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Report on Warfield Neighbourhood Plan 2013 - 2026

An Examination undertaken for Bracknell Forest Council with the support of Warfield Parish Council on the October 2018 submission version of the Plan.

Independent Examiner: Mary O'Rourke BA(Hons) DipTP MRTPI

Date of Report: 17 January 2022

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Contents

	Page
Main Findings - Executive Summary	4
1. Introduction and Background	4
• Warfield Neighbourhood Plan 2013–2026	4
• The Independent Examiner	6
• The Scope of the Examination	6
• The Basic Conditions	7
2. Approach to the Examination	8
• Planning Policy Context	8
• Submitted Documents	9
• Site Visit	10
• Written Representations with or without Public Hearing	10
• Modifications	10
3. Procedural Compliance and Human Rights	11
• Qualifying Body and Neighbourhood Plan Area	11
• Plan Period	11
• Neighbourhood Plan Preparation and Consultation	11
• Development and Use of Land	13
• Excluded Development	13
• Human Rights	13
4. Compliance with the Basic Conditions	14
• EU Obligations	14
• Main Issues	16
• Introduction	16
• Issue 1 – Settlement Boundaries, Local Gaps and Housing	19
- The Spatial Plan	19
- Hayley Green Allocation	21
- Local Gaps	24
• Issue 2 – Design, Natural Environment and Heritage Assets	25
- Good Design	25
- Suitable Alternative Natural Greenspace	27
- Green Infrastructure	28
- Local Green Space	28
- Heritage and Biodiversity	29
- Promoting Dark Skies	29
• Issue 3 – Community Assets, Rural Diversification, Drainage and Parking	30
- Community Assets	30
- Rural Diversification	30
- Drainage Infrastructure	31
- Parking Provision	31

• Factual and Minor Amendments	32
5. Conclusions	32
• Summary	32
• The Referendum and its Area	32
• Overview	33
Appendix: Modifications	34

Main Findings - Executive Summary

From my examination of the Warfield Neighbourhood Plan (the Plan/WNP) and its supporting documentation including the representations made, I have concluded that subject to the policy modifications set out in this report, the Plan meets the Basic Conditions.

I have also concluded that:

- The Plan has been prepared and submitted for examination by a qualifying body – Warfield Parish Council;
- The Plan has been prepared for an area properly designated – the parish of Warfield identified on Plan A in the Plan;
- The Plan specifies the period to which it is to take effect – 2013 to 2026¹; and
- The policies relate to the development and use of land for a designated neighbourhood area.

I recommend that the Plan, once modified, proceeds to referendum on the basis that it has met all the relevant legal requirements.

I have considered whether the referendum area should extend beyond the designated area to which the Plan relates and have concluded that it should not.

1. Introduction and Background

Warfield Neighbourhood Plan 2013–2026

1.1 The parish of Warfield lies to the north of the expanded town of Bracknell, approximately 40km west of London. It is in the heart of the Thames Valley between Windsor and Reading and lies to the south of Maidenhead and the M4 corridor with junction 4 of the M3 around 13kms to the south. It is largely a rural parish, with the northern half protected as Green Belt. Since the 1980s there has been significant new housing development in the southern part of the parish at Whitegrove, Quelm Park and Lawrence Hill and development is continuing on a large planned strategic extension to Bracknell comprising 2,200 homes, 2 new primary schools and associated community facilities and open spaces.² The small village of Warfield sits centrally in the parish with its Conservation Area around the parish church, and there are other settlements of West End, Newell Green and Warfield Street which string out along the B3034 Warfield Street and Hayley Green just to the north of the built-up area of Bracknell. Small villages and hamlets in the Green Belt include Tickleback Row, Moss End, Nuptown, Brockhill, Hawthorn Hill, and Jealotts Hill. The latter is the

¹ Please note the recommended modification PM2 and the agreed extended Plan period to 2037.

² Policy SA9 Land at Warfield, Site Allocations Local Plan adopted in 2013.

home of the Syngenta International Research Centre, a major developed site in the Green Belt. In 2011 Warfield Parish had a population of 10,088 in over 4,100 households. Since then, its population will have increased considerably as a result of the comprehensive planned development taking place on the southern edge of the parish.

- 1.2 In 2012 initial work began on a neighbourhood plan for Warfield, with the formation of a steering group in November 2013. In April 2014, an application was made by Warfield Parish Council (WPC) for designation of the parish of Warfield as a Neighbourhood Area and on 23 July 2014, Bracknell Forest Council (BFC) designated the whole of the parish as a Neighbourhood Area. The steering group comprised volunteers from the local community including residents and Parish Council representatives with the remit to coordinate and drive forward the Neighbourhood Plan. In addition to articles and updates in the Warfield Parish newsletter *The Wren* and on the Parish Council webpage, public consultation events were held and independent planning advisors were appointed to assist the Steering Group, which reported to the main Parish Council. The Consultation Statement, which accompanied the submitted Plan, sets out how the community has been involved, detailing the various consultation events held to engage with the local community and with interested stakeholders.
- 1.3 Formal consultation took place on the pre-submission Plan³ between 18 July and 8 September 2017 and on the October 2018 Submission Version of the Plan between 5 March and 16 April 2019.⁴ The Plan's examination by my colleague, Jill Kingaby, began in May 2019. She identified that following the *People Over Wind* judgement⁵, and as the Plan included a site allocation, an up to date and full Appropriate Assessment under the Habitats Regulations⁶ would be required.⁷
- 1.4 Due to the need for air quality assessments, this took longer than anticipated and the Warfield Neighbourhood Plan Habitats Regulation Assessment, prepared by AECOM and dated February 2021, was submitted by the Parish Council to the examination by letter dated 18 February 2021. Given the considerable time that had elapsed, Ms Kingaby was unable to resume the examination due to other work commitments, and BFC, with the agreement of WPC, appointed me as the examiner to progress the examination.
- 1.5 From 28 June to 9 August 2021, a focussed consultation was undertaken on modifications proposed to the October 2018 submitted Plan in respect

³ As required by Regulation 14 of The Neighbourhood Planning (General) Regulations 2012 (as amended).

⁴ Regulation 16 of The Neighbourhood Planning (General) Regulations 2012 (as amended).

⁵ Court of Justice of the EU judgement in the case of *People Over Wind and Peter Sweetman V Coillte Teorante C-323/17*.

⁶ Conservation of Habitats and Species Regulations 2017 (as amended).

⁷ Letter of 16 May 2019, Ref: 01/JK/WNP.

of the HRA and other proposed modifications including extending the Plan period to 2037 to 'align' with that of the emerging Bracknell Forest Local Plan.⁸ The results of that consultation exercise are set out in Section 3 below.

The Independent Examiner

- 1.6 As set out above, as the first examiner Ms Kingaby was unable to resume the examination this year because of other work commitments, I have been appointed to replace her as the examiner of the Warfield Neighbourhood Plan by BFC, with the agreement of WPC.
- 1.7 I am a chartered town planner and former government Planning Inspector with some 40 years of experience in the public and private sectors, latterly determining major planning appeals and examining development plans and national infrastructure projects. I have recent experience of examining neighbourhood plans. I am an independent examiner, and do not have an interest in any of the land that may be affected by the draft Plan

The Scope of the Examination

- 1.8 As the independent examiner I am required to produce this report and recommend either:
- (a) that the neighbourhood plan is submitted to a referendum without changes; or
 - (b) that modifications are made and that the modified neighbourhood plan is submitted to a referendum; or
 - (c) that the neighbourhood plan does not proceed to a referendum on the basis that it does not meet the necessary legal requirements.
- 1.9 The scope of the examination is set out in Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990 (as amended) ('the 1990 Act'). The examiner must consider:
- Whether the plan meets the Basic Conditions.
 - Whether the plan complies with provisions under s.38A and s.38B of the Planning and Compulsory Purchase Act 2004 (as amended) ('the 2004 Act'). These are:
 - it has been prepared and submitted for examination by a qualifying body, for an area that has been properly designated by the Local Planning Authority;

⁸ https://consult.bracknell-forest.gov.uk/portal/planning/wnp_mods/warfield_neighbourhood_plan_-_focused_consultation

- it sets out policies in relation to the development and use of land;
 - it specifies the period during which it has effect;
 - it does not include provisions and policies for 'excluded development'; and
 - it is the only neighbourhood plan for the area and does not relate to land outside the designated neighbourhood area.
- Whether the referendum boundary should be extended beyond the designated area, should the plan proceed to referendum.
 - Such matters as prescribed in the Neighbourhood Planning (General) Regulations 2012 ('the 2012 Regulations').

1.10 I have considered only matters that fall within Paragraph 8(1) of Schedule 4B to the 1990 Act, with one exception. That is the requirement that the Plan is compatible with the Human Rights Convention.

The Basic Conditions

1.11 The 'Basic Conditions' are set out in Paragraph 8(2) of Schedule 4B to the 1990 Act. In order to meet the Basic Conditions, the neighbourhood plan must:

- Have regard to national policies and advice contained in guidance issued by the Secretary of State;
- Contribute to the achievement of sustainable development;
- Be in general conformity with the strategic policies of the development plan for the area;
- Be compatible with and not breach European Union (EU) obligations (under retained EU law)⁹; and
- Meet prescribed conditions and comply with prescribed matters.

1.12 Regulation 32 of the 2012 Regulations prescribes a further Basic Condition for a neighbourhood plan. This requires that the making of the neighbourhood plan does not breach the requirement of Chapter 8 Part 6 of the Conservation of Habitats and Species Regulations 2017 (the 2017 Regulations).¹⁰

⁹ The existing body of environmental regulation is retained in UK law.

¹⁰ This revised Basic Condition came into force on 28 December 2018 through the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018.

