



Parish Office
7 County Lane
Warfield
Bracknell
Berkshire
RG42 3JP
☎ 01344 457777
info@warfieldparishcouncil.gov.uk

5 December 2019

Development Plan Team
Bracknell Forest Council
Time Square
Market Square
Bracknell
RG12 1JD

Dear Sirs

Warfield Parish Council response to the Draft Bracknell Forest Local Plan

Thank you for the opportunity to comment on the Draft Bracknell Forest Local Plan and for the preparation of the appropriate supporting information.

The attached comments have been prepared by Warfield Parish Council. For the ease of collation, the comments have been presented as per the response form. Responses are submitted for both part 1 and part 2.

Policy LP7 - Jealotts Hill

Warfield Parish Council is aware that the proposals in policy LP7 for Land at Jealotts Hill have attracted a lot of attention locally and we have encouraged members of the public to share their views and submitted comments to Bracknell Forest Council.

The position of Warfield parish Council throughout the local plan consultations that have taken place to date has been that we are opposed to any piece-meal or substantial residential development on the sites and the view of the council remains unchanged based upon the proposals within the latest version of the draft local plan.

We recognise the importance, locally, nationally and internationally of the work undertaken at the Jealotts Hill facility, but we also recognise the value and importance of greenbelt and the biodiversity of the area and wildlife this supports. Warfield Parish Council has seen no evidence within the plan to justify the 'exceptional circumstances' required by the NPPF para.136 to change the Green Belt designation or boundary in the area.

The proposals in the draft local plan raise a number of concerns, but also leave many questions unanswered, particularly around transport and the delivery of community infrastructure. We are also concerned that BFCs own assessments score the site poorly. We have also noted that the housing numbers proposed exceed those assessed by BFC. There also appears to be a considerable amount of evidence, relating to the site that is missing this also needs to be considered.

Warfield Parish Council maintains that any proposals for Jealotts Hill should be considered on their own merits and not included in a draft local plan. The draft plan contains many other important policies, we have therefore recommended that policy LP7 be removed from the plan and considered separately.

Warfield Parish Council has published its response to the draft Bracknell Forest Local Plan on its website.

If you have any queries regarding this matter, please do not hesitate to contact the Parish Office on 01344 457777.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'J. Mawer', with a long horizontal flourish extending to the right.

Jason Mawer

Parish Clerk

Draft Bracknell Forest Local Plan

Revised Growth Strategy – Part 1

Contact details

The name and address as a contact for this submission is:

Jason Mawer
Clerk to the Council
Warfield Parish Council
7 County Lane
Warfield
RG42 3JP
Telephone: 01344 457777
E-mail: clerk@warfieldparishcouncil.gov.uk

Introduction

We note the basis on which the consultation has been undertaken and that changes have been made as a result of the revisions made to the National Planning Policy Framework (NPPF) last year.

We note that the draft Bracknell Forest Local Plan (BFLP) ‘embraces’ the proposals within the emerging Warfield Neighbourhood Plan (WNP) and the requirement of the NPPF to set out a housing requirement for each designated neighbourhood area.

In our response to the March 2018 draft plan we expressed caution about proposed housing trajectory and delivery factors of new homes. This caution is based upon the experience of the Warfield SALP area and our concerns remain.

We would expect any changes made to the draft BFLP as a result of the consultation to be published and opened to further scrutiny. We would expect Bracknell Forest Council (BFC) to work closely with the town and parish councils of the borough to ensure the local plan is deliverable and for the benefit of all communities.

As there is no opportunity to comment on this elsewhere, we would point out that there is an inconsistency in the document on the language used to describe the proposals for Jealotts Hill which includes garden village, garden settlement and garden village principles. We would recommend a consistent approach is taken or an explanation given as to why different terms are used.

Vision and objectives

Warfield Parish Council (WPC) is generally supportive of the vision and plan objectives set out in chapter 3, although the council has concerns regarding the proposals set out for a garden village at Jealotts Hill.

