell Forest Local Plan, the Policies Map, Sustainability Appraisal Reports and this Sustainability Appraisal Post Adoption Statement are available for inspection on the Council's website. It will also be possible to view a hard copy of the BFLP and access the other documents via the links at these venues:

- Council Offices, Time Square, Market Street, Bracknell RG12 1JD  
<https://www.bracknell-forest.gov.uk/council-and-democracy/get-in-touch/contact-us>
- All local libraries across the Borough  
<https://www.bracknell-forest.gov.uk/libraries/library-directory>

Please check relevant web sites for opening hours.

7.2 For further information on purchasing hard copies<sup>27</sup> or accessing electronic copies, contact the Planning Policy Team:

- Email: [development.plan@bracknell-forest.gov.uk](mailto:development.plan@bracknell-forest.gov.uk)
- Phone: Development Plan Team on 01344 352000

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<sup>27</sup> There will be a charge for hard copies of the documents