

WARFIELD NEIGHBOURHOOD PLAN CONSULTATION AUGUST 2021

Representations on behalf of Bewley Homes Ltd

JBB8747.C7791

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August 2021

REPORT

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1 INTRODUCTION

- 1.1 RPS Consulting Services Ltd (“RPS”) is instructed by Bewley Homes (“Bewley”) to represent their site interests in relation to the Warfield Neighbourhood Plan (WNP”) published by Warfield Parish Council (‘WPC’) and to formally respond to the post-examination 2019 consultation issued by Bracknell Forest Council (‘BFC’) which is taking place between Monday 28 June 2021 and Monday 6 August 2021.
- 1.2 Chapter 2 of this document provides a brief overview on the purpose of the consultation and the proposed modifications into the WNP.
- 1.3 Chapter 3 of this document provides a response on the basic conditions with respect to the proposed modifications. This focuses on the proposal to extend the plan period to 2037, as well as considering the implications of the HRA findings.
- 1.4 Chapter 4 of this document provides an update 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 address concerns regarding the basic conditions tests with respect to the proposed Hayley Green allocation.
- 1.5 Chapter 5 provides concluding remarks based on the analysis presented in this submission.

2 CONSULTATION OVERVIEW

Summary of Proposed Modifications

- 2.1 RPS understands that this stage in the examination process is a ‘focussed consultation’ issued by BFC on proposed modifications to the WNP. This consultation follows on from the completion of a Habitats Regulations Assessment (“HRA”) of the WNP, and the proposed extension of the plan period to 2037, as part of the requirements to satisfy the Basic Conditions¹.
- 2.2 The proposed modifications are referred to in ‘Warfield Parish Council’s response to the Examiners further procedural letter dated 1st June 2021 (E21)’ [E22]. These primarily relate to the proposed plan period extension, as well as other modifications as a consequence of the recommendations of the HRA.
- 2.3 RPS welcomes the opportunity to engage on this latest consultation, and agrees with the Examiner’s advice, in her letter dated 1 Jun 2021 [E21], that it is sensible to undertake a formal consultation where changes to the WNP are considered necessary.
- 2.4 The next chapter provides a response on the basic conditions in response to the proposed modifications, and in light of more recent correspondence between the Examiner and BFC and WPC.

¹ As laid out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 .

3 RESPONSE ON THE BASIC CONDITIONS

- 3.1 The consultation guidance provided by the Examiner advises that representations should aim to address whether or not the Plan meets the Basic Conditions.
- 3.2 This chapter therefore provides a response on matters relating to whether the WNP meets the basic conditions, with reference as well to recent correspondence submitted to the Examiner during the time since the initial examination in 2019.

The Basic Conditions

- 3.3 Planning Practice Guidance summarises the basic conditions that the WNP must meet, as defined in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990. They are as follows:
- a. having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan);*
 - b. having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order;*
 - c. having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order;*
 - d. the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development;*
 - e. the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area);*
 - f. the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations;*
 - g. prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).*
- 3.4 Having reviewed the consultation material published by BFC as an update to the examination process, RPS wishes to raise concerns that impact on two of the basic conditions in particular; notably condition e. (general conformity with the strategic policies contained in the development plan), and condition d. (the achievement of sustainable development). Whilst these two criteria are defined separately in law, they are broadly indivisible and so are considered together in this submission.

Proposed modifications with respect to Habitats Regulation Assessment

- 3.5 To address the deficiencies in the submitted WNP with respect to basic condition (f), a HRA [E13] has been prepared and issued as part of this consultation, along with a Air Quality technical note [E14] and a Air Quality modelling memo [E15].
- 3.6 Section 6 of E13 provides the summary of the findings and recommendations from the HRA. The results indicate that there would be no adverse effects on any relevant European sites located within 10km of the WNP boundary. This related to both recreational pressure and atmospheric pollution resulting from new development proposed in the WNP.
- 3.7 Having reviewed the HRA technical work presented, RPS does wish to challenge these findings and therefore does not wish to make any comment with regards to the basic conditions. Nonetheless, it is important to note that a key implication from the HRA is that the WNP area is able to support additional growth and development without any adverse impacts on any European designated sites, in particular it does not establish an upper limit or ceiling on future development in the area.

Proposed Modification – extending the Plan Period

- 3.8 It is acknowledged that the main purpose of extending the plan is to ‘align’ the WNP with the emerging BFLP, which would establish a new plan period for the District (2019-2037²). In respect of the proposal to extend the plan period from 2026 to 2037, RPS has the following comments to make.
- 3.9 RPS objects to the proposed modification to extend the plan period to 2037. If enacted, this would add a further 11 years to the WNP plan period, a change which does not appear to have considered the consequences, for example whether there is a need for additional residential allocations. It is therefore necessary for the evidence base supporting the WNP to properly consider the development needs of the area over the revised, extended plan period. This is to ensure that the WNP is based on ‘adequate, up to date and relevant evidence’ (NPPF 2021, paragraph 31). If it is not, then the WNP cannot be said to meet the basic conditions (a), which relates to plans having regard to national policy.
- 3.10 RPS notes that only the HRA has considered the revised plan period to 2037 as part of the analysis. RPS further notes that the evidence base relied upon by WPC to support the WNP has not been updated since submission in 2019. It is also evident that the information published for this consultation does not include a re-examination of Warfield’s development needs up to 2037. On this basis, RPS contends that the evidence, beyond the HRA, has not adequately assessed the implications of extending the plan period to 2037 and so the WNP does not meet criteria (a) of the basic conditions.

² Although no start date is proposed in the modifications, the date of 2019 is assumed from the technical evidence base including the Air Quality Modelling, which uses 2019 as a baseline.

