

CROWTHORNE NEIGHBOURHOOD DEVELOPMENT PLAN

The Crowthorne Parish Council's response to the Examiners request for clarification (note dated 9th December 2019) is set out below.

Crowthorne Parish Council thank the Examiner for bringing these points to their attention and for the opportunity to provide clarification.

The Examiner's questions are in **bold** text, with Crowthorne Neighbourhood Plan Steering Group's (CNPSG) response directly following each question.

Policy CR7 – Promoting Good Design at Broadmoor

Clarification Request

"I saw the raised topography of the Character Area ...have the views loosely referenced in criterion i. been specifically identified?"

Response

While both the AECOM Design Guide and the Crowthorne Study (which forms part 3 of the Bracknell Forest Council Character Area Assessments SPD) reference the importance of views from Chaplain's Hill and Broadmoor Hospital, neither study illustrates these particular viewpoints on a plan. The Design Guide usefully combines both the updated character assessment and the Crowthorne Study into a single document as an aid to development management.

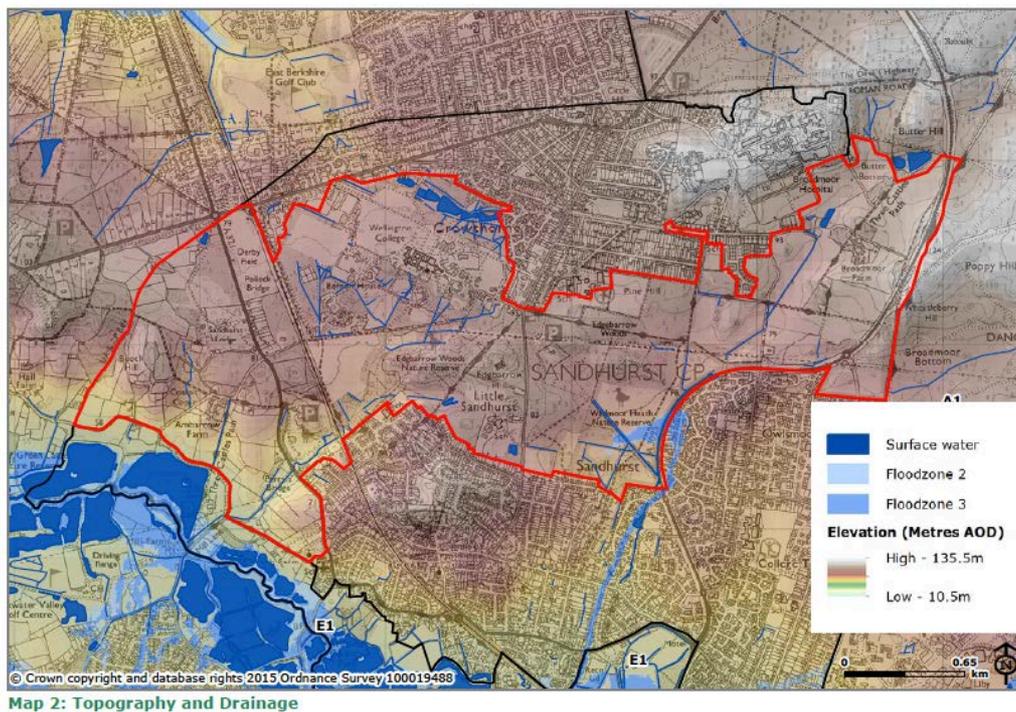
Given their plateau nature, the views afforded are more panoramic in nature albeit development has impeded some outward views. As such it is considered more challenging to define the views on a plan from a single viewpoint as is custom and practice.

As the examiner acknowledges, both Chaplain's Hill and Broadmoor Hospital are located on a raised plateau at approximately 135m AOD as illustrated on Map 2 of Landscape Character Area B1 (Crowthorne/Sandhurst Heath) of the Bracknell Forest Landscape Character Assessment¹ (LCA) (overleaf).

The 'Locality' contract with AECOM has now come to an end and it is not therefore possible to obtain updates to the Design Guide or access field notes. However, the CNPSG would welcome any further advice from the Examiner as to how the location or direction of these views may be better presented.