2. Approach to the Examination

Planning Policy Context

- 2.1 The Development Plan for BFC, not including documents relating to excluded minerals and waste development, comprises the saved policies of the 2002 Bracknell Forest Local Plan (LP2002), the Bracknell Forest Core Strategy adopted in 2008 (CS), and the Site Allocations Local Plan (2013) (SALP). Policy NRM6 of the South East Plan which deals with the Thames Basin Heaths Special Protection Area still also remains part of the extant Development Plan.
- 2.2 Of particular relevance to this examination is policy CS5 of the Core Strategy which identifies land north of Whitegrove and Quelm Park within Warfield Parish as a major location for growth. Policy SA9 of the SALP allocates this land at Warfield for a comprehensive mixed-use development to include 2,200 residential units, employment, neighbourhood centre, two primary schools, multi-functional community hub, on-site open space and Suitable Alternative Natural Greenspace (SANG). The policy also includes a list of infrastructure required to support this development and that masterplans will be prepared by developers and agreed with BFC prior to the submission of a planning application for any part of the site. The policy SA9 allocation is indicated on Inset Map 1 of the WNP.
- 2.3 During the course of preparation of the WNP, BFC has been working on a new Local Plan.¹¹ Consultation on the Issues and Options was carried out in 2016 and on the Revised Growth Strategy between October and December 2019. The Pre-Submission Bracknell Forest Local Plan (emerging BFLP) was submitted to the Secretary of State for Levelling Up, Housing and Communities for examination on 20 December 2021. Following examination and adoption, the Local Plan will be the principal planning policy document for the Borough and will guide development in the Borough up to 2037. In particular, the emerging BFLP sets out the strategy for the level and distribution of development in the Borough; it allocates sites for specific uses, including housing and economic development; and includes policies used to determine planning applications. The BFLP, when adopted, will replace the LP2002 and the CS. However, some of the policies in the 2013 SALP will remain relevant and will not be replaced as it includes sites allocated for development that are still to be developed. Policy NRM6 of the South East Plan will also remain.¹²

¹¹ PPG Reference ID: 41-009-20160211, which applied during the preparation of the WNP (subsequently updated 05092019). This indicates that it is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging local plan.

¹² Policies that are to be superseded and those to be retained are set out in Appendix 6 of the emerging BFLP.

- 2.4 The planning policy for England is set out principally in the National Planning Policy Framework (NPPF) which was originally published in 2012 and subsequently revised in July 2018, then updated in February 2019, and revised again in July 2021. The Planning Practice Guidance (PPG) offers guidance on how this policy should be implemented. As the WNP was submitted to BFC on 24 January 2019, the NPPF 2021 advises that the policies in the original 2012 Framework apply for the purposes of examining the Plan.¹³ However, paragraph 218 also advises that the policies in the most recent Framework are material considerations which should be taken into account in dealing with applications and that '*plans may also need to be revised to reflect policy changes which this Framework has made*'. I have had this guidance in mind in my assessment below of the policies in the Plan and the regard they have to national policies and advice.¹⁴
- 2.5 The WNP was prepared having regard to the 2012 NPPF and a number of updates to the text of the Plan are necessary to reflect the new NPPF 2021. I am recommending an overarching modification to require an update to factual references in the Plan to reflect the new NPPF (**PM1**).

Submitted Documents

- 2.6 I have considered all policy, guidance and other reference documents I consider relevant to the examination, including those submitted which comprise:
- the October 2018 Submission Version of the Warfield Neighbourhood Plan 2013-2026;
 - Plan A of the WNP which identifies the area to which the proposed Neighbourhood Development Plan relates;
 - the Consultation Statement, January 2018;
 - the Basic Conditions Statement, August 2018 (updated January 2019);
 - the Final Sustainability Appraisal Report (incorporating Strategic Environmental Assessment), October 2018;
 - the Warfield Neighbourhood Plan Habitats Regulations Assessment prepared by AECOM, February 2021;
 - all the representations that were made in accordance with the Regulation 16 consultation;
 - the exchange of correspondence between the then examiner, BFC and WPC in 2019;
 - WPC's examination statement of January 2020 and covering letter of 13 February 2020;
 - BFC's examination statement of 11 February 2020;
 - the response of BFC¹⁵ to my procedural letter of 29 March 2021 with initial questions;

¹³ Paragraph 220 of Annex 1, Implementation of the NPPF, July 2021.

¹⁴ Basic Condition set out in Paragraph 8(2) of Schedule 4B to the 1990 Act.

¹⁵ Letter from BFC, dated 26 April 2021, with enclosures.

- the response of WPC¹⁶ to my procedural letter of 29 March 2021 with initial questions;
- further response of WPC¹⁷ to my procedural letter of 1 June 2021;
- responses of BFC¹⁸ and WPC¹⁹ to my procedural letter of 22 July 2021 about the 2021 NPPF;
- the response of WPC²⁰ to my procedural letter of 23 August 2021; and
- all the representations made in response to the focussed consultation (held between 28 June and 9 August 2021) on proposed modifications to the WNP.²¹

Site Visit

2.7 I made an unaccompanied site visit to the Neighbourhood Plan Area on 9 September 2021 to familiarise myself with it, and visit relevant sites and areas referenced in the Plan and evidential documents.

Written Representations with or without Public Hearing

2.8 This examination has been carried out on the basis of written submissions (written representations). Although there is no right to be heard, I have considered the requests made to hold hearing sessions. The Regulation 16 consultation responses and those made in respect of the focussed consultation on proposed modifications to the WNP, clearly articulated the objections to the Plan and presented arguments for and against the Plan's suitability to proceed to a referendum. In addition to the Regulation 16 responses, I have the responses to my letters and those of my predecessor in which I asked for clarification and requested documents from BFC and WPC, and also requested the further focussed consultation. As a result, in terms of the appropriate level of scrutiny for the WNP, I consider that hearing sessions are not necessary.

Modifications

2.9 Where necessary, I have recommended modifications to the Plan (**PMs**) in this report in order that it meets the Basic Conditions and other legal requirements. For ease of reference, I have listed these modifications separately in the Appendix.

¹⁶ Letter sent by email, dated 21 May 2021.

¹⁷ Email and enclosure, dated 14 June 2021.

¹⁸ Letter, dated 3 August 2021.

¹⁹ Letter, dated 27 July 2021.

²⁰ Letter and enclosures, dated 8 November 2021.

²¹ View documents at: <https://beta.bracknell-forest.gov.uk/planning-and-building-control/planning-policy/neighbourhood-planning/warfield>

3. Procedural Compliance and Human Rights

Qualifying Body and Neighbourhood Plan Area

- 3.1 The WNP has been prepared and submitted for examination by Warfield Parish Council which is a qualifying body for an area designated by Bracknell Forest Council on 23 July 2014.
- 3.2 It is the only Neighbourhood Plan for the Plan area, and does not relate to land outside the designated Neighbourhood Area.

Plan Period

- 3.3 The Plan specifies on the front cover the period to which it is to take effect, which is from 2013 to 2026. The Foreword to the Plan explains that the end date of 2026 was chosen to coincide with that of the extant Development Plan for Bracknell Forest but that there was a commitment to review the WNP in 2023. Regulation 16 representations raised concerns about the seemingly arbitrary nature of the Plan period, and whether it is realistic that the Plan's Vision and Objectives would be delivered within that timeframe. I note that BFC²² then suggested a longer Plan period and, in response, WPC has proposed an amendment to extend the Plan period to 2037 to more closely align the WNP with the period of the emerging BFLP.²³
- 3.4 I deal below with the relationship between the WNP and the strategy and policies of the emerging Local Plan. There is no timeframe within which neighbourhood plans are required to be reviewed or updated.²⁴ It would be a matter for the qualifying body to determine as to whether the Plan and its policies remain relevant and whether there was a need for further residential allocations beyond those currently proposed in the WNP and in the emerging Local Plan. I am recommending a modification to the Plan to extend the Plan period to 2037, in the interests of clarity²⁵ and to contribute to the achievement of sustainable development (**PM2**).

Neighbourhood Plan Preparation and Consultation

- 3.5 In July 2014, BPC approved the designation of Warfield as a Neighbourhood Area, as shown on Plan A on page 6 of the submitted WNP. A Steering Group, comprising representatives of the Parish Council and volunteers from the local community including residents, had already been established to take forward development of the Plan and to report to the main Parish Council. Prior to designation, there had been initial calls to residents to become involved in the creation of a neighbourhood plan with articles in the local parish newsletter, public meetings, and open

²² BFC Examination Position Statement, 11 February 2020.

²³ WPC's response to my letter of 1 June 2021.

²⁴ PPG Reference ID: 41-099-20190509.

²⁵ PPG Reference ID: 41-041-20140306.

sessions including at the village fete. A new website and Facebook page were set up for the Neighbourhood Plan.

- 3.6 Open sessions on the environment and infrastructure and on housing and wellbeing and leisure were held in late 2014 and early 2015 with questionnaires sent to each of the 4,100 households in the parish to get feedback on those areas on which the Plan should focus. The questionnaire was also available online and 564 responses were returned. There was further specific consultation and engagement with landowners through 2016 as work continued on the identification of land at Hayley Green for development. In October 2016, a meeting was held with the residents of Hayley Green to explain the site selection process and discuss the proposed masterplan. Two further open consultation events were held at the Whitegrove Community Centre and the Brownlow Hall, Newell Green in October and November 2016 to explain the progress of work on the Plan and site options.
- 3.7 The 6-week consultation on the Regulation 14 version of the Plan ran from 18 July to 8 September 2017. Again, questionnaires were distributed to residents and were made available in both paper form and on line, with 85 responses received from local residents and other interested persons. One of the key concerns of respondents was the proposed allocation of land at Hayley Green for housing development, including that enough development was already being proposed in Warfield and the adverse impact of traffic on the local road network. Other issues raised included how the proposed local gaps were defined. The comments made, and WPC's response in respect of any update to the emerging Plan, are set out in Appendix A to the Consultation Statement.
- 3.8 The submission version of the Plan (October 2018) was the subject of a further 6-week round of consultation, as required by Regulation 16 of the 2012 Regulations, which ended on 16 April 2019. Representations were made, including from Hart District Council, Historic England, Thames Water, CPRE, and Natural England, as well as from BFC. There were representations from landowners and developers interested in sites in the parish as well as objections from residents of Hayley Green to the Hayley Green housing allocation (policy WNP2). I have considered the representations made at the Regulation 16 stage in preparing this report.
- 3.9 In view of concerns raised, I requested further information from WPC about the consultation process and specifically the form and timing of the consultation with residents of Hayley Green.²⁶ It is clear from the detailed responses to my questions that WPC had endeavoured to be inclusive and open in the preparation of the Plan so that the wider community were kept informed of potential development sites in the parish and residents of Hayley Green were able to make their views known on the amount and location of development proposed in their village. They had opportunities to be actively involved in shaping the

²⁶ WPC's responses to Questions 7 and 8 of my procedural letter of 29 March 2021.
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emerging Plan, including through the alternative concept layout provided by the Hayley Green Residents Group, which is assessed in the Final Sustainability Appraisal Report, and were made aware of how their views had informed the draft Plan. Whilst there are residents of Hayley Green who remain opposed to the proposed WNP2 allocation and I examine the policy in terms of the Basic Conditions in section 4 below, I am satisfied that a sufficiently open and inclusive consultation process was followed during the preparation of the WNP.