We wish to note the following points:

- 3.1 The greenbelt is not mentioned in para 2 of the local plan vision
In para 6 we would like to see the addition of the words 'net loss of' ahead of biodiversity.
- 3.2 C – We question the validity of inclusion of the statement on 'secure the future...'
H – the council would expect BFC to work with neighbouring authorities to develop a sustainable transport system.

We note that the potential shortfall in water supply, this could be through infrastructure stress or climate change, is not addressed.

Spatial strategy

The council notes the spatial strategy and that the greenbelt in Bracknell Forest continues to make a 'contribution' to one or more of the five greenbelt purposes.

- 4.21 The council is pleased to note that BFC recognises the significant impact development has on existing communities and that time is required for integration and the building of sustainable communities. WPC endorses this view and will challenge BFC to ensure this is properly managed in the future.
- 4.24 The council thinks it is disingenuous for BFC to say in para 4.24 that no areas were identified for removal of the greenbelt, when it goes on to do so in para 4.25
- 4.25 The council notes that the NPPF refers to altering greenbelt boundaries in 'exceptional circumstances' but these must be fully evidenced and justified. WPC recognises the significant work that has been undertaken for over 90 years at the Jealotts Hill site of both national and global importance. We also accept that changes in practice and advances in research have changed how the site is used. The development of an integrated science park including the current occupier and others is welcomed. However, the council has not seen evidence that enabling development is required in the form of the proposed garden village.

Sustainability principles

Sustainable development and locational principles

WPC remains supportive of the sustainable development principles set out in LP1 and is generally supportive of chapter 5 and LP2, particularly the provision of infrastructure and services within settlement

Housing

Provision of housing

WPC accepts that the provision of more homes is needed from both a national and local context. We remain cautious about housing demand and supply forecasts and need based upon experiences from the Warfield SALP.

Sites allocated for residential/mixed use development

- 6.2 WPC notes chapter 6.2.
- 6.25 WPC remains opposed to the WAR9 land north of Herschel Grange as this site is outside of existing settlement area and proposed development would have a harmful urbanising impact on the character and appearance of the countryside.
- 6.27 We welcome the acceptance of the WNP proposal for Hayley Green and think it is prudent that this provision is included with the plan. We welcome the comments of BFC that the proposal does not undermine the approach taken in the draft BFLP and the endorsement of the principle of development of the site.

Land at Beaufort Park, Nine Mile Ride, Bracknell

No comment submitted

Land E of Wokingham Road and S of Dukes Ride (Derby Field)

No comment submitted

Land at Jealott's Hill, Warfield

In our previous response to the draft BFLP we expressed a view that we would expect any proposals for complete redevelopment of the site be considered upon their own merit rather than permitted through policy. WPC also took the view that it was opposed to any piece-meal or substantial residential development on the site. Based upon the proposals in the plan these views remain unchanged at this time.

As outlined in other sections of the draft BFLP this proposal is of national and international importance and therefore should be subject to more detailed consultation, investigation and deliberation than that offered by the process afforded to developing a local plan particularly as the proposals in LP7 for the allocation of 4,000 new homes is not required to meet the BFC local housing need.

WPC notes that LP/Ev/10n the revised SHELAA (Oct 2019) recommends a capacity of 3,505 dwellings for the site, as opposed to the landowner suggestion of up to 4,000 units.

WPC is concerned that all the evidence required to make a considered appraisal of the proposals is not available at the time and that many elements of the proposal are immature in their development, particularly regarding transportation and is also evidenced by the lack of knowledge of what is actually located within the boundaries of this site.

The lack of evidence of what is located with the designated area, includes a missing a copse at Wellers Wood, the existing recycling centre and other biodiversity including Drown Boy pond etc. AND existing utility infrastructure. Details of existing provision and facilities at JHCL is missing, particularly a significant sized orchard. Loss of this orchard would be contrary to the BF Biodiversity action plan.