¹ CLP/Ev/5a <https://www.bracknell-forest.gov.uk/planning-and-building-control/planning/planning-policy/development-plan/draft-bracknell-forest-local-plan/evidence-base>

Landscape Character Area B1 - Crowthorne/ Sandhurst Heathland Mosaic



Policy CR8 – Promoting Good Design at TRL

Clarification request

“I can see that the context and background to the 500 m Gap included in criterion iv is addressed in paragraph 5.22. However, should this matter be considered only in the text as key parts of the 500m gap are outside the neighbourhood area?”

Response

The Examiner acknowledges the complexity of the administrative boundaries (Local Government, Parish and Neighbourhood Forum boundaries) in the area which fall within the strategic gap between Bracknell and Crowthorne.

By the same token, the CNPSG and the local community are fully aware of the significance of this gap between the current urban limits of Bracknell at Great Holland (outside the neighbourhood plan boundary) and Crowthorne. The CNPSG along with the Crowthorne Village Action Group (CVAG) have made numerous representations on this matter in the past in respect of the impact on this strategic gap of the development now coming forward at TRL and in relation to the proposal to allocate land at the ‘Hideout’ and Beaufort Park immediately to the north of Parish boundary on Nine Mile Ride. While this proposal has been scaled back, Policy LP5 – Land at Beaufort Park, proposes large scale development within the proposed strategic gap².

² Draft Policies Maps 3 and 4 https://consult.bracknell-forest.gov.uk/portal/planning/bracknell_forest_council_local_plan_-_revised_growth_strategy_october_2019

In relation to policy SA5, the Inspector of the Site Allocations Local Plan (2013) reasoned that the existing gap between Crowthorne Village and Bracknell was in danger of being eroded by the TRL development and needed to be maintained. Consequently, Bracknell Forest Council (BFC) were required to amend their plan to ensure a distinct gap was maintained between Crowthorne and the Great Hollands estate.

Section 4 of the Bracknell Forest Landscape Evidence Base Final Report (Sept 2015)³ comprehensively explains the history of gap policy as it relates to plan making in Bracknell dating back to the Entec Study of 2006 (Gap 5). The CNPSG brings the Study to the Examiners attention as it considers the Report's recommendations provide further helpful context to policy CR8. In regard to the Bracknell – Crowthorne gap the Landscape Report (page 68) made the following recommendations:

"Therefore, our recommendation is that a separation between Bracknell and Crowthorne should be maintained (as indicated in Figure 4.2).