- 3.10 On submission of the WNP for examination in 2019, it was found that there was a need for additional HRA, in compliance with the Sweetman court judgement.²⁷ That work was not completed and forwarded by WPC until February 2021. As the Regulation 16 consultation had not included the HRA, and WPC was now proposing modifications to the Plan flowing from its recommendations, in response to my question BFC proposed that there should be a further period of focussed consultation on the Plan. This took place over the 6-week period 28 June to 9 August 2021 and provided opportunity for comment on the HRA, on consequential amendments proposed to the text of the Plan, and on the Parish Council's proposal to extend the Plan period to 2037. All those who had previously commented at the Regulation 16 stage were informed of this further consultation. Responses were received from 13 representors. I have considered these in my preparation of this report, in addition to all previous consultation representations which still stand.
- 3.11 I consider that due regard has been had to the advice in the PPG on plan preparation and that the WNP is procedurally compliant in accordance with legal requirements.

Development and Use of Land

- 3.12 The Plan sets out policies in relation to the development and use of land in accordance with section 38A of the 2004 Act.

Excluded Development

- 3.13 The Plan does not include provisions and policies for 'excluded development'.

Human Rights

- 3.14 I have to consider whether the WNP has had regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights and complies with the Human Rights Act 1998. WPC has addressed the issue of Human Rights in its Basic Conditions Statement. It is satisfied that the Plan does not breach Human Rights (within the meaning of the Human Rights Act 1998), and no issue has been raised by

²⁷ See footnote 5.

BFC in respect of that response.²⁸ From my independent assessment, I see no reason to find otherwise.

4. Compliance with the Basic Conditions

EU Obligations

- 4.1 The WNP was screened for Strategic Environmental Assessment (SEA) by BFC in September 2016. This is a legal requirement and accords with Regulation 15 (e) (1) of the 2012 Regulations. It was found that as the Plan may have significant effects in relation to some of the criteria set out in Schedule 1 of the SEA Regulations²⁹, it was necessary to undertake SEA. A Final Sustainability Appraisal Report, incorporating Strategic Environmental Assessment (SEA), was published by WPC in October 2018. It concluded that the WNP performed well in relation to many objectives; that the preferred spatial option presented a stronger environmental, social and economic case than the alternative options; and that any negative effects would not be significant and would be minimised by appropriate mitigation in the policies. Having read the SEA report and considered the matter independently, I support these conclusions.
- 4.2 The WNP was screened for Habitats Regulations Assessment (HRA) by BFC in October 2016. The HRA noted that the WNP area and the Hayley Green allocation site are located within the 400m – 5km and the 5-7km buffer zones of the Thames Basin Heaths Special Protection Area (SPA); the closest component parcel of the SPA, the Broadmoor to Bagshot Woods and Heaths SSSI³⁰, being 3.3km away. The Windsor Forest and Great Park Special Area of Conservation (SAC) is approximately 3.3km away from the parish and 4km from the Hayley Green site. However, the HRA concluded that significant effects were not likely to occur with regard to the integrity of the European sites within and around Bracknell Forest Borough, because in terms of the SPA any net gain in residential development in the Plan area would need to comply with higher tier policies in the South East Plan and Core Strategy, the wording of which was reflected in the WNP policies. In respect of the integrity of the SAC, the screening concluded that no significant effect was likely. Natural England was consulted on the screening report and did not have any specific comments.
- 4.3 In 2018, the European Court of Justice ruling³¹ determined that mitigation should not be taken into account when forming a view on likely significant effects. As a consequence, full Appropriate Assessment (AA) of the WNP was deemed necessary to meet the EU Regulations and to achieve

²⁸ BFC's response of 26 April 2021 to my first procedural letter.

²⁹ Environmental Assessment of Plans and Programmes Regulations 2004.

³⁰ Site of Special Scientific Interest.

³¹ People over Wind European Court of Justice Case C-323/17 – also known as the Sweetman case.

compliance with the Basic Condition for neighbourhood planning.³² This required that an Air Quality Assessment be carried out since, in addition to concern about recreational pressure on the SPA, there was also particular concerns about atmospheric pollution arising from vehicle emissions associated with new residential or employment development. The Thames Basin Heaths SPA, the Windsor Forest and Great Park SAC, and the Thursley, Ash, Pirbright and Chobham SAC, the closest component part of which, the Chobham Common SSSI, is 7.2km from Warfield Parish, are all sites sensitive to atmospheric nitrogen deposits.

- 4.4 The WNP HRA, prepared by AECOM, was published in February 2021. The report identified the sites and linking impact pathways that required AA. It concluded that in respect of recreational pressure and atmospheric pollution, there would be no adverse effects on the integrity of the Thames Basin Heaths SPA, but that as a precautionary measure it recommended additional text be added to policy WNP2 to align the WNP with any potential future atmospheric pollution mitigation policy. In respect of the impact of atmospheric pollution on the Thursley, Ash, Pirbright and Chobham SAC, it concluded that the WNP would make a minimal contribution to the in-combination nitrogen deposits rates and would not result in adverse effects on the integrity of the SAC. A similar conclusion was also drawn in respect of the Windsor Forest and Great Park SAC. In both cases the HRA concluded that the policy recommendation provided with regard to the SPA would also result in additional protection for the interest features of the two SACs.
- 4.5 BFC agrees³³ with the conclusions of the AA in the HRA of February 2021, which are consistent with the findings of the HRA on the Pre-Submission BFLP (March 2021), of which the WNP formed part of the in-combination assessment. In its formal consultation response³⁴, Natural England stated that *'we are in agreement with the conclusions of the Warfield Neighbourhood Plan's HRA and Air Quality Assessment, that there will be no Likely Significant Effect on Habitat Sites as a result of the Plan, either alone or in combination'*. NE also confirmed its support for the additional text recommended to be included in policy WNP2.
- 4.6 I am satisfied that the HRA and AA procedures have been correctly followed and note that BFC as the competent authority accepts the conclusions of the AA. On the basis of the information provided and my independent consideration, I agree with the conclusion of BFC. In respect of the detail of the recommended wording of policy WNP2, I address this in my assessment set out below.

³² Letter dated 16 May 2019 from the (then) examiner Ms Kingaby to WPC and BFC.

³³ Response attached to BFC letter of 26 April 2021.

³⁴ NE letter of 20 April 2021, Appendix 1 to BFC's response to my first procedural letter attached to BFC's letter of 26 April 2021. Also see NE's email of 23 July 2021 to the focussed consultation.

Main Issues

- 4.7 Having regard for the Warfield Neighbourhood Plan, the consultation responses and other evidence, and the site visit, I consider that there are three main issues relating to the Basic Conditions for this examination. These are:
1. Whether the defined settlement boundaries, local gaps and housing allocation policies, provide an appropriate framework to shape and direct sustainable development, having regard to national policy and guidance and are in general conformity with the strategic policies in the Development Plan;
 2. Whether the WNP policies will secure high standards of design and protect the natural environment and heritage assets in line with national policy and are in general conformity with strategic policies in the Development Plan; and
 3. Whether the policies in the Plan on community assets, rural diversification, drainage and parking, meet the Basic Conditions, particularly in relation to accord with national policy and guidance and in contributing to the achievement of sustainable development.

Introduction

- 4.8 The first 4 chapters of the Plan introduce and provide background to the Plan, describe the area and its spatial and planning policy context, the community's views on planning issues, and set out the Vision and Objectives for the Plan. Given the time that has elapsed since the Plan was submitted for examination, there are a number of textual modifications that I am recommending to these early chapters; some are consequential on updates to national and local planning policy, but others are recommended for clarification³⁵ and to improve the Plan's useability and readability in the interests of consistency and robust decision making.
- 4.9 Chapter 1 introduces and gives background to the plan making process. Paragraph 1.5 should use the precise wording of the Basic Conditions or be deleted from the Plan (**PM3**).
- 4.10 WPC has proposed amendments³⁶ to paragraphs 1.9 to 1.12 to update the Plan in respect of the conclusions of the February 2021 HRA. No objection has been made by BFC to the new text.³⁷ As they clarify the position in respect of compatibility with EU obligations, I am recommending the Plan be modified accordingly (**PM4**).
- 4.11 The character and appearance of the Neighbourhood Area is described in Chapter 2 (paragraphs 2.1 to 2.17). I am recommending modifications to the detail of the text where further explanation is necessary. More

³⁵ See paragraph 4.19 below and footnote 39.

³⁶ Proposed WNP Submission Plan Modification attached to WPC's letter of 21 May 2021.