- 3.11 Similarly, whilst BFC proposes to move the [emerging] Local Plan forward to 2037, there is no certainty that it will progress to adoption in its current form. This uncertainty relates in particular to whether the BFLP has identified sufficient land to meet the minimum number of homes required, plus an allowance for flexibility to meet that need. The draft Local Plan, having recently completed consultation on a Pre-Submission (Regulation 19) version, proposed a housing requirement of 11,482 dwellings for the period 2020-2037. Against this, the Local Plan identified a supply from all sources totalling 11,974 dwellings for the same period, a claimed surplus of 492 dwellings. At face value, this would suggest that sufficient land was available to meet the plan requirement up to 2037.
- 3.12 However, RPS submitted evidence to the Regulation 19 consultation in May 2021, which assessed the various assumptions relied upon by BFC to meet its housing requirement figure. This analysis suggests that a more realistic total supply for the District was in the region 10,800 (10,814) dwellings. The reduction was applied to the proposed site allocations, in particular two sites (Land at Jealott's hill and the Peel Centre), and which results in an overall reduction of 1,160 dwellings compared to the total supply figure proposed by BFC.
- 3.13 It is almost certain that RPS will not be the only party who has challenged the land supply assumptions argued in the BFLP, given this is usually the most contention issue for any Local Plan to grapple with. It therefore remains open to debate, at this point, what the land supply position really is in Bracknell Forest District. It may be the case that land supply position is not as healthy as purported by BFC and that, as a consequence, additional land (either as allocations, or potentially as reserve sites) may need to be identified to plug any shortfall or need for greater flexibility in the supply.
- 3.14 At present, the debate regarding the quantum of growth needed and the supply of land to meet it is yet to be resolved until the BFLP has been through Examination at least. The District Council has indicated that the emerging Local Plan will be submitted to the Secretary of State in 'early summer 2021', which will be followed by Examination in late 2021 and adoption in Spring 2022. The Plan has, at the time of this representation, not been submitted to Government. As the plan also includes proposed releases of Green Belt, RPS remains somewhat less optimistic of the ability of the BFLP to move swiftly through Examination and considers that late 2022 is more realistic. This is important now for the WNP, as there is likely to be a gulf between the making of this Plan, and the BFLP, in whatever iteration it is adopted in.
- 3.15 Therefore, RPS suggests that the WNP should remain sufficiently flexible and robust to allow for changing circumstances, in accordance with national policy (NPPF 2012, paragraph 14), including where the BFLP is found to be deficient on land supply grounds.
- 3.16 If the WNP does not include sufficient flexibility, then there is a risk that the WNP will become out of sync (and out of date) in a short period of time after being made as a consequence. However, the WNP is proposing a number of restrictive designations (namely, Local Gaps) along the existing and emerging boundary to the north of Bracknell town (see WNP Inset Map 1). These will limit the opportunity for the District to address any shortfall in the supply of land in the future. Such

opportunities would include releasing land that is located outside existing settlements on sites with good public transport links, in accordance with Policy CS2. By seeking to restrict opportunities for appropriate, sustainable development on the northern fringes of the town RPS contend this undermines the strategic policies of the development plan.

3.17 On this basis, RPS contends that the WDP does not meet criteria (e) of the basic conditions.

Other matters

3.18 As highlighted in the previous chapter, the newly-appointed Examiner submitted a letter [E16] as part of the Examination, dated 29 March 2021, setting out a number of queries and questions put to both WPC and BFC. The questions sought further clarification from both parties with respect to important issues relating to the WNP, notably the relationship between the WNP, the adopted development plan and, as far as it would assist the Examiner, the emerging Local Plan.

3.19 Question 3 of E16 sought confirmation from BFC that proposed Policy WNP2 (Hayley Green Allocation), to be allocated for 235 dwellings on land located on the northern edge of Hayley Green, was in general conformity with strategic policy CS2. Policy CS2 sets out the locational principles for development in the Core Strategy. Question 2 sought confirmation from that BFC still considered policy WNP2 would not undermine the spatial strategy of the emerging Local Plan.

3.20 A formal response was issued by BFC [E17] to the Examiner's questions on 29th April 2021. RPS notes BFC's response to question 2 which states, in relation to the proposed Hayley Green allocation,

"...The proposal represents positive planning and the development of the site should not have a detrimental impact on the strategic spatial strategy...".

3.21 Nonetheless, the Council goes on to state in its response to Inspector's question 3,

"... Policy CS2 – Locational Principles, is effectively a two part policy. The first part deals with the allocation of sites to meet the housing requirement in the Core Strategy as set out in Policy CS15. A sequence is given with point 4 dealing with extensions to defined settlements which is the category that this proposal would fall under. If good transport links do not exist then there is a need for firm proposals to provide such links." (RPS emphasis).

3.22 Policy CS2 of the Core Strategy lists four criteria against which the allocation of land for development would be tested, defined as 'locational principles'. These criteria were used by BFC to tests the sites included in the Site Allocations DPD, for example. The last criterion of Policy CS2 states:

"Extensions to defined settlements with good public transport links to the rest of the urban area or with firm proposals to provide such links."

3.23 It is therefore necessary for all proposed site allocations, at the very least, to demonstrate that public transport can be delivered as part of development prior to be allocated in the development plan.

- 3.24 From BFC's response, it can therefore be interpreted that BFC has not given an equivocal endorsement of Policy WNP2 with respect to the Basic Conditions. It is clear that there remains some uncertainty regarding whether good public transport links can be secured through the development of the Hayley Green site in such a way as to justify the allocation, as required under Policy CS2. RPS notes that there are bus stops located on the B3034, but the site does not provide safe and convenient access to the urban area by cycle and walking. In these circumstances, RPS does not consider the Hayley Green site to offer 'good transport links' for non-vehicular travel
- 3.25 Consequently, unless 'firm proposals' for the cycle and pedestrian links are provided in accordance with Policy CS2 it will be difficult to conclude that the allocation of Hayley Green in Policy WNP2 meets the basic conditions tests relating to general conformity with the strategic policies of the development plan (condition e).
- 3.26 Having reviewed the responses submitted by WPC since the initial examination in 2019 [E20a-E20d, E22 and E24], there is no further clarity provided on the firm proposals required to justify the allocation of the Hayley Green site. The additional information provided by the WPC therefore does not address the uncertainty highlighted by BFC in its response to the Examiner's questions.
- 3.27 RPS therefore contends that the proposed Hayley Green allocation is not in general conformity with the development plan (Policy CS2). Furthermore, the lack of any firm proposals for delivering 'good public transport links' as part of development of the site would not enable the delivery of sustainable development.
- 3.28 As a result, RPS contend that the WNDP (Policy WNP2), as submitted, does not meet the basic conditions test under criteria (e) and (d).

4 LAND AT BROOKFIELD STABLES, HAYLEY GREEN

4.1 In light of the concerns raised in the previous chapter, RPS would like to submit on behalf of Bewley emerging proposals for Land at Brookfield Stables, Hayley Green ('the Site') for allocation / reserve site consideration.

4.2 Although RPS is aware that the Examiner has not requested site specific information as part of this consultation, this is being included for a few good reasons which we hope will be entertained.

Bewley has not previously been involved in the WNP process, despite having control of land directly adjacent to the only proposed allocation in the WNP;

RPS considers for the reasons set out above, Hayley Green needs to be able to provide more definitive public transport links, and in this regard, land at Brookfield Stables could assist; and

RPS considers that greater flexibility is needed to ensure that the WNP can endure. The plan period has been extended by 11 years to 2037 (adding 5 years to the plan period assuming a start of 2019), though the consideration of whether further growth may be needed has not been considered.

4.3 Both WPC and BFC are aware of the proposals being pursued by Bewley on the Brookfield Stables site. Bewley has promoted the Site through various stages of the Bracknell Forest Local Plan review, as well as providing WPC a copy of its submission to the Further Consultation on the Revised Growth Strategy dated 6th December 2019 following the Regulation 16 consultation stage into the WNP.

4.4 This chapter therefore provides an update on the current status of the Site, which includes revisions to the emerging concept layout for the Site. For reference, a site location plan is presented below.