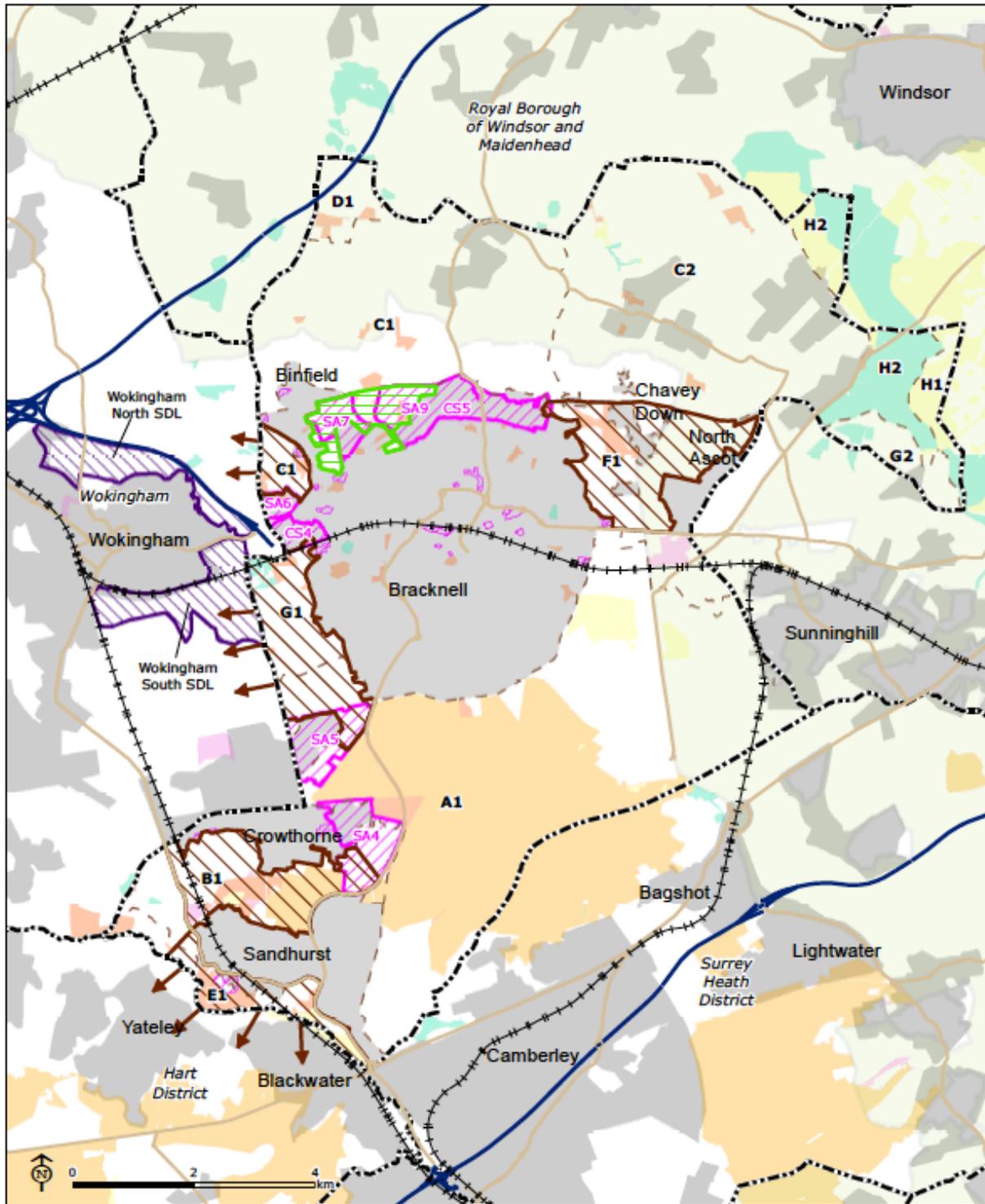
A policy linked to the landscape character assessment (LCA) should be sufficient to protect the valued features of the area including the extensive areas of forest and woodland (which form a physical and visual separation between Crowthorne and Bracknell), undeveloped character, remnant heathland and natural broadleaf woodland, historic features, enclosed character, framed views and recreational areas.

However, in addition to a landscape character based policy, this area could be given an additional layer of protection by drawing a boundary around the area and linking it to a policy specific to settlement separation and settlement identity. The separation could be provided by an extension of Gap 3 between Bracknell and the developed parts of SA5 (leaving the open spaces of SA5 as part of the gap), as shown on Figure 4.3." (see overleaf)

As is evidenced in the LCA, the wooded belt either side of the B3430 Nine Mile Ride is a vital component of the visual separation between Crowthorne and Bracknell , performing both a landscape and ecological function.

In respect of clause (iv) the TRL development boundary has been specifically drawn to maintain the 500m strategic gap as evidenced by the rounding off of the north eastern housing development boundary on Plan G in the Submission Plan. The policy aims to ensure this boundary is maintained.

³ CLP/Ev/5b Bracknell Forest Landscape Evidence Base – Recommendations in relation to landscape designations, gaps and green belt villages (LUC September 2015)- CLP document <https://www.bracknell-forest.gov.uk/planning-and-building-control/planning/planning-policy/development-plan/draft-bracknell-forest-local-plan/evidence-base>



		A1 - Bracknell Forest
		B1 - Crowthorne/Sandhurst Heathland Mosaic
		C1 - Binfield and Warfield Clay Farmland
		C2 - Winkfield and Cranbourne Clay Farmland
		D1 - The Hazes Wooded Clayland
		E1 - Blackmoor River Valley
		F1 - Chavey Down Wooded Sands
		G1 - Easthampstead Wooded Estate
		G2 - Sunninghill Wooded Estate
		H1 - Windsor Great Park
		H2 - Windsor Forest

Map Scale @ A4: 1:90,000

Bracknell Forest - Landscape Character Assessment

Figure 4.3 Recommended Strategic Gaps and Wedge: Suggested Boundaries

Source: Bracknell Forest Borough Council



Contains Ordnance Survey data © Crown copyright and database right 2015 CB:Green_C EB:Green_C LUCGLA 6323-01_038_Potential_Gaps 03/09/2015

Clarification request

In a wider sense paragraph 5.22 comments about the relationship between Policy CR8, Core Policies CR7 and CR9 and Policy SA5 of the Sites Allocations Local Plan. However, the final part of the paragraph suggests that the work on the Design Guide has been overtaken by the work on the Allocations Plan. I saw that work has now started on the residential development. In this wider context:

- is the policy in general conformity with Policy SA5 of the Site Allocations Local Plan?
- if so, should it make a more explicit reference to the principles of that policy and the extent to which it intends to add distinctive local value?