³⁷ BFC email of 12 November 2021.

particularly, paragraph 2.7 should clarify that it is BFC's Character Area Assessments Supplementary Planning Document (SPD). As drafted, paragraph 2.10 should give more detail on the extent and purpose of the Thames Basin Heaths Special Protection Area (TBHSPA) buffer zone and thus why it has an impact on the Plan area and proposals. In the absence of any context, the reference in paragraph 2.13 to the Warfield Masterplan Green Infrastructure Strategy is unhelpful and should be deleted. The lists of local amenities and facilities at paragraphs 2.15 to 2.17 require updating with the additions and deletions identified in the Regulation 16 representations. Plan B, which appears to be taken from an old draft Local Plan, is very 'blurry' and difficult to read, and should be replaced with an up-to-date map of Warfield Parish at a higher resolution to show clearly the physical and policy constraints described in the text. These modifications are recommended in the interests of clarity (**PM5-PM9**) to meet the Basic Conditions.

- 4.12 Paragraph 2.20 onwards describes the parish's spatial context and the development pressures on Warfield with the urban area of Bracknell expanding northward and the 'squeezing' of the countryside between the built-up area and the Green Belt to the north. This is intended to be shown on Plan C. However, as the map is for illustrative purposes only, it seems to me to add little to the WNP other than bring the potential for uncertainty and confusion and I am recommending that it should be deleted (**PM10**). As paragraph 2.18 refers to the new development that is taking place on the southern edge of the parish, it would be better placed after paragraph 2.20 and further detail added about the development of Land at Warfield (SALP policy SA9) (**PM11**). This level of planned growth and the continuing pressure for development is seen as creating major challenges and few spatial options for the WNP. In that paragraph 2.19 sets out survey feedback from local residents and their ambitions for the area, it would be clearer after paragraph 2.21 (**PM12**). The text of paragraphs 2.23 and 2.24 should be updated to refer to the more recent 2020 Strategic Housing and Economic Land Availability Assessment (SHELAA) (**PM13**).
- 4.13 More detail on the 4 broad areas of the parish is given in paragraphs 2.25 to 2.40. BFC has suggested a number of minor factual corrections and the text should be modified accordingly (**PM14**). I am also recommending the deletion of paragraph 2.35 as I am not persuaded of the relevance to the Plan of an appeal decision made some 6 years ago on land not in Warfield (**PM15**). There are various references in Chapter 2 to 'the countryside wedge' and 'countryside gap'. However, there seems to be no consistency in how the terms are used, nor where or what their function is or indeed if they are the same. Moreover, I see potential for even more confusion in the future given that the emerging Local Plan also designates a Green Wedge on land between Binfield and Warfield³⁸. In my view it is enough to identify land outside the settlements as countryside, without the need for any further qualification, or, if there is a

³⁸ Policies Map and policies LP19 and LP38.

need to distinguish it from land in the Green Belt, as countryside outside the Green Belt. I am therefore recommending deletion of the word 'wedge' or 'gap' where it is used after the word 'countryside' in the Plan. References I have noted include paragraphs 2.20, 2.23, 2.32, 2.34, 3.14 and the heading on page 17 (**PM16**).

- 4.14 In describing the major expansion of development to the south, and the ongoing pressure on BFC to find more land to meet the Borough's objectively assessed housing needs, paragraph 2.36 identifies Newell Green and Warfield Street as being particularly at risk of 'encirclement'. Objection has been made that the term is overly emotive. But since the concern of WPC is that the villages could be surrounded or encircled by new development, I do not consider it to be unreasonable.
- 4.15 The planning policy context in which the WNP was prepared is set out in Chapter 3. I have already recommended that the Plan be modified to refer to the 2021 NPPF and this will require changes to be made to paragraphs 3.1, 3.2 and 3.3 (PM1). Paragraph 3.8 notes that the WNP was '*prepared at a time of great uncertainty over the spatial strategy for allocating housing land in the Borough*'. Since the Plan was submitted for examination, work has progressed on the new Local Plan. The Pre-submission Bracknell Forest Local Plan for the period to 2037 was submitted to the Secretary of State for Levelling Up, Housing and Communities for examination on 20 December 2021. Paragraphs 3.7 and 3.8 should be updated to reflect this (**PM17**). Since the period of the Plan is recommended to be extended, paragraphs 3.10 to 3.13 are unnecessary and should be deleted (**PM18**). In respect of relevant policies in the extant Development Plan, as paragraph 3.6 acknowledges that the list in paragraph 3.5 is not exhaustive, I agree with BFC that it serves no useful purpose and should be deleted along with paragraph 3.6 (**PM19**).
- 4.16 Plan E is described as the Warfield Parish Extract from the BFC Policies Map 2013. However, it lacks a key and the resolution is such that it is extremely difficult to read. I have found the same problem with most of the maps in the Plan and this needs to be addressed in the final version, in the interests of clarity. I am recommending the Plan be modified by the replacement of Plan E with a legible map that clearly shows the current BFC policies (**PM20**).
- 4.17 Chapter 4 sets out the community's views. A full reference is needed to the appendix referred to in paragraph 4.20 (**PM21**). A number of Regulation 16 representations objected to paragraph 4.17 which refers to discussions and meetings held with residents and land interests on the proposal for Hayley Green (policy WNP2), and particularly the '*alternative concept plan*'. This was appraised in the Final Sustainability Appraisal Report as a reasonable alternative but was not considered to offer the same level of landscape mitigation as the preferred strategy. I am satisfied that paragraph 4.17 is a reasonable summation of the consultation exercise and its analysis.

- 4.18 Monitoring and review of the Plan's policies is addressed in paragraph 5.3. Chapter 6 deals with implementation and it will be for WPC and BFC to agree a monitoring framework.
- 4.19 There are 15 policies in the WNP that fall to be considered against the Basic Conditions. When made, the WNP will form part of the development plan and the PPG advises that development plan policy should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence, and should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.³⁹ Policies should relate to the development or use of land. With this in mind, I now turn, in the following paragraphs, to address each of my three main issues.

Issue 1 – Settlement Boundaries, Local Gaps and Housing

- 4.20 Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. But neighbourhood plans should not promote less development than set out in the strategic plans for the area or undermine those strategic policies.⁴⁰ Government guidance is that '*plans should be prepared positively, in a way that is aspirational but deliverable*'.
- 4.21 The Vision for Warfield Parish at paragraph 5.1 of the WNP is to meet a wide variety of local needs whilst retaining '*its rural and open countryside character in part by retention of the Metropolitan Green Belt*'. However, as policy WNP2 proposes an additional 235 dwellings on land at Hayley Green, there will inevitably be some change to the rural and open countryside character. The Vision refers to Syngenta. As a strategic site in the Green Belt which is identified in the spatial strategy of the emerging Local Plan for a new Garden Village to be developed alongside a Science and Innovation Park, it is not a matter for the Neighbourhood Plan. I am therefore recommending a modification to redraft the Vision to set out more clearly what the Plan, through its policies and allocation, is seeking to deliver, in accord with national policy guidance (**PM22**).

The Spatial Plan

- 4.22 Policy CS2 of the Bracknell Forest Core Strategy sets out locational principles for development and the Key Diagram identifies existing settlements within which priority will be given to locating development. In these defined settlements and on allocated sites, development will be permitted '*which is consistent with the character, accessibility and provision of infrastructure and services within that settlement*'. Newell

³⁹ PPG Reference ID: 41-041-20140306.

⁴⁰ 2021 NPPF, paragraph 29.

Green, Warfield Street and Hayley Green are identified as defined settlements and their settlement boundaries are indicated on the Bracknell Forest Policies Map.⁴¹ The small cluster of development at West End is not defined as a settlement in the CS and is shown on the Policies Map as lying within the SALP policy SA9 allocation. The spatial strategy of the emerging Local Plan is to continue to allow small scale growth to occur within the defined settlement areas of the villages to support their service role, whilst maintaining their identity and integrity.

- 4.23 Policy WNP1 is described as setting the overall spatial plan for the parish. However, the first sentence reads as a description of the area and is not policy. Nor is it accurate as not all development is inappropriate in the Green Belt. It should be deleted. The second part of the policy defines settlement boundaries for the three settlements of Newell Green, Warfield Street and Hayley Green, those for Newell Green and Warfield Street being unchanged from the Bracknell Forest Policies Map and which are tightly drawn around the existing development. In respect of Hayley Green, the settlement boundary is shown on Inset 1 of the Policies Map extended to the north to include the Plan's policy WNP2 housing allocation, whilst excluding a small number of houses on the north west corner of the junction of Hayley Green and Forest Road.
- 4.24 Concern was raised by BFC in its Regulation 16 consultation response that extending the defined settlement boundary of Hayley Green would be more appropriately dealt with in the emerging Local Plan as a strategic matter and once the extent of the built-up area was clearer. However, it was accepted that the WNP should show the boundaries of the allocated site. In its 2020 position statement⁴², BFC clarified its position, explaining that the land at Hayley Green was no longer proposed for allocation in the draft Bracknell Forest Local Plan, and instead was left to be dealt with through the WNP. More recently, the Pre-submission Bracknell Forest Local Plan⁴³ in referring to the NPPF requirement⁴⁴ that strategic policies should identify a housing requirement for designated neighbourhood areas within the overall requirement, states that *'only one of the neighbourhood plans currently under preparation includes a possible site allocation - this is the Warfield Neighbourhood Plan which is currently at Examination. The site proposed for allocation is Land at Hayley Green for 235 dwellings. The Council supports the principle of development on this site, and the dwellings proposed, would be additional to the homes being planned in this document'*.
- 4.25 Given that BFC supports the principle of development on this site, and earlier accepted that the WNP should show the boundaries of the allocated site, I am satisfied that policy WNP1 in proposing an enlargement of the

⁴¹ The Policies Map shows designations relating to: saved' policies in the Bracknell Forest Borough Local Plan; Core Strategy designations; and sites allocated for development in the Site Allocations Local Plan. It was adopted by the Council on 17 July 2013.

⁴² BFC's Examination Position Statement, 11 February 2020.

⁴³ Paragraph 7.44.

⁴⁴ Now paragraph 66 of the 2021 NPPF.