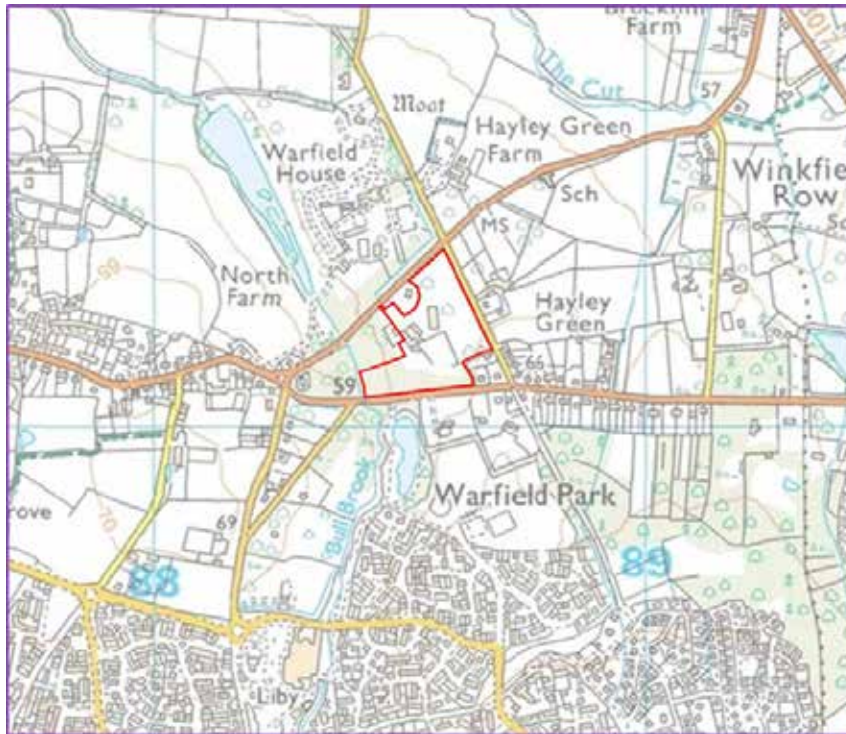


Figure 4-1 Brookfield Stables Site Location Plan

Update on the Site Status

4.5 As WPC and BFC will be aware, a planning application for up to 90 dwellings and associated open space (20/01085/OUT) was submitted and validated on 24th December 2020. The application was accompanied by a series of technical assessments in support of the proposals. A number of issues were resolved through negotiation with BFC on the application but, nonetheless, it was subsequently withdrawn on 30 June 2021.

Highways issues

4.6 Notably, it is important to regard that Bewley and the Local Housing Authority (Berkshire County Council) have reached an agreement on highways matters related to the application. A technical report dated 10 June 2021 was prepared by i-Transport and submitted to BFC on behalf of Bewley, which provides further details on the provision of a suitable access to the Site (a copy is available on the BFC’s planning register). This shows that the Site is capable of being delivered in isolation or in combination with the Hayley Green allocation, should the Site be identified in the development plan. The relevant extract from the report is appended to this submission (**Appendix A**).

Landscape / Local Gap

4.7 Another matter that has been flagged by WPC and BFC is the perceived impact from developing the Site on the ‘local gap’ between Warfield Street and Hayley Green. This matter was recently considered by BFC in the consultee response to the outline application dated 24 March 2021, provided on landscape issues, which is appended to this submission (**Appendix B**). The response

rightly referred to the findings of BFC’s own Landscape Sensitivity Appraisal of Potential Housing and Employment Sites in Bracknell Forest (LUC February 2018), which assessed the Site (under ref. WAR12).

4.8 In terms of landscape sensitivity to development, the Site scored ‘medium’. This is a lower sensitivity to that assigned to the Hayley Green allocation (a mix of medium/high land parcels). An extract from the LSA below shows this visually.

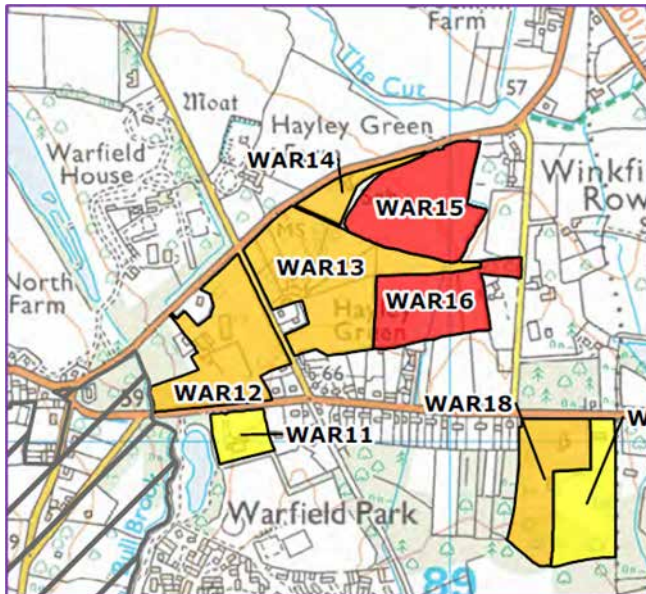


Figure 4-2 Landscape Sensitivity Map

4.9 On the ‘role of area in setting’ the assessment found that:

“Although not in a defined ‘Strategic Gap’, the site [WAR12] contributes to the perceived gap between Warfield Street and Hayley Green and the Warfield allocation and the loss of open space could increase coalescence. However if the trees along Forest Road are retained, the site could be designed so that the area retains its role as a wooded gap between the settlements.”

4.10 Therefore, BFC’s own evidence clearly shows that mitigation measures are available to reduce the perception of impact on the perceived ‘gap’. Despite this, BFC has now sought to move away from its own evidence, stating in the consultee response:

“If this site was to come forward now it would undermine the local assessment of the location of gaps between the historic villages, specifically between Warfield Street and Hayley Green. If the land identified for development in the Neighbourhood Plan is developed as well as this application site, there would be no gap. This would irreversibly change the character of the villages and the rural character of the land forming the gaps...”

4.11 RPS disputes this claim, and is an issue that RPS has responded to in representations to the Regulation 19 draft BFLP consultation as recently as May 2021. To summarise those representations here, even if some impact were caused by a reduction in separation between Hayley Green and Bracknell as a result of releasing the Site for development, Bewley have

already given consideration to how the Site could be delivered, which is sympathetic to the issue of separation.

- 4.12 As shown below in Figure 4-3, the potential developable area of the Site has been identified, which would broadly correspond to the land take of the existing equine business on the Site, along with curtilage land. Alongside the developable land, the area to the south-western corner of the Site can be set aside for landscape and open space provision, which builds upon the already strong boundary planting and would provide belt of green space which continues northwards from Westmorland Park to the south.