The existing road network would be insufficient for the proposals as they stand. There is little evidence that any real planning into how transportation to and from the site would take place and with the site bordering another local authority area, we believe these proposals would have a significant impact beyond the boundaries of BFC. Significant investment on a regional/national basis would be required to deliver improvements. The lack of accessible access to the public transport network would also need to be addressed. The proposals talk of 'self-containment of journeys within the site' whilst this is a worthy objective relatively few residents are likely to live and work on-site and with no provision for some basic facilities during the plan period i.e. secondary school) significant journeys off-site would be required, we therefore would expect proposals to be complaint with policy LP13.

WPC recognises the important role that the site plays to employment and economic activity with the borough. We also recognise the significant role the site has played both nationally and internationally in the development of agrochemicals over many years. We recognise that the models of research have changed over the decade and that work is required to ensure the site continues to make a world leading contribution in the field of agrochemicals.

The following questions require answering:

6.47 What evidence is there that companies involved in associated technologies are ready/willing to move to Jealotts Hill?

6.48 What evidence is there that enabling development is required to help fund the significant investment needed in the site?

If LP7 were implemented during the lifetime of the BFLP is there a commitment from the occupier to the site long term and what would happen if they withdrew?

The proposals in LP7 during the period of the draft BFLP are inconsistent with the spatial plan of delivery without impacting on existing communities. The provision of 1 primary school

during the period and no commitment (during the life of the plan) for the delivery of community facilities including retail, healthcare and community hub is inconsistent with the spatial plan provision outlined in para 4.21

Warfield has a large number of footpaths, byways and restricted byways that would need to be protected, with many in the proposal area. The proposed site at Jealotts Hill is within the Green Belt and contributes to all five purposes of the Green Belt, the most significant contribution being 'assist in safeguarding the countryside from encroachment'.

WPC note the low scores obtained for the proposal in SA4a. BFCs own assessment (3.157 Draft Sustainability proposal) says *'The most significant landscape impact as a result of the proposed site allocations is that at WAR3, Jealott's Hill. Although parts of the site are enclosed due to the topography and woodland which reduces visual sensitivity, the tranquil rural character and the elevation of other parts of the site results in intervisibility with the wider countryside to the south, north and west, the lack of relationship with the existing settlement and presence of some valued landscape features, such as hedgerows and hedgerow trees, and woodland copses, results in an overall sensitivity of medium-high to a development of this scale. The site contributes to all five purpose of the Green Belt, the most significant contribution being 'assist in safeguarding the countryside from encroachment'. Site requirements include the need to develop a comprehensive masterplan that is clearly based on landscape evidence; and to undertake and demonstrate integration of an Environmental Impact Assessment.'* We believe this supports our position that this proposal should be removed from the draft BFLP and considered separately so that time is taken to gather the required evidence and develop a comprehensive plan. WPC is concerned about the existing wildlife that lives or uses the site and the impact development would have on these species.

WPC notes the significant issues raised by BFC in its various supporting documents including the Housing Background Paper. This includes some of the area already mentioned, but also includes heritage assessments, strategic flood risk assessments, accessibility assessments, ecological assessments and waste water treatment amongst others. The constraints of the site are clearly set out by BFC in its site suitability assessment summary (p245 Housing Background Paper) and the issues these raise. WPC is concerned that BFCs view is that these could be addressed through development management, which therefore means on the evidence, including the Sustainability Appraisal that the site is suitable for allocation. WPC does not agree with this approach. For such a significant proposal to be included in the draft BFLP without all the evidence and detail required would in the view of the council be a folly. We therefore remain of the view the policy should be removed and considered again on its own merits.

Forms of residential accommodation

Warfield Parish Council is supportive of additional accommodation for older people and care homes. The siting of these homes is important to create a welcoming atmosphere, with good access to healthcare and other local facilities. Sufficient parking particularly for staff and visitors is required.