Hayley Green settlement boundary would not undermine the core locational policies of the extant Development Plan nor the approach being taken in the emerging Local Plan in terms of its spatial strategy.

- 4.26 As currently drafted, policy WNP1 only supports infill development within the settlement boundaries, which would appear to be at direct odds with the allocation of land for development at Hayley Green, within the new settlement boundary. The second part of policy WNP1 should be redrafted to clarify that development within the settlement boundaries will be supported, provided it accords with development plan policies.
- 4.27 Outside the settlement boundaries, policy WNP1 states that proposals for development *'will only be supported if they are appropriate forms of development'*. In the absence of any explanation in the policy or supporting text as to what development would be considered *'appropriate'* in the countryside, this part of policy WNP1 lacks the necessary precision in drafting required by the PPG⁴⁵, and it should be deleted. Providing that these modifications are made (**PM23**), policy WNP1 would have regard to national policy and guidance, be in general conformity with the strategic Core Strategy policies (and align with the spatial strategy of the emerging Local Plan), and would contribute towards the achievement of sustainable development, thus meeting the Basic Conditions.
- 4.28 In the interests of consistency, clarity and precision, modifications are also required to the supporting text. Paragraph 5.14 is unnecessary as is the last sentence of paragraph 5.13, and the last part of the previous sentence which is out of date with regard to BFC's 5-year housing land supply. The conclusions drawn in paragraph 5.12 do not appear to be supported by the survey or SHELAA evidence. In paragraph 5.10, policy WNP1 supports rather than *'refines'* policy CS2(2). To have a consistent approach throughout the Plan, the Objectives that policy WNP1 is expected to deliver should be listed (**PM24**).

Hayley Green Allocation

- 4.29 The Core Strategy provides through the strategic allocation in the SALP for 2,200 houses being built in the parish between 2015 and 2026. The WNP was prepared in the context of the Berkshire (including South Bucks) Strategic Housing Market Assessment 2016 that forecast an objectively assessed housing need for a further 635 dwellings per year in Bracknell Forest. Given that identified level of need, paragraph 3.9 of the WNP sets out the Parish Council's intention to plan positively to address the needs of the parish as well as assisting in addressing the housing shortfall identified at that time in the Borough. This intention aligns with national policy, the 2012 NPPF stating that neighbourhood planning *'provides a powerful set of tools for local people to ensure that they get the right types of development for their community'*⁴⁶, whilst the 2021 NPPF advises that

⁴⁵ PPG Reference ID: 41-041-20140306.

⁴⁶ 2012 NPPF, paragraph 184.

'neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan'.⁴⁷

- 4.30 Neighbourhood plans can allocate sites for development, including housing. Advice in the PPG is that a qualifying body should carry out an appraisal of options and an assessment of individual sites against identified criteria.⁴⁸ The April 2017 Housing Site Assessment Report describes the assessment exercise that was undertaken here, following the locational principles set out in CS policy CS2 and the preferred Neighbourhood Plan spatial strategy, focussing particularly on the defined settlements, and which identified the extension of Hayley Green to the north as the preferred option. The Final Sustainability Appraisal Report⁴⁹ confirmed that assessment, concluding that none of the alternative options would deliver a more sustainable outcome than Hayley Green, nor that any available land in those alternative locations would deliver a better outcome. An appraisal of reasonable alternatives concluded that the proposed concept masterplan offered the more sustainable outcome in terms of the level of landscape mitigation and the community benefit of the accessible open green space. I am satisfied that the appraisal and assessment process was sufficiently thorough and robust, as required by national guidance.
- 4.31 The Plan through policy WNP2 provides for the allocation of land at Hayley Green for a comprehensive mixed-use development of approximately 235 dwellings and sets out detailed development criteria. It has regard to the Government's objective of significantly boosting the supply of homes and would contribute towards the achievement of sustainable development. In respect of general conformity with the strategic policies of the development plan, the development accords with the locational principles and sequential approach set out in CS policy CS2 which includes '*4. extensions to defined settlements with good public transport links to the rest of the urban area or with firm proposals to provide such links*'. The emerging Local Plan also supports the principle of development on the site. Accordingly, I am satisfied that policy WNP2 meets the Basic Conditions.
- 4.32 Turning then to consider the detail of policy WNP2, I agree with BFC that the policy would benefit from the different clauses being separately identified, as parts A, B, C and D, and it would assist all readers for the individual points to be numbered 1, 2, 3 etc rather than using Latin numerals. Entry level, intermediate and affordable rented homes should be replaced with '*affordable housing*', which is defined in the Glossary to the NPPF. The allocation site is in multiple ownerships and Part B seeks to ensure that it is developed comprehensively via a single outline planning

⁴⁷ The most recent manifestation is the 2021 NPPF, paragraph 29.

⁴⁸ PPG Reference ID: 41-042-20170728.

⁴⁹ October 2018.

permission and not in a piecemeal fashion. Modifications are recommended to the detailed policy wording to achieve this.

- 4.33 Part C requires agreement by the local planning authority of a detailed masterplan prior to the submission of an application for development and I agree this is necessary to ensure that the site is developed in a comprehensive manner. As to the details of any application, encouraging people to walk and cycle to the facilities and services at County Lane should form part of the access and movement strategy. Homes with 1 to 3 bedrooms may be suitable as both family and starter homes and I see no need to distinguish between them. In addition to housing for older people, provision should be made for people with long term health and physical disabilities. National policy requires decision makers not just to 'consider' but to conserve and enhance the historic environment ⁵⁰. Environmental enhancements should be integrated into the built development to create new ecological habitats, including green corridors. The Green Concept Plan at Inset Map 2 shows development on areas susceptible to surface water flood risk. The sustainable drainage strategy should provide for its remediation and secure no increase in surface water flood risk to any land on or off site and no detriment to the quality of water in the River Cut. I recommend deleting part xvi as any grant of outline planning permission will allow for detailed matters of design and appearance to be submitted as reserved matters applications for later approval by the local planning authority.
- 4.34 The conclusions of the HRA refer to the difficulty of providing within the Hayley Green development a sufficiently large greenspace of at least 10 hectares on site and fulfilling the required SANG criteria, indicating that investment into an existing SANG may be the most time-effective approach. Policy WNP6 requires development proposals to include measures to mitigate impacts on the SPA, which may include provision of a bespoke SANG. Nonetheless, as recommended in the HRA, I consider that a specific mitigation criterion should be included in policy WNP2, along the lines recommended in the HRA. These modifications are recommended to meet the Basic Conditions (**PM25**).
- 4.35 The accompanying text provides justification for the development. Since it is not intended for the public open green space to be formally designated as Local Green Space, the third and fourth sentences of paragraph 5.18 should be deleted, amendment should be made to item g of paragraph 5.20 and the wording on Inset Map 2 should be changed (**PM26, PM27** and **PM28**). Provided these modifications are made, I conclude that policy WNP2 along with policy WNP1 provide an appropriate framework to shape and direct sustainable development, having regard to national policy and guidance and would be in general conformity with the strategic policies of the Development Plan, thus meeting the Basic Conditions.

⁵⁰ 2021 NPPF, paragraph 189 onward.

Local Gaps

- 4.36 The Core Strategy at paragraph 119 describes one of the functions of the countryside as being to help preserve the physical and visual separation of settlements by protecting the rural areas between them and identifies Bracknell Forest as containing a number of distinct settlements separated by areas of open land. The three settlements of Newell Green, Warfield Street and Hayley Green are strung out along the B3034 and Forest Road. I saw on my visit that each is only separated from the next by a narrow gap of relatively open undeveloped land and they are where the countryside, between the expanding town of Bracknell and the Green Belt, is under the greatest pressure for development.
- 4.37 It is an objective of the WNP to retain the essential open rural character of the parish and manage development pressures in the countryside. The 2017 Local Landscape Appraisal identified the importance of the existing settlement pattern to local landscape character. Thus, policy WNP7 seeks to prevent the coalescence of the defined settlements by defining Local Gaps between them, where development should not, individually or cumulatively, harm their function and open character.
- 4.38 There are strategic gap policies in the Core Strategy and emerging Local Plan. However, neither establish the principle of protecting gaps through the use of gap designations in this location and paragraph 5.42 should be deleted (**PM29**). Having said that, advice in the PPG is that it is for the local community to determine the specific topics that a neighbourhood plan covers. Given the scale of development taking place to the south, there is local concern that that the existing countryside settlements should not be overwhelmed and end up part of a 'greater' urban area of Bracknell. Through policy WNP7, the Plan seeks to protect the distinct and separate spatial identities of the parish's settlements. No objection has been made by BFC in respect of any non-conformity between policy WNP7 and strategic gap policy CS9 in the Core Strategy and emerging Local Plan policy LP19.
- 4.39 Policy WNP7 requires that proposals should demonstrate how they would reinforce the positive characteristics of the gap and maintain its integrity. However, without any detailed assessment as to what those positive characteristics might be, it fails to have regard to the advice in the PPG⁵¹ that policies should be drafted clearly and without ambiguity, and I am recommending that the last sentence is deleted from policy WNP7 (**PM30**). As I am recommending modifications to policy WNP1, the last sentence of paragraph 5.40 is no longer relevant and should be deleted (**PM31**).
- 4.40 The Local Gaps are indicated on Inset Map 1 of the Policies Map. That between Newell Green and Warfield Street is limited to a short stretch of frontage land on the north side of the road whereas that around Hayley

⁵¹ PPG Reference ID: 41-041-20140306.

Green is more extensive. Having regard to the policy's objectives of preventing coalescence and retaining the separate identity of Hayley Green, I am not persuaded that the Local Gap should include Warfield Park, an established community of over 500 residential park homes on the edge of Bracknell. I am therefore recommending that the Inset Map is amended to exclude Warfield Park from the Local Gap designation (**PM32**).