Figure 4-3 Brookfield Stables - Site Framework Plan

- 4.13 It can be seen that any new development would broadly follow the existing footprint and line of development established by the existing buildings and associated uses on the Site. Furthermore, the new residential dwellings would not intrude into the area of separation that already exists on the Site in the south-wester corner. This would ensure that the physical and visual separation can be maintained, as far as practicable, and, as a result, by ensuring development is sympathetic in this regard, coalescence between Hayley Green and Bracknell (by virtue of the proximity to Land at Warfield site allocation) can be prevented.
- 4.14 RPS contends that this information represents relevant and up to date evidence that should be take into account in judging the appropriateness of the Site as a potential site allocation, or reserve site, in accordance with national policy (NPPF 2021, paragraph 31). However, this information has been ignored as part of the preparation of the WNP.
- 4.15 Furthermore, figure 4-4 below shows the emerging masterplan for Land at Warfield/SA9 allocation, taken from the *Warfield Supplementary Planning Document (SPD)*.

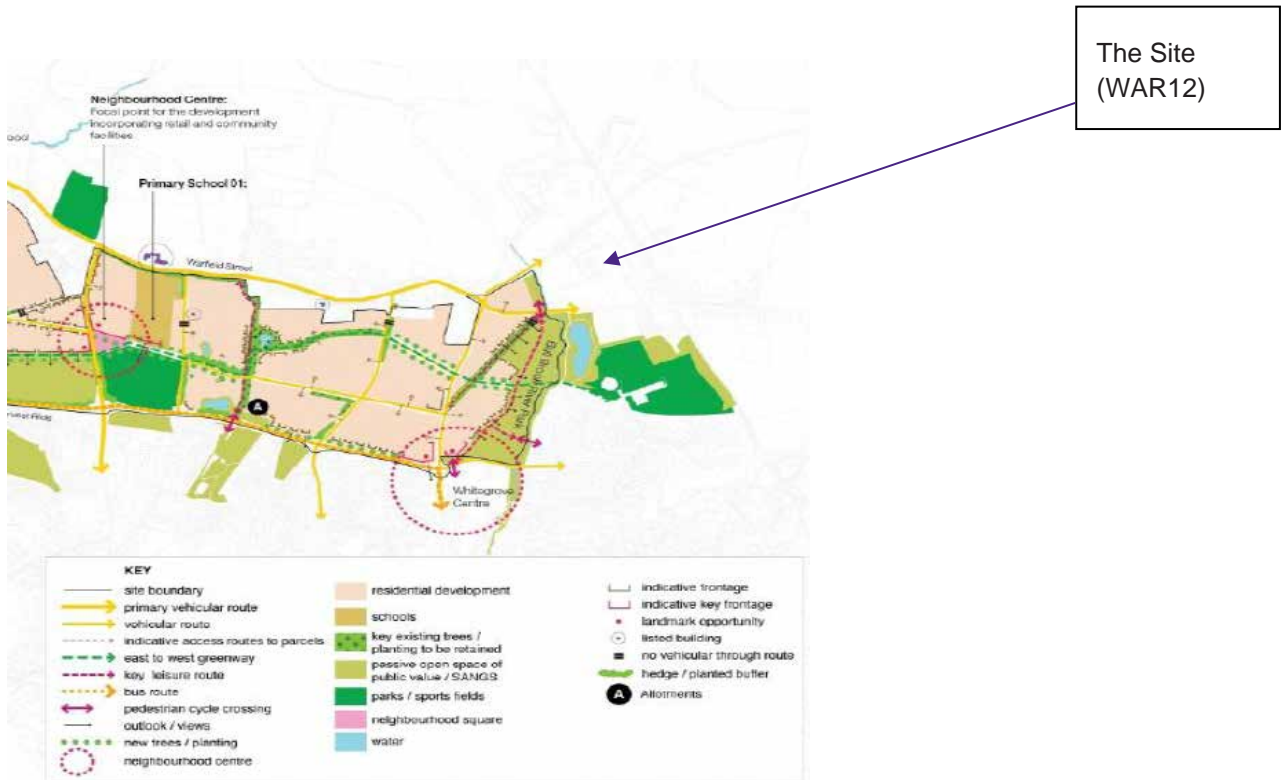


Figure 4-4 Land at Warfield/SA9 – Concept Plan

- 4.16 As can be seen, the emerging masterplan identifies an area of ‘passive open space of public value / SANG9’ to be laid out along the eastern boundary of the site. This falls within the ‘Bull Brook River Park’ Character Area and reflects the presence of an existing watercourse that runs in a north-south axis along this part of the site. The overall extent of the new open space/SANG to be provided is extensive and would clearly increase the sense of physical and visual separation between SA9 (and thus Bracknell) and the Site, to be retained in perpetuity. The separation between SA9 and Hayley Green is would be further enhanced due to the retention of the open land that exists in the south-west corner of the Site and the potential enhancements in connectivity with Westmorland Park (see next section), as highlighted above. Again, the consultee response ignores the provision of open space on the Land at Warfield. RPS considers that site SA9 would help to maintain the presence of a gap between the existing settlements.
- 4.17 For these reasons, RPS disputes the view that any development in this location would result in there being ‘no gap’ between Hayley Green and Bracknell. RPS therefore contends that the exclusion of the Site on the grounds of separation have not been adequately justified on the evidence available.

Further considerations

- 4.18 A significant benefit that can be secured through the allocation and development of the Site is the potential sustainability benefits from enhancing the accessibility and connectivity between the Hayley Green allocation and Bracknell.

4.19 Figure 4-5 below highlights the potential locations of the new cycle and pedestrian routes through the Site that can connect with the emerging plans for the ‘Land at Warfield/SA9’ to the south (thin dashed line). It would be proposed that a pedestrian crossing would be secured on Forest Road to provide for a safe passing point, supporting the encouragement of walking/cycling in this area.



Figure 4-5 Extract of Concept Plan – showing possible route of new cycle and pedestrian routes (blue hatch)

4.20 As can be seen, there is clear potential to provide a direct connection from the Site, via Edmunds Lane, to Westmoreland Park which then connects into the enhanced open space as part of the plans for Land at Warfield site via Edmunds Lane.

4.21 This will provide safe, direct and convenient walking and cycling access to a range of education, employment, health, and retail facilities within a reasonable walking and cycling distance to the south of the site. The connection also provides for links to the additional bus service on County Lane which are within a reasonable walking distance from the site providing links to Bracknell town centre. New residents will therefore have appropriate opportunity to make journeys without needing to use the car.

4.22 The provision of new pedestrian and cycle linkages through the Site could clearly assist in enhancing the sustainability credentials not only of development on the Site, but also the Hayley Green allocation. RPS also notes a small, but important change, arising from the 2021 edition of the NPPF. This relates to the amended policy 73 (was 72), and the addition of the text in parenthesis that indicates that significant extensions should be supported by necessary infrastructure and facilities including a genuine choice of transport modes (RPS emphasis). This additional text has been issued as part of a wider tranche of changes relevant to climate change mitigation and RPS considers that this is important in the context of the allocation of land in the WNP, and ensuring that the proposals can be as resilient as possible. In this context, RPS considers that the inclusion of Brookfield Stables, and the proposed cycle route would better allow the allocation (as a whole) to respond to the recently amended NPPF.