Response

The CNPSG concur with the Examiners comments that as a result of the passage of time, the build out at Bucklers Park (TRL) has begun. However, the CNPSG maintain the policy does not undermine policy SA5 nor is it out with 'general conformity'. The CNPSG consider that all clauses of the Policy retain value (including clause ii) should any further applications come forward in the character area, particularly to the south. The CNPSG agrees that an additional reference in the Policy will confirm the complementary nature of SA5 and CR8.

Clarification request

"In paragraph 5.22 was the '23' at the beginning of the third sentence intended to be the start of the otherwise missing paragraph 5.23?"

Response

Yes. The CNPSG agree that this can be corrected as a minor modification, along with any additional corrections that the Examiner may recommend.

Policy CR9 – Crowthorne High Street

Clarification request

"In the second paragraph of the policy three requirements are identified to achieve support for new development and alterations to existing buildings.

What is the purpose of the first requirement? Would it have any significance for the majority of proposals which might arise in the Plan period? For example, how would it apply to proposals for the change of use of an existing building?

In any event is the issue of the public realm already adequately addressed in the penultimate paragraph of the policy?

Response

The purpose of the first paragraph is to contribute to the vitality of the High Street⁴. It responds to the rapid changes taking place in the retail sector and the encouragement in the NPPF (2019) for a more positive and flexible approach to planning for the future of 'town centres'. Paragraph 85 of the NPPF acknowledges that diversification is key to their long-term vitality and viability.

The Grimsey Review 2 Report⁵ highlights that town centres should be 'gathering points for the whole community' and form the 'heart of a thriving community hub.' Taken as whole, the CNPSG consider the policy serves this purpose.

The Policy is also intended to establish a positive context for the High Street for the plan period to influence changes that may take place, whether through a planning application, permitted change of use or public sector funding.

The CNPSG considers the role of Crowthorne High Street will become even more significant over the plan period as an attractive and walkable destination for new residents of 'Bucklers Park'. Given the traffic pressure and resulting air quality issues that exist, it considers the policy endorses this position and is complementary to emerging Policy LP32.

The CNPSG also concur with the Examiners view of the overlap between clause (i) and the penultimate paragraph and have no objection to the deletion of clause (i).

Clarification request

"Does the penultimate paragraph of the policy intend either to support or require wider enhancements to the High Street? As I read this element of the policy its focus is on developers agreeing any such works with the CNPSG.

If this is the intention should this part of the policy become supporting text?"

Response

The penultimate paragraph is intended to require wider enhancements to the High Street to enhance its attractiveness and hence footfall, and to complement other opportunities for investment to meet air quality objectives such as through the greater provision of street trees.

The CNPSG wish to maintain this as a policy requirement given the air quality challenges that exist and would welcome further correspondence on this matter should the Examiner deem this helpful.

⁴ Defined in the Draft Bracknell Forset Local Plan Part 1 – Strategic Revised Growth Strategy Policy LP10 as a 'District Centre'

⁵ <http://www.vanishinghighstreet.com/wp-content/uploads/2018/07/GrimseyReview2.pdf>

Policy CR10 - Station Parade, Dukes Ride

Clarification request

The final part of the policy resists the loss of existing shops in Station Parade. Is this approach too prescriptive?

What specific harm would arise from (for example) the opening of additional restaurants in this rather specialised shopping parade?

Response

The CNPSG do not consider the policy is too restrictive, accepting that in some cases changes from A1 retail use (which may or not be time limited) in the way described may already be permitted.

Parades of shops, such as Station Parade are a common and established feature of an urban area, generally regarded as a lower order form of retail provision serving localised catchments. In many cases, the original function of such provision for 'shopping' has become more diversified – as is the case at Station Parade.

Nonetheless, Station Parade continues to perform an important local retail function which is likely to gain further significance if development for 217 dwellings west of the railway line at Derby Field, within a walkable distance from the Parade, is developed (Policy LP6 - Land East of Wokingham Road and south of Dukes Ride⁶).