Affordable housing

WPC recognises that the definition of affordable housing is broad and that ‘affordable’ housing in many cases is neither affordable or available to local housing need. WPC would like to see a diverse mix of tenures types on sites to allow sustainable communities to develop. To assist we would recommend the deletion of the section in policy LP8 covering exceptional circumstances in point iv.

Housing for older people and people with disabilities

WPC is supportive of LP22

Self-build, custom build, gypsy & travellers, travelling showpeople

No comment submitted

Economic development

Provision of economic floorspace

WPC is generally supportive of the proposals and policy LP9

Hierarchy of 'Town Centres'

WPC is supportive of LP10

7.22 We note that the new local centre at Jealotts Hill is incorrectly identified as being in Winkfield

Edge of centre retail location

WPC is generally supportive of the proposals

Infrastructure

Local Infrastructure and Facilities

WPC is generally supportive of LP12.

WPC expects BFC to work with neighbouring local planning authorities/and or government bodies to ensure infrastructure provision is co-ordinated and would expect the plan to reflect this.

We would expect town and parish councils to be consulted with over infrastructure proposals for their local areas at the earliest opportunity.

Transport principles

WPC welcomes the principles of policy LP13.

WPC would like to see the BFC take the opportunity to reclassify/declassify elements of the existing highway network where appropriate to support both development and create safe environments for pedestrians, cyclists and riders.

Where sections of the existing transport infrastructure are further developed or enhanced, appropriate mitigation must be included for the impact on biodiversity.

8.16 to ensure consistency with parking standards, BFC should adopt developments of five dwellings or more.

Standards for Open Space of Public Value

WPC is supportive of LP14

8.22 Supportive of OSPV accessibility standards in table 4

Climate change and built and natural environment

Climate change

WPC is supportive of the principles in 9.1

Natural environment - Green infrastructure

WPC is supportive of policy LP15

9.17 WPC would like to see a definition of the meaning of the statement 'significant landscape and visual amenity assets'. WPC challenges the assertion that Warfield does not have assets of significance.

Question: Should farmland be included within the scope of green infrastructure?

Thames Basin Heaths Special Protection Area

WPC notes policy LP16

9.30 WPC is concerned about the propensity of off-site SANG and the impact this has on the environment, particularly through vehicle movements.

WPC would like to see tree planting take place on SANG where this can be accommodated. Existing wildlife should be suitably protected, particularly from dogs, when SANG allocations are made.

Flooding and drainage

Section 9.4 is noted.

Separation of settlements (gaps)

The establishment of a SANG wedge in the north of Warfield (either completed, nearing completion or at the planning stage) should be recognised as a green wedge

Built environment - design principles

WPC is supportive of the design principles in LP19, although we would prefer to see point iii. more strongly worded on maximising energy efficiency.

WPC expects BFC to follow principles for character areas as set out in neighbourhood Development Plans.

Changes to Policies map

Summary of changes

LP20 we refer the removal of Jealotts Hill from the greenbelt to our comments on LP7

10.5 We are confused by the numbering shown for Land south of The Limes (Nos 17-16) the numbering and description are contradictory.

10.10 if policy LP7 is brought forward, we would expect to see Jealotts Hill designated as a defined employment area

Appendices

Appendix 1: Summary of Local Plan Evidence Base

We note that the link to this document does not work when accessed from the BFC website.

Appendix 2: Housing Trajectory

WPC accepts that the provision of more homes is needed from both a national and local context. We remain cautious about housing demand and supply forecasts and need based upon experiences from the Warfield SALP.

Progress on some of the areas in the SALP suggest either, that developers are sitting on land holdings to maximise return, or that the demands placed by BFC on developers for the sites are challenging to meet, which is not necessarily a negative. Regardless, timescales have slipped and we would ask BFC to be mindful that ever more complex sites (particularly through multiple ownership) will take longer to bring forward than expected.

Appendix 3: Borough and parish maps showing allocations

No comment submitted

Appendix 4: Site profiles for sites proposed for allocation

We note the no site profile is included for Hayley Green as this relates to the Warfield Neighbourhood Plan, and would expect any proposals brought forward would be based upon the concept plan proposed in the WNP.