- 4.23 Figure 4-6 below shows the concept plan for the Hayley Green allocation, taken from the WNP Submission version.
- 4.24 It can be seen that the emerging plan relies on existing travel routes via the junction of Hayley Green and Forest Road to provide access to Westmorland Park and the enhanced open space provision on Land at Warfield for new residents of Hayley Green. Whilst available, this is clearly not the most ideal travel option for pedestrians and cyclists wishing to travel from the Hayley Green site into Bracknell. Therefore, the provision of a routes through the Site, as highlighted above, would offer pedestrians and cyclists a better and safer option. In terms of an access point, Bewley anticipates that this could be thought the area highlighted on the western access of Figure 4.6 below, which would run through Brookfield Stables, onto a pedestrian crossing leading to Edmunds Way.
- 4.25 This is another consideration that is relevant to the consideration of the Site as a site allocation, which should be weighed in the balance by the Council in assessing the Site. If not, then this represents another reason why the site assessment for the Site is not justified given the benefits highlighted above.



Figure 4-6 Hayley Green proposed allocation

- 4.26 In conclusion, RPS contend that the reasons for excluding the Site with respect to the relationship of the Site to Hayley Green does not accurately reflect the reality on the ground. Similarly, RPS contend that the WFC and BFC has applied a blanket protectionist approach to the consideration of separation also cited as a reason for excluding the Site which seeks to prevent any development on the Site for its own sake without any qualification of the likely impact, contrary to national policy. The Council has also failed to acknowledge the evidence submitted by RPS (supplemented by additional evidence here) which shows that the Site is capable of being delivered in such a way as to minimise the impact on the physical and visual separation between Hayley Green and Bracknell, contrary to national policy which requires plans and policies to be underpinned by relevant and up to date evidence.
- 4.27 Furthermore, the provision of enhanced facilities for cycling and walking would undoubtedly assist in addressing the potential impacts on air quality due to vehicle-related trips resulting from new

residential development. This is highlighted in the WNP Habitats Regulations Assessment (HRA) [E13, paragraph 5.48) and which forms the basis for one of the modifications (E22, modification h.) proposed to the WNP.

5 CONCLUSIONS

- 5.1 This representation has been prepared on behalf of Bewley Homes in response to the ‘focussed consultation’ pursuant to the examination of the Warfield Neighbourhood Plan (“WNP”). The consultation has been issued by Bracknell Forest Council (“BFC”) in light of proposed modifications proposed by Warfield Parish Council (“WPC”) published on 14 June 2021 [E22]. The proposed modifications focus on the recently prepared Habitats Regulations Assessment (“HRA”), and the proposed extension of the WNP to 2037 (from 2026).
- 5.2 On the HRA, RPS notes the key finding that there will be no adverse effects on any European designated sites within 10km of the WNP area. This clearly shows that, in relation to those sites with the highest degree of policy and legal protection, further development can be supported within the WNP. With respect to the proposed modifications flowing from the HRA, RPS does not at this point wish to raise any concerns on the basic conditions.
- 5.3 On the proposed modification to extend the plan period, RPS wishes to point out that only the HRA has specifically assessed then implications of the time extension (11 years from 2026 to 2037). There is therefore a gap in the evidence base that needs to be addressed before the WNP can be said to meet the basic conditions, in particular relating to a re-examination of Warfield’s development needs over the revised period. Without the evidence base being updated in line with the proposed time period, RPS suggests the WNP does not meet criteria (a) and the regard to national policy and the requirement that plans are underpinned by up to date, accurate and relevant evidence (NPPF 2021, paragraph 31).
- 5.4 Furthermore, it remains uncertain at this time whether the Bracknell Forest Local Plan will proceed to adoption in its current form. This is particularly with respect to housing land supply policies. RPS has assessed the land supply position in the District and has identified potential reductions in the supply of land up to 2037 of around 1,160 dwellings. This raises the potential need for additional sites to be identified through the local plan and, as a consequence, there should be much greater flexibility built into the WNP to allow for this. Similarly, the restrictive nature of the WNP, in particular with respect to the designations proposed along the current and emerging northern boundary of Bracknell, limits the opportunities to address any shortfall in supply on sites outside existing settlements, thus undermining the strategic policies of the development plan (Policy CS2) which allow development in such locations. On this basis, RPS contend that WNP does not meet criteria (e) of the basic conditions and the need for general conformity with strategic policies of the development plan.
- 5.5 Other concerns are also raised relating to the policy approach with respect to the proposed Hayley Green Allocation (Policy WNP2) and whether the policy is in general conformity with the strategic policies of the development plan. On this point, as argued in chapter 3 of this submission, RPS contends that the approach (as drafted) does not sufficiently address the need for ‘good public transport links’ to be demonstrated before an allocation can be made, as required by Policy CS2 of the Core Strategy. This is because the policy provides little detail or ‘firm proposals’ to

demonstrate safe and convenient accessibility for cycling and walking accessibility into Bracknell urban area.

Appendix A

Extract from the I-Transport report, dated 10 June 2021

Technical Note

Project No: ITL16315
Project Title: Land at Brookfield Stables
Title: Further Highways Information - Updated
Ref: SJ/ITL16315-004A TN
Date: 10 June 2021

SECTION 1 INTRODUCTION

- 1.1 Bewley Homes have appointed i-Transport LLP to provide highways and transport advice in relation to an outline planning application (BFC Reference 20/01085/OUT) for a residential development of up to 90 dwellings and associated infrastructure including a new cycle path connecting to Edmunds Lane.
- 1.2 BFC Highways responded to the planning application by a memorandum dated 19 February 2021 with the applicant responding on 30 April 2021 in a Technical Note reference ITL16315-003 TN. As a result further comments were provided by BFC Highways on 5 May 2021 and these were addressed in further Technical Note reference ITL16315-004 TN which was submitted to BFC. The Technical Note was discussed with BFC Highways on 9 June 2021 and has now been updated within this Technical Note reference ITL16315-004A TN. The BFC Highways comments are included in full at **Appendix A**. The comments identified seven issues to be addressed, these are summarised below:

Street Lighting and Vehicle Speed

- *“Details of street lighting need to be provided, as a minimum along the length from the existing lamp opposite The Limes to the proposed uncontrolled pedestrian crossing adjacent to Strawberry Hill, encompassing the proposed vehicular access and proposed pedestrian crossing points”.*
- *“The submitted measured speeds indicate that there is a speeding issue along this section of B3034 Forest Road in proximity of the access. The applicant should set out a proposed scheme of signage and markings to help to reinforce the 30mph speed limit to drivers”. –*

Vehicle access

- *“In this instance, if the applicant cannot provide a ghost-island right-turn lane as requested by the Highway Authority then localised widening passing the access should be considered. This would also help to resolve the issue of the swept paths of the refuse vehicle oversailing the opposite carriageway of B3034 Forest Road when making a left-turn out, as shown within the drawings in the submitted Transport Assessment.”*