Policy CR11 - Employment

Should the Broadmoor designation be identical to that in the Bracknell Forest Policies Map?

Response

No. The eastern boundary of the Broadmoor employment area, as defined on the Bracknell Forest Policies Map, and the boundary defined on the Policy Map for emerging policy LP27 (illustrated overleaf) are now both out of date.

Broadmoor Hospital has been extended to the east to provide a *“replacement secure mental health hospital and associated development, involving demolition of some existing buildings, and construction of new access road and roundabout junction to the A3095 Foresters Road (App/11_00743_Ful)”*.

These replacement facilities have now been completed. The CNP Policies Inset Map uses a more recent OS Base Map than by BFC and includes the new buildings and perimeter road.

⁶ Draft Bracknell Forest Local Plan Part 1 – Strategic Revised Growth Strategy

The approved site plan (attached) and Google Earth image (below) illustrate the location of the new buildings. With BFC's agreement, the CNPSG propose that the eastern boundary of policy CR11 at Broadmoor as illustrated on the CNP Policies Inset Map is amended to include the new eastern perimeter wall of the hospital extension as per the approved site plan. To aid the examination on this matter the CNPSG has attached a revised Policies Inset Map showing a revised CR11 boundary.



(Credit: Google Imagery © 2020 – accessed 2nd Jan 2020)

Examiners invitation to respond to Regulation 16 representations

Response to Historic England Representation

The CNPSG welcome the positive response received by Historic England and are content to accept the minor amendment proposed in paragraph 2.10 .

Response to Legal and General Representation

The CNPSG is content for the Examiner to consider, alongside the CNPSG's response to CR8 (above), whether the minor amendments they propose, given the discussion on policy flexibility outlined below, are necessary to meet the 'Basic Conditions'.

Response to Wellington College Representation

The CNPSG welcomes the College's general support for the Plan.

Policy CR12 - With regard to their comments on CR12 'Enhancing Green Infrastructure' while they correctly state BFC have several green infrastructure (GI) studies these have not yet been combined into a single comprehensive Green Infrastructure Strategy and Map of the Borough. The map on page 45 of the Submission Plan was kindly prepared by BFC following discussions with the CNPSG. It was prepared on an interim basis and the Policy is clear that it proposes the establishment of a Green Infrastructure (GI) Network in Crowthorne Parish and hence why the GI map title is referred to as indicative.

Paragraph 6.4 of the Plan (Local Infrastructure Improvements) defines a series of projects to improve connectivity. The CNPSG would support the addition to the project list to include working with landowners (including Wellington College) and the Local Authority to prepare and finalise a comprehensive GI map of the Parish which addresses both human and ecological connectivity, and extends into the detail of individual typologies.

Policy CR13 – The CNPSG disagrees with the assertion that there is flexibility in the delivery of biodiversity 'net gain' from development. The CNPSG would like to bring to the Examiner's attention the last Government's proposals to mandate the introduction of a 10% biodiversity net gain requirement on all development.

Response to BFC Representation

The CNPSG welcomes the opportunity to respond to the numerous references to 'ambiguity' of the CNP Policies cited in BFC's Regulation 16 response as reasons why the policies fail to be in 'general conformity' with the 'Basic Conditions'.

The NPPF and Planning Practice Guidance⁷ indicates that plans should provide a clear framework within which decisions on planning applications can be made. And that policies in neighbourhood plans should be drafted with sufficient clarity so that

⁷ Paragraph 41 (41-041-20140306)

a decision-maker can apply them consistently and with confidence when determining planning applications.

National policy is also supportive of the role played by local communities in the planning process in general, and the role of neighbourhood plans in particular. Planning Practice Guidance sets out the role for communities, by way of qualifying bodies, in producing neighbourhood plans. It addresses the headings "Who leads in neighbourhood planning in an area?" and, quite separately, "The role of the local planning authority in neighbourhood planning". There is no suggestion that local planning authorities should be taking a lead role in preparing or setting the policies in neighbourhood plans.

In response to BFC's Regulation 14 comments on the design policies, the supporting text to each policy was modified to make clear that flexibility could be applied in the development management process in order that any applicant had the opportunity to demonstrate how the design of a proposal had been influenced by local character.