WAR3 WPC would expect to see as a requirement the protection of Drown Boy Pond and Wellers Wood and the existing community Landshare project site and orchard.

WAR9 WPC remains opposed to the WAR9 land north of Herschel Grange as this site is outside of existing settlement area and proposed development would have a harmful urbanising impact on the character and appearance of the countryside.

Appendix 5: Defined 'Town Centre' maps

The proposed community hub at Priory Field should be included as a local centre with shops.

Appendix 6: Changes to designated Employment Areas

WPC would recommend that the Syngenta site be designated as an employment area. The site contributes significantly to the employment land supply for class B uses (B1 research and development of products and processes) and the site meets the council's objective of supporting economic growth and resilience.

Appendix 7: Landscape Character Areas

No comment submitted

Appendix 8: Green Belt villages

No comment submitted

Appendix 9: Existing policies to be replaced by the BFLP

No comment submitted

Appendix 10: Glossary and abbreviations

A definition of a garden village is required including the principles with references

Draft Bracknell Forest Local Plan

Non-Strategic – Part 2

Non-strategic (Development management Policies)

10.2 Housing for older people and people with disabilities

10.2.1 LP22 - Warfield Parish Council (WPC) is supportive of additional accommodation for older people and care homes. These siting of these homes is important to create a welcoming atmosphere, with good access to healthcare and other local facilities. Sufficient parking particularly for staff and visitors is required.

10.3 Housing mix

10.3.1 WPC is supportive of policy LP23 and the housing mix

11.1 Designated Employment Areas

11.1.1 WPC believes the Syngenta site should be a designated employment areas, on the basis of the importance the employment of the site provides to the borough.

11.3 Smaller businesses

11.3.1 Warfield parish Council recognises the important role smaller businesses play to the health of the local and national economy. It is important that smaller business units are protected where necessary from redevelopment to other uses.

11.4 Bracknell Town Centre

11.4.3 Warfield Parish Council supports policy LP28. Further development within the town centre needs to ensure the viability of commercial activity as well as ensuring the right environment to make the area attractive to residents, businesses and visitors to the Borough. Other supporting infrastructure such as appropriate street lighting needs to be incorporated.

It is essential that the necessary transport infrastructure, particularly public transport services, pedestrian and cycle facilities are core to the delivery of development within the town centre.

12.1 protection of community facilities and services

12.1 WPC is supportive of section 12.1 and policy LP31 Protection of community facilities and services. This policy should ensure that any existing provision of parking is maintained to protect local residents and roads from parking blight.

12.2 Plan, open space and sports provision

12.2 WPC agreed that play, open space and sports provision must be protected and enhanced. We therefore support policy LP32 We would hope that the borough will work with the towns and parishes to ensure that provision meets local needs.

13.1 Protection of Countryside

13.1 Warfield Parish Council generally welcome the section on development affecting the countryside and Green belt.

13.2 Green Belt

13.2 WPC supports of policy LP34

13.3 Landscape Character and separations of settlements

13.3.1 Warfield Parish Council is supportive of Policy LP35.

13.4 Rural Workers Dwellings

13.4 Warfield Parish Council is supportive of Policies LP36 and 37.

Warfield Parish Council would expect Bracknell Forest Council to be rigorous in its review of evidence were a change of occupancy conditions is requested.

13.5 Equestrian Uses

13.5.1 Warfield Parish Council is generally supportive of Policy LP38.

There is a need to recognise that the scale and speed of development especially in the north of the borough, has resulted in many established stables now finding themselves without appropriate opportunity to hack and exercise. No new stable /equestrian facilities should be permitted in areas where increased vehicle, cycle and pedestrian activity make horses a danger to themselves and others.

14.2 Tall buildings

14.2 Warfield Parish Council would expect Bracknell Forest to ensure that any tall building proposals take account of findings of Grenfell Inquiry.