- *“The offset relationship to the existing western access to Northfield Farm is not ideal. If permission 17/00656/OUT is not implemented then this access remains extant, with a centre-line stagger of less than 15m (the minimum for opposite staggered junctions set out in the Council's Highways Guide for Development)”*
- *“Details of the culvert required under the proposed site access need to be provided”*

Ped / cycle improvements

- *“The Highway Authority notes at this stage that access and off-site highway works, including formation of the Toucan crossing over B3034 Forest Road, would need to be undertaken under Section 278 of the Highway Act; this should be secured by the Section 106 agreement for the site. Similarly, whilst the detail is for reserved matters, the Council would request adoption of the site roads, including a through pedestrian / cycle link between the Toucan crossing on Forest Road and the uncontrolled crossing on Hayley Green, under Section 38 of the Highways Act; this too should be secured by the Section 106 agreement for the site. ”*
- *“The Highway Authority would also be looking for the S106 agreement for the development to provide a proportionate contribution to junction improvement schemes at Five Ways and Malt Hill.”*

- 1.3 This Technical Note provides an updated response to the request for the seven amendments following the meeting with BFC Highways on 9 June 2021 and provides updated proposals to address them.

SECTION 2 STREET LIGHTING AND VEHICLE SPEEDS

2.1 Street lighting

2.1.1 The Bracknell Forest Council - Highways Guide for Development (HGfD) provides guidance and specifications for adoptable street lighting. The specification varies depending on the type of street to be lit with a range of column, lantern and lamp types and heights provided.

2.1.2 The applicant commits to provide improved street lighting along the length of Forest Road from the existing lamp opposite The Limes to the proposed uncontrolled pedestrian crossing adjacent to Strawberry Hill, this will include the proposed vehicular access and proposed Toucan crossing to Edmunds Lane. **Drawing ITL16315-GA-003 Rev D** provides a note to confirm this commitment. The details of the specific provision of street lighting will be secured in a suitably worded Grampian style planning condition or a Section 106 obligation and the improved street lighting will be delivered by the applicant under a subsequent Section 278 Agreement as part of the agreed package of highway works.

2.2 Vehicle speeds

2.2.1 The Transport Assessment includes recorded speeds on Forest Road, these show 85th%tile speeds of circa 37mph and mean speeds of 32mph. Whilst this is not unexpected for a relatively straight and open 30mph road, the application proposals have been updated to set out a proposed scheme of improved signage and road markings as well as 30mph 'repeater' signs to help to reinforce the 30mph speed limit. The further improvements are shown on **drawing ITL16315-GA-003 Rev D and ITL16315-GA-005 Rev B**. These works can be secured in a suitably worded Grampian style planning condition or a Section 106 obligation and will be delivered by the applicant under a subsequent Section 278 Agreement as part of the agreed package of highway works.

SECTION 3 VEHICLE ACCESS

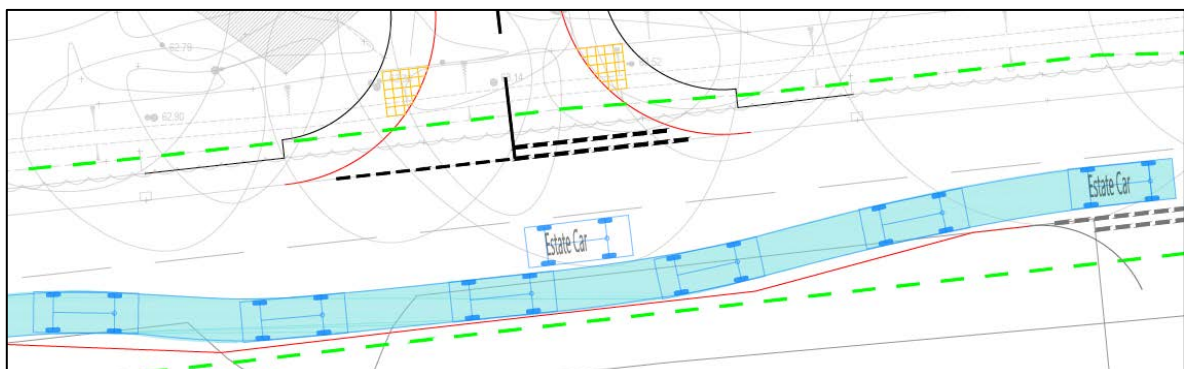
3.1 Passing bay on Forest Road

3.1.1 The applicant maintains that the application of the DMRB is not appropriate in this situation and there is no justification for either a ghost island right turn lane or a localised widening / passing bay scheme. However, as requested a localised widening of Forest Road as part of the site access has been considered. The widening has been designed based on CD 123 Figure 2.14.1 and the note beneath that figure which states:

"A passing bay provides space for through vehicles to pass vehicles waiting to turn right into the minor road but only at low speed".

3.1.2 A potential widening scheme is shown in **Image 3.1** and could provide a passing bay that allows a large estate car to pass a large estate waiting to turn right into the site. The swept path analysis of such movements is also shown.

Image 3.1: Potential passing bay scheme



3.1.3 Whilst a widening scheme could be provided, it is not necessary to make the development acceptable in planning terms and is not required on traffic capacity or highway safety grounds. There is also concern about it having the consequence of increasing traffic speeds on Forest Road and it would bring the edge of the Forest Road running carriageway close to the top of the roadside ditch.

3.1.4 In discussion with BFC Highways it has been agreed that the passing bay option is taken no further and instead the site access has been amended to provide more generous corner radii as shown on **drawing ITL16315-GA-003 Rev D**. The revised design has been the subject of swept path analysis as shown on **drawing ITL16315-GA-004 Rev B** which shows the refuse vehicle does not need to cross the centreline of Forest Road when turning out of the site.

3.2 Existing access to Northfield Farm

3.2.1 BFC identify the offset relationship to the existing western access to Northfield Farm as being 'not ideal' in the situation where permission 17/00656/OUT is not implemented and the existing western access to the farm remains. The concern is around the centre-line stagger of less than 15m which is identified as the minimum for opposite staggered junctions set out in the Council's Highways Guide for Development.

3.2.2 Firstly, the existing western access to the farm is a private drive and not a 'Junction' so the spacing criteria is not relevant. However, in order to progress matters positively, the spacing has been reviewed. In addition, the operation of the existing access and the proposed site access has been further tested.

3.2.3 **Drawing ITL16315-GA-007 Rev A** shows the centreline spacing between the driveway and the site access is around 10m i.e. just 5m below the spacing needed if these were both formal priority junctions. In addition, the 'stagger' between the two accesses is a right/left stagger which avoids any hooking movements and their operation has been tested using swept path analysis which shows there is no physical interaction or risk of conflict between right turning vehicles using the accesses simultaneously.