- 4.41 Providing that the modifications set out above are made, I conclude that the defined settlement boundaries, housing allocation and local gap policies of the Plan provide an appropriate framework to shape and direct sustainable development, having regard to national policy and guidance and are in general conformity with the strategic policies in the Development Plan. Accordingly, the Basic Conditions would be met.

Issue 2 – Design, Natural Environment and Heritage Assets

- 4.42 It is a longstanding objective of Government policy to promote good design. The 2012 NPPF required that local and neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area⁵². The most recent national planning policy emphasises the importance of achieving well-designed places and that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Being clear about design expectations, and how these will be tested, is seen as essential for achieving this. Neighbourhood planning groups are seen as having an important role in identifying the special qualities of each area and explaining how this should be reflected in development.

Good Design

- 4.43 Saved Local Plan policy EN20 and Core Strategy policy CS7 set out design considerations for development whilst policy LP15 of the emerging Local Plan requires proposals to be design led and lays down design principles including where masterplans will be required. In that policies WNP3, WNP4 and WNP5 promote good design in the parish, identifying the specific and common features in the settlements of Newell Green, Warfield Street and Hayley Green that define their individual characters, they give local effect to the extant and emerging Development Plan policies.
- 4.44 As part of the evidence base for the WNP, Character Area Studies were undertaken for each settlement, building on the Northern Villages Study which forms part of the Character Area Assessment SPD adopted by BFC in 2010. Policies WNP3, WNP4 and WNP5 define Character Areas for each of the three settlements. These are identified on Inset Map 1. It has been confirmed by WPC that the Character Areas are contiguous with the defined settlement boundaries and it is necessary in achieving clarity for

⁵² 2012 NPPF, paragraph 56.

this to be made explicit in the Plan's text (**PM33**). There is an error on the map with policies WNP2 and WNP5 transposed in the key. Although its small scale and poor resolution already make Inset Map 1 difficult to read, it is clear that the Hayley Green allocation (policy WNP2) is the area shown cross hatched in pink whilst the Character Area (policy WNP5) is washed purple. This should be corrected⁵³ in the final version of the Plan and I urge WPC to consider the legibility of the Policies Map and Insets as these will be used for development management purposes for many years into the future (**PM34**).

- 4.45 Criticism has been made of the Character Area policies as being unduly prescriptive. However, new text in the 2021 NPPF⁵⁴ supports the preparation of design guides and codes at area-wide, neighbourhood or site-specific scale, and which *'to carry weight in decision making, should be produced either as part of a plan or as supplementary planning documents'*. The Plan was submitted for examination prior to the publication of the National Design Guide and National Model Design Code. In setting out detailed design principles for development proposals which are particular to each of the settlements, I consider that it is very much in accord with the approach now recommended in national policy.
- 4.46 Turning then to consider their wording, policies WNP3, WNP4 and WNP5 have the same opening paragraph before setting out the design principles particular to each settlement. I agree with BFC that this part of the policies could usefully be simplified, in the interests of clarity and to avoid ambiguity, by the deletion of references to the SPD and to the Character Area Studies which are already referred to in the supporting text. I also consider the policies need to clarify the role of the recently published National Design Guide and National Model Design Code (**PM35, PM36 and PM37**).
- 4.47 Policy WNP3 lists 5 design principles for development within the Newell Green Character Area. In respect of part I, BFC has referred to proposals in the CS, which could impact on the open character of the Warfield Memorial Ground and Priory Fields. To avoid ambiguity, the requirement to retain their open character should be deleted from policy WNP3. I am satisfied that the principles set out at II to V are necessary to ensure a high standard of design which responds positively to the character of Newell Green and which would contribute towards the achievement of sustainable development. As it is an important design principle that infill development minimises its impact on the street scene, this should be listed as a further design principle. The Development Plan is to be read as a whole so there is no need for the last sentence of the policy (**PM35**).
- 4.48 Paragraphs 5.31 to 5.33 describe the character of Warfield Street and policy WNP4 lists 4 design principles to which development should have

⁵³ Modifications for the purpose of correcting errors is provided for in Paragraph 10(3)(e) of Schedule 4B to the 1990 Act.

⁵⁴ 2021 NPPF, paragraphs 128 and 129.

regard. To be consistent with the supporting text, in part I design should respect the 'semi-rural' character of the village and Newell Hall should be deleted as it is outside the Character Area. However, I consider that it is of interest and value to those who are planning development in the village for the design policy to list local heritage assets. One of the characteristics of Warfield Street is its frontage trees and boundary hedging. As well as encouraging their retention or re-provision, part III could usefully require that proposals supplement planting where it is sparse. For the reason set out above, I am including infill development as a further principle in policy WNP4 (**PM36**).

- 4.49 Policy WNP5 sets out design principles for development in the Hayley Green Character Area. Minor modifications are proposed to part I to refer to the semi-rural character of the area and, to avoid ambiguity, the principles set out in text in the last part of the policy should be included as numbered points (**PM37**). There is an erroneous reference in paragraph 5.35 to Westmoreland Park being an area of local landscape importance which should be deleted (**PM38**). Subject to the modifications set out above being made, I am satisfied that the three design policies by promoting good design would contribute towards the achievement of sustainable development, having regard to national policy and be in general conformity with strategic policies of the development plan.

Suitable Alternative Natural Greenspace

- 4.50 Warfield lies within the TBHSPA buffer zone and strategic policy CS14 and saved South East Plan policy NRM6 require that where development proposals would have a significant effect on the integrity of the European site, either alone or in combination, that effective avoidance and/or mitigation of any identified adverse effects must be demonstrated and secured prior to approval of the development. The provision of Suitable SANG is addressed in policy WNP6 and requires that development proposals include measures to mitigate the impact of residential development upon the TBHSPA, which '*will include the provision of a bespoke SANG*'. Mitigation measures should comply with BFC's TBHSPA avoidance and mitigation strategy.⁵⁵ The SPD includes detailed guidance on the delivery of mitigation measures as well as the SANG catchments, so there is no need for further detail to be included in policy WNP6. However, the policy needs qualifying as not all development proposals, for example house extensions, will have a significant effect on the integrity of the TBHSPA and therefore require mitigation to be put in place (**PM39**). In light of the HRA's conclusions and recommendations, it may be that a bespoke SANG for the Hayley Green allocation is not deliverable and alternative SANG provision would have to be secured (**PM40**). Subject to these recommended modifications, I am satisfied that policy WNP6 has regard to national policy, is in general conformity with strategic policies

⁵⁵ Thames Basin Heaths Special Protection Area Supplementary Planning Document, adopted April 2018.

and would contribute towards the achievement of sustainable development, thus meeting the Basic Conditions.

Green Infrastructure

- 4.51 It is national and strategic policy⁵⁶ that planning policies and decisions should contribute to and enhance the natural and local environment. A review of Green Infrastructure was carried out as part of the evidence base supporting the emerging Local Plan and policy LP16 seeks to protect and enhance the Borough's green infrastructure and to support the creation of new green infrastructure. The WNP proposes through policy WNP8 the establishment of a Green Infrastructure Network within the parish, *'as shown on the Policies Map'*. The map and supporting text refer to blue infrastructure but it is not included in the policy title or the Glossary definition. The definition also does not include footpaths, bridleways, etc and this needs to be corrected (**PM41**). The Green Infrastructure Policies Map on page 52 appears to be largely based on the existing Rights of Way network and is not comprehensive as it omits other areas of green infrastructure like the SANGs at Cabbage Hill and Frost Folly Park, but I note that it does show The Cut and Bull Brook corridors. Other than the three Local Green Spaces, covered by policy WNP9, the network shown on the map is largely linear.
- 4.52 Paragraph 5.48 refers to the creation of a new Bridle Circuit to connect with the established circuit at Binfield, but there is no detail as to how this is to be achieved through the planning system. There are green dotted lines on the map which the key identifies as 'WNP8 Green Infrastructure Network existing opportunity' but it is unclear as to what these opportunities are, nor is there any more detail in the reasoned justification. This may be another mapping issue with the Plan which can be addressed in the final version. Modifications are needed to the title and wording of policy WNP8 and to the supporting text (**PM42, PM43** and **PM44**).

Local Green Space

- 4.53 The NPPF addresses the way that planning can promote healthy communities. Paragraphs 76 to 78 of the 2012 NPPF, now paragraphs 101 to 103 in the 2021 NPPF, set out how local communities through local and neighbourhood plans can identify for protection green spaces that are important to them. In accord with national policy, the Plan through policy WNP9 designates 3 areas as Local Green Spaces (LGSs) which are shown on the Green Infrastructure Policies Map. Descriptions and assessments of the sites have been provided to me. Having regard to this evidence and what I saw on my site visit, I am satisfied that Chuff Corner and Hayley Green Wood are local in character, but not extensive tracts of land, are demonstrably special and in close proximity to the community they

⁵⁶ 2021 NPPF, paragraph 174 and Core Strategy policies CS6, CS7 and CS8.

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serve, and thus meet the criteria for LGS designation. In my view, they are capable of enduring beyond the end of the Plan period

- 4.54 The third site is the Warfield Memorial Ground which lies on the north side of the B3034 outside the defined settlement boundaries of Newell Green and has a cricket ground and a play area. BFC has objected to its designation as LGS as being at odds with the objectives of SALP policy SA9 to enhance existing areas of open space to serve the new development of Land at Warfield. One project is to improve the recreational facilities at Warfield Memorial Ground. As redevelopment of the existing sports pavilion could impact on openness, the concern is that this could conflict with policies for managing development within a LGS which should be consistent with those for Green Belts.⁵⁷
- 4.55 I agree that in these circumstances, designating the Memorial Ground as LGS would be inconsistent with the local planning of sustainable development, contrary to paragraph 101 of the 2021 NPPF. Also, given that development is planned for the Memorial Ground, there must be some uncertainty as to whether the designation would be capable of enduring beyond the end of the plan period. For these reasons, I am recommending policy WNP9 is modified by the deletion of the Warfield Memorial Ground. I am also recommending the replacement of the final paragraph of the policy and deletion of the last sentence of paragraph 5.50, which are only partially correct as to the application of Green Belt policy in LGS. Subject to these modifications (**PM45** and **PM46**), policy WNP9 would meet the Basic Conditions.