Bracknell Forest Council (BFC) published its Design Supplementary Planning Document (SPD) in March 2017. The CNPSG welcomes the positive commitment the SPD makes to design and to neighbourhood planning. Paragraph 1.1.1 confirms BFC's commitment to 'securing high quality new development' and that 'the requirement for good design is at the heart of this commitment and central to the assessment of development proposals.'

Paragraph 1.1.9 goes on to state that:

"All areas of the Borough either have in place a Neighbourhood Plan or are working towards adopting a Neighbourhood Plan. These Neighbourhood Plans include additional policies specific to their areas which often relate to issues of character and context. The implementation of these policies and consultation with local resident groups should assist developers of both small scale proposals and larger neighbourhood extensions to achieve enhancements to an area and promote a sense of neighbourhood pride for all the community in development coming forward in their area."

Sections 2.3 and 2.4 of the SPD directs designers to the importance of integrating new development into its surroundings and the importance of 'Placemaking' in creating a positive sense of place that enhances the existing character of a site and the context of the local area.

Alongside the Streetscene SPD, the Design SPD largely reflects the general principles of good design and the characteristics set out in the recently published National Design Guide (and the Urban Design Compendium before it) rather than identifying the particular context and character of Crowthorne.

The Bracknell Forest Character Area Assessments SPD (March 2010) section on Crowthorne provided design recommendations for four study areas which at that time supplemented the Crowthorne Village Design Statement.

The Crowthorne Design Guide⁸ (AECOM Sept 2018) reviewed the key points made in the Character Area Assessment SPD and updated these where required and extended its coverage to provide greater clarity to how development and change may be managed.

The supporting text to each design policy in the Submission Plan, including policy CR1, confirms that it is not the intention that every planning application should adhere fully to every design characteristic, but does require planning applications to demonstrate that, where relevant to the location of the proposal, attention has been paid to those attributes, or that an alternative design approach is more appropriate. Hence rather than being overly prescriptive, the CNPSG consider the design policies are locally distinctive and sufficiently flexible in order that they will “influence local planning decisions as part of the statutory development plan”⁹.

The CNPSG maintain that the characteristics defined in the design policies are not excessive nor ‘ambiguous’ and that the policy drafting is reasonable given the greater significance now being placed on design in National Policy. The CNPSG appreciates however, there are other design-related policies in the development plan which a decision maker may also apply.

The design policies in the CNP establish a local context to enable the design quality and design merits of development to be considered “throughout the evolution and assessment of proposals” (NPPF paragraph 128) to ensure successful high quality consents are secured.

“Does the PC wish to comment upon ...”Bracknell Forest Council’s observation on policy CR13”

Response

Policy CR13: Biodiversity is locally distinctive in that it identifies local environmental assets and seeks to secure their ongoing protection. The CNPSG consider the policy is complementary to strategic policies, and as in all cases, CR13 should be read alongside the policies of the development plan ‘as a whole’, including NRM6.

The CNPSG consider Policy CR13 raises the profile of the local environment and does not undermine it. Its deletion, it feels, would be contrary to the Parish Council’s CRoW Act Section 40¹⁰ and Biodiversity duties¹¹ and reflects the objectives of the Government’s 25 Year Environment Plan¹², including the expectation that a ‘net gain’ in biodiversity is delivered by all development.

⁸ <http://www.crowthornepc.org.uk/np-consultation/Appendix-C-Crowthorne-Design-Guide.pdf>

⁹ ‘Non-strategic policies’ - NPPF paragraph 29

¹⁰ Countryside and Rights of Way Act 2000 (CRoW Act)

¹¹ Natural Environment and Rural Communities Act 2006

<https://www.gov.uk/guidance/biodiversity-duty-public-authority-duty-to-have-regard-to-conserving-biodiversity>

¹²https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf

Proposed Minor Modification

CR9 Crowthorne High Street – correct incorrect policy title (Crowthorne Centre) on Submission Plan page 5 and Policy Inset Map

Documents attached:

CPC Doc 2 – Broadmoor Hospital approved Site Plan (App/11_00743_Ful)

CPC Doc 3 – Updated CNP Policy Map (OS Copyright added)

CPC Doc 4 – Updated CNP Policy Map Inset 1 (CR11 boundary amended, CR9 Policy title corrected and OS Copyright added)