3.2.4 It is also relevant that the scheme has been the subject of a Stage One Road Safety Audit which raised no residual safety concerns with this arrangement.

3.2.5 Finally, the western access will be closed as part of planning permission 17/00656/OUT, the site is now the subject of a Reserved Matters planning application 21/00440/REM which confirms the access is to be closed. There is no obvious reason to suggest that the permission will not be implemented and the access closed.

3.3 Site access culvert

3.3.1 The proposed site access will be delivered by the applicant under a Section 278 Agreement and the detailed design approval process will include full details of the culvert required under the proposed site access in line with the BFC Highways Guide for Development which states that *"highways and structures which the LHA will normally adopt include carriageways, footways, main footpaths, cycleways, verges and highway structures such as bridges, culverts and retaining walls which are constructed in accordance with the appropriate standards and are for the use of the general public"*.

3.3.2 A note has been added to **drawing ITL16315-GA-003 Rev D** confirming the details of the culvert required under the proposed site access will be provided and approved at the detailed design stage and this can be secured in a suitably worded Grampian style planning condition or Section 106 obligation and delivered by the applicant under a subsequent Section 278 Agreement as part of the agreed package of highway works.

SECTION 4 PEDESTRIAN AND CYCLE IMPROVEMENTS

4.1 Section 106 / 278 Agreements

4.1.1 As requested by BFC Highways the applicant confirms that the access and off-site highway works including adoption of the site roads, a through pedestrian / cycle link between the Toucan crossing on Forest Road and the uncontrolled crossing on Hayley Green will be undertaken under Section 278 and Section 38 of the Highways Act and these works will be secured by a Section 106 agreement or Unilateral Undertaking for the site. For the avoidance of doubt this will include:

- The formation of the site access including new culvert (**drawing ITL16315-GA-003 Rev D**)
- Toucan crossing over B3034 Forest Road at Edmunds Lane (**drawing ITL16315-GA-003 Rev D**)
- Adoption of the site roads to include a through pedestrian / cycle link between the Toucan crossing on Forest Road at Edmunds Lane and the uncontrolled crossing on Hayley Green (**drawing ITL16315-GA-005 Rev B**); and
- The wider pedestrian, passenger transport, street lighting and speed management measures shown on **drawing ITL16315-GA-003 Rev D** and **drawing ITL16315-GA-005 Rev B**)

4.2 Five-Ways / Malt Hill Improvement schemes

4.2.1 In principle, the applicant is prepared to make a proportionate contribution under Section 106 to junction improvement schemes at Five Ways and Malt Hill.

4.2.2 These junctions are close to the site and are thus directly related to the development, further details will need to be agreed with regard to the detail of the improvement schemes so that it can be agreed that they are necessary to make the development acceptable in planning terms and that the contribution is fairly and reasonably related in scale and kind to the development, however at this stage the applicant is content to agree this as a 'Heads of Terms' matter - subject to further discussion at the Section 106 stage.

SECTION 5 SUMMARY AND CONCLUSIONS

5.1 Summary

5.1.1 Bewley Homes have appointed i-Transport LLP to provide highways and transport advice in relation to an outline planning application (BFC Reference 20/01085/OUT) for residential development of up to 90 dwellings and associated infrastructure including a new cycle path connecting to Edmunds Lane.

5.1.2 BFC Highways responded to the planning application by a memorandum dated 19 February 2021, a response was provided by the applicant on 30 April 2021. A further BFC Highways response was provided on 5 May 2021 which identified seven areas where further work or agreement was needed. These have all now been addressed as summarised in **Table 5.1**.

Table 5.1: BFC Highways comments and applicant response

BFC Comment	Applicant response
Details of street lighting need to be provided, as a minimum along the length from the existing lamp opposite The Limes to the proposed uncontrolled pedestrian crossing adjacent to Strawberry Hill, encompassing the proposed vehicular access and proposed pedestrian crossing points.	Drawings ITL16315-GA-003 Rev D and ITL16315-GA-005 Rev B now confirm that street lighting improvements will be provided throughout the scheme.

BFC Comment	Applicant response
<p>The applicant should set out a proposed scheme of signage and markings to help to reinforce the 30mph speed limit to drivers.</p>	<p>Drawings ITL16315-GA-003 Rev D and ITL16315-GA-005 Rev B now include a scheme of signage and markings to help to reinforce the 30mph speed limit to drivers</p>
<p>Localised widening passing the access should be considered.</p>	<p>A potential widening scheme has been prepared and whilst it could be provided, it is not necessary to make the development acceptable in planning terms and is not required on traffic capacity or highway safety grounds. There is also some concern about it having the consequence of increasing traffic speeds on Forest Road and it would bring the edge of the Forest Road running carriageway close to the top of the roadside ditch. For these reasons it is agreed with BFC that this will be taken no further and instead the site access has been amended to provide more generous radii as shown on drawing ITL16315-GA-003 Rev D, this has been tracked on drawing ITL16315-GA-004 Rev B and the refuse vehicle does not need to cross the centreline of Forest Road when leaving the site.</p>
<p>The offset relationship to the existing western access to Northfield Farm is not ideal. If permission 17/00656/OUT is not implemented then this access remains extant, with a centre-line stagger of less than 15m (the minimum for opposite staggered junctions set out in the Council's Highways Guide for Development).</p>	<p>The existing western access to the farm is a private drive and not a 'Junction' so the spacing criteria is not relevant. However, the spacing has been reviewed and shown to be around 10m i.e. just 5m below the spacing needed if both were formal junctions. In addition, the 'stagger' is a right/left stagger which avoids any hooking movements and their operation has been tested using swept path analysis which shows there is no physical interaction or risk of conflict between right turning vehicles using the accesses simultaneously. A Stage One Road Safety Audit has raised no residual safety concerns with this arrangement and the western access will be closed as part of planning permission 17/00656/OUT and the current Reserved Matters application 21/00440/REM and there is no obvious reason to doubt this will not occur.</p>

BFC Comment	Applicant response
Details of the culvert required under the proposed site access need to be provided.	A note has been added to drawing ITL16315-GA-003 Rev D confirming the details of the culvert required under the proposed site access will be provided and approved at the detailed design stage and this can be secured in a suitably worded Grampian style planning condition or Section 106 obligation and delivered by the applicant under a subsequent Section 278 Agreement as part of the agreed package of highway works.
Pedestrian and cycle improvements.	The applicant has confirmed that the site access and off-site highway works including adoption of the site roads, a through pedestrian / cycle link between the Toucan crossing on Forest Road and the uncontrolled crossing on Hayley Green and all pedestrian, passenger transport, street lighting and speed management measures shown on drawing ITL16315-GA-003 Rev D and drawing ITL16315-GA-005 Rev B will be secured in a S106 agreement and delivered under S38/278 Agreements by the applicant.
Five-Ways / Malt Hill Improvement schemes	In principle, the applicant has confirmed they are prepared to make a proportionate contribution under Section 106 to junction improvement schemes at Five Ways and Malt Hill. This will be discussed further at the S106 Agreement stage.