Heritage and Biodiversity

- 4.56 Subject to the recommended modifications, policy WNP12 accords with national and strategic policy in seeking to protect and enhance heritage and biodiversity in the parish. In order to achieve clarity, it should be redrafted, separating out policy in respect of heritage matters from biodiversity policy (**PM47**). The supporting text should also reference the Environment Act 2021 and its requirement for Biodiversity Net Gain (**PM48**).

Promoting Dark Skies

- 4.57 It is national policy that planning policies should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.⁵⁸ By requiring that development proposals beyond the built-area of Bracknell are designed in a way that minimises light pollution, in particular by compliance with the Institute of Lighting Engineers guidelines for rural areas, policy WNP13 promotes dark skies, in accord with the objectives of national and local policy.

⁵⁷ 2021 NPPF, paragraph 103.

⁵⁸ 2012 NPPF, paragraph 125 and 2021 NPPF, paragraph 185 c).

4.58 I conclude on my second issue that providing the modifications set out above are made, the policies in the WNP will secure high standards of design and protect and enhance the parish's natural environment and heritage assets in line with national policy and in general conformity with strategic policies in the Development Plan, and thus would meet the Basic Conditions.

Issue 3 – Community Assets, Rural Diversification, Drainage and Parking

Community Assets

4.59 The residents of Warfield Parish are served by a number of community facilities and assets that the Plan through policy WNP10 seeks to support and to resist their loss. The policy includes a long list of community facilities and assets, including woodland, football pitches and play facilities as well as pubs, shops and community centres. The difficulty with including such a list in a plan is that there might inadvertently be omissions, particularly given the scale of planned development taking place which will bring forward other new facilities and assets during the life of the Plan. I am therefore recommending the policy is modified to remove the list and to amend its wording to make clear that proposals that would result in the loss of local community facilities and assets will not be supported, unless their current use is no longer viable⁵⁹ (**PM49**). Consequential amendments will be required to the supporting text (**PM50**).

4.60 Currently, residents have to travel to access local health services and policy WNP10, as drafted, supports a new doctor's surgery or dentist facility, *'provided they are located outside the Green Belt'*. In the absence of any reasoning for such a restriction on their location, I am deleting these words from the policy along with the requirement for there to be sufficient off-street car parking which is addressed elsewhere in the Plan.

Rural Diversification

4.61 The larger northern part of the parish is countryside and national policy supports a prosperous rural economy. Amongst other things, planning policies should enable the sustainable growth and expansion of all types of business in rural areas.⁶⁰ Policy WNP11 is entitled supporting rural diversification but as drafted it is unduly onerous only supporting the re-use of existing buildings in particular limited circumstances and is more restrictive than national policy. In limiting housing development in the countryside, the last part of the policy also conflicts with the NPPF, which recognises that *'in rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs'*.⁶¹ As policy WNP11 fails to have adequate and

⁵⁹ See text in the Plan at paragraph 5.54.

⁶⁰ 2021 NPPF, paragraph 84.

⁶¹ 2021 NPPF, paragraph 78.

appropriate regard to national policy, I am recommending that it be deleted from the Plan (**PM51**). Consequential amendments will be needed to the accompanying text.

Drainage Infrastructure

4.62 When plan making, paragraph 162 of the 2012 NPPF requires local planning authorities to work with other authorities and providers to assess the quality and capacity of infrastructure for, amongst other things, water supply and wastewater and its treatment. The more recent PPG advises that protecting and improving water bodies may be relevant when drawing up a neighbourhood plan.⁶² Paragraph 5.66 of the Plan refers to there being local drainage issues in Warfield and the adjacent parish and policy WNP14 supports the provision of new and improved foul and surface water drainage infrastructure to meet the needs of the community. The policy is supported by Thames Water. Whilst there are other agencies and legislative provisions concerned with drainage capacity and solutions, which will be a pre-requisite for any new development, I consider it is appropriate, in the local circumstances, for this issue to be highlighted in the WNP. I am satisfied that policy WNP14 has regard to national policy advice and would contribute towards the achievement of sustainable development. Accordingly, it meets the Basic Conditions.

Parking Provision

4.63 Policy WNP15 addresses issues of off-road parking and seeks to ensure that garages and other ancillary buildings are not overly dominant in the street scene. However, to require that parking provision should replicate parking solutions in the immediate area could have an unintended detrimental impact if the existing parking/garaging is poorly considered, resulting in more of the same. In the second part of the policy, it would be more useful if 'buildings' were replaced by the words '*parking provision*', as surface parking, if poorly located, can itself dominate a house frontage or approach. I also recommend that the last part of the policy which refers to the Bracknell Forest Parking Standards is moved to be placed as supporting text. Subject to these modifications (**PM52**), I consider that policy WNP15 would contribute towards the achievement of sustainable development.

4.64 Provided that the modifications set out above are made, the policies in the Plan on community assets, rural diversification, drainage and parking, would meet the Basic Conditions, particularly in relation to having regard to national policy and guidance and in contributing to the achievement of sustainable development.

⁶² PPG Reference ID: 34-015-20140306.

Factual and Minor Amendments

4.65 I have noted above on the need for various maps in the Plan to be redrawn and that the Policies Map, Inset Map 1 and the Green Infrastructure Policies Map all have errors but most particularly that I found them very difficult to read. Advice in the PPG is that policy in a neighbourhood plan should be clear and unambiguous.⁶³ This should also apply to the Policies Map which will be used by developers and decision makers to understand where policy will be applied. I understand that BFC has advised that it could help with the mapping and I urge the qualifying body to take up this offer. In addition to those where I have recommended modifications, I have also noted a number of minor typographical errors in the text of the Plan, but none go to the fulfilment of the Basic Conditions. Other minor amendments to the text can be made consequential to the recommended modifications, alongside any other minor changes or updates, in agreement between WPC and BFC.⁶⁴

5. Conclusions

Summary

- 5.1 The Warfield Neighbourhood Plan has been duly prepared in compliance with the procedural requirements. My examination has investigated whether the Plan meets the Basic Conditions and other legal requirements for neighbourhood plans. I have had regard for all the responses made following consultation on the Neighbourhood Plan, and the evidence documents submitted with it.
- 5.2 I have made recommendations to modify a number of policies and text to ensure the Plan meets the Basic Conditions and other legal requirements. I recommend that the Plan, once modified, proceeds to referendum.

The Referendum and its Area

- 5.3 I have considered whether or not the referendum area should be extended beyond the designated area to which the Plan relates. The Warfield Neighbourhood Plan as modified has no policy or proposals which I consider significant enough to have an impact beyond the designated Neighbourhood Plan boundary, requiring the referendum to extend to areas beyond the Plan boundary. I recommend that the boundary for the purposes of any future referendum on the Plan should be the boundary of the designated Neighbourhood Plan Area.

⁶³ PPG Reference ID: 41-041-20140306.

⁶⁴ PPG Reference ID: 41-106-20190509.

Overview

- 5.4 I recognise that the WNP is the culmination of a lot of commitment and hard work over the last 7 years by the members of the Steering Group and the Warfield Parish Council. The examination process itself has taken time because of the need to ensure that the necessary statutory requirements were met, including a further focussed consultation. The Plan has achieved the difficult task of setting out a positive proposal to accommodate new housing in Warfield that is compatible with the strategic proposals of the Core Strategy and the emerging Local Plan. I commend the Parish Council for taking the initiative to produce this Plan which, subject to some modification, will form the basis for development management decisions over the coming years.

Mary O'Rourke

Examiner

Appendix: Modifications

Proposed modification number (PM)	Page no./ other reference	Modification
PM1	Throughout the Plan	Update all references within the text of the Plan to national policy in the NPPF to ensure that they reflect the new 2021 NPPF.
PM2	Front cover, contents page, foreword, paragraph 1.3 and all other references in the Plan to the Plan period	Amend the Plan period dates to 2013 to 2037 on the front cover, contents page and all consequential references in the Plan to the Plan period.
PM3	Paragraph 1.5	Delete a.- d. and rewrite the Basic Conditions as set out in the 2012 Regulations.
PM4	Paragraphs 1.9 - 1.12	Replace with the updated text provided by WPC and attached to its submission of 21 May 2021.
PM5	Paragraph 2.7	In line 1 after 'the' add 'Bracknell Forest Council's'.
PM6	Paragraph 2.10	Add further text to explain the extent and purpose of the TBHSPA buffer zone and the implications for the Plan area.
PM7	Paragraph 2.13	Either delete or redraft to give context on the Warfield Masterplan Green Infrastructure Strategy.
PM8	Paragraphs 2.15 - 2.17	Update the lists of local amenities and facilities.
PM9	Page 11	Replace Plan B with an up-to-date map of Warfield Parish at a high resolution showing clearly the physical and policy constraints described in the Plan's text.
PM10	Page 15	Delete Plan C.