14.3 Advertisements and shop fronts

14.3.1 Warfield Parish Council is generally supportive of policy LP41.

The council would like Bracknell Forest council to review para 14.3.4 to include provision for a reduction in illumination 'out of hours'. This would result in a reduction of light pollution and a saving of energy. Businesses, stores and public buildings should have a 'turn off lights' policy.

16. Natural environment

16. WPC is supportive of the principles in 16 and policies LP43, LP44 and LP45

17. Climate change and environmental sustainability

17.1. WPC is fully supportive of policy LP46 and the standards laid out to address climate change through renewable energy and sustainable construction. WPC would expect to see a percentage of new homes use renewables.

17.3 Sustainable Drainage Systems (SuDS)

17.3.1 Warfield Parish Council recognises the importance of Sustainable Drainage Systems (SuDS). We recognise the Borough must be satisfied that SuDS have been designed with regard to the long-term maintenance cost and that SuDS should look to replicate natural drainage and where possible bring amenity, recreation and wildlife benefits.

Warfield Parish Council would like Bracknell Forest to require householders to install permeable driveways and paved areas wherever possible.

17.4 Pollutions and hazards

17.4 Warfield Parish Council is supportive of policy LP49 but feels it should go further on light pollution particularly in the countryside. We would welcome the need for a lighting assessment with applications.

17.5 Warfield Parish Council supports policy LP50.

18.1 Assessing transport impacts and requirements

18.1 WPC is generally supportive of policy LP51

18.2 Transport infrastructure provision

18.2 Warfield Parish Council is generally supportive of policy LP52. Warfield Parish Council strongly supports the protection, enhancement and maintenance of Public Rights of Way.

18.3 Travel plans and parking

18.3 Warfield Parish Council is generally supportive of policy LP53.

For policy LP54 we note that all relevant proposals must have regard to the councils current parking standard.

Draft Sustainability Appraisal (SA)

Draft Sustainability Appraisal (SA) (Incorporating Strategic Environmental Assessment) of the Draft Bracknell Forest Local Plan (October 2019)

Table 8 of the SA (Sustainability Appraisal Results for Sites Proposed for Allocation) demonstrates the less than positive effects of WAR3 for allocation. 9 out of 13 of the influences shown demonstrate either negative or very negative effects against the SA objectives, the worse performance of all the potential sites listed. WAR3 scoring particularly badly for SA4a Landscape, SA6b waste water pollution, SA7 resource use (other) and SA18 land use.

WPC would also question the evaluation that SA11 housing need is met. The proposals for 4000 homes in WAR3 are in excess of the requirements outlined in the local plan and as the reason the site is brought forward, we are told, is to develop the science park on the site. We therefore dispute that the site has a very positive effect on the SA objective.

Table 9 shows the results with mitigation. We note that even after mitigation 6 of the 13 influences remain either negative or very negative.

WPC also fails to understand how the proposals which include the science park only lead to a neutral impact, depending on implementation for objective SA9 economy and employment, particularly as the proposal is made on the basis of improving and developing new economic and employment facilities through the science park.

WPC notes the comments in para 3.194 which says that “a further review is underway to determine if this is the ‘best and most versatile’ land and to assess the potential loss of this resource; this is included as a site requirement.” We would suggest that consideration is an important factor that needs to be assessed before the proposal moves forward.

Other supporting documents

Housing Background Paper

WPC expects to see a commitment to the provision of a community Landshare with an orchard as part of the proposals for any garden village.

Infrastructure Delivery Plan (IDP)

4.0.1 WPC is disappointed in the site-specific transport infrastructure information in the IDP. In addition to any capacity improvements to junctions, consideration should be given to the road network joining this junctions. The current road network in the area is already coping with additional capacity from the Warfield SALP and we do not believe this matter can be left until the planning application stage. We are very concerned that Highways England have not identified any site-specific requirements to the strategic road network, particularly because the site will have regional, national and international importance and will generate additional journeys to it, with some requiring further travel from train stations and airports.