5.2 Conclusion

5.2.1 Further information has been provided to address the matters raised. The submitted further information in this Technical Note and on **drawings ITL16315-GA-003 Rev D** and **ITB16315-GA-005 B** set out a package of on and off-site accessibility improvements and confirmation is requested from BFC Highways that matters raised have been suitably addressed subject to the imposition of planning conditions and heads of terms being agreed for a Section 106 Agreement.

Appendix B

Bracknell Forest Council consultee response to outline application 20/01085/OUT dated 24 March 2021

Memorandum: Internal e-planning consultation

To: Transport Development Environmental Health and Safety Landscape Officer Biodiversity Officer Tree Officer Jon Mullis Lead Local Flood Authority Urban Design Officer Implementation Environmental Policy Officer (SPA) Parks and Countryside Officer The Environment Agency Waste and Recycling Officer Landscape Officer Renewable Energy Officer Ellie Eghtedar - Head Of Housing Planning Policy Section	From: Katie Andrews Direct Line No. 01344 351142 Dated: 26.01.2021 Doc Ref: EMEMO Valid Date: 24th December 2020
Ref: 20/01085/OUT (<i>Please quote this on all correspondence</i>) Original Planning Number (if applicable): PP-09350576	
Proposal: Outline application for residential development of up to 90 dwellings including public open space and associated infrastructure, including a new cycle path connecting to Edmunds Lane. Matter of access to be determined with all other matters reserved.	
Location: Brookfield Farm Bracknell Road Warfield	
Officer Notes: Case officers notes.	

I notify you of the above planning application for your consultation, and would be grateful to receive any comments you may wish to make, in writing, by **16 February 2021**. **Should no response be received by this date it will be taken you have no comments to make.**

Please note that unless this consultation relates to a pre-app our response may be put on-line.

Please do not hesitate to contact me should you have any questions.

Case Officer *Katie Andrews*

For Head of Planning

VIEW this application online (click on link below)

Enter the application number - 20/01085/OUT

<http://www.bracknell-forest.gov.uk/viewplanningapplications>

(Please note that it can take 1 working day from the validation date [namely 24.12.2020] before this application and drawings are available on line).

NOTE:

1. Internal Consultee's wishing to check plan measurements or sensitive documentation should use the tools available via the internal IDOX software.
2. Please note should you require a hard copy of a plan you have two choices:

- i) View/Photocopy the drawings from the "Registered Copy" held at reception ground floor TS South (Plan copier - second floor TS South)
 - ii) View/Print the drawings directly from IDOX to the plan printer "IP_The beast" located on the ground floor TS South
3. Two new viewing stations are now also available on the ground floor TS South
- Finally, as an internal consultee you should have access to the internal IDOX Server and relevant printer, if not you need to notify the ICT Helpdesk.

Memorandum: Consultee Response (Planning)

NOTE: Consultee to complete yellow boxes and return this memo via email to the Case Officer

TO:	Katie Andrews	Direct Line: 01344 351142	Planning Development Control
FROM:	Liisa Balkham	Ext No.	
Consultee: <i>Delete those not applicable</i>	Design / Policy / Implementation / Highways / Trees / Landscape / Ecology / Env Health / Waste / Other	Dated:	24/03/2021
Ref:	20/01085/OUT (Please quote this on all correspondence)		
Proposal:	Outline application for residential development of up to 90 dwellings including public open space and associated infrastructure, including a new cycle path connecting to Edmunds Lane. Matter of access to be determined with all other matters reserved.		
Location:	Brookfield Farm Bracknell Road Warfield		
Consultee Response:	DWG / Doc Ref:		

The landscape sensitivity was assessed to be medium.

There are some additional details regarding the assessment that are relevant and additional.

The findings of the applicants site appraisal show that there are only direct views into the site from locations at close range, i.e. along the roads bordering the site, and that these close views are filtered through boundary tree and shrub plantings. The site is not visible from longer range views throughout the ZTV due to intervening vegetation and dense tree cover.

Although the site is enclosed by boundary vegetation, the vegetation cover during winter months is limited and sparse resulting the site to be clearly visible through the boundaries from the adjoining roads.

The Pre-Submission Bracknell Forest Local Plan has now been published for consultation. The application site is above where it was assessed to contribute to the perceived gap between Hayley Green and Warfield allocation. The proposed development would considerably reduce the gap function.

The site is also in the local gap defined in the emerging Neighbourhood Plan for Warfield Parish in policy WNP7. In this plan, land to the east of this site is allocated for development related to Hayley Green in policy WNP2, although the adjoining site has not been allocated for housing in the Pre-Submission Bracknell Forest Local Plan.

If this site was to come forward now it would undermine the local assessment of the location of gaps between the historic villages, specifically between Warfield Street and Hayley Green. If the land identified for development in the Neighbourhood Plan is developed as well as this application site, there would be no gap. This would irreversibly change the character of the villages and the rural character of the land forming the gaps.

It is suggested that

It is not clear if the proposed mature landscape framework could be retained and enhanced with the proposed density.

It is also stated in 7.13 (of the LVIA)

I would agree that the scale of the proposed development would not fit the scale and character of development in the area.

It is also proposed that

Although this would retain the open space along the western boundary as part of the gap, the proposed buildings would be located closer to the more open countryside. Additionally, the proposed arrangement of the residential blocks in a grid pattern would not reflect the rural setting or the linear character of the villages.

The proposed site access along Forest Road would result in loss of trees and open views to the development. A pedestrian and cycle route is proposed through the site north to south. Creating the route through the tree belt would result in loss of trees and decrease the screening. Lighting would be likely to be required resulting in biodiversity conflicts.

The proposal would also result in the loss of several individual mature trees within the internal site area that are identified as valued features in the Landscape Character Assessment and also in the LVIA extract below.

A separate heritage assessment has been carried out to consider whether the development of the site would affect the setting of the Grade II listed building Warfield House which has extensive grounds extending south to Bracknell Road.

To conclude, the proposal would result in suburban form of housing in a countryside location, within a site that has been allocated as part of the strategic gap in the Pre-Submission Bracknell Forest Local Plan and could not be supported.

<p>Summary</p> <p><i>Consultee's summary will be pasted into the Officers Report</i></p>	<p>Type summary here which will be included in the Case Officers Report. (300 words)</p> <p>This is not applicable to <u>Policy</u> comments whose response above will be incorporated into the Officers final report.</p>
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RECOMMENDATION <i>check relevant boxes</i>		CONDITIONS Discharge	PRE-APP submission
<input type="checkbox"/> APPROVE	<input type="checkbox"/> REFUSE	<input type="checkbox"/> COMPLIES with Conditions	<input type="checkbox"/> SUPPORT PRE-APP
<input type="checkbox"/> S106 Legal Agreement		<input type="checkbox"/> NON-COMPLIANCE	<input type="checkbox"/> OBJECT PRE-APP