PM11	Paragraph 2.18	Move paragraph 2.18 after paragraph 2.20 and add information on the development of Land at Warfield (SALP policy SA9) and renumber.
PM12	Paragraph 2.19	Move paragraph 2.19 after paragraph 2.21 and renumber the paragraphs.
PM13	Paragraphs 2.23 and 2.24	Update with reference to the 2020 Strategic Housing and Economic Land Availability Assessment (SHELAA).
PM14	Paragraphs 2.25 to 2.40	Redraft with the factual corrections identified by BFC.
PM15	Paragraph 2.35	Delete.
PM16	Throughout the Plan	Delete the words 'wedge' or 'gap' where it follows the word 'countryside'.
PM17	Paragraphs 3.7 and 3.8	Redraft and update to refer to the Pre-Submission Bracknell Forest Local Plan March 2021.
PM18	Paragraphs 3.10-3.13	Delete.
PM19	Paragraphs 3.5 and 3.6	Delete.
PM20	Page 22	Replace Plan E with a legible map clearly showing the current BFC policies.
PM21	Paragraph 4.20	Line 3 – include a full reference for the 'appendix'.
PM22	Paragraph 5.1	Redraft the Vision along the lines of the following: <i>Warfield will have succeeded in meeting a wide variety of local needs, including through the provision of new housing at Hayley Green. The settlements will remain as distinctive communities and the rural and open character of the surrounding countryside will be protected. The settlements and</i>

		<i>their communities will continue to thrive and their health and well-being will be sustained, benefitting from improvements in local infrastructure and facilities and improved access to the countryside.</i>
PM23	Page 29	Delete policy WNP1 and replace with the following: <i>The Neighbourhood Plan defines the settlement boundaries of Newell Green, Warfield Street and Hayley Green. These are shown on the Policies Map. Development within the settlement boundaries will be supported, provided it accords with development plan policies.</i>
PM24	Pages 29 and 30	In paragraph 5.10 line 4 replace 'refines' with 'supports'. In paragraph 5.11 line 4 delete 'wedge'. Delete paragraph 5.12. In paragraph 5.13, line 1 delete 'hence', and in line 5 delete from 'because' to the end of the paragraph. Delete paragraph 5.14. Include the Objectives that policy WNP1 delivers.
PM25	Page 30	Rewrite policy WNP2 as follows: <i>A. The Neighbourhood Plan allocates land at Hayley Green (as shown on the Policies Map) for a comprehensive mixed-use development of approximately 235 dwellings. The development should provide for:</i> <i>1. Open market and affordable housing;</i>

		<p>Then renumber the requirements 2 to 5.</p> <p>Rewrite the rest of policy WNP2 as follows:</p> <p><i>B. The whole development should be delivered as a single outline permission to ensure that the site is developed comprehensively. Any planning applications for piecemeal development that would undermine this objective will not be supported.</i></p> <p><i>C. Prior to the submission of a planning application for any part of the allocation site, a masterplan will be prepared by the developer(s) and submitted to and agreed with the local planning authority and should accord with the requirements of policy WNP2 and other relevant development plan policies. Once agreed by the local planning authority it will be an important material consideration in the determination of any subsequent planning application(s).</i></p> <p><i>D. The outline application should include:</i></p> <p><i>1. a detailed access and movement strategy showing footpath and cycleway connectivity to existing facilities in the area and what provision is to be made to encourage residents to walk and cycle to facilities and services in County Lane;</i></p> <p><i>2. an infrastructure delivery plan;</i></p> <p><i>3. a mix of 1, 2 and 3 bedroom homes as well as homes suitable for older people and those with</i></p>
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		<p>long term health issues or physical disabilities;</p> <p>4. a landscape strategy;</p> <p>5. a heritage statement which addresses the conservation and enhancement of nearby heritage assets;</p> <p>6. an ecology, green infrastructure and boundary treatment strategy setting out how the existing environmental assets will be protected and how environmental enhancements will be integrated into the built development to create new ecological habitats, including green corridors;</p> <p>7. a flood risk assessment and sustainable drainage strategy to provide for the remediation of areas susceptible to surface water flooding and to demonstrate that there will be no increase in surface water flood risk to any land on or off site and no detriment to the quality of water in the River Cut;</p> <p>8. a transport strategy to demonstrate how the scheme will manage traffic generation and its effects on the local highway network;</p> <p>9. an archaeological assessment and evaluation including details of any necessary mitigation; and</p> <p>10. measures to avoid and mitigate the impact of residential development upon designated habitat sites, in line with policy WNP6 and the TBHSPA SPD or any successor mitigation strategy.</p>
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PM26	Paragraph 5.18	Delete the 3 rd and 4 th sentences.
PM27	Paragraph 5.20	In g. delete the words 'a designated Local Green Space to form'.
PM28	Inset Map 2	Replace 'Designated Local Green Space' with 'public open space'.
PM29	Paragraph 5.42	Delete.
PM30	Page 37	Delete the last sentence of policy WNP7.
PM31	Paragraph 5.40	Delete the last sentence.
PM32	Inset Map 2	Amend the Inset Map 1 to exclude Warfield Park from the Local Gap designation.
PM33	Page 33	Add a new paragraph after 5.25 to confirm that the Character Areas for Newell Green, Warfield Street and Hayley Green are contiguous with the defined settlement boundaries and are shown on the Policies Map.
PM34	Page 50	Correct the key to Inset Map 1 in respect of policies WNP2 and WNP5.
PM35	Page 33	<p>Delete the first paragraph of policy WNP3 and replace with the following:</p> <p><i>Development proposals in the Newell Green Character Area, as shown on the Policies Map, should have regard to the following design principles:</i></p> <p>In I, delete the words 'and the retention of their open character'.</p> <p>Add as a new VI the first sentence of the last part of the policy that begins '<i>Infill development ...</i>'.</p> <p>Delete the final sentence that begins '<i>In all other respects ...</i>' and replace with:</p> <p><i>Regard should also be had to the National Design Guide and the National Model Design Code.</i></p>

PM36	Page 35	<p>Delete the first paragraph of policy WNP4 and replace with the following:</p> <p><i>Development proposals in the Warfield Street Character Area, as shown on the Policies Map, should have regard to the following design principles:</i></p> <p>In I line 1 replace 'rural' with '<i>semi-rural</i>' and delete 'Newell Hall'.</p> <p>In III line 1 add '<i>supplement</i>' after <i>retain</i>.</p> <p>Add as a new V the first sentence of the last part of the policy that begins '<i>Infill development ...</i>'.</p> <p>Delete the final sentence that begins '<i>In all other respects ...</i>' and replace with:</p> <p><i>Regard should also be had to the National Design Guide and the National Model Design Code.</i></p>
PM37	Page 35	<p>Delete the first paragraph of policy WNP5 and replace with the following:</p> <p><i>Development proposals in the Hayley Green Character Area, as shown on the Policies Map, should have regard to the following design principles:</i></p> <p>In I line 1 replace 'rural' with '<i>semi-rural</i>'.</p> <p>Add as a new V the first sentence of the last part of the policy that begins '<i>Infill development ...</i>'.</p> <p>Add as a new VI the second sentence of the last part of the policy that begins '<i>New development to the north</i>'.</p> <p>Delete the final sentence that begins '<i>In all other respects ...</i>' and replace with:</p>

		Regard should also be had to the National Design Guide and the National Model Design Code.
PM38	Paragraph 5.35	Delete the reference to area of local landscape importance.
PM39	Page 37	In policy WNP6 line 1 add after the words ' <i>Development proposals</i> ' the words ' that would have a significant impact on the integrity of the site, either alone or in combination with other proposals, '....
PM40	Page 37	In policy WNP6 line 4 after ' <i>bespoke SANG</i> ' add the words ' or other alternative SANG provision '.
PM41	Page 63	Clarify in the Glossary that Green Infrastructure also includes blue infrastructure and access routes like footpaths, cycleways, bridleways, etc.
PM42	Page 52	Redraw the Green Infrastructure Policies Map to comprehensively and clearly identify the location and types of existing green and blue infrastructure and where opportunities have been identified to create new green and blue infrastructure.
PM43	Page 38	Delete the first part of policy WNP8 and redraft as follows: <i>The Parish's green and blue infrastructure will be protected and enhanced. The Warfield Green Infrastructure Network will be established and will include, but is not limited to, the features shown on the Green Infrastructure Policies Map.</i> Redraft the second part of policy WNP8 as follows:

		<p>Development proposals on land that adjoins the network should enhance its visual character and biodiversity and contribute to the maintenance and improvement of the network, including the ecological value of The Cut and Bull Brook. Opportunity to create a new Bridle Circuit, as shown on the Policies Map, will be supported.</p> <p>In the last part of the policy replace 'will be required to demonstrate that such loss is unavoidable' with 'will not be supported'.</p>
PM44	Paragraphs 5.46 and 5.48	<p>In paragraph 5.46 delete 'The network proposes' and replace with 'It is proposed'.</p> <p>In paragraph 5.48, replace 'The network also' with 'The Plan'.</p>
PM45	Page 40	<p>Modify policy WNP9 by deleting '2. Warfield Memorial Ground'.</p> <p>Delete the last paragraph of the policy and replace with:</p> <p>Policies for managing development on the designated Local Green Spaces will be consistent with those applied to Green Belt.</p>
PM46	Paragraph 5.50	Delete the last sentence.
PM47	Page 42	<p>Redraft policy WNP12 into two parts as follows:</p> <p>A. Development proposals must seek to avoid harm to the significance of heritage assets, including the Warfield Conservation Area, and will be assessed against paragraphs 194-208 of the NPPF.</p> <p>B. Developments should provide net gains for biodiversity. Where</p>

		<p>effects are unavoidable then the proposals must show how these effects will be mitigated.</p> <p>Development proposals should contribute to and enhance the natural environment by ensuring the protection of local assets such as mature trees, hedgerows, woodland, the network of Local Nature Reserves in the south of the Parish and the provision of additional habitat for wildlife and green spaces for the community.</p>
PM48	Paragraph 5.61	Update the text to refer to the Biodiversity Net Gain provisions of the Environment Act 2021.
PM49	Pages 40 and 41	<p>Delete the first part of policy WNP10 and replace with the following:</p> <p>Proposals that would result in the loss of local community facilities and assets will not be supported, unless their current use is no longer viable.</p> <p>Delete the list i. to xxv.</p> <p>In the last part of policy WNP10 delete from 'provided they are ...'.</p>
PM50	Paragraph 5.54	Amend to reflect the reworded policy WNP10.
PM51	Pages 41 and 42	Delete policy WNP11 and make consequential amendments to the accompanying text.
PM52	Page 45	<p>In the first part of policy WNP15 line 3 delete from 'and should replicate' to 'area'.</p> <p>In the second part of policy WNP15, delete 'buildings' in line 1 and replace with 'parking provision'.</p> <p>Delete the last part of policy WNP15 and move to the supporting text.</p>